



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

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Order Instituting Rulemaking to Develop Additional  
Methods to Implement the California Renewables  
Portfolio Standard Program.

R.06-02-012

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

R.08-08-009

**POST-WORKSHOP REPLY COMMENTS OF  
SIERRA PACIFIC POWER COMPANY (U 903 E)  
REGARDING DEFINITION OF "CALIFORNIA BALANCING AUTHORITY AREA"**

Christopher A. Hilen  
Associate General Counsel  
SIERRA PACIFIC POWER COMPANY  
6100 Neil Road  
Reno, Nevada 89511  
Telephone: (775) 834-5696  
Facsimile: (775) 834-4811  
Email: [chilen@nvenergy.com](mailto:chilen@nvenergy.com)

Andrew B. Brown  
Jedediah J. Gibson  
Ellison, Schneider & Harris, LLP  
2600 Capitol Avenue, Ste. 400  
Sacramento, California 95816  
Telephone: (916) 447-2166  
Facsimile: (916) 447-3512  
Email: [abb@eslawfirm.com](mailto:abb@eslawfirm.com)

May 12, 2010

Attorneys for Sierra Pacific Power Company

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

Order Instituting Rulemaking to Develop Additional Methods to Implement the California Renewables Portfolio Standard Program.	R.06-02-012
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SIERRA PACIFIC POWER COMPANY (U 903 E)  
REGARDING DEFINITION OF “CALIFORNIA BALANCING AUTHORITY AREA”**

Pursuant to the April 26, 2010, Administrative Law Judge’s Ruling Requesting Post-Workshop Comments, Sierra Pacific Power Company (“Sierra”) hereby provides these Post-Workshop Reply Comments to parties’ comments filed on April 30, 2010. The sole issue addressed here is how to best define “California Balancing Authority Area” (“CBAA”), as used in D.10-03-021 (“TREC Decision”)<sup>1</sup> in the context of Sierra’s multi-state balancing authority. For the reasons outlined here, Sierra recommends that the Commission allow load-serving entities (“LSEs”) with loads located within the California portion of a multi-state balancing authority that trigger a RPS procurement obligation to use resources within that balancing authority to provide a “bundled” product. However, any California LSE with loads located elsewhere in California that carry a RPS obligation would need to satisfy the California Public Utilities Commission (“CPUC” or “Commission”) “dynamic transfer” tests to qualify deliveries for the bundled product. This clarification should strike an adequate balance between the Commission’s intent with respect to imported power while recognizing that for the multi-state balancing authorities there are “imports” made to serve the in-area loads.

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<sup>1</sup> The TREC Decision is available at [http://docs.cpuc.ca.gov/WORD\\_PDF/FINAL\\_DECISION/115056.PDF](http://docs.cpuc.ca.gov/WORD_PDF/FINAL_DECISION/115056.PDF).

**I. Background on Sierra and RPS compliance for Multi-Jurisdictional Utilities.**

Sierra is a multi-jurisdictional utility (“MJU”) serving approximately 46,000 California customers located primarily around Lake Tahoe. Over 90% of Sierra’s customers are located in the Reno area and Northern Nevada. Almost all resources used to serve the California territory are located in Nevada and are delivered via Sierra’s transmission facilities. Sierra operates its own balancing authority and is not part of the California Independent System Operator (“CAISO”). Additionally, Sierra has no significant transmission interconnection paths with the CAISO. Although Sierra’s service territory is bisected by the border between California and Nevada, Sierra does not “import” power to its California customers insofar as it operates a single, integrated balancing authority that includes its California retail customers. As used in the TREC Decision, the “import” concept that is part of the delivery requirement for out-of-state resources is really about the scheduled interchange between different balancing authorities found in different states. Because Sierra operates an integrated transmission system within California and Nevada, and because the renewables that Sierra uses are interconnected with Sierra’s transmission system in Nevada, care must be taken with respect to creating a geographically based definition for “REC-only” transactions.

Sierra appreciates that the TREC Decision reflects MJU-specific concerns when setting out how to relax the “bundled procurement” requirement to provide for TRECs.<sup>2</sup> The existing RPS statutes include structures that address unique issues applicable to MJUs like Sierra. For example, California Public Utilities Code § 399.17 determines how resources located outside of California but interconnected with an MJU’s transmission system are deemed “delivered” and thereby eligible for an MJU’s RPS compliance on a different basis from out-of-state resources found eligible under § 399.12. While Sierra anticipates that the § 399.17 approach will continue

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<sup>2</sup> See, e.g., TREC Decision discussions at pages 47-48, 52, 60, Conclusion of Law 17, Ordering Paragraph 20.

to be the avenue for securing resources used to meet its California RPS requirement, the company is also looking at the proposal from the perspective of how renewable resources interconnected with Sierra could provide TREC's to Sierra or another LSE that may have loads within Sierra's balancing authority.

## **II. Post-Workshop Reply Comments**

Sierra's review of the comments filed on April 30, 2010 found that a number of parties sought to define CBAA in a way that seemed to turn on whether the balancing authority area was "primarily" located within California,<sup>3</sup> or whether there were substations located within California.<sup>4</sup> This view must also be squared with the fact that the CAISO has import interties located outside the State of California which make up part of their balancing authority boundary.

Sierra understands that certain parties have expressed concerns that allowing a multi-state balancing authority with some California territory to qualify as a CBAA without conditions could essentially negate the goal of the "dynamic transfer" test in the CPUC's bundled product definition.<sup>5</sup> However, those concerns are only germane when the bundled product must be imported to *another* balancing authority where the loads creating the California RPS procurement obligation may be located. The concern should be irrelevant in the narrow set of cases where there are loads located within California that create an RPS procurement obligation that are also located within a multi-state balancing authority. In that circumstance, an RPS-

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<sup>3</sup> See Post Workshop Comments of BP Wind Energy, North America, Inc., pp. 3-4; Post Workshop Comments of Iberdrola Renewables, Inc., pp. 5-6; Opening Comments of LS Power Associates, L.P. on Post-Workshop Questions, p. 3; Post-Workshop Comments of Sempra Generation, p. 2; Post-Workshop Comments of Shell Energy North America (US), L.P., p. 3; Post Workshop Comments of the Union of Concerned Scientists, p. 2; Post Workshop Comments of Zephyr Power Transmission, LLC and Chinook Power Transmission, LLC, p. 3.

<sup>4</sup> See Post-Workshop Comments of Pacific Gas and Electric Company, p. 9; Southern California Edison Company's Post-Workshop Comments, pp. 5-6; Post-Workshop Comments of the Sacramento Municipal Utility District, pp. 3-4.

<sup>5</sup> These concerns were raised at the April 23, 2010 Public Workshop regarding Implementing Renewable Energy Credit Trading, but Sierra is uncertain which parties raised the concerns.

eligible resource located within the multi-state balancing authority does deliver a bundled product to the California loads.

Accordingly, Sierra recommends that the bundled product test in the TREC Decision include a mechanism for an LSE to identify whether it serves load located within a multi-state balancing authority with a California territory, and allow it to count resources located within that multi-state balancing authority as providing a bundled product to meet its electric service obligations in the California territory. This provision will recognize the physical reality within the multi-state balancing authority (where no “import” is made to serve those loads), as well as the fact that resources needed to meet the RPS procurement obligation within another CBAA are served by true imports that should be subject to the dynamic transfer tests. This approach recognizes the variability in the transmission system borders associated with CBAAs, and would treat as bundled those resources located outside of California but connected directly to balancing authorities such as CAISO, Los Angeles Department of Water and Power or Imperial Irrigation District. Moreover, it would reflect the Legislature’s intent found in § 399.17.

### III. Conclusion

Sierra appreciates this opportunity to address how the definition of “California Balancing Authority Area” should be defined for purposes of determining what renewables deliveries should qualify for the TREC Decision’s new “bundled” product. Sierra’s proposal, outlined above, attempts to strike a reasonable compromise between the TREC Decision’s original intent and the physical reality associated with Sierra’s operation of an integrated multi-state balancing authority that serves some California load.

Dated: May 12, 2010

Respectfully submitted,

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/s/

Christopher A. Hilen  
Associate General Counsel  
SIERRA PACIFIC POWER COMPANY  
6100 Neil Road  
Reno, Nevada 89511  
Telephone: (775) 834-5696  
Facsimile: (775) 834-4811  
Email: [chilen@nvenergy.com](mailto:chilen@nvenergy.com)

Andrew B. Brown  
Jedediah J. Gibson  
Ellison, Schneider & Harris, LLP  
2600 Capitol Avenue, Ste. 400  
Sacramento, California 95816  
Telephone: (916) 447-2166  
Facsimile: (916) 447-3512  
Email: [abb@eslawfirm.com](mailto:abb@eslawfirm.com)

Attorneys for Sierra Pacific Power Company



Certificate of Service

I hereby certify that I have this day served a copy of “POST-WORKSHOP REPLY COMMENTS OF SIERRA PACIFIC POWER COMPANY (U 903 E) REGARDING DEFINITION OF ‘CALIFORNIA BALANCING AUTHORITY AREA’” on all known parties to R.08-08-009 and R.06-02-012 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on May 12, 2010 at Sacramento, California.

\_\_\_\_\_  
/s/

Eric Janssen

R.06-02-012 & R.08-08-009

Service Lists

May 12, 2010

dgulino@ridgewoodpower.com  
ron.cerniglia@directenergy.com  
rick\_noger@praxair.com  
keith.mccrea@sablaw.com  
csmoots@perkinscoie.com  
rresch@seia.org  
jim\_p\_white@transcanada.com  
garson\_knapp@fpl.com  
Cynthia.A.Fonner@constellation.com  
Lflowers@LSPower.com  
ken.baker@wal-mart.com  
ej\_wright@oxy.com  
sylvia.castillo@bsgclearing.com  
jordan.white@pacificorp.com  
rkeen@manatt.com  
mmazur@3PhasesRenewables.com  
susan.munves@smgov.net  
klatt@energyattorney.com  
douglass@energyattorney.com  
pssed@adelphia.net  
cathy.karlstad@sce.com  
Joni.Templeton@sce.com  
william.v.walsh@sce.com  
kswitzer@gswater.com  
cponds@ci.chula-vista.ca.us  
AMSmith@SempraUtilities.com  
DAKing@SempraUtilities.com  
fortlieb@sandiego.gov  
GBass@SempraSolutions.com  
KHassan@SempraUtilities.com  
CentralFiles@SempraUtilities.com  
jleslie@luce.com  
tdarton@pilotpowergroup.com  
GloriaB@anzaelectric.org  
wplaxico@axiopower.com  
kerry.eden@ci.corona.ca.us  
Joe.Langenberg@gmail.com  
dorth@krcd.org  
ek@a-klaw.com  
nes@a-klaw.com  
pepper@cleanpowermarkets.com  
holly@ausra.com  
jrichman@bloomenergy.com  
dbp@cpuc.ca.gov

dsh@cpuc.ca.gov  
mpo@cpuc.ca.gov  
nao@cpuc.ca.gov  
theresa.mueller@sfgov.org  
mhyams@sfgwater.org  
marcel@turn.org  
mpa@a-klaw.com  
wvm3@pge.com  
b.barnes@cleantechamerica.com  
bcragg@goodinmacbride.com  
jsqueri@gmsr.com  
jared.johnson@lw.com  
jarmstrong@goodinmacbride.com  
mday@goodinmacbride.com  
nmurray@natureener.net  
shong@goodinmacbride.com  
vidhyaprabhakaran@dwt.com  
dhuard@manatt.com  
jkarp@winston.com  
jeffgray@dwt.com  
salleyoo@dwt.com  
sho@ogradey.us  
crmd@pge.com  
ECL8@pge.com  
ssmyers@att.net  
gpetlin@3degreesinc.com  
ralf1241a@cs.com  
wbooth@booth-law.com  
Audra.Hartmann@Dynergy.com  
kowalewsia@calpine.com  
jeremy.weinstein@pacificorp.com  
jody\_london\_consulting@earthlink.net  
jkepke@ch2m.com  
Laurie.Mazer@bp.com  
gmorris@emf.net  
lwisland@ucsusa.org  
ndesnoo@ci.berkeley.ca.us  
jpross@sungevity.com  
tomb@crossborderenergy.com  
janreid@coastecon.com  
johnrredding@earthlink.net  
jweil@aglet.org  
demorse@omsoft.com  
aivancovich@caiso.com  
jsanders@caiso.com  
dennis@ddecuir.com  
jdalessi@navigantconsulting.com

cmkehrein@ems-ca.com  
dcarroll@downeybrand.com  
jmcfarland@treasurer.ca.gov  
jluckhardt@downeybrand.com  
steven@iepa.com  
abb@eslawfirm.com  
dkk@eslawfirm.com  
glw@eslawfirm.com  
lmh@eslawfirm.com  
eddyconsulting@gmail.com  
kmills@cfbf.com  
wwester@smud.org  
dbranchcomb@spi-ind.com  
nelson@thnelson.com  
dmdubson@stoel.com  
kevin.lynch@iberdrolausa.com  
jcolive@bpa.gov  
rhardy@hardyenergy.com  
Tom.Elgie@powerex.com  
WBlattner@SempraUtilities.com  
janice@strategenconsulting.com  
jf@pointcarbon.com  
mpf@stateside.com  
tciardella@nvenergy.com  
dan@energysmarthomes.net  
Derek@AltaPowerGroup.com  
EGrizard@deweysquare.com  
r.raushenbush@comcast.net  
tam.hunt@gmail.com  
mpr-ca@coolearthsolar.com  
Harry.Singh@RBSSempra.com  
Hecht@sempraTrading.com  
jansell@alternitywindpower.com  
tmartin@alternitywindpower.com  
steven.schleimer@barclayscapital.com  
perlism@dicksteinshapiro.com  
MASullivan@hhlaw.com  
tszymanski@hunton.com  
vsuravarapu@cera.com  
tjaffe@energybusinessconsultants.com  
mannm@dteenergy.com  
cswoollums@midamerican.com  
abiecunasjp@bv.com  
judith.kim@walmartlegal.com  
rmccoy@ercot.com  
allison.heaton@macquarie.com  
andre.templeman@macquarie.com

christi.nicolay@macquarie.com  
joe.paul@dynegy.com  
lisa.yoho@citi.com  
roxane.perruso@tac-denver.com  
bbaker@summitblue.com  
kjsimonsen@ems-ca.com  
dsaul@pacificsolar.net  
dbrooks@nvenergy.com  
chad\_dickason@soleonenergy.com  
freesa@thirdplanetwind.com  
dykema@thirdplanetwind.com  
chilen@NVEnergy.com  
emello@sppc.com  
tdillard@sppc.com  
jgreco@terra-genpower.com  
ctorchia@chadbourne.com  
lmitchell@hanmor.com  
jackmack@suesec.com  
case.admin@sce.com  
gary.allen@sce.com  
rkmoore@gswater.com  
mary@solutionsforutilities.com  
mtmcewan@gmail.com  
TCorr@SempraGlobal.com  
liddell@energyattorney.com  
mshames@ucan.org  
marcie.milner@shell.com  
ccasselman@pilotpowergroup.com  
HRasool@SempraUtilities.com  
JWright@SempraUtilities.com  
DNiehaus@SempraUtilities.com  
bjnese@stoel.com  
billm@enxco.com  
peter.pearson@bves.com  
shess@edisonmission.com  
csteen@bakerlaw.com  
rblee@bakerlaw.com  
michaelgilmore@inlandenergy.com  
janet.gagnon@solarworldusa.com  
hal@rwitz.net  
wes658@gmail.com  
sue.mara@rtoadvisors.com  
mdjoseph@adamsbroadwell.com  
michael.mcdonald@ieee.org  
matthew@turn.org  
paulfenn@local.org  
Dan.adler@calcef.org  
srovetti@sflower.org  
andre.devilbiss@recurrentenergy.com  
dcover@esassoc.com  
jim.howell@recurrentenergy.com  
luke.dunnington@recurrentenergy.com  
mflorio@turn.org  
nsuetake@turn.org  
nlong@nrdc.org  
bfinkelstein@turn.org  
snuller@ethree.com  
avege@firstwind.com  
fred.wellington@navigantconsulting.com  
MGML@pge.com  
gcooper@cpv.com  
Jennifer.Barnes@Navigantconsulting.com  
filings@a-klaw.com  
cpuccases@pge.com  
spauker@wsgr.com  
vjw3@pge.com  
cmmw@pge.com  
nxk2@pge.com  
diarmuid@greenwoodenv.com  
arno@recurrentenergy.com  
cassandra.sweet@dowjones.com  
elizabeth.blase@lw.com  
jscancarelli@crowell.com  
jrehfeld@naturener.net  
lcottle@winston.com  
mchediak@bloomberg.net  
rhassan@fbr.com  
sdhilton@stoel.com  
stevegreenwald@dwt.com  
tkaushik@manatt.com  
katherine@evomarkets.com  
nfinerty@evomarkets.com  
tsolomon@winston.com  
judypau@dwt.com  
bobgex@dwt.com  
Diane.Fellman@nrgenergy.com  
cem@newsdata.com  
lisa\_weinzimer@platts.com  
atk4@pge.com  
imcgowan@3degreesinc.com  
alho@pge.com  
bari@pge.com  
regrelcpuccases@pge.com  
ELL5@pge.com  
GXL2@pge.com  
MMCL@pge.com  
MRGG@pge.com  
SEHC@pge.com  
corwalther@pacbell.net  
beth@beth411.com  
kerry.hattevik@nexteraenergy.com  
andy.vanhorn@vhcenergy.com  
sean.beatty@mirant.com  
info@calseia.org  
sbeserra@sbcglobal.net  
domanschen@mofo.com  
timea.Zentai@navigantconsulting.com  
pletkarj@bv.com  
portha@astound.net  
dietrichlaw2@earthlink.net  
alex.kang@itron.com  
nellie.tong@us.kema.com  
ramonag@ebmud.com  
ahaubenstock@brightsourceenergy.com  
bepstein@fablaw.com  
mrw@mrwassoc.com  
cpucdockets@keyesandfox.com  
kfox@keyesandfox.com  
cwooten@lumenxconsulting.com  
rschmidt@bartlewells.com  
clyde.murley@comcast.net  
nrader@calwea.org  
gtrobinson@lbl.gov  
rhwiser@lbl.gov  
ed.smeloff@sunpowercorp.com  
brad@mp2capital.com  
michael@mp2capital.com  
lynn@lmaconsulting.com  
anders.glader@elpower.com  
keithwhite@earthlink.net  
eric.cherniss@gmail.com  
shani@scvas.org  
sberlin@mccarthyllaw.com  
jrobertpayne@gmail.com  
david@mid.org  
tomk@mid.org  
joyw@mid.org  
brbarkovich@earthlink.net  
dgrandy@caonsitegen.com  
rmccann@umich.edu  
martinhomec@gmail.com

tobinjmr@sbcglobal.net  
bdicapo@caiso.com  
grosenblum@caiso.com  
saeed.farrokhpay@ferc.gov  
e-recipient@caiso.com  
david.oliver@navigantconsulting.com  
kdusel@navigantconsulting.com  
cpucrulings@navigantconsulting.com  
lpark@navigantconsulting.com  
pmaxwell@navigantconsulting.com  
lwhouse@innercite.com  
tpomales@arb.ca.gov  
amber@iepa.com  
mclaughlin@braunlegal.com  
pstoner@lgc.org  
bernardo@braunlegal.com  
blaising@braunlegal.com  
dseperas@calpine.com  
bsb@eslawfirm.com  
jgg@eslawfirm.com  
jdh@eslawfirm.com  
esison@smud.org  
obartho@smud.org  
rroth@smud.org  
aorchar@smud.org  
bbeebe@smud.org  
mdeange@smud.org  
vwood@smud.org  
bpurewal@water.ca.gov  
mniroula@water.ca.gov  
artrivera@comcast.net  
karen@klindh.com  
atrowbridge@daycartermurphy.com  
ehadley@reupower.com  
sas@a-klaw.com  
deb@a-klaw.com  
jravenesanmarcos@yahoo.com  
californiadockets@pacificorp.com  
cbreidenich@yahoo.com  
jholmes@emi1.com  
rarego@lakeviewlight.com  
dws@r-c-s-inc.com  
pblood@columbiaenergypartners.com  
castille@landsenergy.com  
pbrehm@infiniacorp.com  
lindsay\_zaitsoff@transalta.com  
john\_dunn@transcanada.com

meredith\_lamey@transcanada.com  
olga.beznosova@bctc.com  
jmcMahon@crai.com  
ab1@cpuc.ca.gov  
agc@cpuc.ca.gov  
as2@cpuc.ca.gov  
ams@cpuc.ca.gov  
aes@cpuc.ca.gov  
aeg@cpuc.ca.gov  
bwm@cpuc.ca.gov  
cjm@cpuc.ca.gov  
cni@cpuc.ca.gov  
css@cpuc.ca.gov  
dot@cpuc.ca.gov  
eks@cpuc.ca.gov  
gtd@cpuc.ca.gov  
jm3@cpuc.ca.gov  
jb9@cpuc.ca.gov  
jaa@cpuc.ca.gov  
jf2@cpuc.ca.gov  
kpp@cpuc.ca.gov  
lmi@cpuc.ca.gov  
mrl@cpuc.ca.gov  
mjs@cpuc.ca.gov  
mjh@cpuc.ca.gov  
nlr@cpuc.ca.gov  
psd@cpuc.ca.gov  
rmm@cpuc.ca.gov  
smk@cpuc.ca.gov  
svn@cpuc.ca.gov  
sc1@cpuc.ca.gov  
tbo@cpuc.ca.gov  
kenneth.swain@navigantconsulting.com  
gcollord@arb.ca.gov  
ahuang@arb.ca.gov  
claufenb@energy.state.ca.us  
gbarkalo@energy.state.ca.us  
hrait@energy.state.ca.us  
kzocchet@energy.state.ca.us  
lgonzale@energy.state.ca.us  
rmiller@energy.state.ca.us  
pbarthol@energy.state.ca.us  
hchronin@water.ca.gov  
GouletCA@email.laccd.edu  
kelly.cauvel@build-laccd.org  
eisenblh@email.laccd.edu  
npedersen@hanmor.com

mike.montoya@sce.com  
TRoberts@SempraUtilities.com  
cadowney@cadowneylaw.com  
phil@reesechambers.com  
bruce.foster@sce.com  
elaine.duncan@verizon.com  
cec@cpuc.ca.gov  
jeanne.sole@sfgov.org  
abrowning@votesolar.org  
todd.edmister@bingham.com  
edwardoneill@dwt.com  
ted@fitcoalition.com  
mrh2@pge.com  
bill@fitcoalition.com  
michaelboyd@sbcglobal.net  
dgeis@dolphingroup.org  
davidb@cwo.com  
jim.metropulos@sierraclub.org  
sgp@eslawfirm.com  
Christine@consciousventuresgroup.com  
jnelson@psrec.coop  
acitrin@prosoliana.com  
elvine@lbl.gov  
HYao@SempraUtilities.com  
nick.chaset@tesseractarsolar.com  
jgorberg@lspower.com  
Karen.Kochonies@MorganStanley.com  
Morgan.Hansen@MorganStanley.com  
nicole.fabri@clearenergybrokerage.com  
richard.chandler@bp.com  
nblack@calbioenergy.com  
tcarlson@rrienergy.com  
chiang@elementmarkets.com  
jpittsjr@pcgconsultants.com  
jon.jacobs@paconsulting.com  
jenine.schenk@apses.com  
LPaskett@FirstSolar.com  
Jeff.Newman@bth.ca.gov  
Douglas@Idealab.com  
fhall@solarelectricsolutions.com  
george.wiltsee@sce.com  
tyler.johnson@sce.com  
chad@cenergypower.com  
rjgilleskie@san.rr.com  
Jcox@fce.com  
CKebler@SempraGeneration.com  
farrellytc@earthlink.net

chestonem@sharpsec.com  
john@deweygroup.com  
lechnitz@lumospower.com  
hanigan@encous.com  
pfmoritzburke@gmail.com  
Jeff.Hirsch@DOE2.com  
m.stout@cleantechamerica.com  
renee@gem-corp.com  
mramirez@sflower.org  
tburke@sflower.org  
norman.furuta@navy.mil  
mcarboy@signalhill.com  
jay2@pge.com  
jsp5@pge.com  
pshaw@suntechamerica.com  
tjl@a-klaw.com  
Eriks@ecoplexus.com  
hans@recurrentenergy.com  
sara@solaralliance.org  
BXSZ@pge.com  
S2B9@pge.com  
James.Stack@CityofPaloAlto.org  
wetstone@alamedapt.com  
kerry.hattevik@nrgenergy.com  
masont@bv.com  
ken.alex@doj.ca.gov  
gteigen@rcmdigesters.com  
stephaniec@greenlining.org  
mcmahon@solarcentury.com  
sgallagher@stirlingenergy.com  
erasmussen@co.marin.ca.us  
juliettea7@aol.com  
dweisz@co.marin.ca.us  
tfaust@redwoodrenewables.com  
jna@speakeasy.org  
tim@marinemt.org  
ed.mainland@sierraclub.org  
wem@igc.org  
tom\_victorine@sjwater.com  
rick@sierraecos.com  
danielle@ceert.org  
varaninie@gtlaw.com  
mgarcia@arb.ca.gov  
steveb@cwo.com  
Tiffany.Roberts@lao.ca.gov  
cte@eslawfirm.com  
ttutt@smud.org

hurlock@water.ca.gov  
lterry@water.ca.gov  
rliibert@cbbf.com  
DocToxics@aol.com  
c.mentzel@cleanenergymaui.com  
Tashiana.Wangler@PacifiCorp.com  
dtownley@infiniacorp.com  
clu@cpuc.ca.gov  
ctd@cpuc.ca.gov  
ciw@cpuc.ca.gov  
trh@cpuc.ca.gov  
jmh@cpuc.ca.gov  
kar@cpuc.ca.gov  
kwh@cpuc.ca.gov  
lau@cpuc.ca.gov  
mjd@cpuc.ca.gov  
mwt@cpuc.ca.gov  
mc3@cpuc.ca.gov  
sha@cpuc.ca.gov  
nil@cpuc.ca.gov  
rkn@cpuc.ca.gov  
ys2@cpuc.ca.gov  
Will.Brieger@doj.ca.gov  
cleni@energy.state.ca.us  
mprior@energy.state.ca.us  
pdoughma@energy.state.ca.us  
dvidaver@energy.state.ca.us  
jwoodwar@energy.state.ca.us

KEVIN BOUDREAUX  
CALPINE POWERAMERICA  
CA, LLC  
717 TEXAS AVENUE, SUITE  
1000  
HOUSTON TX 77002

3 PHASES RENEWABLES LLC  
2100 SEPULVEDA BLVD,  
SUITE 37  
MANHATTAN BEACH CA  
90266

MICHAEL MEACHAM  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA CA 91910

COMMERCE ENERGY, INC.  
600 ANTON BLVD., SUITE 2000  
COSTA MESA CA 92626

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

MOUNTAIN UTILITIES  
PO BOX 1  
KIRKWOOD CA 95646

LARRY F. EISENSTAT  
DICKSTEIN SHAPIRO LLP  
1825 EYE STREET, NW  
WASHINGTON DC 20006

RICHARD LEHFELDT  
DICKSTEIN SHAPIRO LLP  
1825 EYE STREET, NW  
WASHINGTON DC 20006

AOL UTILITY CORP.  
12752 BARRETT LANE  
SANTA ANA CA 92705

STEPHEN A. S. MORRISON  
CITY & COUNTY OF SAN FRANCISCO  
CITY HALL, SUITE 234  
1 DR CARLTON B. GOODLET PLACE  
SAN FRANCISCO CA 94102-4682

DONALD N. FURMAN  
IBERDROLA RENEWABLES INC  
1125 NW COUCH STREET, SUITE 700  
PORTLAND OR 97209