



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

**FILED**

08-17-10  
04:59 PM

Order Instituting Rulemaking On The  
Commission's Own Motion To Consider  
Revising Energy Utility Tariff Rules Related To  
Deposits And Adjusting Bills As They Affect  
Small Business Customers.

R.10-05-005  
Filed May 6, 2010

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON  
SMALL BUSINESS AND COMMUNITY OUTREACH STAFF REPORT**

JENNIFER T. SHIGEKAWA  
FADIA RAFEEDIE KHOURY

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6008  
Facsimile: (626) 302-6693  
E-mail: fadia.khoury@sce.com

Dated: **August 17, 2010**

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY COMMENTS ON  
SMALL BUSINESS AND COMMUNITY OUTREACH STAFF REPORT**

TABLE OF CONTENTS

I. INTRODUCTION ..... 1

II. DISCUSSION ..... 2

    A. Small Commercial Customers Will Be Adequately Informed Of  
    The Revised Backbilling Rules ..... 2

    B. The Proposed Decision Should Not Rely On DRA’s Faulty  
    Rationale For Reducing The Deposit To Twice The Average Bill ..... 3

    C. The Report’s Recommendations For Reestablishment-of-Credit  
    Deposits For Slow-Paying and Non-Paying Customers Are Clear  
    And Reasonable ..... 5

    D. The Flexibility Of The Tariff Rules As Written Allows SCE To  
    Provide Meaningful Credit Assistance To Its Small Commercial  
    Customers ..... 6

    E. The Deposit Rules Should Sunset On January 1, 2012, And Should  
    Be Implemented Six To Eight Weeks Following A Decision ..... 8

    F. The Report’s Recommended Rule Revisions Are Not Without Cost  
    And Any Such Costs Should Be Recovered ..... 9

III. CONCLUSION ..... 9

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

Order Instituting Rulemaking On The  
Commission's Own Motion To Consider  
Revising Energy Utility Tariff Rules Related To  
Deposits And Adjusting Bills As They Affect  
Small Business Customers.

R.10-05-005  
Filed May 6, 2010

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON  
SMALL BUSINESS AND COMMUNITY OUTREACH STAFF REPORT**

**I.**

**INTRODUCTION**

Southern California Edison ("SCE") respectfully submits these reply comments on the Small Business and Community Outreach Staff Report ("Report"), which summarized the July 6, 2010 workshop held to discuss issues raised by the California Public Utilities Commission's ("Commission's") Order Instituting Rulemaking To Consider Revising Energy Utility Tariff Rules Related to Deposits And Adjusting Bills As They Affect Small Business Customers ("Rulemaking").<sup>1</sup>

---

<sup>1</sup> Rulemaking (R.) 10-05-005.

## II. DISCUSSION

### A. Small Commercial Customers Will Be Adequately Informed Of The Revised Backbilling Rules

Greenlining agrees with the consensus from the workshop that customers who do not belong to Respondents' default groups of "small commercial customers" may nonetheless benefit from the proposed revised backbilling and deposit rules if they certify that they are "micro-businesses," and Greenlining notes that this would "shift[] the burden of determining which businesses meet the [Government Code] definition from the IOU to the customer."<sup>2</sup> Greenlining nonetheless "urges the Commission to require the IOUs to inform non-residential customers that they may qualify for heightened protections if they meet either the energy usage or government code definition."<sup>3</sup>

This recommendation is unnecessary, because no notification will even be required for small commercial customers in SCE's "default" group, i.e., customers in the GS-1 rate group. These customers will *automatically* be included as beneficiaries of the revised rules. SCE's proposed revisions to Tariff Rules 7, 11 and 17—indicating that "Small Commercial Customers, as defined in Rule 1," *and* customers who certify that they meet the California Government Code Section 14837 definition of "micro-business"—is sufficient to inform small commercial customers that even if they do not belong to the default group, they, too, could potentially qualify for a reduced backbilling period.<sup>4</sup> SCE welcomes the commitment—expressed at the July 6 workshop—by the Consumer Service and Information Division of the Commission ("CSID"), the California Small Business Roundtable ("CSBRT"), and the California Small Business Association ("CSBA"), to inform small commercial customers who call these organizations that

---

<sup>2</sup> Greenlining Opening Comments on the Report, p. 3.

<sup>3</sup> *Id.*

<sup>4</sup> *See* SCE Opening Comments on the Report, pp. 4-7.

those customers may pursue self-certification with the Respondents, where appropriate. And SCE will, of course, work with customers who call about a backbill that exceeds three months to help them understand how to pursue self-certification, if applicable. However, because self-certification is appropriate for only a very small subset of customers outside of the default GS-1 rate group (defined in Rule 1 as “Small Commercial Customers”), the Respondents should not bear the burden of identifying and targeting communications to small commercial customers not already included in that default rate group every time a rebill is initiated.

**B. The Proposed Decision Should Not Rely On DRA’s Faulty Rationale For Reducing The Deposit To Twice The Average Bill**

The vast majority of the active parties in this proceeding already agree that the Commission should reduce the deposit amount required for small commercial customers to establish and reestablish credit to twice the average monthly bill,<sup>5</sup> at least subject to a sunset date.<sup>6</sup> In light of this consensus, it is unnecessary for the Proposed Decision (“PD”) to adopt or otherwise reference DRA’s doubtful conclusion that the rule revision will “not cause significant cost to the utilities.”<sup>7</sup> DRA argues that a reduction in Respondents’ “interest expense” on the deposits will ostensibly offset the cost of increased uncollectibles. DRA’s argument is incorrect, because the Commission has authorized SCE to recover, in rates, the cost of interest paid on customer deposits. This is because SCE is required to finance its rate base in part using customer deposits. To the extent that deposits are reduced, SCE’s cost of financing its rate base through other means will increase, and that additional cost will be more than any “interest expense” savings SCE would enjoy from deposit reductions. This is to say nothing of the fact that reducing deposits increases SCE’s uncollectible expense.

---

<sup>5</sup> See SCE Opening Comments on the Report, p. 6; PG&E Opening Comments on the Report, p. 2; Southwest Gas Opening Comments on the Report, p. 3; PacifiCorp Opening Comments on the Report, p.4; DRA Opening Comments on the Report, p. 6; TURN Opening Comments on the Report, p. 2; Greenlining Opening Comments on the Report, pp. 4-5; CSBRT/CSBA Opening Comments on the Report, p. 2.

<sup>6</sup> See Section II.E below.

<sup>7</sup> DRA Opening Comments on the Report, pp. 6-7.

Equally problematic is DRA's unsupported assumption that "[r]atepayers are more likely to default if deposit requirements are increased since their limited financial resources will be tied up in deposits."<sup>8</sup> Nothing in DRA's comments supports this hypothesis. Small businesses are generally not lost or saved based on the value of a cash deposit; if they are, the utility is correct in assuming that the business is a high credit risk. The Respondents' credit policies are designed to adequately cover risk; the more the utilities collect, the more they protect other ratepayers from bad debt. SCE's average monthly bill for GS-1 customers from 2007 – 2009 was approximately \$127 per month. The average *maximum* monthly bill for the same period was approximately \$148 per month. Thus, the difference between paying two times the maximum monthly bill versus two times the average monthly bill is only about \$42 for the average GS-1 customer. However, SCE must decrease deposit amounts by that \$42 average difference for a large pool of GS-1 customers, which means that reducing the deposit amount to two times the average monthly bill decreases SCE's ability to protect other ratepayers from bad debt.

DRA also relies on data from SDG&E and SoCalGas to argue that "requiring more deposits does not increase the recovery rate." However, this comparison is problematic. There is likely a significant difference in the average monthly bill amount between Sempra's gas-only and electric/dual commodity customers. If customers have significantly smaller gas bills than electric, they will be more likely to pay those bills regardless of the deposit amount. This could be an important factor in the difference in recovery rates, if there is such a difference, between the two utilities. Moreover, SCE does not define "gross" and "net" uncollectibles the way DRA does;<sup>2</sup> depending on how the other utilities define "gross" and "net," any cross-utility comparisons are potentially flawed.

---

<sup>8</sup> *Id.*, p. 6.

<sup>2</sup> DRA defines "gross uncollectibles" as the total uncollected amount before deposits are applied to offset unpaid debt, and "net uncollectibles" is the total uncollected amount after deposits are applied. DRA Opening Comments on the Report, p. 6. By contrast, SCE reports "gross uncollectibles" *after* deposits are applied. "Net uncollectibles" includes other payments, credits, and adjustments that are not necessarily associated with the same accounts that were written off. To determine the amount for SCE's "Deposits Applied" in Appendix A, Table 1 of DRA's Opening Comments on the Report, DRA subtracted net uncollectible from gross

Continued on the next page

In sum, the PD should not rely on DRA’s flawed rationale if it chooses to adopt the Report’s recommendations to decrease deposits to twice the average monthly bill. It is simpler and more accurate to simply conclude that because of the economic downturn, it may be appropriate to reduce the deposit amount for small businesses to provide temporary relief.

**C. The Report’s Recommendations For Reestablishment-of-Credit Deposits For Slow-Paying and Non-Paying Customers Are Clear And Reasonable**

Greenlining notes incorrectly that the Report did not specifically suggest whether to waive reestablishment-of-credit deposits for slow payment or non-payment of bills following a disconnection.<sup>10</sup> Similarly, TURN contends that the Report did not address whether Respondents should be prohibited from collecting deposits for “re-establishing credit for late or non-payment or following a disconnection.”<sup>11</sup> These characterizations of the Report are inaccurate. The Report states clearly that the Respondents should “permit[] one warning within a calendar year prior to any request for a deposit for a late payment,”<sup>12</sup> a recommendation with which SCE agrees. Moreover, the Report suggested two *options* for Respondents to address a situation in which the customer is late a *second* time during the calendar year—either require a deposit that is no more than two times the average bill, or require enrollment in automatic payment.<sup>13</sup> As SCE stated in its Opening Comments on the Report,<sup>14</sup> the flexibility reflected in the Report’s two-option proposal is appropriate and acceptable to SCE, because some customers may not be eligible for enrollment in the automatic payment program (for example, if they are simultaneously taking advantage of a flexible payment plan), due to automatic banking restrictions that cannot differentiate between monthly and total outstanding balances due. While

---

Continued from the previous page

uncollectibles. For SCE, that formula will not generate “Deposits Applied.” Thus, DRA’s data for SCE is incorrect.

<sup>10</sup> Greenlining Opening Comments on the Report, p.5.

<sup>11</sup> TURN Opening Comments on the Report, p. 2.

<sup>12</sup> Report, p. 20.

<sup>13</sup> *Id.*

<sup>14</sup> SCE’s Opening Comments on the Report, pp. 8-9.

SCE is amenable to offering DirectPay in lieu of a cash deposit to help qualified small business customers, the Commission should consider that this option increases financial risk to other ratepayers. If a customer has insufficient funds in its account from which the automatic payment is drawn, SCE will take on additional uncollectible expense for which no security deposit was collected. That additional uncollectible expense, if ultimately written off, results in additional costs that other ratepayers will bear.

In light of the Report's recommendations, the PD should not propose that Respondents be required to waive reestablishment-of-credit deposits entirely, including for *non-payment* of bills or following a *disconnection*, as TURN and Greenlining seem to suggest. That would require a more extreme position than that taken in the Report, and would lead to bad debt. Greenlining states that "[i]t is unclear how forcing a small business that is struggling to pay its bills to pay additional deposits is beneficial to anyone other than the IOU."<sup>15</sup> This is a misguided argument. As the workshop participants and facilitators acknowledged, deposits secure the utilities from high uncollectible expenses which, if not recovered from or offset by deposits, is written off and results in increased costs for all other ratepayers. The fact that the hypothetical customer in Greenlining's example has already been disconnected and is "struggling to pay its bills" makes this customer a high credit risk. Any proposed revisions to the credit rules should be mindful of protecting ratepayers from such risks.

**D. The Flexibility Of The Tariff Rules As Written Allows SCE To Provide Meaningful Credit Assistance To Its Small Commercial Customers**

Greenlining urges that "the Commission must be aware of the full range of options the IOUs offer to their customers, such as payment plans, notice procedures, automated payment systems, and deposit alternatives."<sup>16</sup> In addition to listing the relevant credit policies in its

---

<sup>15</sup> Greenlining Opening Comments on the Report, p. 6.

<sup>16</sup> *Id.*, p. 5.

Opening Comments to the Rulemaking,<sup>17</sup> SCE described these policies in detail to CSID and to DRA, in response to data requests propounded on July 12 and July 9, respectively. Thus, there is no need for a “confidential or limited disclosure of internal collection practices,” as Greenlining proposes.<sup>18</sup> To summarize, SCE’s existing policies and procedures for assisting small commercial customers to meet their credit obligations include the following:

- For slow-paying or non-paying commercial customers, SCE issues several overdue and/or final call notices to warn customers they may be required to pay a deposit even if service has not been disconnected.
- Should a commercial customer receive three expired overdue notices or two returned checks within a twelve-month period, that customer will receive a letter indicating that it may be subject to a reestablishment-of-credit deposit.
- SCE provides additional warnings to small commercial customers who have an arrearage balance of \$1,000 or less to help them avoid disconnection. Upon expiration of overdue notices, SCE attempts to contact the customer via the Voice Response Unit, and also mails a final call notice.
- In April 2010, SCE expanded its Level Pay Plan (“LPP”) and began marketing it to GS-1 customers (SCE’s small commercial customers). LPP allows small commercial customers to make equal monthly payments for their expected annual bill (to avoid volatility resulting from seasonal pricing or fluctuation in usage).
- SCE offers a partial payment plan to commercial customers who are disconnected for nonpayment. Under this payment plan, only 50 percent of the required deposit is collected up front, and the remaining 50 percent balance is billed to the customer for payment at a later date. The customer is given the option of paying the remaining 50 percent balance through a flexible payment arrangement plan.
- For customers having financial difficulty associated with a rebill, SCE offers payment arrangements commensurate with the timeframe that the rebill period covered.
- In April 2010, SCE began offering payment arrangements to small commercial customers up to 60 days for energy bills (it was formerly limited to 30 days).

---

<sup>17</sup> See Southern California Edison Company’s Opening Comments On The Order Instituting Rulemaking To Consider Revising Energy Utility Tariff Rules Related to Deposits And Adjusting Bills As They Affect Small Business Customers, p. 14.

<sup>18</sup> Greenlining Opening Comments on the Report, p. 5.

- Frequently, SCE may grant additional extensions should a customer request an even more flexible payment arrangement.
- Non-cash deposit alternatives include: (1) Assignment of Certificate of Deposit, (2) Irrevocable Letter of Credit, (3) Qualified Guarantor, and (4) Surety Bond.

These rules, policies, and procedures are aimed at helping SCE’s small commercial customers, and many of them are made possible by the flexibility afforded by the current tariff rules as written.<sup>19</sup>

**E. The Deposit Rules Should Sunset On January 1, 2012, And Should Be Implemented Six To Eight Weeks Following A Decision**

SCE explained in its Opening Comments on the Report why the proposed revisions to the deposit rules should sunset on January 1, 2012.<sup>20</sup> SDG&E and SoCalGas agree that the proposed sunset date is appropriately consistent with the sunset date proposed in Decision (D.)10-07-048.<sup>21</sup> Southwest Gas similarly expressed concern about revising deposit rules “indefinitely” to require waiver of reestablishment-of-credit deposits resulting in part from backbills.<sup>22</sup> The PD in this proceeding should consider these recommendations and adopt an appropriate sunset date that will provide Respondents sufficient time to examine whether these rule revisions are effective in the long-term.

SCE agrees with SDG&E and SoCalGas that the Commission should allow the Respondents six to eight weeks to “fully roll out the new rebilling and potential deposit

---

<sup>19</sup> On pages 2-3 of their jointly filed opening comments on the Report, the CSBRT and CSBA posed a series of questions about how the Respondents determine the appropriate deposit amount for their small commercial customers. SCE provided information responsive to some of those questions when it replied to CSID’s and DRA’s data requests. Should the CSBRT and CSBA wish to see the data request responses, they are free to request them from SCE. SCE has refrained from re-stating those data request responses here in light of its agreement to reduce the deposit amount to twice the average bill, subject to a sunset date, and its agreement to provide slow-paying or non-paying customers at least one warning per calendar year before it imposes a reestablishment-of-credit deposit.

<sup>20</sup> See SCE Opening Comments on the Report, pp. 6-7.

<sup>21</sup> SDG&E and SoCalGas Opening Comments on the Report, pp. 6-7.

<sup>22</sup> Southwest Gas Opening Comments on the Report, pp. 2-3.

requirements.<sup>23</sup> SCE respectfully requests that the PD give the Respondents at least two months after the final decision to implement the measures resulting from the Rulemaking.

**F. The Report’s Recommended Rule Revisions Are Not Without Cost And Any Such Costs Should Be Recovered**

All of the active Respondents in this proceeding have urged recovery of incremental costs that will be incurred in connection with rule revisions prompted by this Rulemaking.<sup>24</sup> These costs include, among other things, the cost of implementing and maintaining the proposed rule revisions; the costs of ensuring compliance with the new rules; the costs of manually processing rebills of customers who choose to self-certify that they are a micro-business; the rise in uncollectible expenses resulting from a reduction in the deposit amounts; and the costs of separately identifying small commercial customers for purposes of assessing a lower deposit amount than for larger commercial customers. Thus, DRA is incorrect that “[t]he Utilities should not incur any additional costs as a result of implementing the . . . changes [proposed in the Rulemaking] because they are within the Utilities’ normal scope of operations.”<sup>25</sup> In the absence of a specific cost recovery mechanism resulting from this proceeding, SCE will include any implementation costs and estimated writeoff impacts in the update portion of its 2012 GRC proceeding, which will be filed with the Commission in approximately September of 2011.

**III.**

**CONCLUSION**

SCE reiterates its commitment to the spirit of the Rulemaking. The backbill period should be reduced to three months for a default class of customers already defined in SCE’s rules as “Small Commercial Customers,” and any small business customers outside of that default

---

<sup>23</sup> SDG&E and SoCalGas Opening Comments on the Report, p. 6.

<sup>24</sup> SCE Opening Comments on the Report, pp. 9-10; SDG&E and SoCalGas Opening Comments on the Report, p. 6; PG&E Opening Comments on the Report, p. 4; Southwest Gas Company Opening Comments on the Report, p. 4; PacifiCorp Opening Comments on the Report, p. 4.

<sup>25</sup> DRA Opening Comments on the Report, p. 2.

class can self-certify that they meet the California Government Code definition of “micro-business.” The suggested procedure in the Report for addressing slow-paying or non-paying customers is appropriately flexible, and it complements the important policies SCE has adopted for aiding small commercial customers in this difficult economic climate. The Report’s recommendation that deposits be reduced to twice the average bill should be subject to a sunset date, and the Respondents must be permitted to recover incremental costs resulting from these rule revisions.

Respectfully submitted,

JENNIFER T. SHIGEKAWA  
FADIA RAFEEDIE KHOURY

/s/ Fadia Rafeedie Khoury

By: Fadia Rafeedie Khoury

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6008  
Facsimile: (626) 302-0000  
E-mail: fadia.khoury@sce.com

August 17, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON SMALL BUSINESS AND COMMUNITY OUTREACH STAFF REPORT on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **17th day of August, 2010**, at Rosemead, California.

/s/ Raquel Ippoliti

Raquel Ippoliti

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



California Public  
Utilities Commission

CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

**PROCEEDING: R1005005 - CPUC- OIR TO CONSIDER**

**FILER: CPUC**

**LIST NAME: LIST**

**LAST CHANGED: AUGUST 2, 2010**

[DOWNLOAD THE COMMA-DELIMITED FILE](#)  
[ABOUT COMMA-DELIMITED FILES](#)

[Back to Service Lists Index](#)

### Parties

CATHERINE MAZZEO  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510  
FOR: SOUTHWEST GAS CORPORATION

FADIA RAFEEDIE KHOURY  
ATTORNEY  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE., PO BOX 800  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

NGUYEN QUAN  
MGR - REGULATORY AFFAIRS  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773  
FOR: GOLDEN STATE WATER COMPANY

KIM F. HASSAN  
SOUTHERN CALIFORNIA GAS COMPANY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101  
FOR: SOUTHERN CALIFORNIA GAS  
COMPANY/SAN DIEGO GAS & ELECTRIC COMPANY

MARION PELEO  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DIVISION OF RATEPAYER ADVOCATES

NINA SUETAKE  
THE UTILITY REFORM NETWORK  
115 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
FOR: THE UTILITY REFORM NETWORK

DANIEL F. COOLEY  
STAFF COUNSEL  
PACIFIC GAS AND ELECTRIC COMPANY  
BOX 7442, MC B30A / 77 BEALE ST.NO3161  
SAN FRANCISCO, CA 94120  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MICHELLE R. MISHOE  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 1800  
PORTLAND, OR 97232  
FOR: PACIFICORP

## Information Only

---

GREGORY HEALY  
SOCALGAS/SDG&E  
EMAIL ONLY  
EMAIL ONLY, CA 00000

STEPHANIE C. CHEN  
THE GREENLINING INSTITUTE  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: THE GREENLINING INSTITUTE

DONALD L. SODERBERG  
VP - PRICING & TARIFFS  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD / BOX 98510  
LAS VEGAS, NV 89150  
FOR: SOUTHWEST GAS CORPORATION

VALERIE J. ONTIVEROZ  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150

BROOKS CONGDON  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

TREVOR DILLARD  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD, MS S4A50 / PO BOX 10100  
RENO, NV 89520-0024  
FOR: SIERRA PACIFIC POWER COMPANY

F. E. JOHN  
VP - REGULATORY AFFAIRS  
SOUTHERN CALIFORNIA GAS COMPANY  
720 WEST 8TH STREET  
LOS ANGELES, CA 90017  
FOR: SOUTHERN CALIFORNIA GAS COMPANY

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

RONALD MOORE  
SR. REGULATORY ANALYST  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BLVD.  
SAN DIMAS, CA 91773  
FOR: GOLDEN STATE WATER COMPANY

KEITH SWITZER  
VP - REGULATORY AFFAIRS  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773-9016  
FOR: GOLDEN STATE WATER COMPANY

KENNETH J. DEREMER  
DIR., TARIFF & REGULATORY ACCTS  
SAN DIEGO GAS & ELECTRIC CO.  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

CPUC FILE ADMINISTRATION  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST. STE 303  
SAN FRANCISCO, CA 94117-2242

BRIAN K. CHERRY  
VP - REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 / 77 BEALE ST., MC B10C  
SAN FRANCISCO, CA 94177  
FOR: PACIFIC GAS & ELECTRIC COMPANY

CASE COORDINATION  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000; MC B9A  
SAN FRANCISCO, CA 94177

RONALD JANG  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000; MC B10B  
SAN FRANCISCO, CA 94177

ALICIA MILLER  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

JEAN CHUNG  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

MIKE LAMOND  
CHIEF FINANCIAL OFFICER  
ALPINE NATURAL GAS OPERATING CO. #1 LLC  
PO BOX 550

JOY A. WARREN  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

VALLEY SPRINGS, CA 95252  
FOR: ALPINE NATURAL GAS OPERATING  
COMPANY

JOHN DUTCHER  
MOUNTAIN UTILITIES  
PO BOX 205  
KIRKWOOD, CA 95646  
FOR: MOUNTAIN UTILITIES

RAYMOND J. CZAHAR  
CHIEF FINANCIAL OFFICER  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
SACRAMENTO, CA 95826  
FOR: WEST COAST GAS COMPANY

CATHIE ALLEN  
DIR., REGULATORY AFFAIRS  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232  
FOR: PACIFICORP

## State Service

---

DRISHA MELTON  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER SERVICE AND INFORMATION DIVISIO  
320 WEST 4TH STREET SUITE 500  
LOS ANGELES, CA 90013

BRUCE DEBERRY  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5043  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KAREN WATTS-ZAGHA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KE HAO OUYANG  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LEE-WHEI TAN  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARZIA ZAFAR  
CALIF PUBLIC UTILITIES COMMISSION  
PUBLIC ADVISOR OFFICE  
ROOM 2-B  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

STEPHANIE GREEN  
CALIF PUBLIC UTILITIES COMMISSION  
PUBLIC ADVISOR OFFICE  
AREA 2-B  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

---

[TOP OF PAGE](#)  
[BACK TO INDEX OF SERVICE LISTS](#)