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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	)	Rulemaking 06-04-009 (Filed April 13, 2006)

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of AB 32 Implementation: Greenhouse Gases.	)	Docket 07-OIIP-01

SACRAMENTO MUNICIPAL UTILITY DISTRICT'S REPLY COMMENTS ON THE PROPOSED REPORTING AND TRACKING PROTOCOL

Jane E. Luckhardt
Downey Brand LLP
555 Capitol Mall, Tenth Floor
Sacramento, CA 95814
Tel: (916) 444-1000
Fax: (916) 444-2100
Email: jluckhardt@downeybrand.com

Attorneys for the
Sacramento Municipal Utility District

August 30, 2007

SACRAMENTO MUNICIPAL UTILITY DISTRICT'S REPLY COMMENTS ON THE PROPOSED REPORTING AND TRACKING PROTOCOL

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC) and the California Energy Commission's (CEC) regulations, the Sacramento Municipal Utility District (SMUD) files these Reply Comments ("Reply Comments") on the Interim Opinion on Reporting and Tracking of Greenhouse Gas Emission in the Electricity Sector ("Proposed Decision") issued on August 15, 2007 in the above captioned proceedings.[1] SMUD provides the following response to the comments filed by other parties in this proceeding on August 24, 2007.

- **The CPUC and CEC should not penalize intermittent renewable resources dependence upon firming power.**
- **The CPUC and CEC should adopt San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company's (SoCal Gas) clarifications to the definition of null power.**
- **The CPUC and CEC should apply the most accurate and defensible emission factors for unspecified power.**
- **The CPUC and CEC should encourage the California Air Resources Board (CARB) to revise the regulations upon a final decision on the point of regulation.**
- **The CPUC and CEC should adopt the change to Appendix A included in CMUA's reply comments.**

1. THE CPUC AND CEC SHOULD NOT PENALIZE INTERMITTENT RENEWABLE RESOURCES DEPENDENCE UPON FIRMING POWER

The Independent Energy Producers Association (IEP) and Division of Ratepayer Advocates (DRA) request that firming resources be assigned their actual emissions

[1] 20 Cal. Code of Regs. Divisions 1 and 2.

value.[2] SMUD disagrees with IEP's and DRA's position. Intermittent resources by their very nature require special treatment to be integrated into the reliable operation of the electric system in the west. Intermittent renewable resources are wind and solar resources, which are essential resources to reduce greenhouse gas emissions. These zero carbon resources should be encouraged to the maximum extent technically and economically feasible by the regulations developed to implement Assembly Bill 32. But, due to their intermittent nature, these resources present challenges for power scheduling and the reliable operation of the grid.

These renewable resources cannot always be accurately forecast but must be scheduled in advance. Therefore, these resources require either the purchaser or the seller to firm the resource. An intermittent resource is not firmed with an individual unit or even an individual power plant. Firming is provided by a system or market resource because the very nature of the need for firming is to be able to respond immediately. Every individual unit or individual power plant is off-line at some point in time for scheduled or unscheduled outages. Thus, the firming resource defaults, practically, to a group of facilities to cover lost power.

Because intermittent renewable resources must be firmed in order to be integrated into the electric system, how firming resources are treated from a carbon perspective will impact the amount of these resources purchased and supported by California entities. The treatment of firming power in these regulations should avoid creating disincentives to purchasing these renewable resources. The accommodation of firming resources in D.07-01-039 and in the regulations adopted by the California Energy Commission, where these same arguments were presented, strikes the right balance in using California ratepayer funds in the broad development of renewable resources.[3]

SMUD has no objection with DRA's request that an intermittent renewable

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[2] Comments of the Independent Energy Producers Association on the Proposed Decision of Commissioner Peevey Related to an "Interim Opinion on Reporting and Tracking of Greenhouse Gas Emissions in the electricity Sector", at 5-6, R.06-04-009, August 24, 2007; Comments of the Division of Ratepayer Advocates on the Proposed Interim Opinion on Reporting and Tracking of Greenhouse Gas Emissions in the Electricity Sector, at 3, R.06-04-009, August 24, 2007.

[3] 20 Cal. Code of Regs.§ 2906, Proposed 15-day language, August 10, 2007.

resource allowed to firm at the same carbon rate should not be able to unbundle and sell renewable energy credits (REC) from this same resource.[4]

2. SDG&E AND SOCAL GAS'S CLARIFICATIONS TO THE DEFINITION OF NULL POWER SHOULD BE ADOPTED

DRA's suggestion that RECs not be sold when firming power is counted at the carbon emission rate of the renewable resource is consistent with the Proposed Decision's treatment of null power that SMUD supports.[5] Regarding null power, SMUD also supports the clarifying comments of SDG&E and SoCal Gas to clean up references in the definition of null power to include both the renewable and the environmental component of the REC.[6] Although Alliance for Retail Energy Markets comments regarding splitting the environmental attributes of the REC from null power may be valid, SMUD does not believe they can be adequately evaluated prior to the adoption of these regulations and would recommend that they be evaluated further in the next iteration of these regulations.[7]

3. EMISSION FACTORS USED FOR UNSPECIFIED POWER SHOULD BE AS ACCURATE AND REGIONALLY DEFENSIBLE AS POSSIBLE

Calpine Corporation and the Joint Comments of Environmental Defense, the Natural Resources Defense Council, and the Union of Concerned Scientists advocate for a conservatively high or highest emitting unit emission factor for unspecified power.[8] The reporting regulations stress accuracy, "The regulations shall do all of the following: . . .Ensure rigorous and consistent accounting of emissions". (Cal. Health & Safety Code §

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[4] DRA at 3.

[5] Proposed Decision at 21; Sacramento Municipal Utility District's Comments on the Reporting and Tracking Protocol at 9, R.06-04-009, August 24, 2007.

[6] Comments of San Diego Gas and Electric Company and Southern California Gas Company on Proposed Interim Opinion on Reporting and Tracking of Greenhouse Gas Emission in the Electricity Sector, at 6-7, R.06-04-009, August 24, 2007.

[7] Comments on the Alliance for Retail Energy Markets on the Proposed Decision on Reporting and Tracking of Greenhouse Gas Emissions in the Electricity Sector, at 7-8, R.06-04-009, August 24, 2007.

[8] Comments of Calpine Corporation on the Proposed Decision of Commissioner Peevey on Reporting and Tracking of Greenhouse Gas Emission in the Electricity Sector, at 4, R.06-04-009, August 24, 2007; Joint Comments of Environmental Defense, the Natural Resources Defense Council, and the Union of Concerned Scientists on the Proposed "Interim Opinion on Reporting and Tracking on Greenhouse Gas Emission in the Electricity Sector" ("Joint Comments"), at 5-6, R.06-04-009, August 24, 2007.

38530[b][4].) The reporting and ultimate carbon calculation by CARB should not be intentionally skewed in any direction. Instead, the best available factor should be used. SMUD supports the request by many opening comments that these factors and the regulations be revised in the near future to continue to improve and refine the regulations and the emission factors.[9]

The Joint Comments continue to advocate for an ex post determination of emission factors.[10] SMUD agrees with the position taken by the Proposed Decision that the emission factors be determined on an ex ante basis.[11] SMUD agrees that market certainty is very important to those entities that will be the point of regulation. If an entity does not know in advance the carbon associated with a transaction, they will be unable to accurately forecast their carbon liability and property account for that liability.

4. ONCE CARB DECIDES ON THE POINT OF REGULATION, THE REPORTING REGULATIONS SHOULD BE REVISED

SMUD agrees with Southern California Edison Company that the regulations should be revised once CARB decides upon the point of regulation.[12] These regulations are intentionally drafted to provide the information needed to support either a load based or source based regulatory system. As such, they include more information that would be necessary for either system individually. SMUD supports the adoption of these regulations at this time so as not to force an early decision on the point of regulation. Nonetheless, once CARB decides upon the point of regulation, the reporting requirements can be revised to address only the specific system adopted and reduce the regulatory burden on all parties.

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[9] See for example the Joint Comments at 3.

[10] Joint Comments at 5.

[11] Proposed Decision at 32.

[12] Comments of Southern California Edison Company on Proposed Decision of Commissioner Peevey on Reporting and Tracking of Greenhouse Gas Emission in the Electricity Sector, at 6-7, R.06-04-009, August 24, 2007.

5. SMUD SUPPORTS CMUA'S PROPOSED CHANGES TO APPENDIX A

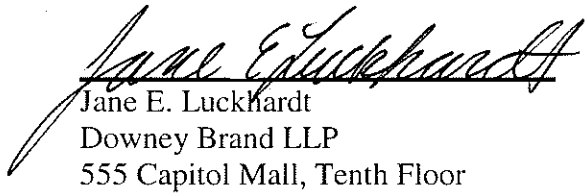
SMUD supports the changes to Appendix A proposed by the California Municipal Utilities Association (CMUA) in their reply comments filed on August 30, 2007.

6. CONCLUSION

In closing, SMUD respectfully requests the CPUC and CEC follow the recommendations provided above in crafting the final decision on reporting and tracking and incorporate the changes to Appendix A included in CMUA's reply comments.

Dated: August 30, 2007

Respectfully submitted,



Jane E. Luckhardt
Downey Brand LLP
555 Capitol Mall, Tenth Floor
Sacramento, CA 95814
Tel: (916) 444-1000
Fax: (916) 444-2100
Email: jluckhardt@downeybrand.com

Attorneys for the
Sacramento Municipal Utility District

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

SACRAMENTO MUNICIPAL UTILITY DISTRICT'S REPLY COMMENTS ON THE PROPOSED REPORTING AND TRACKING PROTOCOL

on all known parties to R. 06-04-009 and CEC Docket No. 07-OIIP-01 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 30th day of August 2007, at Sacramento, California.

Lois Navarrot

Service List R. 06-04-009, updated August 29, 2007

docket@energy.state.ca.us; kgriffin@energy.state.ca.us; cadams@covantaenergy.com; steven.schleimer@barclayscapital.com; steven.huhman@morganstanley.com; rick_noger@praxair.com; keith.mccrea@sablaw.com; ajkatz@mwe.com; ckrupka@mwe.com; lisa.decker@constellation.com; cswoollums@midamerican.com; kevin.boudreaux@calpine.com; trdill@westernhubs.com; ej_wright@oxy.com; pseby@mckennalong.com; todil@mckennalong.com; steve.koerner@elpaso.com; jenine.schenk@apses.com; jbw@slwplc.com; kelly.barr@srpnet.com; rrtaylor@srpnet.com; smichel@westernresources.org; roger.montgomery@swgas.com; ron.deaton@ladwp.com; snewsom@semprautilities.com; dhuard@manatt.com; curtis.kebler@gs.com; dehling@klng.com; gregory.koiser@constellation.com; npedersen@hanmor.com; mmazur@3phasesRenewables.com; tiffany.rau@bp.com; klatt@energyattorney.com; maureen@lennonassociates.com; rhelgeson@scppa.org; douglass@energyattorney.com; pssed@adelphia.net; akbar.jazayeri@sce.com; annette.gilliam@sce.com; cathy.karlstad@sce.com; Laura.Genao@sce.com; rkmoore@gswater.com; dwood8@cox.net; amsmith@sempra.com; atrial@sempra.com; apak@sempraglobal; dhecht@sempratrading.com; daking@sempra.com; svongdeuane@semprasolutions.com; troberts@sempra.com; liddell@energyattorney.com; marcie.milner@shell.com; rwinthrop@pilotpowergroup.com; tdarton@pilotpowergroup.com; lschavrien@semprautilities.com; GloriaB@anzaelectric.org; llund@commerceenergy.com; thunt@cecmail.org; jeanne.sole@sfgov.org; john.hughes@sce.com; llorenz@semprautilities.com; marcel@turn.org;

nsuetake@turn.org; dil@cpuc.ca.gov; fjs@cpuc.ca.gov; achang@nrdc.org; rsa@a-klaw.com; ek@a-klaw.com; kgrenfell@nrdc.org; mpa@a-klaw.com; sls@a-klaw.com; bill.chen@constellation.com; bkc7@pge.com; epoole@adplaw.com; agrimaldi@mckennalong.com; bcragg@goodinmacbride.com; jsqueri@gmssr.com; jarmstrong@goodinmacbride.com; kbowen@winston.com; lcottle@winston.com; sbeatty@cwclaw.com; vprabhakaran@goodinmacbride.com; jkarp@winston.com; jeffgray@dwt.com; cjw5@pge.com; ssmyers@att.net; lars@resource-solutions.org; alho@pge.com; aweller@sel.com; jchamberlin@strategicenergy.com; beth@beth411.com; kerry.hattevik@mirant.com; kowalewskia@calpine.com; wbooth@booth-law.com; hoerner@redefiningprogress.org; janill.richards@doj.ca.gov; cchen@ucsusa.org; gmorris@emf.net; tomb@crossborderenergy.com; bmcc@mccarthylaw.com; sberlin@mccarthylaw.com; anginc@goldrush.com; joyw@mid.org; jjensen@kirkwood.com; mary.lynch@constellation.com; lrdevanna-rf@cleanenergysystems.com; abb@eslawfirm.com; mclaughlin@braunlegal.com; glw@eslawfirm.com; jluckhardt@downeybrand.com; jdh@eslawfirm.com; vwelch@environmentaldefense.org; www@eslawfirm.com; westgas@aol.com; scohn@smud.org; atrowbridge@daycartermurphy.com; dansvec@hdo.net; notice@psrec.coop; deb@a-klaw.com; cynthia.schultz@pacificorp.com; kyle.l.davis@pacificorp.com; ryan.flynn@pacificorp.com; carter@ieta.org; jason.dubchak@niskags.com; bjones@mjbradley.com; kcolburn@symbioticstrategies.com; rapcowart@aol.com; Kathryn.Wig@nrgenergy.com; sasteriadis@apx.com; george.hopley@barcap.com; ez@pointcarbon.com; burtraw@rff.org; vb@pointcarbon.com; kyle_boudreaux@fpl.com; andrew.bradford@constellation.com; gbarch@knowledgeinenergy.com; ralph.dennis@constellation.com; smindel@knowledgeinenergy.com; brabe@umich.edu; bpotts@foley.com; james.keating@bp.com; jimross@r-c-s-inc.com; tcarlson@reliant.com; ghinners@reliant.com; zaiontj@bp.com; julie.martin@bp.com; fiji.george@elpaso.com; echiang@elementmarkets.com; nenbar@energy-insights.com; nlenssen@energy-insights.com; bbaker@summitblue.com; william.tomlinson@elpaso.com; kjsimonsen@ems-ca.com; plusk@wecc.biz; Sandra.ely@state.nm.us; bmcquown@reliant.com; dbrooks@nevp.com; anita.hart@swgas.com; randy.sable@swgas.com; bill.schrand@swgas.com; jj.prucnal@swgas.com; meridith.strand@swgas.com; ckmitchell1@sbcglobal.net; chilen@sppc.com; emello@sppc.com; tdillard@sierrapacific.com; dsoyars@sppc.com; fluchetti@ndep.nv.gov; leilani.johnson@ladwp.com; Lorraine.Paskett@ladwp.com; randy.howard@ladwp.com; robert.pettinato@ladwp.com; hyao@semprautilities.com; rprince@semprautilities.com; rkeen@manatt.com; nwhang@manatt.com; pjazayeri@stroock.com; derek@climateregistry.org; david@nemtzow.com; harveyederpspc.org@hotmail.com; vitaly.lee@aes.com; sendo@ci.pasadena.ca.us; slins@ci.glendale.ca.us; THAMILTON5@CHARTER.NET; bjeider@ci.burbank.ca.us; rmorillo@ci.burbank.ca.us; roger.pelote@williams.com; aimee.branes@ecosecurities.com; case.admin@sce.com; tim.hemig@nrgenergy.com; bjl@bry.com; aldyn.hoekstra@paceglobal.com; ygross@sempraglobal.com; jlaun@apogee.net; kmkiener@fox.net; scottanders@sandiego.edu; jkloberdanz@semprautilities.com; andrew.mcallister@energycenter.org; jack.burke@energycenter.org; jennifer.porter@energycenter.org;

sephra.ninow@energycenter.org; jleslie@luce.com; ofoote@hkcf-law.com; ekgrubaugh@iid.com; pepper@cleanpowermarkets.com; gsmith@adamsbroadwell.com; mdjoseph@adamsbroadwell.com; diane_fellman@fpl.com; hayley@turn.org; mflorio@turn.org; Dan.adler@calcef.org; mhyams@sfwater.org; tburke@sfwater.org; norman.furuta@navy.mil; amber@ethree.com; annabelle.malins@fco.gov.uk; dwang@nrdc.org; filings@a-klaw.com; nes@a-klaw.com; obystrom@cera.com; sdhilton@stoel.com; scarter@nrdc.org; abonds@thelen.com; cbaskette@enernoc.com; colin.petheram@att.com; jwmctarnaghan@duanemorris.com; kfox@wsgr.com; kkhoja@thelenreid.com; pvallen@thelen.com; spauker@wsgr.com; rreinhard@mofo.com; cem@newsdata.com; hgolub@nixonpeabody.com; jscancarelli@flk.com; jwiedman@goodinmacbride.com; mmattes@nossaman.com; jen@cnt.org; lisa_weinzimer@platts.com; steven@moss.net; sellis@fypower.org; arno@recurrentenergy.com; ELL5@pge.com; gxl2@pge.com; jxa2@pge.com; JDF1@PGE.COM; sscb@pge.com; svs6@pge.com; S1L7@pge.com; vjw3@pge.com; karla.dailey@cityofpaloalto.org; farrokh.albuyeh@oati.net; dtibbs@aes4u.com; jhahn@covantaenergy.com; andy.vanhorn@vhcenergy.com; info@calseia.org; greg.blue@sbcglobal.net; Joe.paul@dynegy.com; monica.schwebs@bingham.com; phanschen@mofo.com; josephhenri@hotmail.com; pthompson@summitblue.com; dietrichlaw2@earthlink.net; Betty.Seto@kema.com; JerryL@abag.ca.gov; jody_london_consulting@earthlink.net; steve@schiller.com; mrw@mrwassoc.com; rschmidt@bartlewells.com; adamb@greenlining.org; clyde.murley@comcast.net; brenda.lemay@horizonwind.com; carla.peterman@gmail.com; elvine@lbl.gov; rhwiser@lbl.gov; C_Marnay@lbl.gov; philm@scdenergy.com; rita@ritanortonconsulting.com; cpechman@powereconomics.com; emahlon@ecoact.org; richards@mid.org; chrism@mid.org; rogerv@mid.org; fwmonier@tid.org; brbarkovich@earthlink.net; johnrredding@earthlink.net; clark.bernier@rlw.com; rmccann@umich.edu; cmkehrein@ems-ca.com; e-recipient@caiso.com; grosenblum@caiso.com; rsmutny-jones@caiso.com; saeed.farrokhpay@ferc.gov; david@branchcomb.com; kenneth.swain@navigantconsulting.com; kdusel@navigantconsulting.com; gpickering@navigantconsulting.com; lpark@navigantconsulting.com; davidreynolds@ncpa.com; scott.tomashefsky@ncpa.com; ewolfe@resero.com; Audra.Hartmann@Dynegy.com; Bob.lucas@calobby.com; curt.barry@iwpnews.com; dave@ppallc.com; wynne@braunlegal.com; kellie.smith@sen.ca.gov; mwaugh@arb.ca.gov; pstoner@lgc.org; rachel@ceert.org; wtasat@arb.ca.gov; steven@iepa.com; etiedemann@kmtg.com; bushinskyj@pewclimate.org; lmh@eslawfirm.com; obartho@smud.org; bbeebe@smud.org; bpurewal@water.ca.gov; dmacmll@water.ca.gov; kmills@cfbf.com; karen@klindh.com; ehadley@reupower.com; Denise_Hill@transalta.com; sas@a-klaw.com; egw@a-klaw.com; akelly@climatetrust.org; alan.comnes@nrgenergy.com; kyle.silon@ecosecurities.com; californiadockets@pacificorp.com; Philip.H.Carver@state.or.us; samuel.r.sadler@state.or.us; lisa.c.schwartz@state.or.us; cbreidenich@yahoo.com; dws@r-c-s-inc.com; jesus.arredondo@nrgenergy.com; charlie.blair@delta-ee.com; karen.mcdonald@powerex.com; loe@cpuc.ca.gov; clarence.binninger@doj.ca.gov; david.zonana@doj.ca.gov; agc@cpuc.ca.gov; aeg@cpuc.ca.gov; blm@cpuc.ca.gov; cft@cpuc.ca.gov; tam@cpuc.ca.gov; dsh@cpuc.ca.gov; edm@cpuc.ca.gov;

cpe@cpuc.ca.gov; hym@cpuc.ca.gov; hs1@cpuc.ca.gov; jm3@cpuc.ca.gov; jnm@cpuc.ca.gov; jbf@cpuc.ca.gov; jk1@cpuc.ca.gov; jst@cpuc.ca.gov; jtp@cpuc.ca.gov; jol@cpuc.ca.gov; jci@cpuc.ca.gov; jf2@cpuc.ca.gov; krd@cpuc.ca.gov; lrm@cpuc.ca.gov; ltt@cpuc.ca.gov; mjd@cpuc.ca.gov; meg@cpuc.ca.gov; ner@cpuc.ca.gov; pw1@cpuc.ca.gov; psp@cpuc.ca.gov; pzs@cpuc.ca.gov; rmm@cpuc.ca.gov; ram@cpuc.ca.gov; smk@cpuc.ca.gov; sgm@cpuc.ca.gov; svn@cpuc.ca.gov; scr@cpuc.ca.gov; tcx@cpuc.ca.gov; ken.alex@doj.ca.gov; ken.alex@doj.ca.gov; bdicapo@caiso.com; jsanders@caiso.com; jgill@caiso.com; ppettingill@caiso.com; mscheibl@arb.ca.gov; gottstein@volcano.net; pburmich@arb.ca.gov; bblevins@energy.state.ca.us; dmetz@energy.state.ca.us; deborah.slon@doj.ca.gov; dks@cpuc.ca.gov; kgriffin@energy.state.ca.us; ldecarlo@energy.state.ca.us; mpryor@energy.state.ca.us; mgarcia@arb.ca.gov; pduvair@energy.state.ca.us; wsm@cpuc.ca.gov; hurlock@water.ca.gov; hcronin@water.ca.govkdusel@navigantconsulting.com; gpickering@navigantconsulting.com; lpark@navigantconsulting.com; davidreynolds@ncpa.com; scott.tomashefsky@ncpa.com; ewolfe@resero.com; Audra.Hartmann@Dynegy.com; Bob.lucas@calobby.com; curt.barry@iwpnews.com; dave@ppallc.com; wynne@braunlegal.com; kellie.smith@sen.ca.gov; mwaugh@arb.ca.gov; pstoner@lgc.org; rachel@ceert.org; wtasat@arb.ca.gov; steven@iepa.com; etiedemann@kmtg.com; bushinskyj@pewclimate.org; lmh@eslawfirm.com; obartho@smud.org; bbeebe@smud.org; bpurewal@water.ca.gov; dmacmll@water.ca.gov; kmills@cfbf.com; karen@klindh.com; ehadley@reupower.com; Denise_Hill@transalta.com; sas@a-klaw.com; egw@a-klaw.com; akelly@climatetrust.org; alan.comnes@nrgenergy.com; kyle.silon@ecosecurities.com; californiadockets@pacificorp.com; Philip.H.Carver@state.or.us; samuel.r.sadler@state.or.us; lisa.c.schwartz@state.or.us; cbreidenich@yahoo.com; dws@r-c-s-inc.com; jesus.arredondo@nrgenergy.com; charlie.blair@delta-ee.com; karen.mcdonald@powerex.com; loe@cpuc.ca.gov; clarence.binninger@doj.ca.gov; david.zonana@doj.ca.gov; agc@cpuc.ca.gov; aeg@cpuc.ca.gov; blm@cpuc.ca.gov; cft@cpuc.ca.gov; tam@cpuc.ca.gov; dsh@cpuc.ca.gov; edm@cpuc.ca.gov; cpe@cpuc.ca.gov; hym@cpuc.ca.gov; hs1@cpuc.ca.gov; jm3@cpuc.ca.gov; jnm@cpuc.ca.gov; jbf@cpuc.ca.gov; jk1@cpuc.ca.gov; jst@cpuc.ca.gov; jtp@cpuc.ca.gov; jol@cpuc.ca.gov; jci@cpuc.ca.gov; jf2@cpuc.ca.gov; krd@cpuc.ca.gov; lrm@cpuc.ca.gov; ltt@cpuc.ca.gov; mjd@cpuc.ca.gov; meg@cpuc.ca.gov; ner@cpuc.ca.gov; pw1@cpuc.ca.gov; psp@cpuc.ca.gov; pzs@cpuc.ca.gov; rmm@cpuc.ca.gov; ram@cpuc.ca.gov; smk@cpuc.ca.gov; sgm@cpuc.ca.gov; svn@cpuc.ca.gov; scr@cpuc.ca.gov; tcx@cpuc.ca.gov; ken.alex@doj.ca.gov; ken.alex@doj.ca.gov; bdicapo@caiso.com; jsanders@caiso.com; jgill@caiso.com; ppettingill@caiso.com; mscheibl@arb.ca.gov; gottstein@volcano.net; pburmich@arb.ca.gov; bblevins@energy.state.ca.us; dmetz@energy.state.ca.us; deborah.slon@doj.ca.gov; dks@cpuc.ca.gov; kgriffin@energy.state.ca.us; ldecarlo@energy.state.ca.us; mpryor@energy.state.ca.us; mgarcia@arb.ca.gov; pduvair@energy.state.ca.us; wsm@cpuc.ca.gov; hurlock@water.ca.gov; hcronin@water.ca.gov

BALDASSARO DI CAPO
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MATTHEW MOST
EDISON MISSION MARKETING & TRADING, INC.
160 FEDERAL STREET
BOSTON, MA 02110-1776

THOMAS MCCABE
EDISON MISSION ENERGY
18101 VON KARMAN AVE., SUITE 1700
IRVINE, CA 92612

KAREN EDSON
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MARY MCDONALD
DIRECTOR OF STATE AFFAIRS
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630