

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to
Integrate and Refine Procurement
Policies and Consider Long-Term
Procurement Plans.

Rulemaking 10-05-006
(Filed May 6, 2010)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES
ON THE ORDER INSTITUTING RULEMAKING**

NOEL OBIORA
Attorney for the Division of Ratepayer
Advocates

DAVID PECK
Project Coordinator, Division of Ratepayer
Advocates

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-5987
Fax: (415) 703-2262

June 4, 2010

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I. INTRODUCTION

Pursuant to the schedule set forth in the preliminary scoping section of the Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans (OIR), 10-05-006, the Division of Ratepayer Advocates (DRA) hereby submits the following comments.

DRA generally supports the OIR and the three-track procurement planning proceeding that it lays out. The proposed ambitious proceeding, if achieved, will allow the Commission to fully consider the impact of the State's various energy policies in a comprehensive fashion. Likewise, separating the issues into multiple tracks, the proceeding would insure that the Investor Owned Utilities (IOUs) bundled plans are not stalled until the need analysis and rules and policy change issues are all resolved. DRA generally believes that the OIR has properly identified the types of issues that require attention. We offer the following comments for the Commission's consideration.

**II. TRACK I – LONG-TERM SYSTEM AND LOCAL RELIABILITY
RESOURCE PLAN**

The Scoping memo states that the purpose of the "system" planning track is to "identify CPUC jurisdictional needs for new resources to meet system or local resource adequacy over the 2011-2020 planning horizon, including issues related to long-term

renewables planning and need for replacement generation infrastructure to eliminate reliance on power plants using once through cooling (OTC).”¹ DRA generally supports the key areas of focus, namely renewables integration and OTC. That said, DRA recommends that this track also address the issue of the IOUs’ propensity to fill all outstanding net short positions with conventional resources rather than first filling the need with cost-effective preferred resources from the Energy Action Plan (EAP) loading order. In the time since D.07-12-052 was issued, the IOUs have filed Applications and obtained approval for large renewable projects that could fill some of the need authorized in the LTPP, but have never agreed that these renewable projects count towards their net short positions in the long-term plans. They will, of course, argue that they should be allowed to procure any amount of renewable resources they find available because they need all the help they can get to reach 33% and they can bank any excess renewables. DRA believes there is no conflict between procuring renewable resources and that count towards RPS goals when they are available within the State and counting these resources to reduce the need approved in the LTPP, even if these resources are banked towards the latter years of the RPS program. This proceeding should address this issue and clarify the IOUs tendency to rely on fossil fuel resources even when they are still procuring renewables.

A. Long Term Renewable Planning Analysis Should Reflect Actual California Intermittent Renewable Generation

The scoping memo states that Track 1 will focus on long term renewable planning and the need for replacement generation due to once-through cooling (OTC) power plant retirements. Though DRA does not necessarily disagree with this approach, we recommend that any long term renewable planning analysis be primarily based only on the amount of in-state intermittent renewable generation installed (or projected), not the entire 33% RPS goal. There are two reasons for this. First, much of California’s RPS obligation is projected to be met by “baseload” renewables (e.g., geothermal, biomass,

¹ Order Instituting Rulemaking 10-05-006, p. 12.

small hydro, and solar thermal with storage capabilities). These renewables will not require fast ramping fossil resources to address intermittency. Second, much of California's RPS obligation is being met or will be met from renewable resources located in the far reaches of Canada and elsewhere in the Western Electricity Coordinating Council (WECC), distant of the CAISO system. CAISO states that these out-of-state renewables will not require additional fossil fuel generation to maintain grid reliability.² Therefore, no complex planning or integration cost analysis is necessary for these out-of-state resources. Only solar and wind resources (without storage) connected to the CAISO grid need be considered for renewable integration analysis. DRA opposes any renewable integration analysis that would saddle ratepayers with renewable integration costs based on the entire 33% California RPS obligation when the state would only need to integrate a smaller percentage of this goal to meet the objective-- mainly in-state solar and wind resources without storage.

B. DRA Supports Using the Latest Study Results In Estimating The Costs of Fast-Ramping Fossil Generation Needed for the Long Term Renewable Planning Analysis

A large number of studies have been devoted to the operation of utility systems that include significant quantities of intermittent renewables. Studies have been done in California, other U.S. States, and Europe. An area of promise in reducing integration costs is in wind and solar forecasting. Some older studies have been based on operation of the utility grids that were not operated in a manner to optimize the integration of intermittent resources. Other anecdotal reports on this issue ignore that almost any type of power plant is not one hundred percent reliable and needs some back-up.

Some parties have consistently argued that the addition of intermittent renewable resources might undermine system stability absent fast-ramping back-up power, but these parties have never answered the question: how much fast ramping fossil back-up is

² Reply Comments of the CAISO on the Revised PD on Authorizing Use of Renewable Energy Credits for Compliance with the California RPS, p. 3. "...The inherent and unavoidable intermittency of solar and wind resources can be reduced by diversifying the geographic location of these resources, which in-turn reduces the need for the increased use of fossil fuel generation to provide essential services needed to maintain grid reliability."

necessary? Further, these parties ignore the fact that with more accurate forecasting and CAISO's capability for shorter scheduling timeframes, the intermittency of renewables is no different than any other unforced outage for which overall system resource adequacy is clearly designed to address. This OIR should require parties to support their projections about non-renewable resources needed to back up intermittent resources with data from recent studies, especially any that might show that current Resource Adequacy (RA) requirements are not sufficient to address any incremental impacts on system stability caused by the addition of intermittent renewables. In fact, a study by the U.S. Department of Energy's National Renewable Energy Laboratory suggests that 35 % of the nation's electricity could come from solar and wind, without adding expensive new backup power plants, in part due to the advances in forecasting solar and wind generation profiles.³

C. The Long Term Renewable Planning Analysis Should Include the Latest Grid Developments

DRA recommends that renewable integration requirements analysis should take into account the latest system developments. Specifically, the analysis should consider any new CAISO interconnection requirements imposed on renewable generators that may reduce the need for expensive fossil back up generation. Recently, the CAISO Board of Governors approved additional interconnection requirements for intermittent renewable generation (wind and solar plants).⁴ A tariff change has also been approved and is being prepared by CAISO staff for submission to FERC for approval. Many of these new requirements imposed on renewable generators are intended to assure adequate system

³ NREL Study Suggests that We can Add more Solar Thermal and Wind Energy to the Grid than previously Thought; Solar Thermal Magazine http://www.solarthermalmagazine.com/2010/05/31/nrel-study-suggests-that-we-can-add-more-solar-thermal-and-wind-energy-to-the-grid-than-previously-thought/?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+SolarThermalMagazine+%28Solar+Thermal+Magazine%29; see also National Renewable Energy Laboratory Western Wind and Solar Integration Study, May 2010. <http://www.nrel.gov/wind/systemsintegration/wwsis.html>.

⁴ CAISO Interim Interconnection Requirements for Large Generator Facilities Review Initiative – Draft Final Straw Proposal (April 26, 2010). Document listing and describing CAISO-approved additional interconnection requirement changes for intermittent renewable generation (wind and solar plants) <http://www.caiso.com/277e/277e11b8241c60.pdf>.

performance as the composition of the generation fleet in the CAISO control area changes to include more renewable generation. If adopted, these new renewable generator controls may alleviate the necessity for fast-ramping fossil resources to address intermittency. In the end, the ratepayers will foot the bill for either additional ramping fossil resources or additional controls imposed on renewable generators, but rate should not be burdened with the additional cost of both.

D. The Commission Should Stay the Course with the Elimination of OTC Reliance

The Commission has been involved in the development of a statewide OTC policy by meeting regularly with the California State Water Resources Control Board (SWRCB) and the CEC. The purpose of these meetings is to develop realistic implementation plans and schedules so that the OTC policy will not cause disruption in the State's electrical power supply.⁵ DRA recommends the Commission stay the course with this well-thought-out strategy. The elimination of OTC reliance will require further analysis.⁶ Specifically, planning will identify, for each region, the course of action required to eliminate reliance upon a power plant or unit using OTC. The Commission should consider all regional economic solutions that, once operational, would allow OTC to be eliminated with attendant infrastructure upgrades (e.g., transmission upgrades, preferred resources, existing compliant conventional resources) to bring OTC facilities into compliance. Also, the SWRCB policy is phased with some OTC plants given more time to comply. DRA recommends that the phasing out of OTC resources should not be made the basis for new generation additions in this LTPP until other solutions and SWRCB processes are fully implemented and better understood. OTC replacements should be executed as gradually as possible, allowing ample time and RFO(s) to negotiate cost-effective solutions, consider all adequate regional alternatives, and mitigate the risk of market participants imposing undue market power.

⁵ SWRCB; Board Meeting Session – division of Water Quality on the use of coastal and estuarine water for power plant cooling, May 4, 2010, Item 5, Attachment 1, p.2.

⁶ CEC OTC Report (July 2009) pp. 6-7.

E. Commission Should Require Use of Preferred Resources to Fill Net Short Positions Where Appropriate

In D.07-12-052 the Commission specified that in subsequent iterations of the long-term procurement process, the IOUs need to focus on loading order goals and how any fossil generation will complement these goals when filling net short positions.⁷ The IOUs continue to fill their net short positions with conventional resources, without providing a well-developed analysis supporting their position.⁸ Though the Commission has stated a preference for using preferred resources to fill net short positions, when the opportunity arose to do just that, the Commission found the task untenable:

“At this point we decline to count the 500 MW of solar photovoltaic facilities we recently authorized PG&E to procure in D.10-04-052, toward its current procurement allotment. The size and nature of this project, in conjunction with concerns related to the need for generation to back up intermittent generation, raise issues that cannot be resolved on the record before us and which, in any event, are better addressed in the context of the next LTPP.”

(Proposed Decision on A.09-09-021, pp. 38-39.)

Now, consistent with the Commission’s position in A.09-09-021 with respect to the 500 MW of solar photovoltaic facility, the scope of this proceeding should include identifying the LTPP need that these resources are supposed to serve and adjust all previously approved need by the size of the PV project that counts towards the utilities net short. The same should be done for all the applications the IOUs have been bringing to the Commission for approval since D.07-12-052 was issued, including all IOUs Solar PV applications, fuel cell applications, wind farm, and even the California Solar Initiative (CSI). The alternative is that each of these utility resources will result in over-procurement above and beyond what is necessary to maintain grid reliability.

⁷ D.07-12-052, pp. 6-7.

⁸ *Id.*, Finding of Fact (FOF) # 6.

F. Quantifying EE in Load Forecast

In D.07-12-052 the Commission concurred with DRA's recommendation that the CEC and the IOUs should reach consensus on what portion of the Commission's EE goals are embedded in the CEC load forecast.² To achieve this goal, the Demand Forecast Energy Efficiency Quantification Project (DFEEQP) was formed. The 2009 IEPR Staff Workshop, a joint CEC/CPUC/Itron Project for Energy Efficiency Measurement and Attribution, was a public process focused on quantifying both committed EE savings in the 2009 IEPR and uncommitted EE savings. The work of the DFEEQP represents a significant improvement over past efforts to quantify EE savings for the purposes of forecasting load. DRA recommends review, in this OIR, of the planning assumptions adopted in D.08-07-047 and continuing to build upon the analytical work of DFEEQP and the 2009 IEPR record by using the more updated EE savings estimates quantified by the DFEEQP. While the DFEEQP considered various scenarios for quantifying EE savings for purposes of load forecasting, the Commission should not adopt any EE savings estimates that fail to account for verified EE savings from the 2006-2008 program cycle.

G. Evaluating the Uncertainty and Cost of GHG Regulations

DRA recommends that the Commission address these GHG issues in the instant OIR. Firstly, the integration of AB32 and other mandates such as RPS should be reexamined to assure that plans for meeting GHG goals accurately reflect the expected amounts of energy efficiency, demand response, renewables and other GHG-reducing strategies and the cost savings attributable to these preferred resources, particularly renewables, in the context of the total cost necessary to achieve the GHG goals. In pursuing goals established by the Commission, Legislature, and other state agencies, a holistic planning process must ensure that the State is moving toward meeting its goals without duplicating efforts across topic areas. DRA understands that some of the planning of the Cap-and-Trade Program at the California Air Resources Board, for

² *Id.*, FOF #19.

example, may have integrated the 33% renewables goal, but this Commission must make sure that its processes reflect those efforts as well as other activities including energy efficiency, demand response, fuel cells, distributed generation, SmartGrid and Advanced Metering Infrastructure.

Secondly, a comprehensive methodology for calculating the monetary value of greenhouse gas reductions consistently across utilities and the various activities listed above does not currently exist. DRA urges the Commission to include in the scope of this proceeding the development of such a methodology so that the assessment of a “green” resource can quantitatively include its contribution to greenhouse gas goals. DRA understands that in the case of energy efficiency and demand response, for example, a “greenhouse gas” adder is used in cost-effectiveness calculations. However, that adder is so minor as to rarely change the benefit-cost ratio of a particular resource and the methodology for its calculation has not been revisited for some time. In the meantime, much more accurate projections of the price of carbon have been performed by the California Air Resources Board. Rather than just demand response and energy efficiency, all greenhouse gas-reducing resources could be evaluated more accurately with a greenhouse gas adder.

III. TRACK II – IOU SECTION §454.5 BUNDLED PLANS

As specified in the scoping memo, Track II will “consider individual IOU procurement plans pursuant to §454.5, in light of any guidance derived from Tracks I and III adopted no later than the Commission meeting scheduled for November 19, 2010.”¹⁰ DRA agrees with this approach because it addresses the major drawback of consecutively sequencing the system plan analysis and the bundled plan analysis. That the approval of the bundled plans might be postponed indefinitely. Using this approach, Track II will utilize the “best available information” that is adopted from Tracks I and III and will be initiated on a pre-determined schedule (i.e., December 2010). DRA agrees that the intent

¹⁰ Order Instituting Rulemaking 10-05-006, p. 13.

of Track II should be to ensure that the IOU's plans be comparable to one another and consistent with Commission policy in other proceedings.

Per the OIR's request to parties to identify those issues in Track III of the planning process that should be addressed before beginning the Track II phase, DRA does not offer any recommendations at this time. DRA believes that many of the issues in Track III are too complex to be resolved within the schedule set forth in the OIR. Instead the Commission should require parties to utilize the best available information at that time to inform their bundled plans and planning assumptions.

In addition, pursuant to §454.5(d)(3), DRA recommends that Track II consider the extent to which the Energy Resource Recovery Account (ERRA) proceedings usurp elements of the LTPP in ways that were never intended by the Statute. Specifically, in Track II the Commission should consider:

1. Revisiting the interaction of the ERRA and the LTPP. The purpose of ERRA is to ensure "timely recovery of prospective procurement costs incurred pursuant to an approved procurement plan."¹¹ With the expansion of renewable energy resources, demand response,¹² and other procurement policies, the Commission should consider if it is necessary to re-define the scope of the IOUs' annual ERRA compliance filings. The Commission should also consider the IOUs' growing practice of requesting revenue recovery for balancing and memorandum accounts that are not energy procurement-related. (DRA has raised this concern in its testimony for the SCE's 2008 and 2009 ERRA Compliance Proceedings, A.09-04-002 and A.10-04-002, but a Commission decision addressing this point has not yet been issued.)
2. Reviewing the IOUs' Quarterly Compliance Filing obligation to clarify the purpose and scope of these filings, including clarification of what activities reported in these filings are subject to a reasonableness review, as well as a standard of reasonableness in the context of IOU procurement activities.
3. Reviewing the IOUs' forecast filing obligation to clarify that these filings should include the reasonableness review of non-ERRA balancing/memorandum accounts. For example, in the SCE forecast

¹¹ Public Utilities Code §454.5(d)(3).

¹² For example, IOUs' capacity payments to demand response aggregator contracts are recovered in ERRA.

proceeding A.09-08-001, the Public Purpose Programs Adjustment Mechanism (PPPAM) and the California Alternate Rates for Energy Balancing Account (CAREBA) were included in the filing.

The above concerns should also be discussed in the context of the Track III Rulebook. Decisions made in the ERRA proceeding should not form the basis for the rulebook. Rather, the rulebook policies should be decided in this LTPP, and the ERRA proceeding should conform to the Rulebook.

IV. TRACK III - RULE AND POLICY ISSUES

The scoping memo states that Track III will address numerous rule and policy issues related to procurement plans. DRA has recommendations regarding the following issues identified by the scoping memo, namely:

- Compliance with SB 695
- Comply with OTC Policies
- CAISO Market Related Issues
- Refinements to Bid Analysis (PPA vs. UOG)
- GHG Compliance Products and Risk Management Strategies

A. Compliance with SB 695

DRA supports the inclusion in the scope of this proceeding of a discussion of the general principles of cost allocation underlying with SB 695, and previously set forth in D.06-07-029, which promote fair competition for all providers and equitable allocation of costs to all customers. For instance, DRA believes that departing load charges related to the Cost Allocation Methodology (CAM) should be fully non-bypassable, and should be paid by both by existing direct access customers and direct access customers returning to bundled service and paying the transitional bundled service charge (TBS). In recent Direct Access comments regarding the implementation of SB 695, DRA stated that the TBS needs to be made consistent by the inclusion of resource adequacy (RA) and renewable portfolio standards (RPS) charges. These concerns, if not handled directly in this LTPP proceeding, need to be coordinated with the DA proceeding.

Comply with OTC Policies

DRA generally agrees with the Scoping Memo proposal to modify the LTPP proceeding and procurement processes to require the IOUs to assess replacement infrastructure needs and conduct targeted requests for offers (RFOs) to acquire replacement, repowered or otherwise compliant generation capacity. DRA recommends that any OTC-related RFOs be defined as broadly as possible. This is because the more specifically the buyer identifies the product it seeks, the more market power a seller will be allowed to exert.

B. CAISO Market Related Issues: MRTU and Convergence Bidding

The IOUs are requesting cost recovery for market redesign and technology upgrades (MRTU) implementation in their ERRA Compliance filings. DRA has requested that the Commission establish a separate proceeding to consider all of the IOUs' MRTU costs together (pending SCE's 2008 compliance decision). Specifically:

1. The Commission should order the IOUs to file their reasonableness applications at the same time and consolidate their cost recovery requests into a single rulemaking proceeding. If MRTU implementation costs are recovered in ERRA, the Commission should ensure that they are not also recovered inadvertently in the IOUs' other program applications¹³
2. The Commission should give other market participants and interested parties the opportunity to address the reasonableness of the costs and benefits incurred and how they should be attributed.
3. The Commission should order the development of standards for recovery of MRTU costs. Currently, the allocation of the costs to the beneficiaries of MRTU is not an integral consideration in planning of services from the CAISO's New Market; neither is the quantification of savings.

In addition, DRA also believes the Commission should address the issue of virtual/convergence bidding as identified in Phase I of R.08-02-007. The Commission should invite parties to comment on the positive and negative repercussions of the

¹³ For example, IOUs' have been including certain CAISO integration costs in their demand response program applications.

CAISO's anticipated virtual bidding implementation to begin in February 2011. The Commission should also thoroughly assess the possibility of market manipulation and gaming of virtual bidding and the impact it has on all aspects of optimization including, but not limited to; dispatch, commitment, prices, operating levels, and services of physical generation.

C. Refinements to Bid Analysis (PPA vs. UOG)

At a minimum, DRA recommends that in this OIR the Commission determine if and how the UOG policy framework stated in D.07-12-052 pertains to renewable and preferred resource UOG. In general, when there is an established market like there is with renewables and conventional generation, DRA sees no reason that the Commission's UOG policy framework should differ between resource types. But the Commission suggests that this is not the case and uncertainty remains. Specifically:

“...However, we note that while D.07-12-052 referred to preferred resources, it also acknowledged that “there are additional factors associated with utility ownership of renewable and other loading order or non-conventional resources that have not been fully vetted in this proceeding.” Therefore, we find that the applicability of the policy framework for UOG articulated in D.07-12-052 to renewable resources is unclear.”

(D.10-06-049, Decision Addressing a Solar Photovoltaic Program for SCE, p. 14-17)

Thus DRA recommends that this OIR flesh out the details of the “additional factors” associated with renewable and preferred resource UOG so that the policy framework regarding these resources is clear. Without this, a loophole will persist for which a renewable or preferred resource UOG can bypass any and all Commission procurement policies just for the mere fact that the resource is preferred.

D. Risk Management Strategies and GHG Compliance Products

In this OIR, DRA recommends that the Commission investigate the degree to which the utilities' electric and UOG gas hedging programs are serving the ratepayer interest. The utilities hedging programs seek to limit TeVAR to the level of the Customer

Risk Tolerance (CRT), currently \$0.01/kWh. DRA recommends that the utilities provide in-depth analyses of the incremental costs associated with each of the various hedging products purchased and sold since the inception of the hedging program, how each program has impacted customer rates in the aggregate, and in each quarterly period in which the program has been in place. There is enough historical data at this point in time to evaluate how much ratepayers are paying to achieve the rate stability that the utilities' hedging programs provide. The Commission would then have adequate information to determine the value of these programs, and to consider whether maintaining the current CRT level is an appropriate goal and being achieved by the utilities in a cost-effective manner.

Likewise, DRA recommends the Commission also analyze whether the current risk management strategies properly balance the risk and rewards between utility shareholders and ratepayers. Under the current system, potential hedging losses are simply passed through to the ratepayer. DRA recommends a cost sharing mechanism applied to hedging losses may provide the proper incentive to minimize hedging costs.

With regard to GHG Compliance Products, DRA strongly recommends that any authorization for GHG compliance products not be considered in this proceeding, but instead be deferred until such time as the GHG regulatory program is finalized. Many aspects of the cap-and-trade program are not determined at this time, and it would be premature for the utilities and this Commission to invest time and resources in authorizing GHG compliance products without knowing the underlying details of the state's GHG regulatory program.

V. CONCLUSION

For all the foregoing reasons, DRA respectfully requests that the Commission adopt the recommendations in these comments.

Respectfully submitted,

/s/ NOEL OBIORA

Noel Obiora
Staff Counsel

Attorney for the Division of Ratepayer
Advocates

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-5987
Fax: (415) 703-2262

June 4, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE ORDER INSTITUTING RULEMAKING**” to the official service list in **R.10-05-006** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

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Executed on **June 4, 2010**, at San Francisco, California.

/s/ ROSCELLA V. GONZALEZ
Roscella V. Gonzalez

SERVICE LIST
R.10-05-006

AGL9@pge.com;
AxL3@pge.com;
Danielle@ceert.org;
Diane.Fellman@nrgenergy.com;
GBass@SempraSolutions.com;
GxZ5@pge.com;
JChamberlin@LSPower.com;
MWZ1@pge.com;
RegRelCPUCCases@pge.com;
Sean.Beatty@mirant.com;
WKeilani@SempraUtilities.com;
abb@eslawfirm.com;
achang@efficiencycouncil.org;
amber.wyatt@sce.com;
atrowbridge@daycartermurphy.com;
b.buchynsky@dgc-us.com;
barmackm@calpine.com;
bcragg@goodinmacbride.com;
bill@jbsenergy.com;
blaising@braunlegal.com;
brbarkovich@earthlink.net;
case.admin@sce.com;
cem@newsdata.com;
cho@cpuc.ca.gov;
ckmitchell1@sbcglobal.net;
claufenb@energy.state.ca.us;
clu@cpuc.ca.gov;
cynthia.brady@constellation.com;
dbehles@ggu.edu;
dbp@cpuc.ca.gov;
deana.ng@sce.com;
devin.mcdonell@bingham.com;
dmarcus2@sbcglobal.net;
douglass@energyattorney.com;
dsanchez@daycartermurphy.com;
dwang@nrdc.org;
eddyconsulting@gmail.com;
filings@a-klaw.com;
gmorris@emf.net;
janreid@coastecon.com;
jarmenta@calpine.com;
jws@cpuc.ca.gov;
kd1@cpuc.ca.gov;
kdw@woodruff-expert-services.com;
kowalewskia@calpine.com;
kpp@cpuc.ca.gov;
kristin@consciousventuresgroup.com;

lcottle@winston.com;
liddell@energyattorney.com;
lwisland@ucsusa.org;
mang@turn.org;
marcel@turn.org;
martinhomec@gmail.com;
mary.lynch@constellation.com;
mary@solutionsforutilities.com;
matthew@turn.org;
mdjoseph@adamsbroadwell.com;
mdorn@mwe.com;
mflorio@turn.org;
mjaske@energy.state.ca.us;
mnelson@mccarthyaw.com;
mpieniazek@drenergyconsulting.com;
mrw@mrwassoc.com;
mtierney-lloyd@enernoc.com;
myuffee@mwe.com;
nes@a-klaw.com;
nlong@nrdc.org;
nlr@cpuc.ca.gov;
nws@cpuc.ca.gov;
philm@scedenergy.com;
rcox@pacificenvironment.org;
robertgex@dwt.com;
rschmidt@bartlewells.com;
smartinez@nrdc.org;
ssmyers@att.net;
steven.huhman@morganstanley.com;
steven@iepa.com;
sue.mara@rtoadvisors.com;
svn@cpuc.ca.gov;
tjl@a-klaw.com;
todd.edmister@bingham.com;
vlauterbach@mwe.com;
vsk@cpuc.ca.gov;
wetstone@alamedamp.com;
will.mitchell@cpv.com;
wtr@cpuc.ca.gov;
ys2@cpuc.ca.gov;