FILED
10-19-09
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)

COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON ADMINISTRATIVE LAW JUDGE'S RULING REGARDING PRICING APPROACHES AND STRUCTURES FOR A FEED-IN TARIFF

CORY M. MASON
CHARLES R. MIDDLEKAUFF

Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-2320
Facsimile: (415) 973-5520
Email: CMMw@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

October 19, 2009

TABLE OF CONTENTS

Page

TABLE OF CONTENTS
(continued)

Page

TABLE OF CONTENTS
(continued)

Page

TABLE OF CONTENTS
(continued)

Page

TABLE OF CONTENTS
(continued)

Page

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)

COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON ADMINISTRATIVE LAW JUDGE'S RULING REGARDING PRICING APPROACHES AND STRUCTURES FOR A FEED-IN TARIFF

I. INTRODUCTION

Pursuant to the August 27, 2009 *Administrative Law Judge's Ruling Regarding Pricing Approaches and Structures for a Feed-In Tariff* ("Ruling") and the September 11, 2009 *Administrative Law Judge's Ruling Granting Extension in Part and Adding Price Structure Example for Comment*, Pacific Gas and Electric Company ("PG&E") provides these comments on the issues presented in the Ruling regarding pricing approaches and structures for a renewable feed-in tariff ("FIT") for projects between 1 and 10 megawatts ("MW"). The Ruling asks for comments on the following: (1) Energy Division's System-Side Renewable Distributed Generation Pricing Proposal ("Staff Proposal"), found in Attachment A to the Ruling; (2) price structure issues, set forth in Attachment B to the Ruling; (3) pricing-related goals of a FIT, provided in Attachment C to the Ruling; (4) an assessment of parties' recommendations on a FIT pricing approach, price structure, and price components using the proposed FIT goals, and a comparison of such recommendations against other candidate recommendations; (5) whether official notice should be taken of the California Energy Commission's ("CEC") FIT Final Consultant Report referenced in the Ruling; and (6) anything not already addressed regarding the setting of a FIT price and any other material, relevant and necessary information for full consideration of the price issues presented in the Ruling and its Attachments. PG&E addresses each of these items below.

PG&E generally supports the Energy Division's proposal to use a market-based pricing mechanism, or the renewable auction mechanism ("RAM"), to determine prices under an expanded FIT program. PG&E believes, however, that several refinements and modifications should be made to the RAM to better align the program with the FIT program goals set forth in Attachment C to the Ruling. These recommended changes are explained below. PG&E's proposal regarding the appropriate RAM design should be viewed as a whole; changes to one component of PG&E's proposal may impact and require changes to other aspects of PG&E's proposal. PG&E also recommends that the Commission adopt a price structure (*i.e.*, rate design) comprised of a fixed, all-in, levelized, time of delivery ("TOD")-adjusted payment for energy and capacity (dollars per megawatt-hour ("MWh")) consistent with the current Renewables Portfolio Standard ("RPS") process. This approach best addresses the range of stakeholder interests in an expanded FIT program.

Finally, PG&E believes that the Commission should consider Senate Bill 32 ("SB 32"), which expands the existing FIT program under Public Utilities Code section 399.20 to include projects up to 3 MW and was signed by the Governor last week, as it determines the structure and design of the Commission-proposed FIT expansion. These two programs should be implemented in a complementary manner and in a way that creates streamlined and efficient renewable distributed generation programs. PG&E recommends that the Energy Division hold a workshop to discuss how to best integrate SB 32 and the Commission's FIT program.

II. DISCUSSION

A. FIT Pricing Approach

The Ruling asks parties to comment on any items not already addressed regarding the setting of a FIT price, including details regarding how to determine the price level. PG&E provides such comments in Sections B through E below.

B. Energy Division Pricing Proposal (Attachment A)

Responses to the questions set forth in Attachment A regarding the Energy Division FIT pricing proposal are set forth below.

1. *Do you agree with the program's goals and guiding principles (see Attachment C for a list of the Guiding Principles)? If you do not agree, please explain.*

PG&E is generally supportive of the FIT goals set forth in Attachment C of the Ruling. Several of the goals resonate more than others, and a few require clarification to determine whether they are key contributors to a meaningful FIT. PG&E sets forth each goal below and indicates its agreement, disagreement, and/or need for clarification.

Goal		PG&E Position/Comments
Goal 1	Be open to all RPS-eligible technologies (technology neutrality) to the extent that is consistent with the state's climate change goals and RPS deadlines.	Yes, strongly agree.
Goal 2	Provide sufficient payment to stimulate untapped market segments at the distribution level and build new projects while minimizing ratepayer costs and preserving competition.	Unclear what "sufficient payment" means. If payment is equal to winning bid in a competitive auction, PG&E agrees.
Goal 3	Focus on projects of a certain size that can effectively mitigate the market and regulatory constraints (such as site control and permitting) that slow down development of larger renewable projects.	Agree, depending on cutoff for "certain size."
Goal 4	Minimize the transaction costs for the seller, buyer, and the regulator.	Yes, strongly agree.
Goal 5	Maximize transparency while protecting commercially sensitive information and the public interest.	Agree.
Goal 6	Equitably allocate risk, relative to project size, between the buyer and the seller.	Yes, strongly agree.
Goal 7	Adopt program design elements and a contract that adequately address project viability.	Agree.
Goal 8	Facilitate interconnection of projects that efficiently utilize the existing distribution system.	Unclear - Does this mean limit eligibility to projects interconnecting at distribution level versus transmission level? Or does this mean give preference to projects connecting at distribution level? How does this reconcile with interconnection requirements?

Goal 9	Complement, but not impede or duplicate, existing programs, especially the California Solar Initiative and the existing Renewable Portfolio Standard programs, which are both aimed at facilitating the state's energy policy and climate change goals.	Agree.
Goal 10	Provide sufficient regulatory certainty to create a sustainable marketplace for small distributed generation renewable developers.	Agree.
Goal 11	Just and reasonable rates for the buyer, seller, ratepayer, and society.	Agree.
Goal 12	Simplicity.	Agree.
Goal 13	Economic efficiency.	Unclear what is meant by the term "economic efficiency."
Goal 14	Promote performance.	Agree.
Goal 15	Align performance with demand.	Agree.

2. *Please comment on the strengths and weaknesses of staff's proposed market-based pricing mechanism, including auction design details, using the guiding principles.*

PG&E commends the Energy Division on its thoughtful pricing proposal. The RAM would bring a competitive process to smaller renewable generators without imposing a burden to develop a detailed bid or to negotiate a contract. PG&E is generally supportive of the RAM process and offers its thoughts below on the strengths and challenges of elements of the proposal.

The proposed auction process would resolve the issue parties briefed previously in this proceeding; namely, whether the Commission has authority to establish prices for wholesale energy sales in interstate commerce by generators who are not Qualifying Facilities ("QFs"). As PG&E explained in its opening and reply briefs on this issue (filed on June 18, 2009 and July 10, 2009, respectively), the Commission's authority extends only to establishing prices for wholesale sales by QF generators at no greater than the utility's avoided cost. The RAM, by employing a competitive solicitation, should yield market-based prices and avoid the issue of Commission jurisdiction to set prices in the wholesale generation market. Additionally, the RAM, if structured appropriately, could achieve several of the goals set forth for the FIT program, including: be open to all RPS-eligible technologies, focus on projects of a certain size, minimize transaction costs, equitably allocate risk, complement, but not impede or duplicate, existing programs, and provide just and reasonable rates.

PG&E also notes an additional issue relating to customer cost limitations not addressed by the Staff Proposal that should be addressed by the Commission. Under provisions set forth in statute, long-term renewable contracts involving new or repowered facilities entered into through a competitive solicitation pursuant to certain statutory requirements are subject to a cost limitation.[1/] PG&E was notified by Energy Division earlier this year that it had exhausted its cost limitation, but that it could voluntarily procure eligible renewable energy resources priced above the market price referent ("MPR") subject to Commission approval. Additional legal analysis may be needed to determine whether current statutory cost limitation provisions would apply to contracts signed under an expanded FIT program, and, if so, whether the utilities can be compelled to procure renewable resources under an expanded FIT at above market rates (even when those rates are determined through a competitive process) if the cost cap has been exhausted.

Specific design elements of the RAM program are set forth on pages eight through ten of Attachment A to the Ruling. PG&E addresses below the strengths and weaknesses of these design elements in relation to the proposed FIT goals, and provides recommended modifications where applicable.

a. Project Size (Goals: Provide sufficient payment to stimulate untapped market segments at distribution level; Focus on projects of a certain size; Facilitate interconnection of projects that efficiently utilize the existing distribution system; Complement, but not duplicate or impede, existing programs)

PG&E recommends limiting the size of projects that can participate in the RAM to 3 MW. PG&E suggests this project size, rather than the Staff Proposal's 1 to 10 MW, for a variety of reasons: (1) larger projects will require more complex contractual requirements than the "AB1969 FIT contract with a few additional terms"; (2) the Commission's program can

---

1/ Pub. Util. Code § 399.15(d).

complement the expanded FIT contract authorized in SB 32 for projects up to 3 MW in size; (3) 3 MW is a size range that can interconnect at the distribution system in PG&E's service territory; and (4) projects larger than 3 MW of any technology are able to participate in PG&E's annual RPS solicitation or, should PG&E decide to conduct a RAM for projects between 3 and 20 MW in size, through that mechanism.

Parties have previously raised concern about the proposed upper bound of the program (*i.e.*, 10 MW) in their April 10, 2009 and April 17, 2009 opening and reply comments. Numerous parties, including PG&E, raised questions about the proposed project size cap because of distribution system interconnection issues, uncertainty about the types of resources that will interconnect under the FIT and the propriety of basing a 10 MW size limit on E3's study. Absent a workshop to further develop the evidentiary record on the appropriate project size, PG&E recommends the RAM be limited to projects of 3 MW in size or less.

b. Frequency of Auctions (Goals: Minimize transaction costs; Simplicity; Complement, but not impede or duplicate, existing programs; Regulatory certainty)

The Staff Proposal suggests that a minimum of two auctions per utility per year be conducted. This is overly ambitious given the time needed to pre-qualify bidders, assess the bids received, select winners and receive Commission approval. Initially, it is unlikely that this process can be completed in a timely manner to conduct at least two auctions per year per utility. An annual auction would best meet the goals of simplicity and minimization of transaction costs, and would reduce potential duplication with other competitive processes while still providing the certainty that an auction would occur.

c. Contract Terms (Goals: Equitably allocate risk; Minimize transaction costs; Maximize transparency; Promote performance)

The Staff Proposal recommends use of the AB 1969 FIT contract plus a few additional terms as a standard, non-negotiable contract for an expanded FIT program. PG&E agrees with the use of a standard, non-negotiable contract, as it will help to increase transparency and reduce transaction costs. PG&E's April 10, 2009 comments and April 17, 2009 reply comments filed in this proceeding set forth its preferred contractual terms for an expanded FIT program, which

PG&E believes would promote performance and appropriately allocate risk between generators, the large investor-owned utilities ("IOUs"), and customers.

As PG&E and other parties have noted in previous comments, price and other contract terms are inextricably linked, and a determination regarding price may affect other terms and conditions. Decisions regarding project size and overall program cap may similarly impact the assessment of which terms and conditions are necessary in a FIT contract. For these reasons, a final determination regarding contract terms and conditions should not be made until after other elements of an expanded FIT program are established, including price, eligible project size, and program cap.

d. Project Selection (Goal: Just and reasonable rates; Minimize transaction costs; Maximize transparency; Facilitate interconnection of projects using the existing distribution system)

The Staff Proposal advocates for selection of projects based on a non-negotiable bid price. PG&E agrees that it is reasonable to select winning bids using non-negotiable bid prices, provided that consideration is also given to a project's value and only if certain other, pre-qualifying project viability criteria are met. Assessment of value should be based on time differentiation, location differentiation, and whether a project is able to connect to the distribution level without any required upgrades. Such a system would help facilitate interconnection of projects using the existing distribution system and would address many parties' concerns that, absent some consideration of the overall cost to customers for transmission and distribution upgrades, a project may be selected based on its cost of generation, rather than the all-in cost to customers. Additionally, choosing projects based on price and value according to an established methodology will help to increase transparency and reduce transaction costs that may accompany other project selection approaches.

e. Program Cap/Amount of Renewables to Procure (Goal: Provide sufficient regulatory certainty; Equitably allocate risk; Complement, but not impede or duplicate, existing programs; Just and reasonable rates)

The Staff Proposal recommends implementation of a program cap for the RAM based on a revenue requirement, and proposes an interim revenue requirement cap equivalent to approximately 1,000 MW proportionally allocated between each IOU over the next four years. PG&E agrees with Energy Division's proposal for a program cap based on a revenue requirement, and discusses its proposed methodology to derive the program cap revenue requirement in response to question five below.

With respect to the 1,000 MW interim soft target on which to base the revenue requirement cap for the next four years, it is unclear how to reconcile the number of MWs to be used to determine the interim program cap under the RAM with the number of MWs being offered in other RPS programs. PG&E notes that SB 32 establishes a 750 MW statewide limit for a FIT up to 3 MW. Additional discussion is needed to ascertain how the SB 32 statewide cap and the RAM program cap interact to reduce program duplication and avoid a situation where a large tranche of the portfolio is set aside for renewable generators that ultimately do not participate in either the SB 32 or the RAM programs. Until such a discussion occurs, PG&E suggests that a program cap for the up to 3 MW RAM be set using 500 MW. Should the Commission ultimately determine that the RAM should be available for projects up to 10 MW in size, PG&E suggests that the same 500 MW target be used initially until additional discussions are conducted. While this would initially implement a lower RAM cap than suggested in the Staff Proposal, a lower interim target is also appropriate because there has been no analysis to determine how much distributed generation can be accommodated on the system.

PG&E and the other IOUs need to better understand the precise system impacts of accommodating the must-take resources acquired under both the RAM, if implemented, and SB 32. A lower initial target for the RAM better allocates the operational and reliability risks associated with the program, and will still provide helpful information for use in future integrated resource planning and examination of the cap and the amount to be procured through future auctions. Starting with a lower overall RAM cap would not preclude the Commission from increasing the cap over time, depending on the results of future need determinations. A ramp up in the program could foster increased competition in the early years of the program and limit customer cost impacts.

The Staff Proposal recommends that the revenue requirement cap be adjusted through the annual RPS plans and/or the long-term procurement plan ("LTPP") proceeding. PG&E is concerned that if the amount of distributed generation to be procured is determined through the LTPP, delays in that proceeding could stall the RAM process. Additionally, establishing the need through the annual RPS plan could stall the issuance of the annual RPS solicitation. PG&E believes that the better of these two approaches is for the Commission to establish the need determination for a multi-year period in the next LTPP to provide certainty to the marketplace about the volume that will be procured through the program.

f. Product-Specific Revenue Requirements (Goals: Be open to all RPS-eligible technologies; Provide sufficient payment to stimulate untapped market segments; Just and reasonable rates)

The Staff Proposal recommends that each auction under the RAM will procure pre-determined amounts of renewable products based on utilities' renewable needs, and that each auction will have a specific revenue requirement for each product category. The Staff Proposal sets forth baseload, peaking as-available, and non-peaking as-available as examples of potential product categories. PG&E agrees with Energy Division's recommendation that there be product-specific revenue requirements and agrees with the three proposed product categories. Product-specific revenue requirements will allow for more meaningful participation of all technologies and will allow for sufficient payment to promote the development and performance of specific products while limiting ratepayer costs for any one product. For example, if there were no product-specific revenue requirements, then technologies that provide value over the peak but are more expensive could effectively be precluded from participating in the auction because the revenue requirement could be fully subscribed by lower cost off-peak or baseload technologies participating in the auction. If there is a specific revenue requirement for a specific product, however, PG&E will be able to compare bids from the same technologies that can provide a particular product and choose the least expensive alternatives in that category. This will result in a more diverse portfolio of small renewables development.

PG&E provides definitions for the above-mentioned product categories in response to question five below. PG&E also recommends that price caps for each of the three product categories be adopted to help limit customer cost impacts, as discussed below in response to question three.

g. Project Viability (Goals: Promote performance; Adopt program design elements and a contract that adequately address project viability; Equitably allocate risk)

The Staff Proposal sets forth parameters on project viability, including the amount required for project development security and the amount of time for the project to achieve commercial operation. PG&E supports the $20/kw project development security requirement, the 18 month period within which to come online, and the one-time six month extension for regulatory delays. These requirements will incent only viable projects to sign up for the FIT program, and will encourage generators to come online within 18 months by making project development security non-refundable after 18 months. The regulatory delay extension provision will preserve space in the program for those projects that are delayed for reasons outside of their control but are otherwise viable.

While PG&E is supportive of the RAM's one-time six month extension to a project's commercial operation date, it is unclear from the proposal how requests for such extensions will be addressed. For example, where a project can get a one-time six month extension if the project can successfully demonstrate that the cause of the delay was regulatory (transmission, permitting, etc.), the proposal does not indicate to whom that demonstration should be made. Similarly, the proposal does not indicate who will be the final arbiter of an extension request. As PG&E proposed in its reply comments submitted on April 17, 2009 in this proceeding, PG&E believes that the decision to grant an extension for regulatory delays should remain within the sole discretion of the IOUs.

PG&E is not opposed to the other project viability requirements concerning project development experience, site control, and satisfaction of equipment standards, provided that such requirements are clearly defined and do not introduce unnecessary complexity into the FIT program. For example, on the project development experience criterion, more specific parameters should be set forth for how this condition is met. It could be that to demonstrate viability in this area, there must be someone with development experience involved in the project, whether through direct employment by the project or through a consultancy. The Commission may want to require that, where the development experience is held by a consultant, the developer demonstrate that the consultant will remain part of the management team through the project development cycle to avoid the potential for parties to only use the consultant until a contract is executed. Additionally, the RAM process does not appear to address how or when a determination of project viability based on project development experience, site control, and satisfaction of equipment standards occurs. From PG&E's perspective, it may be helpful to make this assessment in advance of price submission so that the actual project selection process, based on price and value, will be streamlined and winners can be notified expeditiously. If pre-qualification of bidders is not secured, it will take more time to assess and score bids once submitted and will delay the announcement of successful bids.

h. All Energy Must be Exported to the Grid (Goals: Simplicity; Maximize transparency)

PG&E supports this design element because it results in a clear separation of the wholesale and retail markets. Renewable facilities will be paid a wholesale market price for the energy they deliver to the grid and utility planners will be better able to plan for the electric system needs because they will not have to account for varying levels of on-site usage. It will also ensure that the full output of the facility is counted toward meeting California's RPS goal.

i. Seller Concentration (Goals: Just and reasonable rates; Promote performance)

The Staff Proposal provides that no one seller may contract for more than 50 percent of the capacity or revenue cap in each auction (across all bids). It is not clear that limiting the number of contracts that one party can secure in a single auction will result in the most attractively priced contracts being selected. Such a limitation may also inadvertently preclude what could be successful projects from achieving commercial operation and, ultimately, delivering more clean energy to customers. The Commission may wish to eliminate this requirement and instead allow the utilities to rely on their individual credit policies, which are designed to address counterparty concentration risk.

j. Commercialized Technologies (Goal: Be open to all RPS technologies)

The Staff Proposal states that the auction is intended for commercialized technologies, which are defined as technologies currently in use at a minimum of two operating facilities of similar capacity worldwide. Such a limitation fails to meet the goal of "be open to all RPS technologies." The Commission should modify this requirement to indicate that the auction is open to all technologies, subject to satisfaction of certain eligibility and project viability criteria, to ensure that the goal of "be open to all RPS technologies" is fulfilled. Concerns regarding technology viability should be adequately addressed by the other project viability requirements set forth in the Staff Proposal.

k. Preferred Distribution Substations (Goals: Facilitate interconnection of projects using the existing distribution system; Maximize transparency; Minimize transaction costs)

The Staff Proposal recommends that the IOUs make information available on preferred distribution substations based on available capacity of that substation on a real-time basis. While PG&E agrees that some information needs to be made available to indicate preferred locations for distributed generation projects, it is unclear that provision of information on a real-time basis is necessary to achieve this goal. Such a requirement can mean significant investment in communication platforms and resources to maintain such a system, while not providing significant benefits to participants, particularly if auctions are held only once per year as PG&E recommends. The Commission should establish a Working Group that can evaluate how best to provide such information and can develop specific processes and protocols. Such a group would allow parties to fully explore the type of information and frequency of updates that best meets the program needs in a transparent way that is easily understood. The process should also include identification of locations of winning bidders in the auction, to the extent they would, once completed, reduce the capacity available at a particular substation.

l. Annual Evaluation of Auction Program (Goals: Provide sufficient regulatory certainty; Complement, but not impede or duplicate, existing programs)

Energy Division proposes an annual evaluation of the expanded FIT program to review competitiveness, auction design, time to complete projects, auction timing, and project status. An annual evaluation of the auction program may duplicate existing RPS reporting and compliance requirements. Absent specific guidance on the process for conducting such an evaluation, PG&E is unable to determine if this requirement will meet the goal of complementing, but not impeding or duplicating, existing programs. PG&E is concerned that if new requirements are added to the annual RPS Plan, the annual solicitation for other RPS facilities may be delayed. Additionally, in the early years of the program, there may not be sufficient information available to evaluate the program results. The Commission may wish to postpone such an evaluation until 18 months after the first projects are selected to ensure sufficient data are available to evaluate the program.

The Staff Proposal identifies easy adjustment of auction rules based on lessons learned from prior auctions as a benefit of the RAM. To promote regulatory certainty, however, the Commission should not "easily" adjust the program rules. If solicitations are being held twice a year, or even once per year as PG&E proposes, parties may not have sufficient time to adjust and incorporate new program rules into their bid preparation or submittal. A clear roadmap of the regulatory process for evaluation and updates to the program is needed so that all participants understand the timing and potential magnitude of any proposed modifications.

m. Publication of Auction Information (Goals: Maximize transparency while protecting commercially sensitive information; Complement, but not impede or duplicate, existing programs)

The Staff Proposal suggests that, while the price of each bid would be confidential, the staff could release auction bid information on an aggregated basis to the extent it does not violate Commission confidentiality rules. Under those rules,[2/] information on offers received in the

2/ *See* D.06-06-066, Appendix 1.

solicitation cannot be made public until three years after the solicitation closes, except for certain aggregate information regarding the number of projects and megawatts per resource type, which may be disclosed earlier. The confidentiality rules also provide that while limited summary information regarding renewable resource contracts is public, terms and conditions of such contracts may not be made public until three years after the date the contract states the deliveries are to begin. Although the Staff Proposal envisions a standard, public, non-negotiable contract for the RAM program, price would not be standard across winning bidders and should therefore remain confidential until the rules permit disclosure. Protecting the confidentiality of bid and price data in accordance with the Commission's confidentiality rules is essential to ensure that prices in one solicitation do not become the "floor" prices in the next solicitation. Release of auction bid and price data earlier than the time set forth in the confidentiality decision would also conflict with how that decision has been implemented more broadly on RPS matters. PG&E strongly supports use of the Commission's existing confidentiality guidelines for the RAM portion of the RPS program.

n. RAM Program Design Elements for Projects >10 to 20 MW (Goal: Equitably allocate risk; Complement, but not impede or duplicate, existing programs; Focus on projects of a certain size; Facilitate interconnection of projects using the existing distribution system)

Energy Division proposes that the IOUs would have the discretion not to solicit projects from greater than 10 MW to 20 MW in size, and sets forth other design elements for projects of this size that are discussed further below. PG&E supports much of Energy Division's proposal, but believes that it should apply to projects between greater than 3 MW and 20 MW in size, given PG&E's proposal that the must-take portion of the RAM be available only for projects up to 3 MW in size.

The Staff Proposal provides that if an IOU decides to procure projects greater than 10 MW to 20 MW, it must seek approval of the auction revenue requirement for this size range through its annual RPS plan. PG&E instead proposes that, should an IOU wish to hold an auction for projects in the greater than 3 MW to 20 MW size range, it should be allowed to seek approval of the revenue requirement through the advice letter process. The advice letter process could provide greater timing flexibility than the annual RPS plan process, as well as greater certainty about when regulatory approval would be obtained. Requiring the revenue requirement to be approved through the annual RPS plan process could result in delays in issuance of the RAM for projects in the proposed size range, given that the timing of submittals and approval of the IOUs' annual RPS plans has not been consistent from year to year.

PG&E supports the use of its RPS pro-forma agreement for projects sized from greater than 3 MW to 20 MW. It also supports the additional six month extension, for a total potential extension of one year, which would be granted to projects in this size category if they can successfully demonstrate that regulatory processes delayed commercial operation.

o. **RAM Pros and Cons** (Goal: Stimulate untapped markets)

The Staff Proposal provides that one benefit of the RAM is that it can be implemented quickly, and thus take advantage of short-term federal stimulus programs that support renewable projects, including grants in lieu of the investment tax credit or the loan guarantee program. PG&E questions whether the RAM can be implemented quickly enough to help renewables projects take advantage of such programs. Certain of the federal programs require that project construction begin by December 31, 2010 if the project is to be eligible. Unless these deadlines are extended, it is unclear whether the implementation timeframe will be fast enough for sellers to tap into.

3. *If you have specific modifications to the staff proposal, please provide a rationale for the modifications pursuant to the guiding principles.*

Please see PG&E's response to question two above. PG&E's additional recommendations are noted below.

a. **Price caps** (Goal: Provide sufficient payment…while minimizing ratepayer costs and preserving competition; Just and reasonable rates)

The Commission should set a price cap for each product category being sought in the RAM. Such a provision would protect customers from paying exorbitant prices in times where competition may not be robust or the number of parties able to provide a particular product is limited. PG&E suggests that the price cap be established in the form of the MPR + $/MWh premium. This would allow parties to see the value placed upon one product versus another. For example, using the MPR + $/MWh format, an "as available peaking" product will yield a higher $/MWh adder than the "as available non-peaking" product, allowing parties to see the renewable premium associated with each product.

b. Project Location (Goal: Simplicity)

PG&E recommends that eligibility for an IOU's FIT be limited to those projects that are developed in that IOU's service territory. As PG&E explained in its April 10, 2009 comments in this proceeding, to the extent that there are any distribution or transmission grid benefits from projects that sign up for an IOU's FIT, those benefits should accrue to that IOU's customers, who will be paying for the power. Moreover, under the proposal, if one of the other IOUs' programs is fully subscribed and PG&E's is not, PG&E would be forced to take generation from projects located in another IOU's service territory that signed up for PG&E's FIT because of the must-take nature of the FIT program. This could present significant transmission challenges in terms of available transmission capacity necessary to bring the power into or out of PG&E's service territory.

c. Gaming Opportunities Must be Addressed (Goal: Just and reasonable rates for the buyer, seller, ratepayer, and society)

If a seller fails to achieve commercial operation within the timeframe specified in the FIT (for up to 3 MW, 18 months, with one six month extension; for greater than 3 MW to 20 MW, 18 months, with two six month extensions) and the FIT contract is terminated as a result, that seller should be prohibited from seeking another FIT contract or a contract through the annual RPS solicitation for a period of time, unless the sponsoring utility is willing to waive the "time out" period. PG&E recommends that the period equal three years. This will help reduce potential gaming, whereby a party could delay commercial operation as an FIT project is nearing completion and then, if the FIT contract is terminated, seek to secure a new contract at a higher price either through the annual RPS program or a subsequent RAM. Other provisions may be necessary to prevent parties from terminating non-FIT contracts at lower prices for the purpose of securing a contract through the RAM at a higher price. Under such circumstances, it may be appropriate to grant the IOU discretion as to whether it must take the power from the facility at the higher price.

d. Interaction with Other Incentives (Goal: Complement, but not impede or duplicate, existing programs)

The Commission should clarify whether developers participating in the expanded FIT would be eligible for other subsidies that may exist, including, but not limited to, the California Solar Initiative ("CSI"), net metering, the Small Generator Incentive Program ("SGIP"), and the PIER funding. To the extent the Commission finds it would be reasonable to allow access to certain customer-funded incentives, it should require safeguards or payback of incentives over time to ensure that customers do not pay twice for the same incentive – the first time through the incentive payment and the second through an energy price that is not reduced to reflect the value of the subsidy. This issue is complicated by the fact that SB 32, which provides for a FIT to 3 MW, adds provisions to Section 399.20 of the Public Utilities Code allowing "any owner or operator of an electric generation facility that received ratepayer-funded incentives" to be eligible for a SB 32 FIT or standard contract. SB 32 also requires that the incentives be reimbursed unless the Commission determines ratepayers have received sufficient value from the incentives provided to the facility based on how long the project has been in operation and the amount of energy previously generated by the facility. Additional work will need to be performed to determine whether and how developers that have received other incentives may participate in the RAM.

4. If RAM is not your preferred pricing mechanism, please provide an alternative proposal that addresses the guiding principles and how your proposal results in the procurement of viable and low-cost projects within a capped program.

Not applicable. As noted in its response to questions two and three, PG&E is supportive of the RAM, with the modifications set forth above.

5. *Staff has proposed a soft 1000 MW interim target over the next four years, which needs to be converted into a revenue requirement. Please propose a methodology to calculate the revenue requirement based on the 1000 MW interim target. Parties should address, at a minimum:*

- *Definition of renewable products (e.g. peaking "as-available", non-peaking "as available," and baseload.*

- *Preferred resource mix of the renewable DG portfolio. The preferred resource mix should be broken down by megawatts of specific renewable products and then by commercialized technologies that conform with the renewable product definitions identified above.*

- *Cost and capacity factor for different renewable technologies that were identified above in the preferred resource mix.*

a. Definitions

PG&E proposes the following definitions for three renewable products to be procured through the RAM:

(1) "As-Available non-peaking" means intermittent energy and capacity deliveries that are subject to a fuel source not controlled by the generator. The projects that may provide an As-Available non-peaking offer are: (1) wind; (2) run-of-river hydro; or (3) any other technology that PG&E determines qualifies. Non-peaking products are those with a time of delivery multiplier that is less than 1.1.

(2) "As-Available peaking" means intermittent energy and capacity deliveries that are subject to a fuel source not controlled by the generator. The projects that may provide an As-Available peaking offer are: (1) solar; (2) run-of-river hydro; or (3) any other technology that PG&E determines qualifies. Peaking products are those with a time of delivery multiplier that is equal to or greater than 1.1.

(3) "Baseload" means energy and capacity delivered on a twenty-four (24) hours per day, seven (7) days per week schedule (i.e., "24x7") with the ability to demonstrate that the project can achieve an annual capacity factor of at least 80%. This minimum requirement is meant to take into account maintenance and forced outages. Technologies that may qualify as baseload products are biomass and geothermal.

Participants in the RAM should be required to provide a project generation profile. The applicable profile should represent the contract capacity factor and take into account planned maintenance and estimated rates of forced outage of the project.

For As-Available peaking, As-Available non-peaking, and Baseload products, the time of delivery multiplier will be determined using the factors set forth in the table below. These factors reflect the relative value of the energy and capacity during the respective periods.

Table A: 2009 Time of Delivery (TOD) Periods & Factors

Monthly Period	Super-Peak[1,4]	Shoulder[2,4]	Night[3,4]
Jun – Sep	2.20	1.12	0.69
Oct.- Dec., Jan. & Feb.	1.06	0.93	0.76
Mar. – May	1.15	0.85	0.64

<u>Definitions</u>:

1. Super-Peak (5x8) = HE (Hours Ending) 13 - 20, Monday - Friday (*except* NERC holidays).
2. Shoulder = HE 7 - 12, 21 and 22, Monday - Friday (*except* NERC holidays); and HE 7 - 22 Saturday, Sunday and *all* NERC holidays.
3. Night (7x8) = HE 1 - 6, 23 and 24 all days *(including* NERC holidays).
4. NERC (Additional Off-Peak) Holidays include: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. Three of these days, Memorial Day, Labor Day, and Thanksgiving Day occur on the same day each year. Memorial Day is the last Monday in May; Labor Day is the first Monday in September; and Thanksgiving Day is the 4th Thursday in November. New Year's Day, Independence Day, and Christmas Day, by definition, are predetermined dates each year. However, in the event they occur on a Sunday, the "NERC Additional Off-Peak Holiday" is celebrated on the Monday immediately following that Sunday. However, if any of these days occur on a Saturday, the "NERC Additional Off-Peak Holiday" remains on that Saturday.

b. Preferred Resource Mix

PG&E proposes that equal amounts of each of the three products be sought through the RAM solicitation. For example, if the RAM were seeking projects totaling 100 MW of capacity, PG&E would seek to secure 33.3 MW of as-available peaking products, 33.3 MW of as-available non-peaking products, and 33.3 MW of baseload products.

Should any one product category not be fully subscribed, the remaining revenue requirement in that category should not be added to another category. For example, if the revenue requirement for the as-available peaking product is only 60% subscribed, the remaining 40% should not be added to the as-available non-peaking product category. PG&E suggests this to preserve the RAM goal of establishing "pre-determined amounts of renewable products based on the renewable need of the utility."[3/] If residual revenue requirement amounts for a particular

3/ Ruling, Attachment A at 8.

product were shifted to another product category, PG&E could end up procuring additional energy products that are not needed to meet its energy needs.

Because PG&E is proposing to solicit equal quantities from each product category, and provides eligible technologies for each product category in the "Definitions" section above, it is not necessary to provide the technologies that would compete in each category. Where multiple technologies are competing in one product category (e.g., biomass and geothermal in the baseload category), the price bid will determine which technologies are ultimately awarded a contract through the RAM.

c. Calculation of Total Revenue Requirement Amount

Inputs needed to calculate the total revenue requirement amount include:

(1) Total Program Target in MWs

(2) PG&E's portion of Program Target in MWs

(3) PG&E Calculation of number of MWs to be solicited for each product (1/3 of item 2 for each product)

(4) Establish Capacity factor by product

(5) Convert MW per product to MWh

(6) Estimate average of expected bid price for each product

(7) Calculate RRQ per product

As requested in Attachment A to the Ruling, PG&E provides a revenue requirement calculation in excel format at the following link:

https://www.pge.com/regulation/RenewablePortfolioStdsOIR-III-Admin/Other-Docs/PGE/2009/RenewablePortfolioStdsOIR-III-Admin_Other-Doc_PGE_20091019-01.xls

6. Additional comments regarding the Energy Division FIT pricing proposal.

PG&E does not have any additional comments regarding the Staff Proposal at this time.

C. Pricing Structure Issues (Attachment B)

Responses to the questions set forth in Attachment B regarding FIT price structure (rate design) are set forth below. As noted in Attachment B, the price structure may affect elements of the transaction, (e.g., incentives for performance), and may fulfill various interests of the parties (e.g., transparency, simplicity). PG&E addresses the following fifteen issues to assist the Commission consider possible further implementation of price structure as it relates to a FIT.

1. Who are the stakeholders with respect to the FIT?

PG&E agrees that the entities listed in Attachment B in connection with this question (namely, buyers (ratepayers, utilities, load serving entities), sellers (project developers, venture capitalists, equity holders, debt holders), and society) are stakeholders with respect to the FIT. PG&E provides further explanation below regarding the roles of these stakeholders, and also adds several additional stakeholders.

Role	Stakeholder
People who pay any above-market costs of FIT	• Customers
People who benefit from the impacts of increased renewable energy development, including greenhouse gas ("GHG") reduction	• Society (not 100% overlapping with Customers) • Environmental and other advocacy groups
People who benefit from building FIT projects	• Project developers—divided between large and capitalized and small and less capitalized • Construction firms • Equipment manufacturers • Tax investors, venture capitalists, equity holders, debt holders (e.g., banks—both commercial and investment)
People who operate the electrical system	• Utilities—both IOUs and munis • Load serving entities ("LSEs")—for profit and non-profit • California Independent System Operator ("CAISO") • FIT project owner and/or operator

2. *What are the interests of those stakeholders relative to the FIT?*

Stakeholder	Interests
<u>People who pay any above-market costs of FIT:</u>	
• Customers	• Just and reasonable rates for safe and reliable electricity that is available when demanded by the customer • Equity, transparency
<u>People who benefit from the impacts of increased renewable energy development, including GHG reduction:</u>	
• Society (not 100% overlapping with Customers) • Environmental and other advocacy groups	• Greenhouse gas reductions • Conservation, efficiency, equity, transparency, simplicity, equitable allocation of risk between stakeholders, certainty/stability
<u>People who benefit from building FIT projects:</u>	
• Project developers—divided between large and capitalized and small and less capitalized	• Profit maximization • Upfront payment • Assurance of project cost recovery • Revenue security • Transparency, simplicity, certainty/stability
• Construction Firms	• Profit maximization • Upfront payment
• Equipment Manufacturers	• Profit maximization • Upfront payment
• Tax investors, venture capitalists, equity holders, debt holders (e.g., banks—both commercial and investment)	• Profit maximization commensurate with risk • Assurance of project cost recovery • Revenue security, certainty/stability
<u>People who operate the electrical system:</u>	
• Utilities—both IOUs and munis	• Least cost/best fit • Reasonable project performance • Performance that aligns with demand now and over time • Risk minimization • Just and reasonable rates for safe and reliable electricity that is available when demanded by the customer • Simplicity/ease of implementation, certainty/stability

• LSEs—for profit and non-profit	• Least cost/best fit • Reasonable project performance • Performance that aligns with demand now and over time • Risk minimization
• CAISO	• Reasonable project performance • Performance that aligns with demand now and over time • Risk minimization
• FIT project owner and/or operator	• Recovery of going forward costs

3. *What price components may be used in various pricing approaches and structures, and what are the advantages and disadvantages relative to each price component?*

PG&E believes the advantages and disadvantages of each type of price component are as follows:

Price Components	Advantages	Disadvantages
Energy rate (cents/kWh) • This is assumed to mean a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity consistent with the current RPS process.	• A fixed, levelized energy rate incents continued performance over the expected life of the FIT project. • An all-in rate assures project cost recovery if the FIT project performs as expected. • A TOD adjustment incents energy production in periods valued most by the utility.	None
Demand rate (dollars/kW-year) • This is assumed to be a "capacity payment."	None	A demand rate typically disconnects payment from performance, such as has happened with QF projects.

Fixed payment (e.g., dollars per month, dollars for installed capacity, dollars for resource adequacy, dollars per customer) • This is assumed to be an upfront payment as in the California Solar Initiative ("CSI") program.	None	• Creates wealth-transfer from ratepayer to FIT project developers, builders, manufacturers and financers. • Eliminates the incentive to continue producing GHG-reducing energy.
Adjustments (e.g., time of delivery factors; energy rate, demand rate and/or fixed payment tied to an index to periodically adjust to market)	A TOD adjustment incents energy production in periods valued most by the utility.	Indexing to market would disconnect the energy rate from the cost of service.

4. *What is the best combination of price components to meet stakeholder interests?*

PG&E believes stakeholder interests are best met by using the **energy rate** (cents/kWh) price component, defined as a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process. Such an RPS-style energy rate benefits the buyer because it pays for performance and incents energy production in most-valued periods, and benefits the seller because it assures a known income stream and cost recovery for the project—assuming the project performs as expected. This approach is simple, easy to implement, and consistent with current RPS practice.

5. *If there are competing stakeholder interests, what is the best combination of price components to reasonably balance competing interests.*

For the reasons provided in response to question four, PG&E believes that competing stakeholder interests are reasonably balanced by using the **energy rate** (cents/kWh) price component, defined as a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process.

6. *Discuss whether or not the Commission should state a preference for certain price components and price structures to be used in a Commission-adopted FIT. If so, identify and discuss which components and structures should be preferred by the Commission.*

The Commission should state a preference for certain price components and price structures to be used in a Commission-adopted FIT. For the reasons stated in response to question four, PG&E believes that the Commission should state a preference for a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process.

7. *Discuss whether or not the Commission should require certain price components and price structures to be used in a Commission-adopted FIT. If so, identify and discuss which components should be required by the Commission.*

The Commission should require certain price components and price structures to be used in a Commission-adopted FIT. For the reasons stated in response to question four, PG&E believes that the Commission should require use of a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process.

8. *State anything else that is material and relevant to the issue of pricing structure (rate design) for a Commission-adopted FIT.*

PG&E does not have anything else to add on the issue of pricing structure (rate design) at this time.

In addition, please comment on the following specific examples for a twenty year contract. Each example applies to any FIT pricing approach (e.g., price based on seller's cost, buyer's avoided cost, auction, bi-lateral negotiation, other).

9. *Example A: If the sole or primary interest is to ensure cost recovery for the project, the optimal payment may be a lump sum at the commercial operation date. Please comment.*

PG&E believes a lump sum payment at the commercial operation date would create a wealth transfer from ratepayers to FIT project developers, builders, manufacturers and financers. While a lump sum payment may ensure cost recovery for and will incent the construction of FIT projects, it will not incent their operation. Greenhouse gas reductions and other benefits associated with renewable energy development will only occur if FIT projects continue to operate for their expected lifetime. This is best incented by using a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process. This approach will also assure project cost recovery if the project performs as expected.

10. *Example B: If the project has both fixed and variable costs and the sole or primary interest is to ensure cost recovery for the project, the optimal payment may be a lump sum at the commercial operation for the fixed costs and payment of variable costs as incurred over time. Please comment.*

This example is essentially the same as the example posed in question nine. When the project's return on investment, i.e., profit, is paid up-front, there is no meaningful incentive to continue operating the FIT project for its expected lifetime. The best way to incent continued operation is by using a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process. This approach will also assure project cost recovery if the project performs as expected.

11. *Example C: Assume that the primary interests are revenue certainty for the seller, conservation (i.e., optimal use of resources), efficiency and equity. Assume that the selected payment structure is a combination of fixed (e.g., dollars per month) along with demand and energy prices; the demand price (dollars/kW per month) is at a fixed level (dollar amount) in the contract for the life of the contract and paid upon performance (delivery); the initial energy price (cents/kWh) is fixed in the contract, payment varies by time of delivery (TOD) based on TOD factors, is paid based upon performance (delivery), and the energy rate is adjusted to the market once every 5 years. Under this price structure, perhaps the fixed payment provides revenue security for the project; the demand and energy rates provide an incentive for performance; and the periodic adjustment to the market provides assurance to both the project and ratepayers that prices never vary too drastically from current market realities while the seller's variable costs (to the extent they vary with the market) are recovered without over- or under-payment, thereby promoting efficiency and equity. Is this an optimal price structure? Please comment.*

No, this is not an optimal price structure, for the following reasons:

- Payment of the demand price in this example is not linked to the time of performance, and therefore will not incent energy production in most-valued periods.

- A fixed payment creates a wealth-transfer from ratepayers to FIT project developers, builders, manufacturers and financers, and eliminates the incentive to continue producing GHG-reducing energy.

- Indexing payments to the market price would disconnect the payments from the cost of service, because the market moves with changes in natural gas prices and the cost of producing renewable energy does not. If the phrase "adjustment to market" is intended to mean something different, i.e., an adjustment to reflect the current market value for renewable resources, this could result in unanticipated increases in prices depending on the demand for renewable resources generated by statutory and regulatory requirements.

- The price structure proposed in this question introduces complexity and potential implementation challenges.

The best way to incent continued operation at a reasonable level of performance is by using a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process. As explained above, this approach would also provide revenue certainty and assurance of cost recovery provided the project performs as expected.

12. *Example D: Assume the price structure is an energy payment only, and the initial average overall price is $0.25/kWh to be paid by TOD factors set in the standard contract. To balance competing interests (e.g., revenue security, conservation, efficiency, equity), assume the payment is 80% fixed and 20% variable. That is, $0.20/kWh is paid for each delivered kWh over the life of the contract. The remainder, $0.05/kWh, is paid the first 5 years, and is then subject to adjustment to reflect the current market (e.g., formula in the contract that based on an index to model seller's variable costs), and is adjusted again at years 10 and 15. The TOD factors are updated once at year 10 to align with the current TOD profile of the buyer. This price structure might satisfy several interests including (a) simplicity (i.e., based only on energy price), (b) providing some certainty to the seller of the payment type (energy only) and amount (with 80% fixed and 20% subject to adjustment), (c) payment upon performance (to provide the incentive to produce), (d) payment based on TOD (to provide the incentive to provide the product when needed), (e) an update to a portion of the price (to align with the market), (f) an update to TOD factors periodically (to align TOD factors with current market needs in order to give the seller an incentive to shift production, if possible, to the times the electricity is needed), and (g) revenue certainty for the majority (80%) of the payment (perhaps a benefit to the project) while aligning a portion (20%) of the total payment with the current "market" (a potential benefit to the project if the project has variable costs that vary with market conditions, and a potential benefit to ratepayers so the total payment does not get too far out of alignment with market realities). Please comment.*

PG&E does not believe that this is an optimal price structure. Indexing payments to the market price would disconnect the payments from the cost of service, because the market moves with changes in natural gas prices and the cost of producing renewable energy does not. If the phrase "adjustment to reflect the current market" is intended to mean something different, i.e., an adjustment to reflect the current market value for renewable resources, this could result in unanticipated increases in prices depending on the demand for renewable resources generated by statutory and regulatory requirements. PG&E believes that the better approach is a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process.

13. Example E: Payment is made upon performance (i.e., an energy price paid in cents/kWh). Renewable technologies (with storage) that can guarantee on-peak energy are encouraged (e.g., photovoltaic with storage would receive a different FIT level of payment than photovoltaic without storage). To avoid over payment/under payment, FIT price levels are revisited annually and revised according to the amount of energy delivered. Revised prices apply to new contracts, but not existing contracts. If the amount of new FIT generation exceeds 2 percent of retail sales, FIT price levels should drop by 10 percent. Please comment.

PG&E agrees with this example's use of the energy rate (cents/kWh) price component, provided that the energy rate is defined as a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh). In its discussion of "revisiting" and "revising" price levels, however, this example appears to mimic a German-style feed-in tariff and to assume that the price paid under an expanded FIT would be a Commission-determined price. PG&E does not agree that a German-style feed-in tariff is best for California, and instead supports use of a competitive pricing mechanism for an expanded FIT as explained in Section II.B. of these comments.

14. Other examples: Please provide other reasonable examples and explain whether or not the Commission should consider or adopt elements of those examples.

PG&E does not have any other examples to offer at this time.

Finally, please address:

15. Based on a consideration of the range of stakeholder interests, various candidate price components and examples, please state the specific price structure (rate design), if any, you recommend be adopted by the Commission.

Based on a consideration of the range of stakeholder interests and the various candidate price components and examples, PG&E recommends that the Commission adopt a price structure (rate design) comprised of a fixed, all-in, levelized, TOD-adjusted payment for energy and capacity ($/MWh) consistent with the current RPS process.

D. Pricing Related Goals of an FIT (Attachment C)

PG&E has provided its comments on the goals set forth in Attachment C to the Ruling in Section II.B.1. above.

E. Assessment of Recommendations on FIT Pricing (Attachments D and E)

The Ruling requires the IOUs to assess their recommendation on a FIT pricing approach, price structure, and price components using the goals set forth in Attachment C to the Ruling, and to compare and contrast their recommendation against other candidate recommendations. The Ruling further requires the IOUs to take the lead in coordinating this assessment with other parties, and directs parties to prepare a coordinated showing on this assessment (and on any other parts of comments on the Ruling) to the extent feasible. The Ruling asks that parties consider using the matrices provided in Attachments D and E to the Ruling for their assessment of pricing approaches and price components, but also allows other approaches that effectively present parties' views.

The IOUs undertook efforts to coordinate with all interested parties regarding the assessment of FIT pricing recommendations and other aspects of the Ruling. These efforts are described in the *Joint Comments of San Diego Gas & Electric Company (U 902 E), Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338 E), the Solar Alliance, GreenVolts, the Sierra Club, Baytel and L. Jan Reid on Administrative Law Judge's Ruling Regarding Pricing Approaches and Structures for a Feed-In Tariff* ("Joint Comments") filed on October 19, 2009. Attached to the Joint Comments is a matrix that memorializes the results of these efforts. As explained in the Joint Comments, parties expressed a wide range of views on FIT pricing issues, and consensus was not reached on all issues.

PG&E's pricing recommendations assessment is provided in the above-referenced matrix attached to the Joint Comments. PG&E notes that its assessment is based upon certain interpretations of the meaning of the proposed FIT goals, and assumptions regarding how such goals do or do not apply to the various pricing approaches and components. Other parties may have based their assessment on different interpretations and assumptions.

F. Proposal to Take Official Notice of California Energy Commission FIT Final Consultant Report

PG&E does not oppose official notice being taken of the CEC's FIT Final Consultant Report referenced in the Ruling.

G. Additional Material Information

PG&E does not have any additional information regarding FIT price issues to add at this time, but reserves the right to offer additional information in reply comments.

III. CONCLUSION

PG&E appreciates the opportunity to comment on the Ruling and its Attachments and recommends that the Commission adopt the Energy Division's RAM proposal with the modifications described above.

Respectfully submitted,

CORY M. MASON
CHARLES R. MIDDLEKAUFF

By: /s/
CORY M. MASON

Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-2320
Facsimile: (415) 973-5520
Email: CMMw@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

October 19, 2009

VERIFICATION

I am an employee of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification on its behalf. I have read the foregoing "Comments of Pacific Gas and Electric Company (U 39 E) on Administrative Law Judge's Ruling Regarding Pricing Approaches and Structures for a Feed-In Tariff" dated October 19, 2009. The statements in the foregoing document 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 this 19th day of October, 2009 at San Francisco, California.

/s/
Valerie J. Winn
Manager
Pacific Gas and Electric Company

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 19th day of October 2009, I served a true copy of:

COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON ADMINISTRATIVE LAW JUDGE'S RULING REGARDING PRICING APPROACHES AND STRUCTURES FOR A FEED-IN TARIFF

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.08-08-009 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for R.08-08-009 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 19th day of October 2009 at San Francisco, California.

/s/

DONNA LEE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: October 15, 2009

CPUC DOCKET NO. R0808009

Total number of addressees: 390

MAGGIE CHAN
PACIFIC GAS & ELECTRIC COMPANY
MAILCODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: MMCL@pge.com
Status: INFORMATION

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MC B9A
SAN FRANCISCO CA 94177
Email: RegRelCPUCCases@pge.com
Status: INFORMATION

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
Email: cpuccases@pge.com
Status: INFORMATION

SHAUN HALVERSON
PACIFIC GAS AND ELECTRIC COMPANY
PG&E MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: SEHC@pge.com
Status: INFORMATION

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B9A
SAN FRANCISCO CA 94105-1814
Email: nxk2@pge.com
Status: INFORMATION

GRACE LIVINGSTON-NUNLEY ASSISTANT PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: GXL2@pge.com
Status: INFORMATION

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A, RM 991
SAN FRANCISCO CA 94105
Email: ELL5@pge.com
Status: INFORMATION

CORY M. MASON ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B30A
SAN FRANCISCO CA 94105-1814
FOR: Pacific Gas and Electric Company
Email: cmmw@pge.com
Status: INFORMATION

JOHN PAPPAS UTILITY ELECTRIC PORTFOLIO MANAGEMENT
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, N12E
SAN FRANCISCO CA 94105
Email: jsp5@pge.com
Status: INFORMATION

VALERIE WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE 12G
SAN FRANCISCO CA 94177
Email: vjw3@pge.com
Status: INFORMATION

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B13L
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: jay2@pge.com
Status: INFORMATION

MARK HUFFMAN ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
MC B30A PO BOX 770000
SAN FRANCISCO CA 94177
FOR: Pacific Gas and Electric Company
Email: mrh2@pge.com
Status: PARTY

EDWARD V. KURZ ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., B30A
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: evk1@pge.com
Status: PARTY

EVELYN C. LEE ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B30A
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: ecl8@pge.com
Status: PARTY

CHARLES MIDDLEKAUFF ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120
FOR: Pacific Gas and Electric Company
Email: crmd@pge.com
Status: PARTY

Nilgun Atamturk
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: nil@cpuc.ca.gov
Status: STATE-SERVICE

Amy C. Baker
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: ab1@cpuc.ca.gov
Status: STATE-SERVICE

Traci Bone
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5031
SAN FRANCISCO CA 94102-3214
Email: tbo@cpuc.ca.gov
Status: STATE-SERVICE

Laurence Chaset
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5131
SAN FRANCISCO CA 94102-3214
Email: lau@cpuc.ca.gov
Status: STATE-SERVICE

Michael Colvin
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: mc3@cpuc.ca.gov
Status: STATE-SERVICE

Christopher Danforth
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ctd@cpuc.ca.gov
Status: STATE-SERVICE

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5215
SAN FRANCISCO CA 94102-3214
Email: mjd@cpuc.ca.gov
Status: STATE-SERVICE

Paul Douglas
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: psd@cpuc.ca.gov
Status: STATE-SERVICE

Dorothy Duda
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5109
SAN FRANCISCO CA 94102-3214
Email: dot@cpuc.ca.gov
Status: STATE-SERVICE

Gretchen T. Dumas
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4300
SAN FRANCISCO CA 94102-3214
Email: gtd@cpuc.ca.gov
Status: STATE-SERVICE

Julie A. Fitch
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE RM 4004
SAN FRANCISCO CA 94102-3214
Email: jf2@cpuc.ca.gov
Status: STATE-SERVICE

Thomas Flynn
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: trf@cpuc.ca.gov
Status: STATE-SERVICE

Anne Gillette
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: aeg@cpuc.ca.gov
Status: STATE-SERVICE

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: skg@cpuc.ca.gov
Status: STATE-SERVICE

Karin M. Hieta
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: kar@cpuc.ca.gov
Status: STATE-SERVICE

Sara M. Kamins
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: smk@cpuc.ca.gov
Status: STATE-SERVICE

Meri Levy
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: mjh@cpuc.ca.gov
Status: STATE-SERVICE

Jaclyn Marks
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jm3@cpuc.ca.gov
Status: STATE-SERVICE

Rahmon Momoh
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: rmm@cpuc.ca.gov
Status: STATE-SERVICE

David Peck
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4103
SAN FRANCISCO CA 94102-3214
Email: dbp@cpuc.ca.gov
Status: STATE-SERVICE

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
505 VAN NESS AVE RM 2203
SAN FRANCISCO CA 94102-3214
Email: jmh@cpuc.ca.gov
Status: STATE-SERVICE

Edward Howard
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: trh@cpuc.ca.gov
Status: STATE-SERVICE

Cheryl Lee
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: cnl@cpuc.ca.gov
Status: STATE-SERVICE

Mark R. Loy
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRANCH
505 VAN NESS AVE RM 4205
SAN FRANCISCO CA 94102-3214
Email: mrl@cpuc.ca.gov
Status: STATE-SERVICE

Burton Mattson
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5104
SAN FRANCISCO CA 94102-3214
Email: bwm@cpuc.ca.gov
Status: STATE-SERVICE

Raj Naidu
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS
505 VAN NESS AVE AREA 3-B
SAN FRANCISCO CA 94102-3214
Email: rkn@cpuc.ca.gov
Status: STATE-SERVICE

Marcelo Poirier
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5025
SAN FRANCISCO CA 94102-3214
Email: mpo@cpuc.ca.gov
Status: STATE-SERVICE

Nika Rogers
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4101
SAN FRANCISCO CA 94102-3214
Email: nlr@cpuc.ca.gov
Status: STATE-SERVICE

Andrew Schwartz
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5217
SAN FRANCISCO CA 94102-3214
Email: as2@cpuc.ca.gov
Status: STATE-SERVICE

Mitchell Shapson
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4107
SAN FRANCISCO CA 94102-3214
Email: sha@cpuc.ca.gov
Status: STATE-SERVICE

Sean A. Simon
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: svn@cpuc.ca.gov
Status: STATE-SERVICE

F. Jackson Stoddard
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5125
SAN FRANCISCO CA 94102-3214
Email: fjs@cpuc.ca.gov
Status: STATE-SERVICE

Mary Jo Stueve
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4101
SAN FRANCISCO CA 94102-3214
Email: mjs@cpuc.ca.gov
Status: STATE-SERVICE

Cynthia Walker
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: ciw@cpuc.ca.gov
Status: STATE-SERVICE

Aniana M. Schwankl
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ams@cpuc.ca.gov
Status: STATE-SERVICE

Curtis Seymour
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: css@cpuc.ca.gov
Status: STATE-SERVICE

Anne E. Simon
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5107
SAN FRANCISCO CA 94102-3214
Email: aes@cpuc.ca.gov
Status: STATE-SERVICE

Donald R. Smith
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: dsh@cpuc.ca.gov
Status: STATE-SERVICE

Elizabeth Stoltzfus
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: eks@cpuc.ca.gov
Status: STATE-SERVICE

Matthew Tisdale
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
Email: mwt@cpuc.ca.gov
Status: STATE-SERVICE

Jane Whang
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5029
SAN FRANCISCO CA 94102-3214
Email: jjw@cpuc.ca.gov
Status: STATE-SERVICE

Keith D White
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: kwh@cpuc.ca.gov
Status: STATE-SERVICE

MICHAEL MAZUR
3 PHASES RENEWABLES, LLC
2100 SEPULVEDA BLVD, STE 37
MANHATTAN BEACH CA 90266
FOR: 3 Phases Renewables
Email: mmazur@3PhasesRenewables.com
Status: PARTY

3 PHASES RENEWABLES LLC
2100 SEPULVEDA BLVD, STE 37
MANHATTAN BEACH CA 90266
Status: PARTY

LEIGH FAVRET
3DEGREES
6 FUNSTON AVE
SAN FRANCISCO CA 94129
Email: lfavret@3degreesinc.com
Status: INFORMATION

GABE PETLIN
3DEGREES
PRESIDIO OF SAN FRANCISCO
6 FUNSTON AVE
SAN FRANCISCO CA 94129
Email: gpetlin@3degreesinc.com
Status: PARTY

THOMAS ELGIE
POWEREX CORPORATION
1400, 666 BURRAND ST
VANCOUVER BC V6C 2X8 CANADA
FOR: Powerex Corporation
Email: Tom.Elgie@powerex.com
Status: PARTY

MONIQUE STEVENSON
SEA BREEZE PACIFIC REGIONAL TRANSMISSION
LOBBY BOX 91
333 SEYMOUR ST., STE 1400
VANCOUVER BC V5B 5A6 CANADA
Email: MoniqueStevenson@SeaBreezePower.com
Status: INFORMATION

MARC D. JOSEPH ATTORNEY
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO CA 94080
FOR: ADAMS BROADWELL JOSEPH & CARDOZO
Email: mdjoseph@adamsbroadwell.com
Status: INFORMATION

JAMES WEIL DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 1916
SEBASTOPOL CA 95473
FOR: Aglet Consumer Alliance
Email: jweil@aglet.org
Status: PARTY

BRAD WETSTONE
ALAMEDA POWER AND TELECOM
2000 GRANT ST, PO BOX H
ALAMEDA CA 94501-0263
FOR: ALAMEDA POWER AND TELECOM
Email: wetstone@alamedapt.com
Status: INFORMATION

MICHAEL ALCANTAR ATTORNEY
ALCANTAR & KAHL LLP
1300 SW 5TH AVE., STE 1750
PORTLAND OR 97201
Email: mpa@a-klaw.com
Status: INFORMATION

SEEMA SRINIVASAN
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94105
Email: sls@a-klaw.com
Status: INFORMATION

ANNIE STANGE
ALCANTAR & KAHL LLP
1300 SW FIFTH AVE, STE 1750
PORTLAND OR 97201
Email: sas@a-klaw.com
Status: INFORMATION

GREGORY S. G. KLATT
DOUGLASS & LIDDELL
411 E. HUNTINGTON DRIVE, NO 107-356
ARCADIA CA 91006-8102
FOR: Alliance for Retail Energy Markets
Email: klatt@energyattorney.com
Status: PARTY

DANIEL W. DOUGLASS ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS/ DIRECT ACCESS/WESTERN POWER TRADING FORUM/DIRECT ACCESS CUSTOMER COALITION
Email: douglass@energyattorney.com
Status: PARTY

JAN MCFARLAND
CAEATFA
915 CAPITOL MALL, RM. 468
SACRAMENTO CA 95814
FOR: Americans for Solar Power
Email: jmcfarland@treasurer.ca.gov
Status: PARTY

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN ST, STE 750
PHOENIX AZ 85004
Email: jenine.schenk@apses.com
Status: INFORMATION

CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., STE 900
COSTA MESA CA 92626
FOR: BAKER & HOSTETLER LLP
Email: csteen@bakerlaw.com
Status: INFORMATION

STEVEN S. SCHLEIMER DIRECTOR,COMPLIANCE & REGULATORY AFFAIRS
BARCLAYS BANK, PLC
200 PARK AVE, FIFTH FLR
NEW YORK NY 10166
Email: steven.schleimer@barclayscapital.com
Status: INFORMATION

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVE
BERKELEY CA 94703-2714
Email: rschmidt@bartlewells.com
Status: INFORMATION

RYAN PLETKA RENEWABLE ENERGY PROJECT MANAGER
BLACK & VEATCH
2999 OAK ROAD, STE 490
WALNUT CREEK CA 94597
FOR: BLACK & VEATCH
Email: pletkarj@bv.com
Status: INFORMATION

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA CA 91737
FOR: American Utility Network
Email: pssed@adelphia.net
Status: PARTY

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.
58470 HWY 371
PO BOX 391909
ANZA CA 92539
FOR: Anza Electric Cooperative
Email: GloriaB@anzaelectric.org
Status: PARTY

ROGER LEE
BAKER & HOSTETLER LLP
600 ANTON BLVD., STE 900
COSTA MESA CA 92626
FOR: BAKER & HOSTETLER LLP
Email: rblee@bakerlaw.com
Status: INFORMATION

CHAD CHAHBAZI
BAP POWER CORPORATION D/B/A CENERGY
2784 GATEWAY ROAD, STE 102
CARLSBAD CA 92009
Email: chad@cenergypower.com
Status: INFORMATION

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
FOR: BARKOVICH AND YAP INC.
Email: brbarkovich@earthlink.net
Status: INFORMATION

PETER T. PEARSON ENERGY SUPPLY SPECIALIST
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE, PO BOX 1547
BIG BEAR LAKE CA 92315-1547
Email: peter.pearson@bves.com
Status: INFORMATION

TIM MASON
BLACK & VEATCH CORP.
2999 OAK ROAD, STE 490
WALNUT CREEK CA 94597
Email: masont@bv.com
Status: INFORMATION

MARK CHEDIAK
BLOOMBERG NEWS
3 PIER 101
SAN FRANCISCO CA 94111
Email: mchediak@bloomberg.net
Status: INFORMATION

RICHARD F. CHANDLER
BP SOLAR
630 SOLAREX COURT
FREDERICK MA 21703
Email: richard.chandler@bp.com
Status: INFORMATION

SCOTT BLAISING ATTORNEY
BRAUN & BLAISING MCLAUGHLIN, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
Email: blaising@braunlegal.com
Status: INFORMATION

BRUCE MCLAUGHLIN ATTORNEY
BRAUN & BLAISING P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
FOR: BRAUN & BLAISING P.C.
Email: mclaughlin@braunlegal.com
Status: INFORMATION

RYAN BERNARDO
BRAUN BLAISING MCLAUGHLIN, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
Email: bernardo@braunlegal.com
Status: INFORMATION

KEITH MCCREA ATTORNEY
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVE, NW
WASHINGTON DC 20004-2415
FOR: CA Manufacturers & Technology Assn.
Email: keith.mccrea@sablaw.com
Status: PARTY

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON ST, STE 780
VANCOUVER WA 98660
FOR: CAC
Email: dws@r-c-s-inc.com
Status: INFORMATION

ROD AOKI ATTORNEY
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94015
FOR: CAC
Email: rsa@a-klaw.com
Status: PARTY

MOHAN NIROULA
CALIF DEPT OF WATER RESOURCES
RESOURCE ADEQUACY SECTION
3310 EL CAMINO AVE, STE 256
SACRAMENTO CA 95821
Email: mniroula@water.ca.gov
Status: INFORMATION

MICHELLE GARCIA
CALIFORNIA AIR RESOURCES BOARD
1001 I ST
SACRAMENTO CA 95814
Email: mgarcia@arb.ca.gov
Status: INFORMATION

TOM POMALES
CALIFORNIA AIR RESOURCES BOARD
1001 I ST
SACRAMENTO CA 95812
Email: tpomales@arb.ca.gov
Status: INFORMATION

ROSS BUCKENHAM
CALIFORNIA BIOENERGY LLC
2828 ROUTH ST, STE 500
DALLAS TX 75201
Email: rbuckenham@calbioenergy.com
Status: INFORMATION

DAN ADLER DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
5 THIRD ST, STE 1125
SAN FRANCISCO CA 94103
FOR: CALIFORNIA CLEAN ENERGY FUND
Email: Dan.adler@calcef.org
Status: INFORMATION

BETH VAUGHAN
CALIFORNIA COGENERATION COUNCIL
4391 NORTH MARSH ELDER CT.
CONCORD CA 94521
Email: beth@beth411.com
Status: INFORMATION

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE
SACRAMENTO CA 95821
Email: lterry@water.ca.gov
Status: INFORMATION

WILLAIM N. BRIEGER DEPARTMENT OF JUSTICE
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1300 I ST., STE. 125/ PO BOX 944255
SACRAMENTO CA 94244-2550
FOR: California Department Of Justice
Email: Will.Brieger@doj.ca.gov
Status: STATE-SERVICE

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
3310 EL CAMINO AVE. RM 300
SACRAMENTO CA 95821
Email: hurlock@water.ca.gov
Status: INFORMATION

PAMELA DOUGHMAN
CALIFORNIA ENERGY COMMISSION
TECHNOLOGY SYSTEMS DIVISION
1516 9TH ST, MS 45
SACRAMENTO CA 95814
Email: pdoughma@energy.state.ca.us
Status: STATE-SERVICE

CONNIE LENI
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS-20
SACRAMENTO CA 95814-5512
Email: cleni@energy.state.ca.us
Status: STATE-SERVICE

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO CA 95814
Email: mpryor@energy.state.ca.us
Status: STATE-SERVICE

JIM WOODWARD
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS 20
SACRAMENTO CA 95814-5512
Email: jwoodwar@energy.state.ca.us
Status: STATE-SERVICE

HOLLY B. CRONIN STATE WATER PROJECT OPERATIONS DIV
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO CA 95821
Email: hcronin@water.ca.gov
Status: STATE-SERVICE

JAMES MCMAHON
CRA INTERNATIONAL
50 CHURCH ST.
CAMBRIDGE MA 2138
FOR: California Department of Water Resources
Email: jmcmahon@crai.com
Status: STATE-SERVICE

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST., STE 303
SAN FRANCISCO CA 94117
Email: cem@newsdata.com
Status: INFORMATION

CLARE LAUFENBER GALLARDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-46
SACRAMENTO CA 95814
Email: claufenb@energy.state.ca.us
Status: STATE-SERVICE

ROSS A. MILLER ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS 20
SACRAMENTO CA 96814-5512
Email: rmiller@energy.state.ca.us
Status: STATE-SERVICE

DAVID VIDAVER
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-20
SACRAMENTO CA 95814-5512
Email: dvidaver@energy.state.ca.us
Status: STATE-SERVICE

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-45
SACRAMENTO CA 95814
Email: kzocchet@energy.state.ca.us
Status: STATE-SERVICE

JOSEPH FLESHMAN
CALIFORNIA ENERGY COMISSION
1516 9TH ST, MS-45
SACRAMENTO CA 95814
FOR: CALIFORNIA ENERGY COMISSION
Email: jfleshma@energy.state.ca.us
Status: STATE-SERVICE

SUSANNAH CHURCHILL
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST.
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: schurchi@energy.state.ca.us
Status: STATE-SERVICE

LORRAINE GONZALES
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS-45
SACRAMENTO CA 95814
FOR: CALIFORNIA ENERGY COMMISSION
Email: lgonzale@energy.state.ca.us
Status: STATE-SERVICE

HEATHER LOUIE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-45
SACRAMENTO CA 95818
FOR: CALIFORNIA ENERGY COMMISSION
Email: hlouie@energy.state.ca.us
Status: STATE-SERVICE

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 45
SACRAMENTO CA 95814
FOR: CALIFORNIA ENERGY COMMISSION
Email: hraitt@energy.state.ca.us
Status: STATE-SERVICE

HILARY CORRIGAN
CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO CA 94117-2242
FOR: CALIFORNIA ENERGY MARKETS
Email: cem@newsdata.com
Status: INFORMATION

RONALD LIEBERT ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: rliebert@cfbf.com
Status: INFORMATION

KAREN NORENE MILLS ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: kmills@cfbf.com
Status: PARTY

STEVE BRINK
CALIFORNIA FORESTRY ASSOCIATION
1215 K ST, STE 1830
SACRAMENTO CA 95814
FOR: California Forestry Association
Email: steveb@cwo.com
Status: INFORMATION

DAVID A. BISCHEL PRESIDENT
CALIFORNIA FORESTRY ASSOCIATION
1215 K ST, STE 1830
SACRAMENTO CA 95814
FOR: California Forestry Association
Email: davidb@cwo.com
Status: PARTY

BALDASSARO DI CAPO COUNSEL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: bdicapo@caiso.com
Status: INFORMATION

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CALIFORNIA ISO
Email: e-recipient@caiso.com
Status: INFORMATION

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: jsanders@caiso.com
Status: PARTY

EDWARD W. O'NEILL ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: California Large Energy Consumers Association
Email: edwardoneill@dwt.com
Status: PARTY

KAREN LINDH
CALIFORNIA ONSITE GENERATION
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE CA 95843
Email: karen@klindh.com
Status: INFORMATION

SARAH BESERRA
CALIFORNIA REPORTS.COM
39 CASTLE HILL COURT
VALLEJO CA 94591
Email: sbeserra@sbcglobal.net
Status: INFORMATION

SUE KATELEY EXECUTIVE DIRECTOR
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN
PO BOX 782
RIO VISTA CA 94571
FOR: California Solar Energy Industries Association
Email: info@calseia.org
Status: PARTY

NANCY RADER EXECUTIVE DIRECTOR
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH ST, STE 213A
BERKELEY CA 94710
FOR: California Wind Energy Association
Email: nrader@calwea.org
Status: PARTY

MARTIN HOMEC ATTORNEY
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
PO BOX 4471
DAVIS CA 95617
Email: martinhomec@gmail.com
Status: INFORMATION

KEVIN BOUDREAUX MANAGER-RETAIL OPERATIONS
CALPINE POWERAMERICA CA, LLC
717 TEXAS AVE, STE 1000
HOUSTON TX 77002
FOR: Calpine
Email: boudreauxk@calpine.com
Status: PARTY

JEFFREY P. GRAY ATTORNEY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: Calpine Power America-CA, llc
Email: jeffgray@dwt.com
Status: PARTY

DOUGLAS M. GRANDY, P.E.
DG TECHNOLOGIES
1220 MACAULAY CIRCLE
CARMICHAEL CA 95608
FOR: California Onsite Generation
Email: dgrandy@caonsitegen.com
Status: INFORMATION

JAMES D. SQUERI ATTORNEY
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: California Retailers Association
Email: jsqueri@gmssr.com
Status: PARTY

JOSEPH M. KARP ATTORNEY
WINSTON & STRAWN LLP
101 CALIFORNIA ST, 39TH FLR
SAN FRANCISCO CA 94111-5894
FOR: California Wind Energy Assn./Abengoa Solar Inc./Ausra Inc and BrightSource Energy Inc.
Email: jkarp@winston.com
Status: PARTY

JULIETTE ANTHONY
CALIFORNIANS FOR RENEWABLE ENERGY
678 BLACKBERRY LANE
SAN RAFAEL CA 94903
Email: juliettea7@aol.com
Status: INFORMATION

MICHAEL E. BOYD PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL CA 95073
FOR: CAlifornians for Renewable Energy, Inc.
Email: michaelboyd@sbcglobal.net
Status: PARTY

DANIELLE MATTHEWS SEPERAS
CALPINE CORPORATION
1215 K ST, STE 2210
SACRAMENTO CA 95814-3978
Email: dseperas@calpine.com
Status: INFORMATION

AVIS KOWALEWSKI
CALPINE CORPORATION
4160 DUBLIN BLVD., STE 100
DUBLIN CA 94568
FOR: CalpinePowerAmerica-CA,LLC
Email: kowalewskia@calpine.com
Status: PARTY

VENKAT SURAVARAPU ASSOCIATES DIRECTOR
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
1150 CONNECTICUT AVE NW, STE. 201
WASHINGTON DC 20036
FOR: CAMBRIDGE ENERGY RESEARCH ASSOCIATES
Email: vsuravarapu@cera.com
Status: INFORMATION

DANIELLE OSBORN-MILLS REGULATORY AFFAIRS COORDINATOR
CEERT
1100 11TH ST, STE 311
SACRAMENTO CA 95814
Email: danielle@ceert.org
Status: INFORMATION

CHRISTIAN MENTZEL
CEM LLC
619 KUPULAU DR
KIHEI HI 96753
Email: c.mentzel@cleanenergymaui.com
Status: INFORMATION

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVE.
SAN FRANCISCO CA 94121
FOR: Center for Energy Efficiency and Renewable Technologies
Email: ssmyers@att.net
Status: PARTY

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PRESIDIO BUILDING 97
PO BOX 29512
SAN FRANCISCO CA 94129
FOR: CENTER FOR RESOURCE SOLUTIONS
Status: PARTY

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
5125 NORTH MARTY AVE, NO.324
FRESNO CA 93711
Email: Joe.Langenberg@gmail.com
Status: PARTY

CLAIRE E. TORCHIA
CHADBOURNE & PARKE LLP
350 SOUTH GRAND AVE., STE 3300
LOS ANGELES CA 90071
Email: ctorchia@chadbourne.com
Status: INFORMATION

BILL GOLOVE
CHEVRON ENERGY SOLUTIONS
345 CALIFORNIA ST, 18TH FLR
SAN FRANCISCO CA 94104
Email: whgolove@chevron.com
Status: INFORMATION

JEANNE M. SOLE DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 375
SAN FRANCISCO CA 94102-4682
FOR: City and County of San Francisco
Email: jeanne.sole@sfgov.org
Status: PARTY

MICHAEL MEACHAM ENVIRONMENTAL RESOURCE MANAGER
CITY OF CHULA VISTA
276 FOURTH AVE
CHULA VISTA CA 91910
Status: PARTY

KERRY EDEN ASST. GENERAL MGR.
CITY OF CORONA DEPT. OF WATER & POWER
730 CORPORATION YARD WAY
CORONA CA 92880
Email: kerry.eden@ci.corona.ca.us
Status: PARTY

JIM STACK, PH.D. RESOURCE PLANNER
CITY OF PALO ALTO UTILITIES
250 HAMILTON AVE.
PALO ALTO CA 94301
Email: James.Stack@CityofPaloAlto.org
Status: INFORMATION

FREDERICK M. ORTLIEB OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVE, STE 1200
SAN DIEGO CA 92101
FOR: CITY OF SAN DIEGO
Email: fortlieb@sandiego.gov
Status: PARTY

SUSAN MUNVES ENERGY AND GREEN BLDG. PROG. ADMIN.
CITY OF SANTA MONICA
1212 5TH ST, FIRST FLR
SANTA MONICA CA 90401
Email: susan.munves@smgov.net
Status: PARTY

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS CA 94024
FOR: CLEAN POWER MARKETS, INC.
Email: pepper@cleanpowermarkets.com
Status: PARTY

MARK STOUT
CLEANTECH AMERICA, INC.
1416 BROADWAY ST. STE B
FRESNO CA 93721
Email: m.stout@cleantechamerica.com
Status: INFORMATION

NICHOLE FABRI ZANDOLI PRESIDENT
CLEAR ENERGY BROKERAGE & CONSULTING LLC
403 PARKSIDE AVE
BROOKLYN NY 11226
FOR: Clear Energy Brokerage & Consulting LLC
Email: nicole.fabri@clearenergybrokerage.com
Status: INFORMATION

EDWARD A. MAINLAND
CNRCC SIERRA CLUB CALIFORNIA
1017 BEL MARIN KEYS BLVD.
NOVATO CA 94949
Email: ed.mainland@sierraclub.org
Status: INFORMATION

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94105
FOR: Cogeneration Association of California
Email: filings@a-klaw.com
Status: INFORMATION

COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA CA 92626
Status: PARTY

TAM HUNT
HUNT CONSULTING
4344 MODOC ROAD, 15
SANTA BARBARA CA 93110
FOR: COMMUNITY ENVIRONMENTAL COUNCIL
Email: tam.hunt@gmail.com
Status: PARTY

CYNTHIA A. FONNER SENIOR COUNSEL
CONSTELLATION ENERGY GROUP INC
500 WEST WASHINGTON ST, STE 300
CHICAGO IL 60661
Email: Cynthia.A.Fonner@constellation.com
Status: INFORMATION

COOL EARTH SOLAR
4659 LAS POSITAS RD., STE C
LIVERMORE CA 94551
FOR: Cool Earth Solar
Email: mpr-ca@coolearthsolar.com
Status: INFORMATION

TONY CHEN SR. MANGER, BUSINESS DEVEL.
COOL EARTH SOLAR
4659 LAS POSITAS RD., STE. A
LIVERMORE CA 94551-8861
FOR: Cool Earth Solar
Status: INFORMATION

LYNN M. HAUG ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Corona Department of Water and Power/Sierra Pacific Power Company/FuelCell Energy, Inc.
Email: lmh@eslawfirm.com
Status: PARTY

ROBERT B. GEX ATTORNEY,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
Email: bobgex@dwt.com
Status: INFORMATION

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
Email: judypau@dwt.com
Status: INFORMATION

ANN L. TROWBRIDGE ATTORNEY
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE 205
SACRAMENTO CA 95864
Email: atrowbridge@daycartermurphy.com
Status: INFORMATION

WILLIAM F. DIETRICH ATTORNEY
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, NO. 613
WALNUT CREEK CA 94598-3535
Email: dietrichlaw2@earthlink.net
Status: INFORMATION

RONALD M. CERNIGLIA DIRECTOR- NATIONAL ADVOCACY
DIRECT ENERGY SERVICES, LLC
40 COLUMBINE DRIVE
GLENMONT NY 12077-2966
FOR: DIRECT ENERGY SERVICES, LLC
Email: ron.cerniglia@directenergy.com
Status: INFORMATION

DON LIDDELL ATTORNEY
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
Email: liddell@energyattorney.com
Status: INFORMATION

JANE E. LUCKHARDT ATTORNEY
DOWNEY BRAND LLP
621CAPITOL MALL, 18TH FLR
SACRAMENTO CA 95814
Email: jluckhardt@downeybrand.com
Status: INFORMATION

Christopher Clay
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4300
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: cec@cpuc.ca.gov
Status: PARTY

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4107
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: nao@cpuc.ca.gov
Status: PARTY

AUDRA HARTMANN DIRECTOR, GOVERNMENT & REG. AFFAIRS
DYNEGY, INC.
4140 DUBLIN BLVD., STE. 100
DUBLIN CA 94568
Email: Audra.Hartmann@Dynegy.com
Status: INFORMATION

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH ST, M/S NO. 205
OAKLAND CA 94607
Email: ramonag@ebmud.com
Status: INFORMATION

NEAL DE SNOO
CITY OF BERKELEY
2180 MILVIA ST, 2ND FLR
BERKELEY CA 94704
FOR: East Bay Power Authority/City of Berkeley
Email: ndesnoo@ci.berkeley.ca.us
Status: PARTY

NATE FRANKLIN
EDISON MISSION ENERGY
18101 VON KARMAN AVE, STE 1700
IRVINE CA 92612
Email: NFranklin@edisonmission.com
Status: INFORMATION

STEPHEN HESS DIRECTOR, MARKET POLICY & REG. AFFAIRS
EDISON MISSION MARKETING & TRADING INC.
18101 VON KARMAN AVE, STE. 1700
IRVINE CA 92612-1046
Email: shess@edisonmission.com
Status: INFORMATION

DAVID OLIVARES ELECTRIC RESOURCE
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO CA 95352
FOR: Electric Resource Planning and Development Modesto Irrigation District
Email: davido@mid.org
Status: INFORMATION

ED CHIANG
ELEMENT MARKETS, LLC
3555 TIMMONS LANE, STE. 900
HOUSTON TX 77027-6453
Email: echiang@elementmarkets.com
Status: INFORMATION

DOUGLAS K. KERNER ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: ELLISON, SCHNEIDER & HARRIS LLP
Email: dkk@eslawfirm.com
Status: INFORMATION

CHRISTOPHER T. ELLISON ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
Email: cte@eslawfirm.com
Status: INFORMATION

KELLIE M. HANIGAN
ENCO UTILITY SERVICES
8141 E. KAISER BLVD., STE. 212
ANAHEIM CA 92808
Email: hanigan@encous.com
Status: INFORMATION

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, STE 1600
SAN FRANCISCO CA 94104
FOR: ENERGY AND ENBIRONMENTAL ECONOMICS
Email: snuller@ethree.com
Status: INFORMATION

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO CO 81301
Email: kjsimonsen@ems-ca.com
Status: INFORMATION

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND CA 95776
FOR: Energy Users Forum
Email: cmkehrein@ems-ca.com
Status: PARTY

DOUGLAS E. COVER
ENVIRONMENTAL SCIENCE ASSOCIATES
225 BUSH ST, STE 1700
SAN FRANCISCO CA 94104
Email: dcover@esassoc.com
Status: INFORMATION

KEVIN PORTER SENIOR ANALYST
EXETER ASSOCIATES, INC.
5565 STERRETT PLACE, STE 310
COLUMBIA MD 21044
Email: porter@exeterassociates.com
Status: INFORMATION

RAFI HASSAN SENIOR RESEARCH ASSOCIATE
FBR CAPITAL MARKETS
1950 EMBARACADERO FOUR
SAN FRANCISCO CA 94111
Email: rhassan@fbr.com
Status: INFORMATION

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., STE 107
FOLSOM CA 95630
Email: saeed.farrokhpay@ferc.gov
Status: INFORMATION

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., STE 1744
SAN FRANCISCO CA 94103-1399
Email: norman.furuta@navy.mil
Status: INFORMATION

SAMARA M. RASSI REGULATORY AFFAIRS ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DR., STE 2500
LOUISVILLE KY 40223
Status: INFORMATION

NORA SHERIFF
ALCANTAR & KAHL
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94105
FOR: First Solar, Energy Producers and Users Coalition.
Email: nes@a-klaw.com
Status: PARTY

LORRAINE A. PASKETT VICE PRES., POLICY & MARKET DEVELOPMENT
FIRST SOLAR, INC.
350 WEST WASHINGTON ST, STE 600
TEMPE AZ 85281
Email: LPaskett@Firstsolar.com
Status: INFORMATION

WILLIAM S. KAMMERER
FIT COALITION
2092 MOHAWK DRIVE
PLEASANT HILL CA 94523
FOR: Fit Coalition
Email: bill@fitcoalition.com
Status: PARTY

TED KO ASSOCIATE EXECUTIVE DIRECTOR
FIT COALITION
1640 WALLER ST
SAN FRANCISCO CA 94117
FOR: Fit Coalition
Email: ted@fitcoalition.com
Status: PARTY

BARRY H. EPSTEIN
FITZGERALD,ABBOTT & BEARDSLEY, LLP
1221 BROADWAY, 21ST FLR
OAKLAND CA 94612
FOR: FITZGERLAND, ABBOTT & BEARDSLEY, LLP
Email: bepstein@fablaw.com
Status: INFORMATION

JANINE L. SCANCARELLI ATTORNEY
FOLGER, LEVIN & KAHN, LLP
275 BATTERY ST, 23RD FLR
SAN FRANCISCO CA 94111
Email: jscancarelli@flk.com
Status: INFORMATION

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH FL 33408
Email: garson_knapp@fpl.com
Status: PARTY

STANDISH O'GRADY
FRIENDS OF KIRKWOOD ASSOCIATION
31 PARKER AVE
SAN FRANCISCO CA 94118
Email: sho@ogrady.us
Status: INFORMATION

JAMES L. BYARD PH.D.
206 SACRAMENTO ST, STE 206
NEVADA CITY CA 95959
Email: DocToxics@aol.com
Status: INFORMATION

DOCKET COORDINATOR
5727 KEITH ST.
OAKLAND CA 94618
Email: cpucdockets@keyesandfox.com
Status: INFORMATION

TERRY FARRELLY
269 G AVE
CORONADO CA 92118
Email: farrellytc@earthlink.net
Status: INFORMATION

TODD JAFFE ENERGY BUSINESS BROKERS AND CONSULTANTS
3420 KEYSER ROAD
BALTIMORE MD 21208
Email: tjaffe@energybusinessconsultants.com
Status: INFORMATION

DOUGLAS MCPHERSON
130 W. UNION ST
PASADENA CA 91103
Email: Douglas@Idealab.com
Status: INFORMATION

PETER MORITZBURKE
3 ECHO AVE
CORTE MADERA CA 92925
Email: pfmoritzburke@gmail.com
Status: INFORMATION

DAVID MORSE
1411 W, COVELL BLVD., STE 106-292
DAVIS CA 95616-5934
Email: demorse@omsoft.com
Status: INFORMATION

JASON PAYNE
5450 MAYME AVE 23
SAN JOSE CA 95129
Email: jrobertpayne@gmail.com
Status: INFORMATION

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO CA 94304-2016
Email: rwalther@pacbell.net
Status: INFORMATION

KEITH WHITE
312 KELLER ST
PETALUMA CA 94952
Email: keithwhite@earthlink.net
Status: INFORMATION

MARCIE MILNER
4445 EASTGATE MALL, STE 100
SAN DIEGO CA 92121
Email: marcie.milner@shell.com
Status: PARTY

JEFF COX
FUELCELL ENERGY
1557 MANDEVILLE PLACE
ESCONDIDO CA 92029
Email: Jcox@fce.com
Status: INFORMATION

ROBERT T. BOYD
GE WIND ENERGY
6130 STONERIDGE MAIL ROAD, STE 300B
PLEASANTON CA 94588-3287
FOR: GE WIND ENERGY
Email: robert.boyd@ps.ge.com
Status: INFORMATION

RENEE H. GUILD CEO
GLOBAL ENERGY MARKETS
2481 PORTERFIELD COURT
MOUNTAIN VIEW CA 94040
Email: renee@gem-corp.com
Status: INFORMATION

RICH LAUCKHART
GLOBAL ENERGY
SUITE 200
2379 GATEWAY OAKS DR.
SACRAMENTO CA 95833
Status: INFORMATION

KEITH SWITZER VP REGULATORY AFFAIRS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773-9016
Email: kswitzer@gswater.com
Status: INFORMATION

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD
SAN DIMAS CA 91773
Email: rkmoore@gswater.com
Status: PARTY

DENNIS W. DE CUIR ATTY AT LAW
A LAW CORPORATION
2999 DOUGLAS BLVD., STE 325
ROSEVILLE CA 95661
FOR: Golden State Water Company
Email: dennis@ddecuir.com
Status: INFORMATION

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., STE 402
BERKELEY CA 94704
FOR: Green Power Institute
Email: gmorris@emf.net
Status: PARTY

EMILIO E. VARANINI, III
GREENBERG TRAURIG, LLP
1201 K ST, STE 1100
SACRAMENTO CA 95814
Email: varaninie@gtlaw.com
Status: INFORMATION

CRAIG LEWIS VP OF GOV. RELATIONS
GREENVOLTS
50 FIRST ST, STE 507
SAN FRANCISCO CA 94105
FOR: GreenVolts
Email: craig.lewis@greenvolts.com
Status: INFORMATION

RICHARD W. RAUSHENBUSH GENERAL COUNSEL
GREENVOLTS, INC.
50 1ST ST, STE 507
SAN FRANCISCO CA 94105
FOR: GreenVolts, Inc.
Email: general.counsel@greenvolts.com
Status: PARTY

WILL PLAXICO
HELIOS ENERGY, LLC
31897 DEL OBISPO ST. STE 270
SAN JUAN CAPISTRANO CA 92675-3243
Email: wplaxico@heliosenergy.us
Status: PARTY

CARRIE DOWNEY
LAW OFFICES OF CARRIE ANNE DOWNEY
1313 YNEZ PLACE
CORONADO CA 92118
FOR: Imperial Irrigation District
Email: cadowney@cadowneylaw.com
Status: PARTY

AMBER RIESENHUBER ENERGY ANALYST
INDEPENDENT ENERGY PRODUCERS ASSOC.
1215 K ST, STE 900
SACRAMENTO CA 95814
Email: amber@iepa.com
Status: INFORMATION

STEVEN KELLY POLICY DIRECTOR
INDEPENDENT ENERGY PRODUCERS
1215 K ST, STE 900
SACRAMENTO CA 95814
FOR: INDEPENDENT ENERGY PRODUCERS ASSN
Email: steven@iepa.com
Status: INFORMATION

BRIAN T. CRAGG ATTORNEY
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Independent Energy Producers Association (IEPA)/Caithness Corporation
Email: bcragg@goodinmacbride.com
Status: PARTY

INFINIA CORPORATION
6811 WEST OKANOGAN PLACE
KENNEWICK WA 99336
Email: dtownley@infiniacorp.com
Status: INFORMATION

DAN GEIS
THE DOLPHIN GROUP
925 L ST, STE 800
SACRAMENTO CA 95814
FOR: Inland Empire Utilities Agency
Email: dgeis@dolphingroup.org
Status: PARTY

MICHAEL J. GILMORE
INLAND ENERGY
SOUTH TOWER SUITE 606
3501 JAMBOREE RD
NEWPORT BEACH CA 92660
Email: michaelgilmore@inlandenergy.com
Status: INFORMATION

ALEX KANG
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND CA 94607
Email: alex.kang@itron.com
Status: INFORMATION

JEFF HIRSCH
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO CA 93012-9243
Email: Jeff.Hirsch@DOE2.com
Status: INFORMATION

NELLIE TONG SENIOR ANALYST
KEMA, INC.
492 NINTH ST, STE 220
OAKLAND CA 94607
Email: nellie.tong@us.kema.com
Status: INFORMATION

KEVIN FOX
KEYES & FOX LLP
5727 KEITH AVE
OAKLAND CA 94618
Email: kfox@keyesandfox.com
Status: INFORMATION

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ CA 95062
FOR: L. Jan Reid
Email: janreid@coastecon.com
Status: PARTY

TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND ST
VANCOUVER WA 98683
Email: castille@landsenergy.com
Status: INFORMATION

BRIAN S. BIERING
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Large-Scale Solar Association
Email: bsb@eslawfirm.com
Status: INFORMATION

CHRISTINE HENNING
LARGE-SCALE SOLAR ASSOCIATION
3572 HUNTSMAN DRIVE
SACRAMENTO CA 95826
FOR: Large-Scale Solar Association
Email: Christine@consciousventuresgroup.com
Status: PARTY

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
EMAIL ONLY
EMAIL ONLY CA 0
Email: elvine@lbl.gov
Status: INFORMATION

ROBERT J. GILLESKIE
LIGHTPOINT CONSULTING SERVICES
2570 PINEWOOD ST
DEL MAR CA 92014
Email: rjgilleskie@san.rr.com
Status: INFORMATION

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVE
CORTE MADERA CA 94925
Email: lynn@lmaconsulting.com
Status: INFORMATION

PATRICK STONER PROGRAM DIRECTOR
LOCAL GOVERNMENT COMMISSION
1303 J ST, STE 250
SACRAMENTO CA 95814
Email: pstoner@lgc.org
Status: INFORMATION

PAUL FENN
LOCAL POWER
35 GROVE ST
SAN FRANCISCO CA 94102
Email: paulfenn@local.org
Status: INFORMATION

KELLY CAUVEL
BUILD-LACCD
915 WILSHIRE BLVD
LOS ANGELES CA 90017
FOR: Los Angeles Community College District
Email: kelly.cauvel@build-laccd.org
Status: PARTY

LARRY EISENBERG EXEC. DIR.-FACILITIES PLANNING
LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 WILSHIRE BLVD
LOS ANGELES CA 90017
FOR: Los Angeles Community College District
Email: eisenblh@email.laccd.edu
Status: PARTY

CAMILLE A. GOULET GENERAL COUNSEL
LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 WILSHIRE BLVD
LOS ANGELES CA 90017
FOR: Los Angeles Community College District
Email: GouletCA@email.laccd.edu
Status: PARTY

MARLA DICKERSON
LOS ANGELES TIMES
BUSINESS EDITORIAL, 3RD FLOOR
202 W. FIRST ST.
LOS ANGELES CA 90012
Email: Marla.Dickerson@latimes.com
Status: INFORMATION

JOE GORBERG
LS POWER
1700 BROADWAY 35TH FLR
NEW YORK NY 10019
Email: jgorberg@lspower.com
Status: INFORMATION

CYNTHIA WOOTEN
LUMENX CONSULTING, INC.
1126 DELAWARE ST
BERKELEY CA 94702
Email: cwooten@lumenxconsulting.com
Status: INFORMATION

LEONARD LEICHNITZ
LUMOS POWER LP
1280 BISON B9-37
NEWPORT BEACH CA 92660
Email: leichnitz@lumospower.com
Status: INFORMATION

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

JACK MCNAMARA ATTORNEY
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS CA 91376-1380
Email: jackmack@suesec.com
Status: INFORMATION

RANDALL W. KEEN ATTORNEY
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES CA 90064
FOR: MANATT PHELPS & PHILLIPS, LLP
Email: rkeen@manatt.com
Status: PARTY

DAVID L. HUARD ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, STE 2900
SAN FRANCISCO CA 94111-3736
FOR: MANATT, PHELPS & PHILLIPS, LLP
Email: dhuard@manatt.com
Status: PARTY

TIM ROSENFELD
MARIN ENERGY MANAGEMENT TEAM
131 CAMINO ALTO, STE D
MILL VALLEY CA 94941
Email: tim@marinemt.org
Status: INFORMATION

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND ST
DAVENPORT IA 52801
Email: cswoollums@midamerican.com
Status: INFORMATION

SEAN P. BEATTY SR. MGR. EXTERNAL & REGULATORY AFFAIRS
MIRANT CALIFORNIA, LLC
696 WEST 10TH ST., PO BOX 192
PITTSBURG CA 94565
Email: sean.beatty@mirant.com
Status: INFORMATION

JOY A. WARREN REGULATORY ADMINISTRATOR
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: joyw@mid.org
Status: INFORMATION

NICK ALLEN
MORGAN STANLEY RESEARCH
555 CALIFORNIA ST STE 2200 21ST FLR
SAN FRANCISCO CA 94104
Email: Nick.Allen@morganstanley.com
Status: INFORMATION

SEAN HAZLETT
MORGAN STANLEY
555 CALIFORNIA ST., STE 2200
SAN FRANCISCO CA 94104
Status: INFORMATION

PETER W. HANSCHEN ATTORNEY
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, STE 450
WALNUT CREEK CA 94596
Email: phanschen@mofo.com
Status: INFORMATION

MOUNTAIN UTILITIES
PO BOX 1
KIRKWOOD CA 95646
Status: PARTY

DAN L. CARROLL ATTORNEY
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLR
SACRAMENTO CA 95814
FOR: Mountain Utilities
Email: dcarroll@downeybrand.com
Status: PARTY

JOHN DUTCHER VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD CA 94534-7875
FOR: MOUNTAIN UTILITIES
Email: ralf1241a@cs.com
Status: PARTY

MRW & ASSOCIATES, INC.
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

PAUL D. MAXWELL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
Email: pmaxwell@navigantconsulting.com
Status: INFORMATION

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
Email: cpucrulings@navigantconsulting.com
Status: INFORMATION

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
Email: kdusel@navigantconsulting.com
Status: PARTY

DIANE I. FELLMAN
NEXTERA ENERGY RESOURCES, LLC.
234 VAN NESS AVE
SAN FRANCISCO CA 94102
Email: Diane.Fellman@nexteraenergy.com
Status: INFORMATION

HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE CA 93501
FOR: OAK CREEK ENERGY SYSTEMS, INC.
Email: hal@rwitz.net
Status: INFORMATION

EVELYN KAHL ATTORNEY
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94015
FOR: Occidental Power Services, Inc./First Solar, Inc., Energy Producers and Users Coalition.
Email: ek@a-klaw.com
Status: PARTY

JONATHAN JACOBS
PA CONSULTING GROUP
1700 LINCOLN ST STE 4600
DENVER CO 80203-4509
Email: jon.jacobs@paconsulting.com
Status: INFORMATION

DAVID OLIVER
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
Email: david.oliver@navigantconsulting.com
Status: INFORMATION

KENNY SWAIN
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
Email: kenneth.swain@navigantconsulting.com
Status: INFORMATION

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
FOR: NAVIGANT CONSULTING, INC.
Email: lpark@navigantconsulting.com
Status: INFORMATION

KERRY HATTEVIK DIRECTOR OF REG. AND MARKET AFFAIRS
NRG ENERGY
829 ARLINGTON BLVD.
EL CERRITO CA 94530
Email: kerry.hattevik@nrgenergy.com
Status: INFORMATION

ELIZABETH WRIGHT
OCCIDENTAL POWER SERVICES, INC.
111 WEST OCEAN BLVD
LONG BEACH CA 90802
Email: ej_wright@oxy.com
Status: PARTY

KEN ALEX
OFFICE OF THE ATTORNEY GENERAL
PO BOX 70550
OAKLAND CA 94612-0550
Email: ken.alex@doj.ca.gov
Status: INFORMATION

JORDAN WHITE SENIOR ATTORNEY
PACIFICORP
825 NE MULTNOMAH ST, STE 1800
PORTLAND OR 97232
FOR: PacifiCorp
Email: jordan.white@pacificorp.com
Status: PARTY

KYLE DAVIS DIR., ENVIRONMENTAL POLICY & STRATEGY
PACIFICORP
825 NE MULNOMAH, STE 2000
PORTLAND OR 97232
Email: kyle.l.davis@pacificorp.com
Status: INFORMATION

MARK TUCKER
PACIFICORP
825 NE MULTNOMAH, STE 2000
PORTLAND OR 97232
Email: californiadockets@pacificorp.com
Status: INFORMATION

TASHIANA WANGLER
PACIFICORP
825 NE MULTNOMAH SREET, STE 2000
PORTLAND OR 97232
Email: Tashiana.Wangler@PacifiCorp.com
Status: INFORMATION

BROOKE REILLY
PG & E
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: bari@pge.com
Status: INFORMATION

GARRETT HERING
PHOTON INTERNATIONAL
55 NEW MONTGOMERY, STE 204-205
SAN FRANCISCO CA 94105
Email: garrett.hering@photon-international.com
Status: INFORMATION

REID WINTHROP
PILOT POWER GROUP, INC.
8910 UNIVERSITY CENTER LANE, STE 520
SAN DIEGO CA 92122
Email: rwinthrop@pilotpowergroup.com
Status: PARTY

THOMAS R. DARTON
PILOT POWER SERVICES, INC.
8910 UNIVERSITY CENTER LANE, STE 520
SAN DIEGO CA 92122
FOR: Pilot Power Group, Inc.
Email: tdarton@pilotpowergroup.com
Status: PARTY

JESSICA NELSON ENERGY SERVICES MANAGER
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA CA 96122-7064
Email: jnelson@psrec.coop
Status: PARTY

CARL PECHMAN
POWER ECONOMICS
901 CENTER ST
SANTA CRUZ CA 95060
Email: cpechman@powereconomics.com
Status: INFORMATION

RICK C. NOGER
PRAXAIR, INC.
2430 CAMINO RAMON DRIVE, STE. 300
SAN RAMON CA 94583
Email: rick_noger@praxair.com
Status: PARTY

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA CA 90401
Email: harveyederpspc@hotmail.com
Status: INFORMATION

GEOFF TEIGEN
RCM INTERNATIONAL, LLC
PO BOX 4716
BERKELEY CA 94704
Email: gteigen@rcmdigesters.com
Status: INFORMATION

JIM HOWELL
RECURRENT ENERGY
300 CALIFORNIA ST., 8TH FLR
SAN FRANCISCO CA 94104
Email: jim.howell@recurrentenergy.com
Status: INFORMATION

HANS ISERN
RECURRENT ENERGY
1700 MONTGOMERY, STE 251
SAN FRANCISCO CA 94111
Email: hans@recurrentenergy.com
Status: INFORMATION

ARNO HARRIS
RECURRENT ENERGY, INC.
1700 MONTGOMERY ST., STE 251
SAN FRANCISCO CA 94111
Email: arno@recurrentenergy.com
Status: PARTY

JOHN NIMMONS PRESIDENT
JOHN NIMMONS & ASSOCIATES, INC.
175 ELINOR AVE., STE G
MILL VALLEY CA 94941
FOR: Recurrent Energy
Email: jna@speakeasy.org
Status: INFORMATION

TOM FAUST
REDWOOD RENEWABLES LLC
6 ENDEAVOR DRIVE
CORTE MADERA CA 94925
Email: tfaust@redwoodrenewables.com
Status: INFORMATION

DEREK DENNISTON DIRECTOR
RENEWABLE ENERGY MARKETS
101 CALIFORNIA ST, STE 2750
SAN FRANCISCO CA 94111-5802
Email: derek@evomarkets.com
Status: INFORMATION

JASON ABIECUNAS BLACK & BEATCH GLOBAL RENEWABLE ENERGY
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK KS 66211
FOR: RENEWABLE ENERGY CONSULTANT
Email: abiecunasjp@bv.com
Status: INFORMATION

ART RIVERA
RENEWABLE TECHCOM
10243 ELLENWOOD AVE
SACRAMENTO CA 95827
Email: artrivera@comcast.net
Status: INFORMATION

TOBIN RICHARDSON
RICHARDSON GROUP
1416 VIGO COURT
DAVIS CA 95618
Email: tobinjmr@sbcglobal.net
Status: INFORMATION

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVE
RIDGEWOOD NJ 7450
FOR: RIDGEWOOD POWER MANAGEMENT, LLC
Email: dgulino@ridgewoodpower.com
Status: PARTY

WILLIAM H. BOOTH ATTORNEY
LAW OFFICE OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA CA 94596
FOR: Ridgewood Renewable Power, LLC and Ridgewood Olinda, LLC
Email: wbooth@booth-law.com
Status: PARTY

TRENT A. CARLSON
RRI ENERGY, INC.
1000 MAIN ST
HOUSTON TX 77001
Email: tcarlson@rrienergy.com
Status: INFORMATION

MICHAEL DEANGELIS
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST
SACRAMENTO CA 95817-1899
FOR: SACRAMENTO MUNICIPAL UTILITY DISTRICT
Email: mdeange@smud.org
Status: INFORMATION

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST MS 75
SACRAMENTO CA 95817
FOR: SACRAMENTO MUNICIPAL UTILITY DISTRICT
Email: rroth@smud.org
Status: INFORMATION

WILLIAM W. WESTERFIELD III SR. ATTORNEY
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST, M.S. B406, PO BOX 15830
SACRAMENTO CA 95852-1830
FOR: SACRAMENTO MUNICIPAL UTILITY DISTRICT
Email: wwester@smud.org
Status: INFORMATION

TIMOTHY N. TUTT
SACRAMENTO MUNICIPAL UTILITIES DISTRICT
6201 S. ST, M.S. B404
SACRAMENTO CA 95817-1899
Email: ttutt@smud.org
Status: INFORMATION

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S ST, MS A204
SACRAMENTO CA 95817-1899
Email: vwood@smud.org
Status: INFORMATION

RASHA PRINCE REGULATORY MANAGER
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH ST, GT14D6
LOS ANGELES CA 90013
FOR: San Diego Gas & Electric
Email: rprince@semprautilities.com
Status: PARTY

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO CA 92123
FOR: SAN DIEGO GAS & ELELCTRIC
Email: CentralFiles@semprautilities.com
Status: INFORMATION

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO CA 92123-1530
Email: dniehaus@semprautilities.com
Status: INFORMATION

MICHAEL A. HYAMS POWER ENTERPRISE-REGULATORY AFFAIRS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4TH FLR
SAN FRANCISCO CA 94103
Email: mhyams@sfwater.org
Status: INFORMATION

SANDRA ROVETTI REGULATORY AFFAIRS MANAGER
SAN FRANCISCO PUC
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
Email: srovetti@sfwater.org
Status: INFORMATION

DAVID ORTH GENERAL MANAGER
SAN JOAQUIN VALLEY POWER AUTHORITY
4886 EAST JENSEN AVE
FRESNO CA 93725
FOR: SAN JOAQUIN VALLEY POWER AUTHORITY/KING'S RIVER CONSERVATION DISTRICT
Email: dorth@krcd.org
Status: PARTY

KIM F. HASSAN ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST, HQ-12
SAN DIEGO CA 92101
FOR: San Diego Gas & Electric
Email: khassan@sempra.com
Status: PARTY

JENNIFER WRIGHT CALIFORNIA REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK CT
SAN DIEGO CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY
Email: jwright@semprautilities.com
Status: INFORMATION

HANNON RASOOL
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK CT.
SAN DIEGO CA 92123
Email: hrasool@semprautilities.com
Status: INFORMATION

AIMEE M. SMITH ATTORNEY
SEMPRA ENERGY
101 ASH ST, HQ12
SAN DIEGO CA 92101
FOR: San Diego Gas and Electric Co.
Email: amsmith@sempra.com
Status: PARTY

MANUEL RAMIREZ
SAN FRANCISCO PUC
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
Email: mramirez@sfwater.org
Status: INFORMATION

THERESA BURKE REGULATORY AFFAIRS ANALYST
SAN FRANCISCO PUC
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
FOR: San Francisco Public Utilities Commission
Email: tburke@sfwater.org
Status: INFORMATION

THOMAS J. VICTORINE
SAN JOSE WATER COMPANY
1221 S. BASCOM AVE
SAN JOSE CA 95128
Email: tom_victorine@sjwater.com
Status: INFORMATION

BILLY BLATTNER MANAGER REGULATORY RELATIONS
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVE, STE 2060
SAN FRANCISCO CA 94102
FOR: SDG&E/SoCal Gas
Email: wblattner@semprautilities.com
Status: INFORMATION

THOMAS P. CORR
SEMPRA ENERGY GLOBAL ENTERPRISES
101 ASH ST, HQ16C
SAN DIEGO CA 92101
Email: tcorr@sempra.com
Status: INFORMATION

SEMPRA ENERGY SOLUTIONS
101 ASH ST, HQ09
SAN DIEGO CA 92101-3017
Email: email@semprasolutions.com
Status: PARTY

THEODORE E. ROBERTS SENIOR REGULATORY COUNSEL
SEMPRA GENERATION / SEMPRA BROADBAND
101 ASH ST, HQ 12B
SAN DIEGO CA 92101-3017
FOR: Sempra Energy Solutions
Email: troberts@sempra.com
Status: PARTY

CURTIS KEBLER DIRECTOR-ORIGINATION
SEMPRA GENERATION
101 ASH ST, HQ14D
SAN DIEGO CA 92101
Email: ckebler@SempraGeneration.com
Status: INFORMATION

YVONNE GROSS
SEMPRA GLOBAL
101 ASH ST, HQ08C
SAN DIEGO CA 92101
Email: ygross@sempraglobal.com
Status: INFORMATION

JOHN W. LESLIE ATTORNEY
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, STE 200
SAN DIEGO CA 92130-2592
FOR: Shell Energy North America (US), L.P.
Email: jleslie@luce.com
Status: PARTY

JIM METROPULOS
SIERRA CLUB CALIFORNIA
801 K ST, STE 2700
SACRAMENTO CA 95814
FOR: Sierra Club California
Email: jim.metropulos@sierraclub.org
Status: PARTY

RICK A. LIND
SIERRA ECOSYSTEM ASSOCIATES
PO BOX 2260
PLACERVILLE CA 95667
Email: rick@sierraecos.com
Status: INFORMATION

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO NV 89520-0024
Email: tdillard@sppc.com
Status: INFORMATION

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89520
Email: emello@sppc.com
Status: INFORMATION

JEDEDIAH J. GIBSON ATTORNEY
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Sierra Pacific Power Company
Email: jjg@eslawfirm.com
Status: INFORMATION

ANDREW B. BROWN ATTORNEY
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Sierra Pacific Power Company/Constellation New Energy, Inc.
Email: abb@eslawfirm.com
Status: PARTY

MICHAEL E. CARBOY MANAGING DIRECTOR-EQUITY RESEARCH
SIGNAL HILL CAPITAL LLC
343 SANSOME ST, STE 950
SAN FRANCISCO CA 94104
Email: mcarboy@signalhill.com
Status: INFORMATION

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
FOR: Silicon Valley Manufacturers Group
Email: johnrredding@earthlink.net
Status: PARTY

JEANNE B. ARMSTRONG ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Solar Alliance
Email: jarmstrong@goodinmacbride.com
Status: PARTY

KARLY MCCRORY
SOLAR DEVELOPMENT INC.
5420 DOUGLAS BLVD. STE. F
GRANITE BAY CA 95746-6253
Email: karly@solardevelop.com
Status: INFORMATION

RHONE RESCH
SOLAR ENERGY INDUSTRIES ASSOCIATION
805 FIFTEENTH ST, NW, STE 510
WASHINGTON DC 20005
Email: rresch@seia.org
Status: PARTY

ERIC CHERNISS
SOLARGEN ENERGY
20400 STEVENS CREEK BLVD, STE 700
CUPERTINO CA 95014
Email: eric.cherniss@gmail.com
Status: INFORMATION

MARY C. HOFFMAN
SOLUTIONS FOR UTILITIES, INC.
1192 SUNSET DRIVE
VISTA CA 92081
FOR: Solutions for Utilities, Inc.
Email: mary@solutionsforutilities.com
Status: PARTY

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: gary.allen@sce.com
Status: INFORMATION

SOCAL WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773
Email: kswitzer@gswater.com
Status: PARTY

SARA BIRMINGHAM DIRECTOR, WESTERN POLICY
SOLAR ALLIANCE
646 19TH AVE
SAN FRANCISCO CA 94121
Email: sara@solaralliance.org
Status: INFORMATION

FREEMAN S. HALL
SOLAR ELECTRIC SOLUTIONS, LLC
5353 TOPANGA CANYON BLVD, STE 300
WOODLAND HILLS CA 91364
FOR: Solar Electric Solutions, LLC
Email: fhall@solarelectricsolutions.com
Status: INFORMATION

RACHEL MCMAHON DIRECTOR, GOV. AFFAIRS-PROJECT DEV.
SOLAR MILLENNIUM, LLC
1625 SHATTUCK AVE, STE 270
BERKELEY CA 94709-1161
Email: mcmahon@solarmillennium.com
Status: INFORMATION

DAVID SAUL
PACIFIC SOLAR & POWER CORPORATION
2850 W. HORIZON RIDGE PKWY, STE 200
HENDERSON NV 89052
FOR: SOLEL, INC.
Email: dsaul@pacificsolar.net
Status: PARTY

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
FOR: South San Joaquin Valley/Kings River Conservation District
Email: jdalessi@navigantconsulting.com
Status: PARTY

GEORGE WILTSEE
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: george.wiltsee@sce.com
Status: INFORMATION

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES CA 90013
Email: HYao@SempraUtilities.com
Status: INFORMATION

WILLIAM V. WALSH ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
FOR: Southern California Edison
Email: william.v.walsh@sce.com
Status: PARTY

JONI A. TEMPLETON
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE, PO BOX 800
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: Joni.Templeton@sce.com
Status: INFORMATION

MICHAEL D. MONTOYA ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE, PO BOX 800
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: mike.montoya@sce.com
Status: PARTY

TODD EDMISTER ATTORNEY
BINGHAM MCCUTCHEN
THREE EMBARCADERO CENTER
SAN FRANCISCO CA 94111
FOR: Stirling Energy Systems, Inc. (SES)
Email: todd.edmister@bingham.com
Status: PARTY

SETH D. HILTON
STOEL RIVES, LLP
555 MONTGOMERY ST., STE 1288
SAN FRANCISCO CA 94111
Email: sdhilton@stoel.com
Status: INFORMATION

JENNIFER CHAMBERLIN MGR. OF REG. AND GOV. AFFAIRS
DIRECT ENERGY
2633 WELLINGTON CT
CLYDE CA 94520
FOR: Strategic Energy
Email: jennifer.chamberlin@directenergy.com
Status: PARTY

BRUCE FOSTER SENIOR VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVE, STE. 2040
SAN FRANCISCO CA 94102
Email: bruce.foster@sce.com
Status: PARTY

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY
Email: case.admin@sce.com
Status: INFORMATION

CATHY A. KARLSTAD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: cathy.karlstad@sce.com
Status: PARTY

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 S FLOWER ST., STE 1500
LOS ANGELES CA 90071-2916
FOR: Southern California Generation Coalition
Email: npedersen@hanmor.com
Status: PARTY

SEAN GALLAGHER VP, MARKET STRATEGY & REG. AFFAIRS
STIRLING ENERGY SYSTEMS
2600 10TH ST, STE 635
BERKELEY CA 94710
Email: sgallagher@stirlingenergy.com
Status: INFORMATION

JANICE LIN MANAGING PARTNER
STRATEGEN CONSULTING LLC
EMAIL ONLY
EMAIL ONLY CA 0
Email: janice@strategenconsulting.com
Status: INFORMATION

ELIZABETH BAKER
SUMMIT BLUE CONSULTING
1722 14TH ST, STE 230
BOULDER CO 80304
Email: bbaker@summitblue.com
Status: INFORMATION

JENNIFER BARNES
SUMMIT BLUE CONSULTING, LLC
2920 CAMINO DIABLO, STE 210
WALNUT CREEK CA 94597
Email: jbarnes@summitblue.com
Status: INFORMATION

ED SMELOFF SENIOR MANAGER
SUNPOWER CORPORATION
1414 HARBOUR WAY SOUTH
RICHMOND CA 94804
Email: ed.smeloff@sunpowercorp.com
Status: INFORMATION

JODY LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
FOR: Sustainable Conservation and RCM International
Email: jody_london_consulting@earthlink.net
Status: PARTY

NICK CHASET
TESSERA SOLAR NORTH AMERICA
4800 NORTH SCOTTDALE RD., STE 5500
SCOTTSDALE AZ 85251
Email: nick.chaset@tesserasolar.com
Status: INFORMATION

R. THOMAS BEACH PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
FOR: THE CALIFORNIA COGENERATION COUNCIL/Solar Alliance
Email: tomb@crossborderenergy.com
Status: PARTY

CLYDE MURLEY
CONSULTANT TO NRDC
1031 ORDWAY ST
ALBANY CA 94706
FOR: The Community College league of California
Email: clyde.murley@comcast.net
Status: PARTY

STEPHANIE CHEN LEGAL FELLOW
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE, 2ND FLR
BERKELEY CA 94704
Email: stephaniec@greenlining.org
Status: INFORMATION

TIMEA ZENTAI
SUMMIT BLUE CONSULTING, LLC
2920 CAMINO DIABLO, STE 210
WALNUT CREEK CA 94597
Email: tzentai@summitblue.com
Status: INFORMATION

POLLY SHAW
SUNTECH AMERICA, INC.
71 STEVENSON ST, 10TH FLR
SAN FRANCISCO CA 94105
FOR: Suntech America, Inc.
Email: pshaw@suntechamerica.com
Status: INFORMATION

JOE GRECO
TERRA-GEN POWER LLC
9590 PROTOTYPE COURT, STE 200
RENO NV 89521
Email: jgreco@terra-genpower.com
Status: INFORMATION

PHILLIP REESE
C/O REESE-CHAMBERS SYSTEMS CONSULTANTS,
PO BOX 8
3379 SOMIS ROAD
SOMIS CA 93066
FOR: The California Biomass Energy Alliance
Email: phil@reesechambers.com
Status: PARTY

CHERYL PONDS
OFFICE OF THE CITY ATTORNEY
276 FOURTH AVE
CHULA VISTA CA 91910
FOR: The City of Chula Vista
Email: cponds@ci.chula-vista.ca.us
Status: PARTY

ERIN GRIZARD
THE DEWEY SQUARE GROUP
921 11TH ST, 10TH FLR
SACRAMENTO CA 95814
Email: EGrizard@deweysquare.com
Status: INFORMATION

NINA SUETAKE ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
Email: nsuetake@turn.org
Status: INFORMATION

MATTHEW FREEDMAN ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
FOR: The Utility Reform Network
Email: matthew@turn.org
Status: PARTY

MARCEL HAWIGER ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
FOR: The Utility Reform Network
Email: marcel@turn.org
Status: PARTY

ADAM BROWNING
THE VOTE SOLAR INITIATIVE
300 BRANNAN ST, STE 609
SAN FRANCISCO CA 94107
FOR: The Vote Solar Initiative
Email: abrowning@votesolar.org
Status: PARTY

JP ROSS VP STRATEGOC RELATIONSHIPS
SUNGEVITY
1625 SHATTUCK AVE., STE 210
BERKELEY CA 94709
FOR: THE VOTE SOLAR INITIATIVE
Email: jpross@sungevity.com
Status: PARTY

MICHAEL DAY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE. 900
SAN FRANCISCO CA 94111
FOR: The Vote Solar Initiative and Recurrent Energy, Inc.
Email: mday@goodinmacbride.com
Status: PARTY

AMY FREES
THIRD PLANET WINDPOWER, LLC
940 SOUTHWOOD BLVD., STE 201
INCLINE VILLAGE NV 89451
Email: freesa@thirdplanetwind.com
Status: INFORMATION

LAURA WISLAND
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVE., STE 203
BERKELEY CA 94704
FOR: Union of Concerned Scientists
Email: lwisland@ucsusa.org
Status: PARTY

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA CA 94563
Email: andy.vanhorn@vhcenergy.com
Status: INFORMATION

ELAINE M. DUNCAN ATTORNEY
VERIZON CALIFORNIA INC.
711 VAN NESS AVE, STE 300
SAN FRANCISCO CA 94102
FOR: Verizon California, Inc.
Email: elaine.duncan@verizon.com
Status: PARTY

SHERIDAN J. PAUKER
WILSON SONSINI GOODRICH & ROSATI
SPEAR TOWER, SUITE 3300
ONE MARKET ST
SAN FRANCISCO CA 94105
Email: spauker@wsgr.com
Status: INFORMATION

THOMAS W. SOLOMON
WINSTON & STRAWN LLP
101 CALIFORNIA ST, 39TH FLR
SAN FRANCISCO CA 94111-5894
Email: tsolomon@winston.com
Status: INFORMATION

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX CA 94978-0548
FOR: Women's Energy Matters
Email: wem@igc.org
Status: INFORMATION