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**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)

In the Matter of the Application of Sierra Pacific Power Company (U903E) for Approval of a Net Surplus Compensation Rate.

Application 10-03-010  
(Filed March 15, 2010)

Application of Pacific Gas and Electric Company To Implement Assembly Bill 920 (2009) Setting Terms and Conditions For Compensation For Excess Energy Deliveries By Net Metered Customers. (U 39 E)

Application 10-03-012  
(Filed March 15, 2010)

Application of Southern California Edison Company (U338E) in Response to Assigned Commissioner's Ruling Directing Electric Utilities to File Applications Proposing a Net Surplus Compensation Rate Pursuant to Assembly Bill 920.

Application 10-03-013  
(Filed March 15, 2010)

Application of San Diego Gas & Electric Company (U902E) Proposing a Net Surplus Compensation Rate Pursuant to Assembly Bill 920.

Application 10-03-017  
(Filed March 15, 2010)

**COMMENTS OF CALIFORNIANS FOR RENEWABLE ENERGY ON THE  
PROPOSED DECISION**

In accord with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), CALifornians for Renewable Energy, Inc. (CARE) respectfully comments on the Proposed Decision of ALJ Duda Adopting Net Surplus Compensation Rate Pursuant to Assembly Bill 920 issued in the above captioned proceedings on November 3, 2010 (PD).

These comments will explain why the methodology adopted by the PD for calculation of the net surplus compensation rate (NSCR) is inconsistent with the

requirements of the Federal Power Act (FPA), the Public Utilities Regulatory Policy Act (PURPA), California Assembly Bill 920 (AB92), specific statutory directives, and also inappropriately denies net surplus generators the long-term value of the renewable attributes of their energy for an indeterminate period of time.

### **Introduction**

CARE believes that the proposed Net Surplus Compensation Rate Pursuant to Assembly Bill 920 should be implemented in a way that reduces the costs for the ratepayers. Solar photovoltaic projects can be constructed pursuant to the California Solar Initiative and receive interconnect permission from the utility company owning the distribution lines for up to one megawatt with no interconnect charges. This is for using the electricity on-site (self-generation). Recently adopted legislation amends California Public Utilities Code section 2827 providing reimbursement for any over-generation. While compensation payments were allowed in the past, now the CPUC can assure compensation.

The methodology advanced by the PD must be rejected. Instead, consistent with the FPA, PURPA, and AB 920 , the Commission should adopt a methodology for determining the NSCR comparable to that used to value other renewable generation resources, i.e., establish an avoided cost NSC rate *employing time-of-use rates* under a standard contract as required by statute.

Purportedly the proposed “decision fulfills the requirements of Assembly Bill 920<sup>[1]</sup> and adopts a net surplus compensation rate to compensate net energy metering customers for electricity they produce in excess of their on-site load....Specifically, the

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<sup>1</sup> Stats. 2009, Ch. 376.

net surplus compensation rate will be calculated using a market-based mechanism derived from an hourly day-ahead electricity market price known as the “default load aggregation point” (DLAP) price. A utility’s DLAP price reflects the costs the utility avoids in procuring power during the time period net surplus generators are likely to produce their excess power. . . . The net surplus compensation rate will be a simple rolling average of each utility’s DLAP price from 7 a.m. to 5 p.m. to match the hours that most net surplus generators produce electricity with their solar or wind generating facilities. The simple rolling average will match the 12-month period over which a customer’s net surplus generation is calculated. In 2009, this average DLAP price for Pacific Gas and Electric Company was *five cents per kilowatt hour*”<sup>2</sup>

The proposed decision is inconsistent with the jurisdictional authorities of the CPUC and FERC, inconsistent with the requirements of Senate Bill 1,<sup>3</sup> the “California Solar Initiative” for net energy metering, and the Commission’s Decision 07-01-018<sup>4</sup> issued January 11, 2007 that found “Owners of Renewable Distributed Generation facilities shall own all of the Renewable Energy Credits produced by their facilities” and renewable energy credits (RECs) are not valued appropriately for customer generators based on their facility’s nameplate capacity as opposed to surplus capacity production since they are located on the customer’s side of the distributed utility’s meter based on a time of use (TOU) rate schedule. We assume a TOU rate schedule is applicable only since such (TOU) meters are being deployed under existing multibillion dollar ratepayer funded Smart Metering programs for the three utilities Pacific Gas and Electric Company

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<sup>2</sup> PD at 3

<sup>3</sup> See [http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb\\_0001-0050/sb\\_1\\_bill\\_20060821\\_chaptered.html](http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb_0001-0050/sb_1_bill_20060821_chaptered.html)

<sup>4</sup> See [http://docs.cpuc.ca.gov/PUBLISHED/FINAL\\_DECISION/63678.htm](http://docs.cpuc.ca.gov/PUBLISHED/FINAL_DECISION/63678.htm)

(PG&E) Southern California Edison Company (SCE) and San Diego Gas and Electric Company (SDG&E).

**The PD NSCR is inconsistent with the requirements of the Federal Power Act (FPA), and the Public Utilities Regulatory Policy Act (PURPA)**

CARE's recommended Net Surplus Compensation Rate Pursuant to Assembly Bill 920 is that it be based on the utility's avoided cost as specified under the authority of the FERC<sup>5</sup> (See 18 C.F.R. §§ 292.303 and 292.304) with the actual avoided cost rates established under State authority (See 18 C.F.R. §§ 292.302 and 292.304). That is the utility's avoided cost as specified under the authority of the Federal Energy Regulatory Commission (FERC) which delegates their authority over the Qualified Facility (QF) price paid to this form of FERC regulated wholesale Seller of energy and ancillary services to the California Public Utilities Commission (CPUC).

Only two parties support a utility NSC rate proposal. CARE supports SDG&E's proposal to use SRAC energy rates as the basis for NSC, as well as PacifiCorp's proposal to compensate based on Oregon QF avoided costs prices. Wal-Mart supports SDG&E's proposal to use Commission-approved SRAC rates as the basis for NSC. [PD at 19]

Instead the PD adopts a "net surplus compensation rate [that] will be calculated using a market-based mechanism derived from an hourly day-ahead electricity market price known as the "default load aggregation point" (DLAP) price" as proposed by PG&E.

In simple terms FERC's wholesale ratemaking authority, whether it be under the Federal Power Act (FPA) or the Public Utilities Regulatory Policy Act (PURPA) once any power flows back from the customer-generator side of the utility meter in to

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<sup>5</sup> See <http://www.ferc.gov/industries/electric/gen-info/qual-fac/benefits.asp>

California Independent System Operator (CAISO) controlled grid this electric energy is deemed to be sold in interstate commerce if it is transmitted in interstate commerce or is commingled with electric energy that is transmitted in interstate commerce.

In 132 FERC ¶ 61,047 the FERC found<sup>6</sup> regarding the California Public Utilities Commission (CPUC) petition for declaratory order:

*The Commission's authority under the FPA includes the exclusive jurisdiction to regulate the rates, terms and conditions of sales for resale of electric energy in interstate commerce by public utilities.<sup>[7]</sup> While Congress has authorized a role for States in setting wholesale rates under PURPA, Congress has not authorized other opportunities for States to set rates for wholesale sales in interstate commerce by public utilities, or indicated that the Commission's actions or inactions can give States this authority. We disagree with the characterization of the CPUC's AB 1613 Decisions as merely establishing an "offering price" by the purchaser of power. Rather, we agree with the Joint Utilities that *the CPUC's AB 1613 Decisions constitute impermissible wholesale rate-setting by the CPUC. Because the CPUC's AB 1613 Decisions are setting rates for wholesale sales in interstate commerce by public utilities, we find that they are preempted by the FPA.**

As FERC's July 15, 2010 Order 132 FERC ¶ 61,047 stated regarding CPUC's limited wholesale ratemaking authority "[a]lthough the CPUC has not argued that its [] program is an implementation of PURPA, we find that, to the extent the CHP generators that can take part in the [] program obtain QF status, the CPUC's [] feed-in tariff is *not*

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<sup>6</sup> At paragraphs 64 of 132 FERC ¶ 61,047.

<sup>7</sup> 16 U.S.C. §§ 824, 824d, 824e (2006); e.g., *Mississippi Power & Light Co. v. Mississippi ex rel. Moore*, 487 U.S. 354 (1988).

preempted by the FPA, PURPA or Commission regulations,<sup>[8]</sup> subject to certain requirements,...” Therefore any CPUC approved wholesale NSCR would be pre-empted by FERC’s authority short of the FERC’s first opportunity to review that NSCR. Since any CPUC approved NSCR without FERC's prior review would not be lawful, and would exist in violation of the Federal Power Act (FPA) if the CPUC sets a wholesale price for electricity outside of the avoided cost established under PURPA. It appears the only authority CPUC has is to approve contracts for QFs at or below the avoided cost. Since the PD fails to use avoided cost to determine the NSCR it is unlawful and subject to FERC’s review therefore.

**The PD fails to compensate net surplus generators for the renewable attributes of their electricity**

“We reject proposals to use proxies for the market-value of RECs because it is premature to value RECs that are not yet created by NEM customers. We prefer a market-based valuation for the renewable attributes of net surplus generation, once RECs are created by NEM customers, similar to our choice to use electricity market-prices to value the net surplus generation exported to the grid by NEM customers. Conceptually, we preliminarily agree with proposals by PG&E, SDG&E and the Joint Solar Parties to value renewable attributes based on the average REC price over a 12-month period once RECs are traded, although this will require a means to obtain public REC prices. [PD at 46]

In regards to compensation rate for net surplus generators for the renewable attributes of their electricity AB 920 states:

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<sup>8</sup> 18 C.F.R. § 292.101 et seq. (2010).

The bill would provide that upon adoption of the net surplus electricity compensation rate and the eligible customer-generator electing to receive net surplus electricity compensation, any renewable energy credit, as defined, for net surplus electricity belongs to the electric utility purchasing the electricity and that net surplus electricity counts toward the electric utility's renewables portfolio standard purchasing requirements. [AB920 at 2]

In opposite to AB 920 the PD states “[n]ext, the decision finds that net surplus generators should be compensated for the renewable attributes of their electricity if and when they produce renewable energy credits. The decision finds that net surplus generators must meet certain preconditions, namely Renewables Portfolio Standard certification by the California Energy Commission and Western Renewable Energy Generation Information System metering and tracking requirements, in order to create renewable energy credits and for the utilities to count any net surplus generation they purchase toward Renewables Portfolio Standard annual procurement targets. The decision does not adopt a value for renewable attributes at this time, finding that valuation is premature until renewable energy credits are created by net surplus generators. Finally, net surplus generators seeking net surplus compensation payments for the renewable attributes of their electricity must certify they own any renewable energy credits associated with their generating facilities.” [PD at 3]

CARE considers that greenhouse gas (GHG) offsets<sup>9</sup> in the form of a renewable energy credits (REC)s to also be a type of energy ancillary service that CPUC maintains

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<sup>9</sup> Offsets are defined by AB 32 Section 38505 (k)(2) at page 4 “Greenhouse gas emissions exchanges, banking, credits, and other transactions, governed by rules and protocols established by the state board, that result in the same greenhouse gas emission reduction, over the same time period, as direct compliance with a greenhouse gas emission limit or emission reduction measure adopted by the state board pursuant to this division.”

authority over in regard to the price that is paid QF wholesale Sellers and therefore CPUC controls the parts of the Net Surplus Compensation Rate that the Sellers will be compensated for RECs. The implied REC price is the difference between the costs of the standard contract and the value of a comparable market brown energy product.

The PD is in error where it “finds that net surplus generators must meet certain preconditions, namely Renewables Portfolio Standard certification by the California Energy Commission [CEC] and Western Renewable Energy Generation Information System metering and tracking requirements, in order to create renewable energy credits “.

These preconditions are inapplicable to net metering customer-generators because they have already been met as part of the CEC’s reservation system for eligibility to be a PV solar customer generator under the California Solar Initiative (CSI) and its predecessor program the Self Generation Incentive Program (SGIP) both which have CEC administered reservation programs that are for PV solar facilities that are certified by CEC as a precondition of receiving any benefits. Therefore the PD unnecessarily imposes barriers to customer-generators entering in to a standard contract with their utility as required by AB 920 for compensation for *any renewable energy credit*.

**The PD fails to require the electric utility to offer a standard contract**

In regards to the requirement to provide customer-generators a standard contract for their energy and nameplate capacity Assembly Bill 920 provides [with *emphasis added*]: “*Existing law provides ...where the electricity generated by the eligible customer-generator exceeds the electricity supplied by the electric distribution utility ... during a 12-month period, the eligible customer-generator is a net electricity producer and the*

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[http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab\\_0001-0050/ab\\_32\\_bill\\_20060927\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf)

*electric distribution utility or cooperative retains any excess kilowatthours generated and the customer-generator is not owed compensation for those excess kilowatthours unless the electric distribution utility or cooperative enters into a purchase agreement with the eligible customer-generator for those excess kilowatthours.*” [AB 920 at 1 to 2]

*The bill would require the electric utility to offer a standard contract or tariff to eligible customer-generators that includes compensation for the value of net surplus electricity.* [AB920 at 2]

The PD fails to require the electric utility to offer a standard contract finding instead “[i]n our view, ratepayers would not be indifferent if they were paying a premium contract price for non-contracted power.”<sup>10</sup>

**The PD fails to compensate net surplus generators at time-of-use rates**

In regards to compensation rates for time-of use metered net surplus generators

AB 920 states:

*(B) For all eligible customer-generators taking service under contracts or tariffs employing time-of-use rates, any net monthly consumption of electricity shall be calculated according to the terms of the contract or tariff to which the same customer would be assigned, or be eligible for, if the customer was not an eligible customer-generator.* [AB920 at 7]

Under the FPA or PURPA once any power flows back from the customer-generator side of the utility meter in to California Independent System Operator (CAISO) controlled grid. Most time of use (TOU) meters [also know as time interval meters] are set to take a reading in ten second intervals. Therefore in any ten second interval excess energy may be produced by any net metered customer. While this energy may be negligible during any billing period any excess energy produced within the design

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<sup>10</sup> PD at 37

capability of the meter provided by the utility TOU, Smart Meter, etc. is FERC jurisdictional.

CARE does not provide its own NSC rate proposal, but it supports the proposals by SDG&E and PacifiCorp. In addition, CARE contends that any excess energy produced is FERC jurisdictional, and since TOU meters can take readings in ten second intervals, the applicable NEM true-up period should be a ten second interval. It is unclear from CARE's comments how the Commission would implement a ten second true-up period given the existing NEM program with an annual true-up.<sup>[11]</sup> [PD at 26 to 27]

The PD fails to compensate net surplus generators at time-of-use rates stating “SDG&E and PacifiCorp both propose NSC rates based on SRAC prices paid to QFs. We prefer a market-based approach to valuing NSC. Although QF pricing sounds simple and straightforward, it is not. QF rates are frequently subject to litigation and adjustment in regulatory proceedings. Plus, there are many different settlements and rates for QFs, depending on whether they are renewable or non-renewable. We prefer a publicly available market-price as the source for our NSC rate. In addition, SDG&E is not simply using the QF SRAC price, but proposes to adjust that rate based on an annually determined time-of delivery factor. For non-TOU customers, this adjustment would be based on a representative profile of excess generation derived from SDG&E load research data. (SDG&E, 7/23/10 at 4-5.) We find this adjustment to QF rates complicated and likely to make annual NSC rate updates overly contentious and resource intensive.”

[PD at 32]

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<sup>11</sup> It was difficult to discern CARE's positions from its comments and in general, its comments provided little assistance in reaching the conclusions in this decision.

The PD is therefore in error where it states that the NSCR be based on a “simple rolling average” over a “12-month period”<sup>12</sup> since pursuant to AB 920 “all eligible customer-generators taking service under contracts or tariffs employing time-of-use rates, any net monthly consumption of electricity shall be calculated according to the terms of the contract or tariff to which the same customer would be assigned, or be eligible for, if the customer was not an eligible customer-generator.”

Based on the PD’s finding which are inconsistent with the applicable federal and state statutes it is no surprise that the PD finds “As described in Section 3.1 above, the Commission can adopt an NSC rate based on either market-based rates for electricity, or avoided cost. We will adopt a market-based approach that we determine reflects, as closely as possible, the spot market value of the net surplus generation and complies with the mandate of Section 2827(h)(4)(A-B) that the adopted rate be just and reasonable, leave other ratepayers unaffected, and not shift costs between solar customer generators and other bundled service customers. A market-based mechanism is consistent with the Commission’s oft-stated goal of “markets first”<sup>[13]</sup> and it allows us to compensate NEM customers, when feasible, for both the value of electricity and the value of renewable attributes in order to fulfill a stated goal of AB 920 to encourage private investment in renewable energy resources... We find PG&E’s proposal to use DLAP prices is the most reasonable and efficient source for a market-based electricity value to include in our adopted NSC rate for several reasons...” [PD at 27]

The PD is error because D.07-12-052 is inapplicable for two reasons. One because it applies to conventional fossil generation only of 50 MW or greater not

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<sup>12</sup> See PD at 2, 45, 46, Conclusion of Law 7, and Ordering Paragraph 1.

<sup>13</sup> See, e.g. D.07-12-052.

distributed PV solar, and second because it is contrary of the purpose of the whole Federal QF program which is to mitigate the market power of contracting utilities who seek to exclude the net surplus generators from entry in to the wholesale markets altogether since they are considered a monopoly under that QF program.

Assuming for the sake of argument that PG&E is correct in “calculat[ing] that for December 2009, this average DLAP price was \$.05/kWh, [PG&E, 3/15/10, Attachment B, at 4]”<sup>14</sup> then this clearly a much lower price then the current credit received by net metered customer –generators.

As CARE discussed in it August 6, 2010 Reply to the Parties NSCR proposals “Mr. Boyd offers his June 11, 2009 through July 13, 2009 net energy metering billing statement (Attachment A) to demonstrate for this billing period his OFF peak usage went from a “prior read” of 54,016 KWh usage to -45,161 KWh “current read” which PG&E didn’t appear to dispute at the workshop is a “difference” of -99,176 KWh not the “823” KWh usage listed on this statement. The billing statement lists an [2009] E-7 rate schedule which according to PG&E’s website during this time period<sup>15</sup> the OFF peak price paid by a Tier I retail customer was \$0.08741/KWh. Therefore taking it at face value that the applicable standard is that a compensation rate should be based on “a net sale of energy to a utility over the applicable billing period” why then is Mr. Boyd not owed [or due a credit] of 99,176 KWh x \$0.08741/KWh, or \$8,668.97 for excess capacity produced in the OFF peak during the billing period in question? We believe that because in any ten second interval excess energy may be produced by any net metered customer therefore the proposed use of averaged excess over any applicable billing

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<sup>14</sup> PD at 15

<sup>15</sup> See [http://www.pge.com/tariffs/ResTOU\\_090301-090930.xls](http://www.pge.com/tariffs/ResTOU_090301-090930.xls)

period whether it is monthly or on an annual basis it violates FPA and PURPA accordingly by not recognizing any excess produced on a ten second interval.”[CARE Reply Comments at 2]

### **Conclusion**

The methodology advanced by the PD for determining the NSCR must be rejected. Instead, consistent with the FPA, PURPA, and AB 920, the Commission should adopt a methodology for determining the NSCR comparable to that used to value other renewable generation resources that are already QFs, i.e., establish an avoided cost NSC rate *employing time-of-use rates* under a standard contract as required by statute.

As PG&E stated in its April 5, 2010 letter to the Commission regarding its *Application of Pacific Gas and Electric Company to Implement and Recover in Rates the Costs of its Photovoltaic (PV) Program*, Application 09-02-019 “the RPS program offers the promise of a cleaner energy future. PG&E has signed 100 RPS contracts for over 8500 MW. However, many, even smaller, projects under contract to PG&E face challenges, such as inability to obtain financing, developer experience, siting and transmission. These challenges are not merely incidental or anecdotal; the telling result is that despite the number of new facilities we have contracted for since 2002, only 2 new in-state RPS facilities under contract to PG&E are actually delivering renewable energy to customers today.”

Unlike RPS contracted energy suppliers Net Meter customers covered under AB 920 face none of these challenges, nor is there any question of their viability, therefore the Net Surplus Compensation rate under a QF standard contract should appropriately benefit the Seller and the utility customers alike.

Respectfully Submitted,



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November 23, 2010

**Verification**

I am an officer of the Protesting Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23<sup>rd</sup> day of November 2010, at San Francisco, California.



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Lynne Brown Vice-President  
CALifornians for Renewable Energy,  
Inc. (CARE)

### Certificate of Service

I hereby certify that I have this day served the foregoing document “*Comments on the PD of Californians for Renewable Energy, Inc. (CARE)*” under CPUC Dockets A.10-03-001, A.10-03-010, A.10-03-012, A.10-03-013, and A.10-03-017. Each person designated on the official service list, has been provided a copy via e-mail, to all persons on the attached service list on November 23, 2010, for the proceedings, A.10-03-001, A.10-03-010, A.10-03-012, A.10-03-013, A.10-03-017, with a copy to the List, 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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23<sup>rd</sup> day of November 2010, at Soquel, California.



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