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Southern California Edison Company's  
Application For Approval of Embedded Energy  
Efficiency Pilot Programs for  
2007-2008.

Application 07-01-024  
(Filed January 16, 2007)

Application of Pacific Gas and Electric  
Company Seeking Approval of Water-  
Embedded Energy Savings Pilot Program (U 39  
M)

Application 07-01-026  
(Filed January 16, 2007)

San Diego Gas & Electric Company  
(U-902-E) for Approval of Energy & Water  
Efficiency Partnership and Budget for Years  
2007 Through 2008.

Application 07-01-029  
(Filed January 16, 2007)

Southern California Gas Company  
(U-904-G) for Approval of Energy & Water  
Efficiency Partnership and Budget for Years  
2007 Through 2008.

Application 07-01-030  
(Filed January 16, 2007)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES  
AND THE UTILITY REFORM NETWORK  
ON THE ALTERNATE PROPOSED DECISION ADDRESSING  
PETITIONS FOR MODIFICATION  
OF DECISION 07-12-050**

Diana L. Lee  
Staff Counsel  
Attorney for the Division of Ratepayer  
Advocates  
California Public Utilities Commission  
505 Van Ness Avenue San Francisco, CA  
94102  
Fax: (415) 703-2262  
Phone: (415) 703-4342

Hayley Goodson  
Staff Attorney  
THE UTILITY REFORM NETWORK  
711 Van Ness Avenue, Suite 350  
San Francisco, CA 94102  
Phone: (415) 929-8876  
Fax: (415) 929-1132  
Email: [hayley@TURN.org](mailto:hayley@TURN.org)

Cheryl Cox  
Regulatory Analyst  
Division of Ratepayer Advocates  
505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-3027

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**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) submit these comments on the Alternate Proposed Decision Addressing Petitions for Modification of Decision (D.) 07-12-050 (APD), which Commissioner Bohn issued on

October 22, 2008. The APD would deny the California Water Association's (CWA) Petition for Modification of D.07-12-050 (PFM) on procedural grounds, but grant the relief requested pursuant to Section 1708 of the Public Utilities Code.<sup>1</sup> DRA and TURN respectfully request that the Commission reject the APD and instead approve the Proposed Decision of Administrative Law Judge Gamson, issued on October 7 (PD).<sup>2</sup> As described below, the APD relies on fundamentally flawed assumptions and reaches conclusions without sufficient basis.

The focus of the pilot programs approved by D.07-12-050 should remain on exploring energy savings related to saving water, so that at the end of the pilots, the Commission can determine "whether water conservation and less energy intensive water measures should be funded with utility energy efficiency dollars."<sup>3</sup> California's ratepayers are better served by considering CWA's proposed projects in A.08-07-021,<sup>4</sup> as directed by the PD, because the projects would not significantly improve knowledge about saving energy through saving water or improving the water infrastructure, as required for inclusion in the pilot programs. The projects, therefore, do not meet the threshold for approval articulated in D.07-12-050.

## **II. BACKGROUND**

D.07-12-050 approved a series of pilot projects in which the largest regulated energy utilities would undertake water conservation programs in partnership with water agencies and measure the results.<sup>5</sup> At the same time, the energy utilities would "fund

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<sup>1</sup> Like the PD, the APD would grant Southern California Gas Company and Southern California Edison's unopposed Petition for Modification of D.07-12-050 to modify D.07-12-050 to reflect the cancellation of the Lake Arrowhead Conservation Project

<sup>2</sup> DRA and TURN, as well as Southern California Edison and Pacific Gas and Electric Company recommended minor changes in the PD in their October 27, 2008 comments. DRA and TURN's recommended changes to the PD apply to the APD as well and are discussed at pages 8-9.

<sup>3</sup> D.07-12-050, p. 3.

<sup>4</sup> A.08-07-021 et al. is the proceeding before the Commission to consider electric and gas ratepayer-funded energy efficiency projects for 2009-2011.

<sup>5</sup> D.07-12-050, p. 3.

studies necessary to understand more accurately the relationship between water savings and the reduction of energy use and the extent to which those reductions would vary for different agencies.”<sup>6</sup> This two-pronged approach with an estimated cost of \$6.37 million<sup>7</sup> was aimed at answering important questions about the relationship between saving water and saving energy, so that “the utilities and the Commission [are] in the best position to incorporate appropriate water conservation measures in energy efficiency programs after the completion of the pilot process.”<sup>8</sup>

CWA filed its PFM on July 9, 2008 proposing eight new projects on behalf of six of its members. The eight projects would replace well pumps and/or booster pumps, and upgrade the Supervisory Control and Data Acquisition (SCADA) systems as necessary.<sup>9</sup> According to CWA, the projects may “demonstrate” energy savings that would benefit the ratepayers of energy utilities throughout California. CWA proposed that PG&E and SCE ratepayers should fund the entire \$1.33 million cost of the projects.

### **III. DISCUSSION**

#### **A. The APD’s Statement That The CWA Pilots Would “Fill A Critical Void In The Third Strategic Category” Of Water Pilots Is Erroneous.**

Decision 07-12-050 identified three ways to reduce net energy consumption related to cold water:

1. conserving water;
2. using less energy-intensive water (gravity-fed or recycling versus groundwater, aqueducts or desalination); and
3. improving the efficiency of delivery and treatment systems.<sup>10</sup>

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<sup>6</sup> D.07-12-050, p. 3.

<sup>7</sup> D.07-12-050, p. 5.

<sup>8</sup> D.07-12-050, p. 86.

<sup>9</sup> APD, pp. 9-10.

<sup>10</sup> D.07-12-050, p. 8.

Most of the projects approved by D.07-12-050 fall within the first two categories. Noting this, the Commission in D.07-12-050 encouraged the Utilities to further address the third category, improving the efficiency of the delivery and treatment system of water, as part of their planning for 2009-2011.<sup>11</sup> Because measures that directly save energy by increasing the energy efficiency of water treatment and delivery are already eligible for funding through electric and gas energy efficiency programs (versus the indirect energy savings potentially associated with water conservation), such improvements do not depend on special funding through a pilot program.<sup>12</sup>

The APD incorrectly asserts that D.07-12-050 did not adopt any programs “to improve the efficiency of water delivery,” thus creating a “critical void.”<sup>13</sup> While it is correct that the utilities did not originally propose such programs in their January 2007 applications and supporting testimony, SoCalGas subsequently proposed the Pump Engine Testing evaluation partnership with Crestline Lake Arrowhead Water Agency and the Eastern Municipal Water District in its July 2007 supplemental testimony.<sup>14</sup> The Commission in D.07-12-050 recognized that this program would address the energy efficiency of water delivery and authorized it.<sup>15</sup> Further, D.07-12-050 directed PG&E to include “pump efficiency improvements and water and wastewater treatment options” in the Water System Emerging Technologies partnership program the Commission authorized, ensuring that this program would also address the third strategy.<sup>16</sup>

The APD claims that the “pilot programs proposed by CWA fill a critical void in the third strategic category; improving the efficiency of water delivery and treatment

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<sup>11</sup> D.07-12-050, p. 33.

<sup>12</sup> See D.07-12-050, pp. 87-88.

<sup>13</sup> APD, p. 16 and Proposed Finding of Fact 7 (programs approved by D.07-12-050); p. 20 (“critical void”).

<sup>14</sup> See *i.e.* Comments of TURN and DRA, July 18, 2007, pp. 21-22 (discussing changes to SoCalGas’ proposed pilot programs).

<sup>15</sup> D.07-12-050, pp. 62 (discussing this program as falling into the third strategy), p. 72 (authorizing the program).

<sup>16</sup> D.07-12-050, p. 75.

systems.”<sup>17</sup> The APD’s characterization of the eight proposed projects to improve pump efficiency is incorrect. They would not “fill a critical void” in the pilots approved by D.07-12-050, but would instead provide full funding to projects very similar to those currently offered as part of the Utilities’ energy efficiency portfolios.<sup>18</sup> In contrast, as mentioned above, two pilots approved by D.07-12-050 would evaluate whether previously untested strategies for managing water infrastructure have potential benefits for energy efficiency ratepayers.

D.07-12-50 approved the Crestline Lake Arrowhead/Eastern Metropolitan Water District pilot for testing the efficiency of natural gas pumps and engines. Electric utilities offer pump testing programs, but D.07-12-050 observed that “[t]here is no comparable testing program for natural gas driven pumps....[The] program ...is likely to show us how efficient existing pumps are, how much it would cost to improve their efficiency, and how much energy would be saved from such a program.”<sup>19</sup>

D.07-12-050 also approved PG&E’s proposed Emerging Technologies Program to investigate emerging technologies in water system operating efficiency, including enhanced monitoring and telecommunications to improve water efficiency and reduce water use.<sup>20</sup> Monitoring electric consumption data would allow water utilities to calculate

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<sup>17</sup> APD, p. 20.

<sup>18</sup> The proposed projects are eligible for incentives under PG&E’s existing Heavy Industry Program, and they may also be eligible for incentives through several of SCE’s existing programs. *See* Report of PG&E Pursuant to the Water Embedded Energy Decision 07-12-050, filed March 19, 2008, pp. 6, 7, 9; Report of SCE Pursuant to D.07-12-050, p. 5.

<sup>19</sup> D.07-12-050, p. 72, *see also* Finding of Fact 26.

<sup>20</sup> D.07-12-050, p. 75. The APD cites PG&E’s Emerging Technology program as an example of an instance in which joint funding is not required. APD, p. 18 *see also* Proposed Finding of Fact 16. As explained in PG&E’s and SCE’s November 12, 2008 Opening Comments on the APD at pages 3 through 5, this is incorrect. PG&E’s Emerging Technologies (ET) program is distinguishable from CWA’s request to replace pumps at no cost to participants, because the eight water projects will save energy and therefore reduce costs for CWA’s members, while it is unclear whether the ET participants will in fact achieve operational efficiencies through the project. Moreover, PG&E’s ET program funds emerging technologies, versus measures already evaluated in EM&V studies and available for incentives under ongoing energy efficiency programs.

pump efficiency and water and wastewater treatment options and respond with operational decisions that may improve waterworks energy efficiency.

In contrast to the Crestline Lake Arrowhead/EMD natural gas pump efficiency testing pilot and the PG&E emerging technologies pilot, both of which would *uniquely* investigate certain potential operational efficiencies and their costs, the proposed CWA projects would not significantly advance knowledge about improving the efficiency of water delivery and treatment systems. As the Commission noted in D.07-12-050, “the electric utilities in the state currently provide a very valuable electric pump testing program.”<sup>21</sup> In fact, pump replacement programs have been part of the Utilities’ portfolios for years; additional “pilot programs” to investigate their use are unnecessary and wasteful. Instead, as the Commission pointed out in D.07-12-050, the six water company members of CWA “should be able to pursue energy efficiency improvements through existing energy efficiency ... programs.”<sup>22</sup>

CWA has argued in response to the PD that

“the existing energy efficiency programs do not provide sufficient financial incentive to move forward with these demonstration projects. As a result, unless additional or other funding sources are available, the demonstration projects will not be undertaken.”<sup>23</sup>

The unwillingness of CWA’s members to fund pump improvements that will save their customers money (by saving energy) over the long term is inadequate justification for funding the eight projects as part of a pilot project designed to advance knowledge of saving energy through saving water and improving the water delivery infrastructure. This unwillingness is particularly troubling considering that the Commission’s Water Action Plan (WAP) was adopted nearly three years ago, yet water utilities have made no effort to achieve the energy efficiency goal as set by the WAP.

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<sup>21</sup> D.07-12-050, p. 72; *see also* Proposed Finding of Fact 26.

<sup>22</sup> D.07-12-050, p. 88.

<sup>23</sup> Opening Comments of California Water Association on The Proposed Decision of ALJ Gamson, filed October 27, 2008, p. 4.

**B. The APD’s Statement That The Projects Proposed In CWA’s PFM Advance The Purpose Of The Pilot Programs Authorized By D.07-12-050 Is Erroneous.<sup>24</sup>**

As the APD explains, D.07-12-050 articulated nine criteria for evaluating the energy efficiency pilot programs.<sup>25</sup> These criteria were intended to ensure that the Commission would be in a position to “determine whether water conservation and less energy intensive water measures should be funded with utility energy efficiency dollars” when the pilots are completed.<sup>26</sup>

Central to the APD’s determination that the PFM programs should be funded as part of the pilot programs authorized by D.07-12-050 is its finding that these “programs move us significantly forward in our goal of determining whether less energy intensive water measures should be funded with electric utility energy efficiency dollars.”<sup>27</sup> This finding is illogical. The CWA projects that the APD would authorize encompass measures *already eligible for funding with utility energy efficiency dollars*. These projects will not help the Commission determine whether new water-related measures should be considered for funding as part of the energy utilities’ energy efficiency programs. Similarly, these projects would not significantly advance knowledge of the water-energy nexus as a general matter, for the reasons discussed above.

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<sup>24</sup> See *i.e.*, APD, Proposed Finding of Fact 12.

<sup>25</sup> APD, p. 13.

<sup>26</sup> See APD, p. 12 (quoting D.07-12-050, p. 33).

<sup>27</sup> See, *i.e.*, APD, Proposed Finding of Fact 23.

DRA and TURN recommend that the Commission approve the PD and reject the APD. If the Commission decides to approve the APD, then clarification about the evaluation, measurement and verification (EM&V) process would be useful. The APD states “We will direct the Commission’s Division of Water and Audits (DWA) to develop an Evaluation program to collect efficiency data for these pilot programs. DWA will then be required to report back these results to the Commission.” APD, p. 19. While implicit in that statement is integration of the DWA data collection with the Commission Energy Division’s ongoing EM&V process, it would be helpful if language were added to that effect, to eliminate any potential for future uncertainty.

Even setting aside this significant flaw, the proposed partnerships also fail to meet the nine criteria discussed in the APD. The APD states they would “diversify the program,” yet diversity means little if the programs do not meet the basic goal of D.07-12-050, which is a better understanding of the water/energy relationship. The APD states the programs would ‘stimulate new partnerships’ but as proposed, the projects will not stimulate partnerships’ in which each partner brings something to the table; they would instead represent a transfer of wealth from energy ratepayers to water ratepayers. Finally, the APD states that the programs would “help us understand how energy is used in water delivery,” but the proposed pump replacements are not significantly different from pump replacements that already happen within existing utility programs. CWA’s proposed programs would therefore not significantly advance understanding of how energy is used in water delivery. Hence, the APD incorrectly finds that the PFM programs “generally meet the nine criteria set for evaluating the merits of the pilot programs.”<sup>28</sup>

As previously note in DRA and TURN’s response to CWA’s PFM, Del Oro Water Company has already installed in its Paradise Service District, on a test basis, a Variable Frequency Drive (VFD) pump for which operating data is already available.<sup>29</sup> All the projects proposed by CWA for the participating utilities involve the installation of VFDs. DRA recommended evaluation of the data from the Del Oro project to determine whether the VFD project achieved energy savings and whether it was cost-effective to replace standard pumps with VFDs. The APD is silent on this issue and does not address that fact that it would be prudent to first evaluate the Del Oro data before moving forward with funding the proposed pilots.<sup>30</sup>

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<sup>28</sup> APD, Proposed Finding of Fact 12.

<sup>29</sup> TURN/DRA Response to CWA PFM, pp. 10-11.

<sup>30</sup> DRA understands that the Del Oro Water Company has decided not to proceed with the proposed CWA pilot. The projected cost for Del Oro’s project is \$100,000 (APD, p. 9 and Appendix C, p. 3.) That would reduce the total budget for CWA’s proposed projects by \$100,000. Assuming the Commission approves the APD, the final budget should reflect only confirmed participation by project participants.

Clearly, the programs proposed by CWA in the PFM would not advance the purpose of the pilot programs authorized by the Commission in D.07-12-050. Accordingly, the APD fundamentally errs in concluding that CWA’s proposed pilot programs “have merit and are consistent with (a) the criteria established by D.07-12-050 and (b) the strategic goals of A.07-01-024 et al.”<sup>31</sup>

**C. The APD’s Statement That Some Of The Water Pilots Approved By D.07-12-050 Are In The Service Territories Of Non-IOU Energy Providers Is Erroneous.**

The APD characterizes the pilot programs approved by D.07-12-050 as including “toilet replacements in public water service territories, sometimes served by publicly owned electric utilities.”<sup>32</sup> It is incorrect that toilet replacements in the pilots approved by D.07-12-050 are available for customers of publicly-owned electric companies. Participants in the pilot programs must be customers of an investor-owned utility.<sup>33</sup>

**D. DRA And TURN Did Not Support Partial Funding Of The Proposed Water Pilots.**

The APD correctly notes that TURN and DRA advocated the denial of CWA’s PFM.<sup>34</sup> However, the APD also asserts that TURN and DRA advocated “partial approval of the Petition.”<sup>35</sup> This is incorrect. TURN and DRA advocated for the PFM’s complete denial on two basic grounds. The first was that CWA failed to demonstrate that its proposed programs should be funded by energy ratepayers as part of the pilot

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<sup>31</sup> APD, Proposed Conclusion of Law 2.

<sup>32</sup> APD, p.18.

<sup>33</sup> D.07-12-050, p. 15 (participants in the Santa Clara low-income direct install high efficiency toilet replacement must be customers of both Santa Clara and PG&E; p. 16 (participants must be customers of both the Metropolitan Water District and SCE).

<sup>34</sup> APD, p. 7.

<sup>35</sup> PD, p. 7.

programs adopted by the Commission in D.07-12-050.<sup>36</sup> The second was that CWA's proposal lacked ratepayer accountability measures.<sup>37</sup>

For the first reason, DRA and TURN invited CWA to either propose programs that would fit within the scope and purpose of the pilot programs adopted by D.07-12-050, or seek funding for the projects described in its petition through PG&E's and SCE's existing energy efficiency programs. As DRA and TURN explained:

For the reasons outlined in this response, DRA and TURN request that CWA's petition be denied. For the Commission to determine that a wholly unconnected set of ratepayers should pay for the capital improvements that benefit private water companies, and which may or may not benefit water ratepayers, is a very slippery slope. ... Until CWA demonstrates that its projects warrant special funding through the water-energy efficiency pilot program established in D.07-12-050, CWA members should fund these projects through existing energy efficiency programs.<sup>38</sup>

In discussing these accountability concerns, TURN and DRA also offered the Commission suggestions for protecting water and energy ratepayers in the event the Commission intended to authorize any of CWA's projects. As the PD correctly explains,

DRA/TURN would limit participation in the pilot to those water companies and districts where the resulting impacts to their ratepayers are minimal in terms of costs and water supply issues. DRA/TURN argue this would minimize the capital costs involved while the operational and maintenance costs and water supply impacts could easily be absorbed with a minimal effect on water ratepayers. Further, DRA/TURN would have any energy ratepayer funds that subsidize water company capital improvements be managed by the affected energy utilities, while [sic] evaluation, measurement and verification of any pilot program managed by the Commission's Energy Division. Finally, DRA/TURN argue that the water utilities should conduct a cost-benefits analysis at the conclusion of any approved projects to determine the impact of water ratepayers.<sup>39</sup>

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<sup>36</sup> TURN/DRA Response to CWA PFM, pp. 6-10.

<sup>37</sup> TURN/DRA Response to CWA PFM, pp. 10-13.

<sup>38</sup> TURN/DRA Response to CWA PFM, p. 14.

<sup>39</sup> APD, p. 8.

TURN and DRA appreciate that the discussion of recommendations for limiting ratepayer exposure could have led to the impression of their support for the funding of certain CWA projects under certain conditions. Yet their intention was to highlight the shortcomings of the CWA proposal. At the same time, TURN and DRA sought to mitigate the potential harms to water and energy ratepayers if the Commission were to grant CWA's petition by suggesting project limitations and safeguards. TURN and DRA were not partially supporting CWA's petition as filed. Accordingly, TURN and DRA respectfully request modification of the APD to clarify that TURN and DRA offered suggestions to mitigate the potential harms to water and energy ratepayers if the Commission were to grant CWA's petition, including the project limitations and safeguards discussed in the PD (and quoted above), but TURN and DRA opposed funding these projects through modification of D.07-12-050.

#### **IV. CONCLUSION**

D.07-12-050 approved pilot programs that offer an opportunity to evaluate the water-energy nexus. DRA and TURN respectfully request that the Commission reject the APD and approve the PD, because the projects CWA proposed in its PFM fail to satisfy the goal of D.07-12-050: *advancing knowledge* about the relationship between saving water and saving energy, including saving energy through improving the efficiency of the water delivery and treatment system. Instead, the projects CWA proposed in its PFM are ones that can be considered within the energy efficiency applications currently pending before the Commission. CWA's claim that the projects should be approved as the water-energy pilots because they will otherwise not be funded is inadequate justification for disregarding the goals of D.07-12-050 and the energy ratepayer protections provided by that decision.

Respectfully submitted,

/s/ DIANA L. LEE

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DIANA L. LEE  
Staff Counsel

Attorney for the Division of Ratepayer  
Advocates

California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102  
Fax: (415) 70-2262  
Phone: (415) 703-4342

Hayley Goodson  
Staff Attorney  
THE UTILITY REFORM NETWORK  
711 Van Ness Avenue, Suite 350  
San Francisco, CA 94102  
Phone: (415) 929-8876  
Fax: (415) 929-1132  
Email: [hayley@turn.org](mailto:hayley@turn.org)

November 12, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of **COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK ON THE ALTERNATE PROPOSED DECISION ADDRESSING PETITIONS FOR MODIFICATION OF DECISION 07-12-050 in A.07-01-024 et al.** by using the following service:

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Executed on November 12, 2008 at San Francisco, California.

/s/ ALBERT HILL

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## SERVICE LIST FOR A.07-01-024 et al.

spatrick@sempra.com  
dmahmud@mwdh2o.com  
larry.cope@sce.com  
hayley@turn.org  
jhawks\_cwa@comcast.net  
cxc@cpuc.ca.gov  
dil@cpuc.ca.gov  
achang@nrdc.org  
rcohen@nrdc.org  
deborahshefler@gmail.com  
sshupe@sonoma-county.org  
dgeis@dolphingroup.org  
steven.mccurdy@state.ma.us  
gstaples@mendotagroup.net  
jmeyers@naima.org  
ckmitchell1@sbcglobal.net  
bmcdonnell@mwdh2o.com  
tblair@mwdh2o.com  
pvonhaam@mwdh2o.com  
mdavis@ieua.org  
Case.Admin@sce.com  
olivia.samad@sce.com

liddell@energyattorney.com  
jstephenson@sdewa.org  
jyamagata@semprautilities.com  
Dave.Hanna@itron.com  
Jeff.Hirsch@DOE2.com  
atencate@rsgroup.com  
bruce.foster@sce.com  
marcel@turn.org  
llk@cpuc.ca.gov  
norman.furuta@navy.mil  
eric@ethree.com  
aln2@pge.com  
jwwd@pge.com  
lettenson@nrdc.org  
mlwk@pge.com  
jguzman@nossaman.com  
JMOL@pge.com  
ghamilton@gepllc.com  
Patricia.R.Thompson@gmail.com  
pthompson@summitblue.com  
jody\_london\_consulting@earthlink.net  
mrw@mrwassoc.com

stevek@kromer.com  
clyde.murley@comcast.net  
elvine@lbl.gov  
jlarabee@valleywater.org  
brianmm@scwa.ca.gov  
roseenveng@sbcglobal.net  
rhoneyfield@navigantconsulting.com  
lpark@navigantconsulting.com  
lwhouse@innercite.com  
pstoner@lgc.org  
schaudhr@energy.state.ca.us  
boroski@portland.econw.com  
grover@portland.econw.com  
keatingk2@msn.com  
samsirkin@cs.com  
dmg@cpuc.ca.gov  
trh@cpuc.ca.gov  
mkh@cpuc.ca.gov  
rkn@cpuc.ca.gov  
smw@cpuc.ca.gov  
ztd@cpuc.ca.gov