

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

11-23-10
04:59 PM

**In the matter of the Application of PacifiCorp
(U901E) for approval to implement a Net Surplus
Compensation Rate.**

**Application 10-03-001
(Filed March 1, 2010)**

All Related Matters.

**Application 10-03-010
Application 10-03-012
Application 10-03-013
Application 10-03-017
(Filed March 15, 2010)**

**PACIFIC GAS AND ELECTRIC COMPANY'S
COMMENTS ON THE PROPOSED DECISION
ADOPTING NET SURPLUS COMPENSATION RATE
PURSUANT TO ASSEMBLY BILL 920**

**RANDALL J. LITTENEKER
STACY W. WALTER**

**Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-2179
Facsimile: (415) 973-0516
E-Mail: rjl9@pge.com**

**Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY**

November 23, 2010

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

In the matter of the Application of PacifiCorp (U901E) for approval to implement a Net Surplus Compensation Rate.

**Application 10-03-001
(Filed March 1, 2010)**

All Related Matters.

**Application 10-03-010
Application 10-03-012
Application 10-03-013
Application 10-03-017
(Filed March 15, 2010)**

**PACIFIC GAS AND ELECTRIC COMPANY'S
COMMENTS ON THE PROPOSED DECISION
ADOPTING NET SURPLUS COMPENSATION RATE
PURSUANT TO ASSEMBLY BILL 920**

I. INTRODUCTION

Pacific Gas and Electric Company (PG&E) provides these comments on the *Proposed Decision Adopting Net Surplus Compensation Rate Pursuant to Assembly Bill 920* (PD), which was issued on November 3, 2010. PG&E appreciates the thoughtful evaluation and implementation of Assembly Bill (AB) 920 in the PD. While there are a couple of issues that need adjustments, overall, PG&E strongly supports adoption of the PD by the Commission with just a few suggested revisions. PG&E offers comments on the following items:

- There is additional work needed to develop a process for handling renewable energy credits (RECs) associated with net surplus generation.
- The PD needs to be revised on FERC jurisdiction issues related to price setting authority and interconnection.
- The Commission should clarify that customers which receive service from Energy Service Providers (ESPs) and Community Choice Aggregators (CCAs) are not

entitled to AB 920 compensation, since PG&E is not their generation supplier. It should also ensure that all utility customers enrolled in solar and wind net metering, including those served by ESPs and CCAs, receive net generation compensation.

- PG&E requests additional flexibility on the net surplus generation compensation start date to address variations in PG&E's billing cycle schedule.
- The PD should permit utilities the flexibility to specify the precise period for their rolling average calculation at the time they update the tariffs.

II. DISCUSSION

PG&E supports basing the net surplus compensation rate on the default load aggregation price^{1/} (absent additional compensation for renewable value) and agrees with most of the implementation details set out in the PD as well. There are a few issues discussed in more detail below where revisions would further strengthen the PD.

A. Additional Work is Needed to Address RPS Eligibility, WREGIS Requirements and REC Certification

PG&E agrees with the PD's finding that the value for the Renewable Energy Credits would be based on the market value for such RECs. However, PG&E is concerned about the PD's requirements regarding the process for acquiring such RECs. Specifically, the PD finds that utilities cannot count net surplus generation obtained from NEM customers toward renewable portfolio standard (RPS) procurement targets until NEM customer facilities are CEC

^{1/} On page 2 of the PD, the 2009 average DLAP price for PG&E is incorrectly identified as five cents per kilowatt hour. That was the average price in December 2009, as shown in Attachment B to PG&E's original application, filed March 15, 2010. The correct value for April 2009-December 2009 was 3.856 cents per kilowatt hour as shown on page 4 of PG&E's June 21, 2010, filing showing proposed calculations. The hourly detail behind the 2009 average rate was included in the spreadsheet attached to Appendix A of PG&E's June 21 filing. Likewise, footnote 23 on page 29 of the PD should be revised to remove the parenthetical "(based on the 2009 average)".

certified and their RECs are tracked in WREGIS. The PD reaches this conclusion in order to harmonize the provisions of AB 920 with existing RPS statutes. As described in PG&E's earlier comments in this proceeding, this requirement will greatly constrain the effectiveness of the REC portion of this program. As suggested in the PD, PG&E intends to work with the CEC to develop a streamlined process for RPS certification and accounting requirements for NEM customers. That said, PG&E remains concerned that requiring these customers to obtain RPS certification and to track energy in WREGIS will create a significant burden and barrier for the majority of NEM customers seeking payment for the renewable attributes in the form of RECs.

PG&E notes that, especially for residential customers, the compilation of RECs for net exports could take many years. In fact, in 2009, nearly 65% of residential customers who had net exports at the time of true-up did not have the 1,000 kWh in exports required for a REC.

Instead, PG&E proposes that all customers with net generation receive compensation whether or not they own the REC; and for the utilities to be able to count such kWh toward their RPS targets. Large numbers of customers are eligible to participate in the AB 920 program, most with very small amounts of kWh. Getting declarations from each of them each year about the status of REC ownership for the surplus kWh would be costly and impractical. Moreover tracking those kWh through WREGIS and individual CEC certifications would be expensive, time consuming, and burdensome, especially on residential customers with small systems. Moreover, the statute simply says the utilities get the RECs and can count them towards their RPS targets. In these circumstances, even though the notion of potentially counting the RECs twice is troubling, a simple solution is to do exactly what the statute requires.

If the Commission nonetheless chooses to require CEC certification and REC tracking in WREGIS for these projects, it should remove the requirement in Ordering Paragraph 7 of the

Decision that the utilities obtain certification of renewable energy ownership from a net energy metering customer prior to compensating that customer for any renewable attributes or counting any renewable energy credits from net surplus generation toward RPS annual procurement targets. PG&E believes the requirement to obtain ownership certification is unnecessary given that under the PD, these NEM facilities will be required to be CEC certified and tracked in WREGIS. Tracking the RECs in WREGIS will ensure that the RECs are only counted once and will prevent against double counting. Only one party is allowed to register a WREGIS generating unit and therefore the ownership question will be sorted out during WREGIS registration. Adding this additional ownership certification requirement places a significant and unnecessary administrative burden on this program.

B. FERC Jurisdiction issues

PG&E has some concerns regarding the two FERC jurisdictional issues addressed in the PD regarding both price setting and interconnection.

1. Setting Price for Net Generation Compensation

The PD observed that the sale of net surplus energy over an applicable billing period by a net metered customer could be regulated by the CPUC by adopting a market-based mechanism for identifying the net surplus compensation rate for NEM customers as FERC-approved market-based rate (MBR) sellers.

As an alternative to obtaining MBR authorization from FERC, the PD states on page 10 that a seller may identify itself to its utility as a QF exempt from FERC's MBR filing requirements because, among other reasons, "FERC has previously found that QFs may engage in market-based sales."^{2/} No authority is cited for this proposition. The PD does, however, quote

^{2/} PD at p. 10.

the following finding from *Sun Edison LLC*, 129 FERC P61,146 (2009): “[I]f the entity making a net sale is a QF that has been exempted from section 205 of the FPA, by section 292.601 of our regulations (fn.om.), no filing under the FPA is necessary to permit the net sale;” This direct guidance from FERC makes it unnecessary for the California Commission to offer any rationale to support the exemption of NEM customers from the Federal Power Act (FPA)’s MBR filing requirements because NEM customers are QFs exempted from section 205 of the FPA by FERC regulation. PG&E recommends that this sentence be modified as shown, and the remainder of the paragraph should be stricken:

To engage in such market-based rate sales, NEM customers would either need to obtain market-based rate (MBR) authorization from FERC or identify themselves to their utility as a QF exempt from ~~FERC’s MBR~~ **the** filing requirements **of Section 205 of the Federal Power Act. NEM customers may avoid making any filing at FERC under the latter option because they are exempt both from the FPA and from the requirement to file self-certification of QF status.(fn)**

Fn: FERC Order 732, 130 FERC P 61,214 (2010.)

Consistent with this determination, the PD concludes on page 11 that AB 920 pricing need not be based on avoided cost principles under PURPA. However, the sentence, “In sum, we conclude that we are not restricted to setting an avoided cost rate under PURPA” could be read as the Commission’s conclusion that PURPA allows it to set rates on a basis other than avoided cost. The Commission should avoid this possibility by re-stating its conclusion as follows, “In sum, we conclude that the AB 920 rate may be based on principles other than avoided cost under PURPA.”

2. Interconnection Jurisdiction^{3/}

The PD states on pages 12-13 that the California Public Utilities Commission (“CPUC”) has jurisdiction over all generation projects interconnecting at distribution, and that the Federal Energy Regulatory Commission (“FERC”) has no jurisdiction over local distribution interconnections. This determination is incorrect and must be corrected, although as discussed in PG&E’s comments in this proceeding and repeated below, there are other ways to achieve the same result for customers receiving AB 920 compensation. FERC previously considered the argument about whether it or the states have jurisdiction over distribution level interconnection, both in FERC Order 2003, setting the rules for large generator interconnections, and in FERC Order 2006, where it set small generator interconnection rules. In those orders, FERC agreed that the states have jurisdiction over certain limited generator interconnections, such as projects that deliver only on-site load and projects delivering to the grid under retail net metering arrangements not involving the sale of excess power.^{4/} In addition, the states have jurisdiction over the interconnection of certain Qualifying Facilities (“QFs”) selling all their output under the Public Utility Regulatory Policies Act (“PURPA”) to the interconnected utility.^{5/} However, except in these limited circumstances, FERC concluded that if distribution lines belong to

^{3/} This issue of jurisdiction over interconnection at distribution voltage of generators making wholesale power sales was also recently briefed in comments on CPUC Draft Resolution E-4368 implementing PG&E’s Solar Photovoltaic Program. There, the draft resolution contained language nearly identical to that in this section of this PD. Both SCE and PG&E filed comments on November 9, 2010 explaining why the claim that the CPUC has jurisdiction over all distribution level interconnections is legally flawed and could pose significant practical problems and delay renewable development.

^{4/} See Order 2003, paragraphs 795-809; Order 2003-A at paragraphs 713-744; Order 2003-B at paragraphs 12-14; Order 2003-C at paragraphs 51-53; Order 2006 at paragraphs 466-490, and Order 2006-A at paragraphs 88-99. The FERC’s Large Generator Interconnection Decisions (Orders 2003 to 2003-C) can be found at <http://www.ferc.gov/industries/electric/indus-act/gi/stnd-gen.asp>. FERC’s Small Generator Interconnection Decisions (Orders 2006 to 2006-B) can be found at <http://www.ferc.gov/industries/electric/indus-act/gi/small-gen.asp>.

^{5/} See e.g., *Consumers Energy Company*, 132 FERC ¶ 61,241 (2010) at p. 24.

utilities that are subject to an Open Access Transmission Tariff (“OATT”), then the FERC interconnection rules govern and FERC has jurisdiction over the interconnection.

Whether FERC has jurisdiction over distribution voltage interconnections has also been considered by the federal courts. In *National Ass’n of Regulatory Utility Commissioners v. FERC*, 475 F.3d 1277, 1282 (D.C. Cir. 2007), the District of Columbia Court of Appeals upheld FERC’s determination that FERC has jurisdiction over generator interconnections to a distribution facility when the facility is included in a public utility’s Commission-filed OATT and the interconnection’s purpose is to facilitate a FERC-jurisdictional wholesale sale of electric energy.

The PD cites Section 201(b)(1) of the Federal Power Act (“FPA”), asserting that FERC has no jurisdiction, with limited exceptions, over local distribution facilities.^{6/} However, as FERC explained in Orders 2003 and 2006, and as the D.C. Circuit affirmed in *National Ass’n of Regulatory Utility Commissioners v. FERC*, FERC’s jurisdiction under the FPA extends to generator interconnections at the distribution level when the generator is making wholesale power sales and the energy will be transmitted under an OATT through FERC-jurisdictional transmission facilities. Thus, the PD is incorrect in asserting that the CPUC has jurisdiction over all distribution level interconnection arrangements.

Based on directions from FERC, the three California Investor-Owned Utilities filed revisions to their Open Access Distribution Tariffs incorporating the FERC Small Generator Rules and Agreements. The FERC accepted these agreements and the PG&E, Southern California Edison, and SDG&E rules for interconnecting distribution voltage generators smaller than 20 MW subject to the FERC rules can be found in their FERC wholesale distribution tariffs

^{6/} See PD at p. 13, citing 16 U.S.C. § 824(b)(1) (2010).

(“WDAT”). That procedure is in active use. Currently, PG&E has over 150 generators in its WDAT queue^{7/} and SCE has over 600 projects listed on its WDAT queue.^{8/} To find the existing longstanding wholesale interconnection arrangements illegal, especially after the litigation and loss of this issue at the Court of Appeals, would throw chaos into the interconnection process for pending renewable projects.

Parties argue that if a generator happens to be a QF, then the state’s interconnection rules apply. This is simply not true, as demonstrated by the huge number of renewable projects that have all interconnected under the FERC rules, even though the projects may happen to be QFs. The state has jurisdiction over the interconnection of a project making wholesale power sales only if the sales are under a state regulated PURPA power sales agreement. Renewable contracts are not PURPA agreements, and the courts have found that the CPUC’s effort to regulate renewable resource interconnection arrangements are pre-empted by pervasive FERC regulation. See *Southern California Edison v. Public Utilities Commission*, 121 Cal.App.4th 1303 (2004).

The PD is contrary to well-established FERC and judicial precedent, and thus must be modified. PG&E reiterates its proposal that the preferred solution is to file a joint petition asking FERC to waive its interconnection jurisdiction so that these customers can continue lawfully under their Rule 21 NEM interconnection agreements. In the alternative, the CPUC could include an express requirement that the projects be QFs to receive AB 920 compensation.

C. To the Extent Possible, the CPUC Should Extend AB 920 Credits to All California Residents Who Install PV

The PD does not address on issues raised in PG&E’s original application. The

^{7/} See http://www.pge.com/includes/docs/pdfs/b2b/newgenerator/wholesalegenerators/pge_wdat_queue.pdf

^{8/} See http://www.sce.com/NR/rdonlyres/B2C1D083-BE83-43A8-BB2C-01C7FF955B3D/0/WDAT_Queue_v2.pdf.

Commission should clarify that customers which receive service from ESPs and CCAs are not entitled to AB 920 compensation, since PG&E is not their generation supplier.

In addition, the Draft PD provides that CCA and DA energy suppliers may offer AB 920 credits for excess generation, but are not required to provide this credit.^{9/} PG&E believes that the requirement should not be simply an option for some suppliers. The statute establishing net metering exempts direct access providers (DA) and community choice aggregators (CCA).^{10/} The statute goes on to say in Section 2827 (f)(1) that if a customer takes service from DA, that the IOU is not required to offer NEM.^{11/} Finally, the CPUC has determined that whether or not a CCA provides net metering, the IOU is required to offer the program for services it provides, though any credits provided for generation charges are the responsibility of the CCA.^{12/}

However, if a DA or CCA provider does offer NEM, then PG&E believes they should also offer a credit for surplus net exports under AB 920.

Simply stated, a California policy should apply to all of California. The statute makes clear that POU customers who enjoy retail net metering programs also must be compensated for net surplus electricity. It makes no sense for DA and CCA providers that elect to offer net metering to skip participation in the net surplus electricity compensation portion of the program. The CPUC should require DA providers and CCAs offering net metering to their customers to provide this program as well.

^{9/} PD, at p. 57, Findings of Fact 15.

^{10/} See PUC Section 2827(b)(3), excepting “electric service providers”.

^{11/} In fact, PG&E does provide NEM treatment for its portion of a customer’s eligible charges whenever a DA provider has a net metering program, regardless of the lack of statutory obligation.

^{12/} D.08-02-002, at p.6, first paragraph under “Discussion”.

D. Additional Flexibility on the AB 920 Start Date is Needed Due to PG&E's Billing Cycle Schedule and Tariff Treatment

Ordering Paragraph 2 requires that PG&E file a tariff such that "The net surplus compensation rate for each utility shall take effect upon Commission approval of that utility's advice letter and may be used to compensate customers who chose net surplus compensation when notified in January 2010 or thereafter, as long as the customer's 12-month true-up period ends January 1, 2011 or later."

PG&E is concerned about the application of this requirement to two groups of customers that may have a true-up before January 1, 2011 but still should be eligible for the NSC.

The first group includes customers that either interconnected new PV systems and enrolled in NEM or became new customers (as a "change-of-party") at a location with an existing NEM generator in January of 2010. Depending on where their January meter read date (and January bill-to date) fell, they could have completed their first billing cycle in January 2010. Under PG&E's NEM tariff, a customer's annual true-up takes place after 12 billing cycles (and not necessarily 12 calendar months). This tariff treatment could result in a December 2010 true-up for these customers, rather than January of 2011 true-up. However, such a customer, who received the AB920 letter notifying them of their option for an early true-up in early 2010, would likely not have anticipated that their true-up would fall in December 2010 leaving them ineligible for NSC in January 2011. PG&E estimates there are 395 customers who fall into this category (but only a subset of these will actually have a net surplus credit.) PG&E requests authorization to treat this group of customers as if their annual true up took place in 2011.

The second type of customer is one who was already on the NEM tariff and had their 2010 true-up in very early January. Due to variability in PG&E's meter reading schedule from year to year and the fact that several holidays occur near the end of the year, it is possible that

some of these customers will have their “January 2011” meter read date (and hence their 2011 true-up date) in late December 2010 instead. PG&E estimates there are 1059^{13/} customer who fall into this category (but likely only a subset of these will have actual net surplus credit.) Again, PG&E requests authorization to treat this group of customers as if their annual true up took place in 2011.

To accommodate these customers PG&E respectfully requests that the language in Ordering Paragraph 2 be modified to provide that “The net surplus compensation rate for each utility shall take effect upon Commission approval of that utility’s advice letter and may be used to compensate customers who chose net surplus compensation when notified in January 2010 or thereafter, as long as the customer’s 12-month true-up period ends January 1, 2011 or later plus PG&E customers who could reasonably have expected their true-up period to end January 1, 2011 or later, but due to variations in PG&E’s normal billing processes their true-up occurred in December of 2010.”

E. The PD Should Permit Utilities The Flexibility To Specify The Precise Period For Their Rolling Average Calculation At The Time They Update The Tariffs.

Ordering Paragraph 1 of the Decision requires that PG&E "use the default load aggregation point [DLAP] price from 7 a.m. to 5 p.m. corresponding to the customer's 12-month true-up period, as the value of electricity portion of their individual net surplus compensation rates." PG&E assumes that some flexibility exists in establishing the specific DLAP price period that "corresponds" to the 12 month period for the DLAP price.

In particular, PG&E assumes the CPUC does not intend a rolling average be calculated for each NEM customer. PG&E assumes a rolling average DLAP would be calculated on a

^{13/} An estimated 234 customers fall into both group, so there is some overlap between these groups’ numbers.

CERTIFICATE OF SERVICE BY ELECTRONIC 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 77 Beale Street, San Francisco, California 94105.

On November 23, 2010, I served a true copy of:

**PACIFIC GAS AND ELECTRIC COMPANY'S COMMENTS ON THE PROPOSED
DECISION ADOPTING NET SURPLUS COMPENSATION RATE PURSUANT
TO ASSEMBLY BILL 920**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for A.10-03-001, A.10-03-010, A.10-03-012, A.10-03-013, A.10-03-017 and 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 A.10-03-001, A.10-03-010, A.10-03-012, A.10-03-013, A.10-03-017 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 23rd day of November, 2010, at San Francisco, California.

/S/

PAMELA J. DAWSON-SMITH

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
EMAIL SERVICE LIST**

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001-A1003010-A1003012-A1003013-A1003017

abb@eslawfirm.com;ablauvelt@eahhousing.org;abrowning@votesolar.org;aes@cpuc.ca.gov;airspecial@aol.com;AMSmith@SempraUtilities.com;annette.gilliam@sce.com;atrowbridge@daycartermurphy.com;bcragg@goodinmacbride.com;bernadette@environmentcalifornia.org;californiadockets@pacificorp.com;camb@pge.com;case.admin@sce.com;cem@newsdata.com;CentralFiles@SempraUtilities.com;chilen@nvenergy.com;clamasbabbini@comverge.com;cmkehrin@ems-ca.com;DAKinports@SempraUtilities.com;datarequest@pacificorp.com;don@donricketts.com;dot@cpuc.ca.gov;dsanchez@daycartermurphy.com;EFM2@pge.com;EGizard@deweysquare.com;emello@nvenergy.com;fortlieb@sandiego.gov;HHH4@pge.com;info@calseia.org;jade.juhl@sfgov.org;jarmstrong@goodinmacbride.com;jjg@eslawfirm.com;jnr@cpuc.ca.gov;johnspilman@netzero.net;joyw@mid.org;jzr@cpuc.ca.gov;kfox@keyesandfox.com;L_brown369@yahoo.com;LEarl@SempraUtilities.com;liddell@energyattorney.com;lwhouse@innercite.com;marcel@turn.org;mary@solutionsforutilities.com;michaelboyd@sbcglobal.net;michelle.mishoe@pacificorp.com;mrw@mrwassoc.com;norman.furuta@navy.mil;NXKl@pge.com;regrelcpucases@pge.com;RegRelCPUCCases@pge.com;rjl9@pge.com;rpistoc@smud.org;sara@solaralliance.org;sas@aklaw.com;sha@cpuc.ca.gov;steven@iepa.com;sww9@pge.com;tblair@sandiego.gov;tciardella@nvenergy.com;tcr@cpuc.ca.gov;tjl@aklaw.com;tomb@crossborderenergy.com;vdr@cpuc.ca.gov;

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001; A1003010; -012; -013; -017

Total number of addressees: 63

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: regrelcpuccases@pge.com
Status: INFORMATION

CASE ADMINISTRATION

PACIFIC GAS & ELECTRIC COMPANY

77 BEALE ST, MC B9A
SAN FRANCISCO CA 94177
Email: RegRelCPUCCases@pge.com
Status: INFORMATION

EILEEN COTRONEO

PACIFIC GAS AND ELECTRIC COMPANY

PO BOX 770000, MC B9A
SAN FRANCISCO CA 94177
Email: EFM2@pge.com
Status: INFORMATION

HAROLD HIRSCH

PACIFIC GAS AND ELECTRIC COMPANY

EMAIL ONLY
EMAIL ONLY CA 0
Email: HHH4@pge.com
Status: INFORMATION

NICOLAS KLEIN

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: NXXI@pge.com
Status: INFORMATION

RANDALL J. LITTENEKER

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE ST, PO BOX 7442, MC B30A
SAN FRANCISCO CA 94120-7442
Email: rjl9@pge.com
Status: INFORMATION

COREY MAYERS

PACIFIC GAS & ELECTRIC COMPANY

PO BOX 770000
SAN FRANCISCO CA 94177-0001
Email: camb@pge.com
Status: INFORMATION

STACY W. WALTER

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE ST, MC B30A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: sww9@pge.com
Status: PARTY

Victor D. Ryerson

CALIF PUBLIC UTILITIES COMMISSION

DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5009
SAN FRANCISCO CA 94102-3214
Email: vdr@cpuc.ca.gov
Status: INFORMATION

Dorothy Duda

CALIF PUBLIC UTILITIES COMMISSION

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

Junaid Rahman

CALIF PUBLIC UTILITIES COMMISSION

ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
Email: jnr@cpuc.ca.gov
Status: STATE-SERVICE

Jonathan J. Reiger

CALIF PUBLIC UTILITIES COMMISSION

EXECUTIVE DIVISION
505 VAN NESS AVE RM 5035
SAN FRANCISCO CA 94102-3214
Email: jzr@cpuc.ca.gov
Status: STATE-SERVICE

Thomas Roberts

CALIF PUBLIC UTILITIES COMMISSION

ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
Email: tcr@cpuc.ca.gov
Status: STATE-SERVICE

Anne E. Simon

CALIF PUBLIC UTILITIES COMMISSION

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

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001; A1003010; -012; -013; -017

Total number of addressees: 63

TIM LINDL
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO CA 94105
Email: tjl@a-klaw.com
Status: INFORMATION

R. THOMAS BEACH
CALIFORNIA COGENERATION COUNCIL
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
Email: tomb@crossborderenergy.com
Status: INFORMATION

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

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

FREDERICK M. ORTLIEB
CITY OF SAN DIEGO, DEPUTY CITY ATTORNEY
OFFICE OF THE CITY ATTORNEY
1200 THIRD AVE, STE 1100
SAN DIEGO CA 92101
FOR: City of San Diego
Email: fortlieb@sandiego.gov
Status: PARTY

DIANA SANCHEZ
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO CA 95864
Email: dsanchez@daycartermurphy.com
Status: INFORMATION

DONALD W. RICKETTS
28855 KENROY AVE
SANTA CLARITA CA 91387
FOR: Donald W. Ricketts
Email: don@donricketts.com
Status: PARTY

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

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

LYNNE BROWN VICE PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
24 HARBOR ROAD
SAN FRANCISCO CA 94124
Email: l_brown369@yahoo.com
Status: INFORMATION

TOM BLAIR DEPUTY ENVIRONMENTAL SERVICES
DIRECTOR
CITY OF SAN DIEGO
9601 RIDGEHAVEN COURT, STE 120
SAN DIEGO CA 92123
Email: tblair@sandiego.gov
Status: INFORMATION

CARLOS LAMAS-BABBINI
COMVERGE, INC.
EMAIL ONLY
EMAIL ONLY CA 0
Email: clamasbabbini@comverge.com
Status: INFORMATION

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

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

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001; A1003010; -012; -013; -017

Total number of addressees: 63

ANDY BLAUVELT
EAH HOUSING
EMAIL ONLY
EMAIL ONLY CA 0
Email: ablauvelt@eahhousing.org
Status: INFORMATION

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND CA 95776
Email: cmkehrein@ems-ca.com
Status: INFORMATION

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

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

JOHN M. SPILMAN
LAW OFFICE OF JOHN M. SPILMAN
22 FAIRWAY DRIVE
MILL VALLEY CA 94941-1309
Email: johnspilman@netzero.net
Status: INFORMATION

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY CA 0
Email: mrw@mrwassoc.com
Status: INFORMATION

MICHELLE R. MISHOE
PACIFICORP
825 NE MULTNOMAH ST, STE 1800
PORTLAND OR 97232
FOR: PacifiCorp
Email: michelle.mishoe@pacificorp.com
Status: PARTY

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS, L.L.P.
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
Email: abb@eslawfirm.com
Status: INFORMATION

BERNADETTE DEL CHIARO CLEAN ENERGY PROGRAM
DIR.
ENVIRONMENT CALIFORNIA RESEARCH
1107 9TH ST, STE 601
SACRAMENTO CA 95814
FOR: Environment California Research & Policy Center
Email: bernadette@environmentcalifornia.org
Status: PARTY

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K ST, STE 900
SACRAMENTO CA 95814-3947
Email: steven@iepa.com
Status: INFORMATION

KEVIN T. FOX
KEYES & FOX LLP
5727 KEITH AVE
OAKLAND CA 94618
FOR: Interstate Renewable Energy Council
Email: kfox@keyesandfox.com
Status: PARTY

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

TARYN CIARDELLA SR. LEGAL SECRETARY
NV ENERGY
EMAIL ONLY
EMAIL ONLY NV 0
Email: tciardella@nvenergy.com
Status: INFORMATION

DATA REQUEST RESPONSE CENTER
PACIFICORP
825NE MULTNOMAH, STE. 2000
PORTLAND OR 97232
Email: datarequest@pacificorp.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001; A1003010; -012; -013; -017

Total number of addressees: 63

CATHIE ALLEN DIR., REGULATORY AFFAIRS
PACIFICORP
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
Email: californiadockets@pacificorp.com
Status: INFORMATION

DEAN A. KINPORTS
SAN DIEGO GAS & ELECTRIC COMPANY
8306 CENTURY PARK COURT CP32D
SAN DIEGO CA 92123
FOR: San Diego Gas & electric Company
Email: DAKinports@SempraUtilities.com
Status: PARTY

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP31E
SAN DIEGO CA 92123
Email: CentralFiles@SempraUtilities.com
Status: INFORMATION

JADE JUHL
SF DEPT. OF THE ENVIRONMENT
EMAIL ONLY
EMAIL ONLY CA 00000-0000
Email: jade.juhl@sfgov.org
Status: INFORMATION

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

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

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

RYAN PISTOCHINI RESOURCE PLANNING & PRICING
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S ST.
SACRAMENTO CA 95817
Email: rpistoc@smud.org
Status: INFORMATION

AIMEE M. SMITH
SAN DIEGO GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY CA 00000-0000
FOR: San Diego Gas & Electric Company
Email: AMSmith@SempraUtilities.com
Status: PARTY

LAURA M. EARL
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST, HQ-12
SAN DIEGO CA 92101
FOR: SDG&E
Email: LEarl@SempraUtilities.com
Status: INFORMATION

ELENA P. MELLO TEAM LEADER
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89511
Email: emello@nvenergy.com
Status: INFORMATION

CHRISTOPHER A. HILEN ASSOCIATE GENERAL
COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89511
FOR: Sierra Pacific Power Company
Email: chilen@nvenergy.com
Status: PARTY

SARA BIRMINGHAM DIR - WESTERN POLICY
SOLAR ALLIANCE
11 LYNN COURT
SAN RAFAEL CA 94901
Email: sara@solaralliance.org
Status: INFORMATION

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., PO BOX 800
ROSEMEAD CA 91770
Email: case.admin@sce.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: November 10, 2010

CPUC DOCKET NO. A1003001; A1003010; -012; -013; -017

Total number of addressees: 63

ANNETTE GILLIAM SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: annette.gilliam@sce.com
Status: PARTY

JACQULEINE AYER ACTION TOWN COUNCILMEMBER
PO BOX 810
ACTON CA 93510
FOR: The Acton Town Council
Email: airspecial@aol.com
Status: PARTY

ERIN GIZARD
THE DEWEY SQUARE GROUP
EMAIL ONLY
EMAIL ONLY CA 0
Email: EGizard@deweysquare.com
Status: INFORMATION

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

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

DON LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
FOR: Wal-Mart Stores, Inc.
Email: liddell@energyattorney.com
Status: PARTY

LON W. HOUSE, PH.D
WEC
4901 FLYING C RD.
CAMERON PARK CA 95682
Email: lwhouse@innercite.com
Status: INFORMATION