

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



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Order Instituting Rulemaking to Implement
Senate Bill No. 1488 (2004 Cal. Stats., Ch. 690
(Sept. 22, 2004)) relating to confidentiality of
information.

Rulemaking 05-06-040
(Filed June 30, 2005)

**JOINT OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY (U 39-E), SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E), AND SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) REGARDING PROPOSED DECISION
CLARIFYING THAT CERTAIN INFORMATION IS NOT MARKET
SENSITIVE IF RELEASED IN A SPECIFIED MANNER**

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Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (collectively, the “Joint Utilities”) submit these opening comments in response to Commissioner Grueneich’s Proposed Decision Clarifying that Certain Information Is Not Market Sensitive If Released in a Specified Manner (the “Proposed Decision”), filed November 13, 2009. The Proposed Decision errs in concluding that the California Public Utilities Commission’s (the “Commission”) past confidentiality decisions allow information about renewable power purchase agreements (“PPA”) under negotiation to be released in a way that shows the technology type, bus bar location, and contract capacity of each separate bid or bilateral offer. Such project-specific information is not “aggregated” and therefore remains market sensitive and confidential pursuant to Decision (“D.”) 06-06-066 and Public Utility Code Section 454.5(g). The Joint Utilities provide in these comments an alternative and practical methodology to aggregate bid and offer information so that the data would no longer be market sensitive. Second, the Proposed Decision

appears to single out investor-owned utility (“IOU”) data for publication, and should be corrected to make clear that it applies equally to all retail seller data, including energy service provider (“ESP”) data. Third, the Joint Utilities seek clarification regarding the source of information about the terms of bilateral PPAs under negotiation to ensure the use of the highest quality information for renewable planning efforts and to ensure that the confidentiality of Procurement Review Group (“PRG”) meetings is preserved. Finally, the Joint Utilities seek to correct an erroneous use of the term “market sensitive” in the Proposed Decision.

I. PROCEDURAL HISTORY

A. The Assigned Commissioner’s Ruling and the Draft Proposed Decision

On October 14, 2009, Commissioner Grueneich filed an Assigned Commissioner’s Ruling (the “Ruling”) in this proceeding. In response to a request by the Commission’s Energy Division Staff (“ED”), the Ruling provided a Draft Proposed Decision (the “Draft PD”) that would allow ED to disclose “the capacity, technology, and location of all short-listed Renewable Portfolio Standard projects from the [three IOUs’] 2003-2009 solicitations.”^{1/} The Draft PD would have further ordered that “[s]uch disclosure shall be in aggregate, and shall not identify the price, solicitation year or sponsoring utility.”^{2/}

PG&E filed comments on the Ruling on October 26, 2009 in which it stated that while it does not oppose ED’s request, the method of aggregation of the data should be more carefully defined and the proposed decision should address how the decision should be applied in future releases of similar information. PG&E emphasized that the detailed method of aggregation adopted should ensure that the information cannot be traced back to individual short-listed bids

^{1/} Draft PD at p. 8 (draft proposed Order).

^{2/} *Ibid.*

that may still be under negotiation. PG&E's comments discussed in detail how the requested data could be aggregated to be made public consistent with the Commission's confidentiality decisions, including recommended findings that would ensure that only aggregations of four or more individual bids would be released, that minimum geographic aggregation units would be used to ensure that the confidentiality of negotiations would be preserved, and that the total capacity under negotiation would be aggregated by basic types of renewable technologies.^{3/}

On October 30, 2009, SCE and SDG&E filed reply comments substantially supporting PG&E's opening comments. The Division of Ratepayer Advocates ("DRA") also filed reply comments that shared PG&E's concern that the release of information identifying specific projects under negotiation could lead to market manipulation or higher energy costs. DRA suggested that the Commission strike a balance by ensuring that information regarding specific projects under negotiation would not be disclosed.^{4/} DRA also suggested that the aggregated information to be released include bilateral contracts under negotiation.^{5/} DRA agreed with PG&E that the release of properly aggregated bid information may aid renewable planning efforts.^{6/}

B. The Proposed Decision

The Proposed Decision clarifies the methodology that ED proposes to use in releasing data, and does not adopt the methodology proposed by PG&E and supported by SDG&E and SCE. Based on the example provided in the Proposed Decision, the confidential information

^{3/} See PG&E's Opening Comments Regarding Proposed Determination that Certain Information Is Not Market Sensitive if Released in a Specified Manner, Attachment A, at p. 1.

^{4/} DRA Reply Comments on the Assigned Commissioner's Ruling Seeking Comment on Proposed Determination that Certain Information is not Market Sensitive if Released in a Specific Manner, at pp. 1-2.

^{5/} *Id.* at p. 3.

^{6/} *Id.* at pp. 2-3.

proposed to be released by ED is not in an aggregated form at all. As currently drafted, the Proposed Decision would allow the release of the information in a tabular format where each line would apparently represent an individual RPS solicitation bid or bilateral offer.^{7/} For each such contract, the technology type, contract capacity, bus bar location, and Competitive Renewable Energy Zone (“CREZ”) (or larger geographic area) would be identified.^{8/} The information released would include all “proposed renewable generation projects that have been short-listed in utility [Renewable Portfolio Standard (“RPS”)] solicitations between 2003 and 2009, or identified for bi-lateral negotiations for the same period.”^{9/} The Proposed Decision dismisses PG&E’s concern, shared by SCE, SDG&E, and DRA, that bid information released individually could lead to market manipulation and increased energy cost.^{10/} The Proposed Decision does limit its applicability to information derived from the 2003-2009 period, however, and expressly reserves any decision on the release of other RPS data.^{11/}

II. DISCUSSION

A. The Proposed Decision Errs in Finding that Its Proposed Methodology for Releasing Information Is Aggregation.

The Proposed Decision erroneously and repeatedly states that it is authorizing the release of appropriately “aggregated” RPS information.^{12/} The Proposed Decision correctly implies that so long as otherwise confidential data can be masked or aggregated in a way that removes its

^{7/} Proposed Decision at p. 6.

^{8/} *Id.*

^{9/} *Id.* at pp. 9-10 (Finding of Fact 2 and Conclusion of Law).

^{10/} *Id.* at p. 8.

^{11/} *Id.* at p. 2.

^{12/} *See, e.g.*, Proposed Decision at p. 10 (Ordering Paragraph) (“Such disclosure shall be in aggregate”); p. 9 (Finding of Fact 2) (“[RPS bid information] when released in aggregate . . . is not market sensitive.”).

market sensitivity, the information may be made public.^{13/} The methodology that the Proposed Decision adopts, however, is merely a compilation of information and is not an aggregation. An “aggregate” is “the total sum, quantity, or number of anything.”^{14/} Based on the form provided in the Proposed Decision, it appears that no data would be totaled or summed, but rather each contract under negotiation would be listed as a separate row in the table.^{15/} This approach is not only inconsistent with the Proposed Decision’s assertion that the data is to be aggregated, but is also inconsistent with the Confidentiality Matrix’s prior determination that only the “total number of projects [bid into a solicitation] and megawatts bid by resource type” should be made public.^{16/}

All parties commenting on the original Ruling, including DRA, stressed that the release of information should not identify specific projects under negotiation since that information could lead to market manipulation.^{17/} Nevertheless, the Proposed Decision appears to allow precisely this release of contract-specific information. The release of information in the manner proposed could lead to an increase in the cost of procured energy in a number of ways. First, if a developer in negotiations with a utility for sale of its power is able to determine that it is the only potential seller of energy in an area with a local need, that seller is likely to use such information to demand a higher price for its power. Requiring the release of contract-specific information by

^{13/} See D.06-06-066, as modified by 07-05-032, at p. 78 (Conclusion of Law 6).

^{14/} *Webster’s New Twentieth Century Dictionary of the English Language (Unabridged)* (1965), at p. 34 (emphasis added).

^{15/} Proposed Decision at p. 6.

^{16/} D.06-06-066, Appendix 1, at p. 18.

^{17/} DRA Reply Comments on the Ruling at pp. 1-2; PG&E Opening Comments on the Ruling at p. 3; SCE Reply Comments on the Ruling at pp. 1-2 (supporting PG&E’s comments); SDG&E Reply Comments on the Ruling at p. 1.

bus bar location could cultivate exactly this type of gaming. Although there may be rare exceptions, the bus bar location, as defined in the Transmission Expansion Planning Policy Committee (“TEPPC”) production simulation database, will generally be facility-specific, thereby revealing precisely the location of each generator under negotiation.^{18/}

Second, a developer could use individual contract information by bus bar location to game the interconnection process so that its generation facility benefits from transmission upgrades made by a facility in negotiation with an IOU for a PPA. If a developer has knowledge that a neighboring project is on an IOU shortlist, that developer could enter the California Independent System Operator (“CAISO”) queue as an “Energy Only” delivery project that pushes the requirements to finance such upgrades onto the short-listed facility.^{19/}

Third, as noted by PG&E in its opening comments on the Ruling, developers need to have strategic control over when and how their development plans are made public since this could have a direct impact on project cost and viability. A developer may negotiate a PPA with a utility prior to initiating the permitting process or site acquisition. In that case, the premature release of information that pinpoints the geographical location, the capacity, and the technology

^{18/} See Proposed Decision at p. 6 (indicating that in the data release, the “Bus ID” will correspond to the specific bus bar location, as defined by TEPPC, and noting that information about TEPPC may be found at <http://www.wecc.biz/Planning/TransmissionExpansion/Pages/default.aspx>).

^{19/} The CAISO requires projects to specify their requested deliverability status in the interconnection request that the generator submits to the CAISO. An “Energy Only” project will be subject to CAISO dispatch commands, meaning that when there is congestion on the transmission system, the generator will be dropped. Conversely, “Full Capacity” projects will not be subject to CAISO dispatch commands. Only “Full Capacity” projects qualify for utility Resource Adequacy (“RA”) requirements. Because of this restriction, the majority of utility counterparties must be “Full Capacity” projects. To determine the upgrades required to accommodate all generators in a study cluster, the Transmission Owners include all projects in the study cluster, regardless of whether they are “Full Capacity” or “Energy Only.” To determine the cost responsibility for network (or shared system) upgrades, however, the CAISO only studies those projects that are “Full Capacity,” since “Energy Only” projects can be dropped when there is congestion on the system. Under this system, the projects that are “Energy Only” could use the information they glean from the Commission’s proposed data release to strategically site their facilities near the bus bar for a short-listed “Full Capacity” project and essentially get a free ride at the expense of the utilities’ customers.

type of the facility could alert landowners to the increased demand for their land in the vicinity of the bus bar. Using this information, landowners may increase their selling or leasing prices, and these costs would be passed on to utility customers in the form of higher energy prices, unless the prices rise so high that an otherwise desirable power purchase becomes prohibitively expensive. Similarly, premature release of the location of facilities could foster local opposition against the siting of the facility before the developer has an opportunity to present its plans publicly and to meet with local regulators. Again, this could result in an otherwise desirable project becoming unviable politically and/or economically and increase the cost of energy by forcing the utilities to fill the lost procurement opportunity with more expensive bids.^{20/}

Disclosing the confidential information at issue in the manner detailed in the Proposed Decision has the “potential to materially affect the market price for electricity.”^{21/} As the Commission has acknowledged, it is required by law to ensure the confidentiality of such market sensitive information.^{22/} Accordingly, the Commission would err in adopting the Proposed Decision because it would release market sensitive information without sufficiently masking or otherwise aggregating it.

Potential market manipulation and increases in the cost of energy can be avoided by aggregating the 2003-2009 bids and bilateral offers in the manner originally suggested by PG&E in its comments on the Ruling. For each CREZ, ED could provide a single, aggregated number of megawatts or estimated gigawatt-hours for each of the three basic types of renewable

^{20/} The Joint Utilities are also concerned about the use of such aggregated information. Given that the data addressed in the Proposed Decision does not distinguish between new and existing generation, or between projects at varying stages, there is the potential that the information may be used for an apples-and-oranges comparison.

^{21/} D.06-06-066, as modified by D.07-05-032 at pp. 78-79 (Conclusion of Law 12).

^{22/} *Id.* at p. 80 (Conclusion of Law 24).

technologies (*i.e.*, as-available/peaking, as-available/non-peaking, baseload). Each aggregated number would include all short-listed bids for the three IOUs in the 2003-2009 solicitations and any bilateral offer information included in the Project Development Status Reports or other data submitted by retail sellers in their RPS Semi-Annual Compliance Reports. However, in no case should ED be able to disclose any capacity number for a specific technology type and/or CREZ where the number would represent the aggregated capacity of less than three short-listed bids. Allowing only two bids to be aggregated increases the risk that sophisticated parties could derive market sensitive information from the aggregated data. Additionally, the following types of projects should be separately aggregated (if sufficient numbers of projects exist in each category): (1) all out-of-state generation; (2) all distributed, in-state generation not within a CREZ; and (3) all utility-scale, in-state generation not within a CREZ.

This method of aggregation would facilitate the use of the data in the Renewable Energy Transmission Initiative (“RETI”), the 33% RPS Implementation Analysis^{23/}, and the CAISO’s renewable transmission planning processes since these all build upon the CREZ concept. Accordingly, this method would meet ED’s desire to “support ongoing renewable generation, transmission and integration planning efforts.”^{24/}

In sum, the Proposed Decision does not aggregate the market sensitive information it intends to release and therefore errs in concluding that it is consistent with past confidentiality decisions and state law. The Commission’s goals can be met by appropriately aggregating the bid and offer information as outlined above and in the proposed findings, conclusion, and order

^{23/} For example, the 33% RPS Reference Case Timeline Overview, prepared as part of the Commission’s 33% RPS Implementation Analysis, lists anticipated generation projects in a 33% RPS Reference Case by CREZ at Table 7, p. 23 (ED and Aspen, July 2009) (available at www.cpuc.ca.gov/NR/rdonlyres/A852C58D-F7DC-4719-8D08-FC90D3003308/0/TimelinesWhitePaper.pdf).

^{24/} Ruling at p. 1.

included as Attachment A to this pleading.

B. The Proposed Decision Should Apply Equally to All Retail Sellers

The Proposed Decision's treatment of information should be applied uniformly to all retail sellers subject to the RPS statute, including all ESPs. To single out the IOUs would run afoul of Public Utilities Code Sections 380 and 399.12, which mandate the non-discriminatory application of the State's RPS requirements. Accordingly, the Proposed Decision's finding that certain RPS-related information is not "market sensitive" should apply equally to such information generated by both IOUs and ESPs, consistent with D.06-06-066.

C. The Proposed Decision Should Specify the Source of Bilateral Contract Information to Be Released.

In addition to bid information from RPS solicitations, the Proposed Decision also concludes that the release of "the capacity, location by bus bar and zone, and technology type of proposed renewable generation projects . . . identified for bi-lateral negotiations for [2003-2009]" is not market sensitive.^{25/} Such information would be aggregated with the short-list bids for release and would include "contracts from bi-lateral negotiations, as well as all other . . . bi-lateral negotiations that Energy Division staff is aware of."^{26/}

While the Joint Utilities generally agree that the data released for use in renewable planning efforts should be as comprehensive as possible, it is important that the information be accurate, up-to-date, and of a like quality with the data resulting from solicitations. When a bilateral negotiation reaches the point at which execution appears likely and the terms are as stable as solicitation bids under negotiation, the Joint Utilities include the information regarding that bilateral transaction in each IOUs' RPS Semi-Annual Compliance Report (the "RPS

^{25/} Proposed Decision at p. 10 (Conclusion of Law).

^{26/} *Id.* at 6.

Compliance Report”). Accordingly, the Proposed Decision should be modified to specify that only bilateral negotiation information from RPS Compliance Reports shall be aggregated for release to the public.

The current standard adopted by the Proposed Decision would allow any information – even information not submitted by the utilities themselves – to be included in the aggregated data. The Joint Utilities oppose the inclusion of data on bilateral contract negotiations gleaned from meetings of their respective PRGs to be made public in even an aggregated form. To ensure that the utility PRGs continue to obtain unrestricted access to the IOUs’ internal information and deliberative processes, the Commission must not deviate from the past practice of ensuring that information shared in that forum is not subject to release or use in any other forum.^{27/} Additionally, the information currently provided to the PRGs often includes preliminary term sheets for use in bilateral negotiations, and this information may be inconsistent with more developed information on the same PPA subsequently provided in an RPS Compliance Report.

Finally, a specific order that the RPS Compliance Report information be used as the sole source of bilateral negotiation information will eliminate the need to clarify when a bilateral offer should be defined as “under negotiation” or how to project the likely outcome of early negotiations that have not yet resulted in a term sheet. It may be difficult, if not impossible, to craft such a definition that could be uniformly applied by all retail sellers.

D. The Proposed Decision Errs in Defining “Market Sensitive.”

The Proposed Decision dismisses as speculative PG&E’s concern, shared by SCE, SDG&E, and DRA and detailed in Subsection II.A. above, that the release of information from

^{27/} See, e.g., D.07-12-052 at 123-24 (stressing that information contained in PRG meeting summaries “is in no way admissible in hearings as evidence or able to be cited in testimony.”).

individual short-listed bids under negotiation could lead to negotiating leverage against the utility or other market manipulation.^{28/} In finding this concern “speculative,” the Proposed Decision fails to note that the standard adopted by the Commission for whether information is market sensitive is whether it has the “potential to materially affect the market price for electricity.”^{29/} The inclusion of the word “potential” necessarily requires the Commission to consider whether a reasonable basis exists to believe that release of the information could increase the cost of energy. Indeed, a standard that required proof that a disclosure had already caused a change in the price of energy would be useless since the protection of the information would always come too late.

Additionally, the Proposed Decision’s statement that PG&E’s concerns regarding the potential for increased costs to IOU-customers does not comport with the Commission’s definition of market sensitive misses the mark. The Proposed Decision correctly notes that market sensitive information is information that has “the potential, if released to market participants, to materially affect a buyer’s market price for electricity.”^{30/} The Proposed Decision misses the point, however, in stating that “potential land owners and government permitting agencies do not appear to be the type of market participants D.06-06-066 was concerned with.”^{31/} Regardless of whether landowners and government agencies are the types of market participants that D.06-06-066 was concerned with, the public release of market sensitive project-specific information for projects that are in their infancy will potentially drive up the costs of developing those new projects, which would inevitably cause the project developers (*i.e.*

^{28/} See Proposed Decision at p. 8.

^{29/} D.06-06-066, as modified by D.07-05-032 at pp. 78-79 (Conclusion of Law 12) (emphasis added).

^{30/} See Proposed Decision at 8 (quoting D.06-06-066 as modified by D.07-05-032 at 44).

^{31/} *Id.*

market participants specifically contemplated in D.06-06-066) to raise their bids.

III. CONCLUSION

With the changes recommended above and in Attachment 1, the Joint Utilities support a determination that the specified, aggregated data is not market sensitive and should be disclosed to support ongoing RPS planning initiatives, and that such disclosure should be applied in a non-discriminatory fashion to all retail sellers as required by the Public Utilities Code. If the Joint Utilities determine in the future that the data is being used in a way to manipulate the market or increase the price of energy, the Joint Utilities reserve the ability to seek a modification to the decision.

Respectfully submitted on behalf of the Joint Utilities
under Rule 1.8(d).

Respectfully Submitted,

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Dated: December 3, 2009

Attachment A

Proposed Revisions to Findings of Fact, Conclusion of Law, and Order

Findings of Fact

1. Data identifying proposed renewable generation projects that have been short-listed in utility solicitations or identified for bi-lateral negotiations is market sensitive and properly protected as confidential pursuant to D.06-06-066.

2. The capacity, location by bus bar and zone, and technology type of proposed renewable generation projects that have been short-listed in utility solicitations between 2003 and 2009, or identified during the same period in any retail seller's RPS Semi-Annual Compliance Report as a bi-lateral contract under negotiation for bi-lateral negotiations for the same period, when released in aggregate according to the methodology described below, and without identifying the bid prices, counter party names, solicitation year or sponsoring utility is not market sensitive.

3. "Aggregation" as used in this decision means the calculation of a single, aggregated number of megawatts and/or estimated gigawatt-hours for each Competitive Renewable Energy Zone ("CREZ") identified in the Commission's 33% RPS Implementation Analysis, for each of the three basic types of renewable technologies (i.e. as-available/peaking, as-available/non-peaking, baseload). Each aggregated number should include all short-listed bids from the annual RPS solicitations for all three IOUs in the 2003-2009 period and any information regarding bi-lateral contracts under negotiation identified in any retail seller's RPS Semi-Annual Compliance Report during the same period. Additionally, the following types of projects should be separately aggregated (if sufficient numbers of projects exist in each category): (1) all out-of-state generation; (2) all distributed, in-state generation not within a CREZ; and (3) all utility-

scale, in-state generation not within a CREZ.

4. Data is not sufficiently “aggregated” for purposes of this decision where any capacity number for a specific technology type and CREZ or other geographic area would represent the aggregated capacity of less than three short-listed bids or bilateral contracts. Allowing only a small number of bids to be aggregated increases the risk that parties could derive market sensitive information from the aggregate.

5. Data is not sufficiently “aggregated” for purposes of this decision where the data may be compared against past disclosures of aggregated data to determine the total capacity of bids in a specific CREZ and for a specific technology type in a single solicitation year. For example, the release of aggregated data using the methodology outlined in this decision for the solicitation years 2003-2010 after the disclosure of data for 2003-2009 would effectively disclose the market-sensitive bid information for 2010.

Conclusion of Law

The capacity, location by ~~bus bar and~~ zone, and technology type of proposed renewable generation projects that have been short-listed in utility solicitations between 2003 and 2009, or identified during the same period in any retail seller’s RPS Semi-Annual Compliance Report as a bi-lateral contract under negotiation for bi-lateral negotiations for the same period, when released in aggregate according to the methodology described below, and without identifying the bid prices, counter party names, solicitation year or sponsoring utility is not market sensitive.

ORDER

IT IS ORDERED that:

1. The Commission's Energy Division Staff is hereby authorized to disclose the capacity, technology, and location by ~~bus bar and~~ zone of all short-listed bids resulting from an RPS Solicitation and bi-laterally offers included in any retail seller's RPS Semi-Annual Compliance Report ~~negotiated Renewable Portfolio Standard projects from the Southern California Edison Company, Pacific Gas and Electric Company and San Diego Gas & Electric Company~~ for the period covering ~~the 2003-2009 solicitations~~. Such disclosure shall be aggregated according to the method provided in the Findings of Fact above~~in aggregate~~, shall be done as soon as the 2009 solicitation information is available to include in the data release, and shall not identify the bid prices, counter party names, solicitation year or sponsoring ~~utility~~retail seller.

2. Rulemaking 05-06-040 is closed.

This order is effective today.

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, California 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 December 3, 2009, I served a true copy of:

**JOINT OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY (U 39-E), SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E), AND SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) REGARDING PROPOSED DECISION
CLARIFYING THAT CERTAIN INFORMATION IS NOT MARKET
SENSITIVE IF RELEASED IN A SPECIFIED MANNER**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.05-06-040 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.05-06-040 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 3rd day of December 2009 at San Francisco, California.

/s/
Amy S. Yu

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: December 2, 2009

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