

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



**FILED**

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Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M)	A.08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009-2011	A.08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low-Income Assistance Program and Budgets for Program Years 2009-2011	A.08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009, 2010, and 2011	A.08-05-026 (Filed May 15, 2008)

**COMPLIANCE FILING OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
ON BEHALF OF ITSELF, SOUTHERN CALIFORNIA GAS COMPANY (U 904-G), SAN  
DIEGO GAS & ELECTRIC COMPANY (U 902-M) AND PACIFIC GAS AND  
ELECTRIC COMPANY (U 39-M), REGARDING THE ANNUAL ESTIMATES OF  
CARE ELIGIBLE CUSTOMERS AND RELATED INFORMATION**

<p>KIM HASSAN 101 Ash Street San Diego, CA 92101 Telephone: (619) 699-5006 Facsimile: (619) 699-5027 E-Mail: <a href="mailto:khassan@sempra.com">khassan@sempra.com</a></p> <p>Attorney for SAN DIEGO GAS &amp; ELECTRIC COMPANY SOUTHERN CALIFORNIA GAS CO.</p>	<p>DANIEL COOLEY 77 Beale Street San Francisco, CA 94105 Telephone: (415) 973-0516 Facsimile: (415) 973-6646 E-Mail: <a href="mailto:dfc2@pge.com">dfc2@pge.com</a></p> <p>Attorney for PACIFIC GAS AND ELECTRIC COMPANY</p>
<p>JENNIFER TSAO SHIGEKAWA MONICA GHATTAS Southern California Edison Company 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-3623 Facsimile: (626) 302-7740 E-mail: <a href="mailto:monica.ghattas@sce.com">monica.ghattas@sce.com</a></p> <p>Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY</p>	

Dated: **December 29, 2009**

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STATE OF CALIFORNIA**

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CARE ELIGIBLE CUSTOMERS AND RELATED INFORMATION**

Southern California Edison Company (SCE), on behalf of itself, Southern California Gas Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company (collectively, the “Joint Utilities”), hereby submits the annual estimates of customers eligible for the California Alternate Rates for Energy (CARE) program.

In D.06-12-038, the California Public Utilities Commission (Commission) granted the Joint Utilities’ request to file the annual CARE eligibility estimates on October 15 of each year. On October 14, 2009, Administrative Law Judge (ALJ) Kim granted the Joint Utilities an extension of time until November 30, 2009 in which to file the annual estimates. On December 2, 2009, ALJ Kim granted the Joint Utilities a second extension of time until December 30, 2009.

Athens Research, the contractor that develops large and small area estimates<sup>1</sup> of demographic eligibility on behalf of the Joint Utilities, carefully reviewed the sources for current year small area marginal distributions on income and household size, and found that (due in part to timing issues in their release) these small area sources did not adequately reflect the unusually pronounced 2008-2009 labor force changes revealed in other (larger area) sources like the Census' Current Population Survey and California Employment Development Department data. In 2009, the labor market changes which began in mid-2008 are so substantial that the responsiveness of current year income estimates by demographic vendors, a key input to the the eligibility estimation process, became an issue.

Athens Research used the additional time granted by the ALJ's two extensions of time to review current data sources in an effort to ensure that labor force changes are properly reflected in program eligibility estimates. Athens Research then developed an approach to adjust vendor income estimates making use of current year evidence of inter-annual labor force changes. Absent these adjustments made by Athens Research, the available data would have produced a slight *decrease* in CARE eligibility for 2009. Instead, use of the adjustments produced a substantial increase in eligibility, given that California unemployment increased by 4.5% between June 2008, and June 2009. The Joint Utilities recognize that the lag in available data that is used by demographic vendors in producing current year income distributions has become problematic in the face of the rapid labor force changes taking place recently. The additional adjustment to income inputs is a useful enhancement, in conditions of labor market changes, negative or positive. The Joint Utilities also recognize that the analysis supports the notion that not all job separations create newly CARE- or FERA-eligible households. For example, some households may have remaining income above the CARE guidelines even though a member of that

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<sup>1</sup> The internally consistent large and small area estimates provide the basis for high-level estimates of eligibility that have been used to report eligibility statewide, and by utility service area and county. These same estimates have been useful for identifying and targeting specific neighborhoods for increasing program participation.

household now is unemployed. Other households may have been CARE eligible prior to a member of that household becoming unemployed.

The Joint Utilities remain committed to expanded CARE outreach during these difficult economic times and continue to support the Commission's goal of enrolling all eligible customers who wish to participate in the CARE program.

In Attachment A, the Joint Utilities provide tables showing – by county – total households, demographic eligibility rates for 2010, eligible households for 2010, participating CARE households as of November 30, 2009, and estimated penetration rates based on the 2010 eligibility estimates and November 30, 2009 participation. The 2010 eligibility estimates will be used initially to report January 2010 activity in the Low Income Assistance Programs Monthly Report that will be filed February 22, 2010.

Respectfully submitted,

JENNIFER T. SHIGEKAWA  
MONICA GHATTAS

/s/ MONICA GHATTAS

By: [Monica Ghattas](#)

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

[2244 Walnut Grove Avenue](#)  
[Post Office Box 800](#)  
[Rosemead, California 91770](#)  
Telephone: [\(626\) 302-3626](#)  
Facsimile: [\(626\) 302-7740](#)  
E-mail: [monica.ghattas@sce.com](mailto:monica.ghattas@sce.com)

December 29, 2009

**Attachment A**

**The Joint Utilities' 2009 Report on CARE Eligibility and Penetration Rates**

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of JOINT SUBMITTAL OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), SOUTHERN CALIFORNIA GAS COMPANY (U 904-G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) AND PACIFIC GAS AND ELECTRIC COMPANY (U 39-M) OF THE ANNUAL ESTIMATES OF CARE ELIGIBLE CUSTOMERS AND RELATED INFORMATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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

Executed this **29th day of December, 2009**, at Rosemead, California.

/s/ CECLIA R. JONES

Cecilia R. Jones

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

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



California Public  
Utilities Commission

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**PROCEEDING: A0805022 - PG&E - FOR APPROVAL**  
**FILER: PACIFIC GAS AND ELECTRIC COMPANY**  
**LIST NAME: LIST**  
**LAST CHANGED: DECEMBER 23, 2009**

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### Parties

HOLLY J. LLOYD  
 ANALYST III/STATE REGULATORY AFFAIRS  
 SOUTHWEST GAS CORPORATION  
 5241 SPRING MOUNTAIN ROAD  
 LAS VEGAS, NV 89150-0002  
 FOR: SOUTHWEST GAS CORPORATION

KEITH LAYTON  
 SOUTHWEST GAS CORPORATION  
 PO BOX 98510  
 LAS VEGAS, NV 89193-8510  
 FOR: SOUTHWEST GAS CORPORATION

VALERIE J. ONTIVEROZ  
 SPECIALIST/ STATE REGULATORY AFFAIRS  
 SOUTHWEST GAS CORPORATION  
 5241 SPRING MOUNTAIN ROAD  
 LAS VEGAS, NV 89193-8510

ELENA MELLO  
 SIERRA PACIFIC POWER COMPANY  
 6100 NEIL ROAD  
 RENO, NV 89520

MICHAEL R. THORP  
 SOCALGAS AND SDG&E  
 555 WEST FIFTH STREET, STE 1400  
 LOS ANGELES, CA 90013-1011

ALEX SOTOMAYOR  
 MARAVILLA FOUNDATION  
 5729 UNION PACIFIC AVENUE  
 LOS ANGELES, CA 90022  
 FOR: MARAVILLA FOUNDATION

ARLEEN NOVOTNEY  
 SOUTHERN CALIFORNIA FORUM  
 941 PALMS BLVD.  
 VENICE, CA 90291  
 FOR: SELF

RICHARD VILLASENOR  
 TELACU  
 12252 MC CANN DRIVE  
 SANTA FE SPRINGS, CA 90670

LUIS A. CHAVEZ  
 WINEGARD ENERGY, INC.  
 5354 IRWINDALE AVE., BUILDING B  
 IRWINDALE, CA 91706  
 FOR: WINEGARD ENERGY, INC.

ALLAN RAGO  
 QUALITY CONSERVATION SERVICES, INC.  
 4701 ARROW HIGHWAY, SUITE E  
 MONTCLAIR, CA 91763  
 FOR: THE ENERGY EFFICIENCY COUNCIL;  
 QUALITY CONSERVATION SERVICES, INC.

MICHAEL MONTOYA  
 SENIOR ATTORNEY  
 SOUTHERN CALIFORNIA EDISON  
 2244 WALNUT GROVE AVE.  
 ROSEMEAD, CA 91770

MONICA GHATTAS  
 SOUTHERN CALIFORNIA EDISON COMPANY  
 2244 WALNUT GROVE AVENUE  
 ROSEMEAD, CA 91770  
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KEITH SWITZER  
 BEAR VALLEY ELECTRIC SERVICE  
 630 EAST FOOTHILL BLVD.  
 SAN DIMAS, CA 91773  
 FOR: BEAR VALLEY ELECTRIC SERVICE

RONALD MOORE  
 (133)  
 GOLDEN STATE WATER/BEAR VALLEY ELECTRIC  
 630 EAST FOOTHILL BOULEVARD  
 SAN DIMAS, CA 91773

DON WOOD SR.  
 PACIFIC ENERGY POLICY CENTER  
 4539 LEE AVENUE  
 LA MESA, CA 91941

BRUCE PATTON  
 RANCHO VALLEY BUILDERS, INC.  
 647 AERO WAY  
 ESCONDIDO, CA 92029  
 FOR: THE SAN DIEGO COMMUNITY ENERGY  
 ADVISORY COMMITTEE (SDCEAC)

GEORGETTA J. BAKER  
 ATTORNEY AT LAW  
 SAN DIEGO GAS & ELECTRIC/SOCAL GAS  
 101 ASH STREET, HQ 13  
 SAN DIEGO, CA 92101  
 FOR: SDG&E/SOCALGAS

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

JOY C. YAMAGATA  
 REGULATORY MANAGER  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK COURT, CP 32 D  
 SAN DIEGO, CA 92123  
 FOR: SAN DIEGO GAS & ELECTRIC  
 COMPANY/SOUTHERN CALIFORNIA GAS COMPANY

LYDIA FLORES  
 PRESIDENT  
 AMERICAN INSULATION INC  
 8305 MIRALANI DRIVE  
 SAN DIEGO, CA 92126  
 FOR: AMERICAN INSULATION INC.

TIMOTHY J. LAWLER  
 CEO/PRESIDENT  
 SUNDOWNER INSULATION, INC.  
 1495 RAILROAD AVENUE  
 CLOVIS, CA 93612  
 FOR: SUNDOWNER INSULATION, INC.

ART BRICE  
 RICHARD HEATH AND ASSOCIATES, INC.  
 590 W. LOCUST AVENUE, SUITE 103  
 FRESNO, CA 93650  
 FOR: RICHARD HEATH AND ASSOCIATES, INC.

PAUL KERKORIAN  
 UTILITY COST MANAGEMENT, LLC  
 6475 N PALM AVE., STE. 105  
 FRESNO, CA 93704  
 FOR: NONPROFIT HOUSING ASSOCIATIO OF  
 NORTHRN CALIFORNIA

JERRY H. MANN  
 ATTORNEY AT LAW  
 PERKINS, MANN & EVERETT  
 2222 W. SHAW AVE., SUITE 202  
 FRESNO, CA 93711  
 FOR: RICHARD HEATH & ASSOCIATES

BENJAMIN CARROLL  
 RENAISSANCE INC.  
 2615 W DUDLEY AVE.  
 FRESNO, CA 93728  
 FOR: RENAISSANCE INC.

GREGORY REDICAN  
 DEPUTY DIRECTOR  
 COMMUNITY ACTION AGENCY OF SAN MATEO  
 930 BRITTAN AVENUE  
 SAN CARLOS, CA 94070  
 FOR: SELF

WILLIAM F. PARKER  
 COMMUNITY ACTION AGENCY OF SAN MATEO  
 930 BRITTAN AVENUE  
 SAN CARLOS, CA 94070  
 FOR: COMMUNITY ACTION AGENCY OF SAN  
 MATEO

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

RASHID A. RASHID  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 4107

HAYLEY GOODSON  
 ATTORNEY AT LAW  
 THE UTILITY REFORM NETWORK  
 115 SANSOME STREET, SUITE 900

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

SAN FRANCISCO, CA 94104  
FOR: TURN

DANIEL COOLEY  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B30A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOSEPHINE WU  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B9A  
SAN FRANCISCO, CA 94105

LAILA CORREA  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO, CA 94111  
FOR: LATINO ISSUES FORUM

IRENE K. MOOSEN  
ATTORNEY AT LAW  
WESTERN MANUFACTURED HOUSING COMM. SVCS.  
53 SANTA YNEZ AVENUE  
SAN FRANCISCO, CA 94112

CHONDA J. NWAMU  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94120

JOHN DUTCHER  
VICE PRESIDENT - REGULATORY AFFAIRS  
MOUNTAIN UTILITIES  
3210 CORTE VALENCIA  
FAIRFIELD, CA 94534-7875

DAVID C. CLARK  
SYNERGY COMPANIES  
28436 SATELLITE STREET  
HAYWARD, CA 94545  
FOR: SYNERGY COMPANIES, INC.

JULIE RICHARDSON  
ENERGY EFFICIENCY, INC.  
PO BOX 1612  
UNION CITY, CA 94587  
FOR: ENERGY EFFICIENCY, INC.

ROBERT GNAIZDA  
POLICY DIRECTOR/GENERAL COUNSEL  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, SECOND FLOOR  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

SAMUEL S. KANG  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLR.  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

MARY - LEE KIMBER  
ATTORNEY AT LAW  
DISABILITY RIGHTS ADVOCATES  
2001 CENTER STREET, 3RD FLOOR  
BERKELEY, CA 94704-1204  
FOR: DISABILITY RIGHTS ADVOCATES

MELISSA W. KASNITZ  
ATTORNEY AT LAW  
DISABILITY RIGHTS ADVOCATES  
2001 CENTER STREET, FOURTH FLOOR  
BERKELEY, CA 94704-1204  
FOR: DISABILITY RIGHTS ADVOCATES

DANA ARMANINO  
COMMUNITY DEVELOPMENT AGENCY  
COUNTY OF MARIN  
3501 CIVIC CENTER DRIVE, ROOM 308  
SAN RAFAEL, CA 94903  
FOR: COUNTY OF MARIN COMMUNITY  
DEVELOPMENT AGENCY

SUSAN E. BROWN  
ATTORNEY AT LAW  
A WORLD INSTITUTE FOR SUSTAINABLE HUMANI  
PO BOX 428  
MILL VALLEY, CA 94942  
FOR: A WORLD INSTITUTE FOR SUSTAINABLE  
HUMANITY

PETER HOFMANN  
BO ENTERPRISES  
43B EAST MAIN ST  
LOS GATOS, CA 95030-6907  
FOR: BO ENTERPRISES

MICHAEL LAMOND  
ALPINE NATURAL GAS OPERATING COMPANY  
PO BOX 550  
15 ST. ANDREWS ROAD, SUITE 7  
VALLEY SPRINGS, CA 95252

STEVE HEIM  
WESTERN INSULATION, L.P.  
2400 ROCKEFELLER DRIVE  
CERES, CA 95307  
FOR: WESTERN INSULATION, L.P.

BILL JULIAN  
43556 ALMOND LANE  
DAVIS, CA 95618

CAROLYN COX  
GENERAL MANAGER  
5213 ROSEANA COURT  
FAIR OAKS, CA 95628

GREGGORY L. WHEATLAND  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS L.L.P.  
2600 CAPITOL AVENUE, SUITE 400

SACRAMENTO, CA 95816-5905  
FOR: SIERRA PACIFIC POWER COMPANY

JAMES HODGES  
ACCES  
1069 45TH STREET  
SACRAMENTO, CA 95819  
FOR: ACCES, THE COMMUNITY ACTION OF SAN  
MATEO COUNTY, INC., TELACU, THE  
MARAVILLA FOUNDATION

RAYMOND J. CZAHAR, C.P.A.  
CHIEF FINANCIAL OFFICER  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
SACRAMENTO, CA 95826

LOUISE A. PEREZ  
COMMUNITY RESOURCE PROJECT, INC.  
250 HARRIS AVENUE, SUITE 6  
SACRAMENTO, CA 95838  
FOR: SELF

CRISTAL BEDORTHA  
RESIDENTIAL WALL INSULATION  
3714 NELSON AVE.  
OROVILLE, CA 95965  
FOR: RESIDENTIAL WALL INSULATION

KEITH GRIFFITH  
SELF HELP HOME IMPROVEMENT PROJECT INC.  
3777 MEADOWVIEW DR. 100  
REDDING, CA 96002  
FOR: SELF HELP HOME IMPROVEMENT PROJECT  
INC.

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

## Information Only

---

ZACHARY FRANKLIN  
GRID ALTERNATIVES  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: GRID ALTERNATIVES

RICHARD ESTEVES  
SESCO, INC.  
77 YACHT CLUB DRIVE, SUITE 1000  
LAKE HOPATCONG, NJ 07849-1313

JIM MEYERS  
SOUTHWEST REGIONAL MANAGER  
NORTH AMERICAN INSULATION MANUF. ASSOC.  
7792 SOUTH HARRISON CIRCLE  
CENTENNIAL, CO 80122

DAVE MUNK  
PROGRAM MANAGER  
RESOURCE ACTION PROGRAM  
2724 UPPER CATTLE CREEK ROAD  
CARBONDALE, CO 81623

CHRISTOPHER HILEN  
SIERRA PACIFIC POWER CO.  
PO BOX 10100  
RENO, NV 89511

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

STEVEN D. PATRICK  
ATTORNEY AT LAW  
SEMPRA ENERGY  
555 WEST FIFTH STREET, STE 1400  
LOS ANGELES, CA 90013-1011

SENATOR RICHARD POLANCO  
3701 GLENALBYN DRIVE  
LOS ANGELES, CA 90065

RON GARCIA  
RELIABLE ENERGY MANAGEMENT, INC.  
6250 PARAMOUNT BLVD.  
LONG BEACH, CA 90805

JOSE ATILIO HERNANDEZ  
LIOB MEMBER  
LIOB  
9237 GERALD STREET  
NORTHRIDGE, CA 91343

WALLIS J. WINEGAR  
WINEGARD ENERGY, INC  
5354 IRWINDALE AVENUE, BLDG B.  
IRWINDALE, CA 91706

WALLIS WINEGARD  
WINEGARD ENERGY, INC.  
5354 IRWINDALE AVE., BUILDING B  
IRWINDALE, CA 91706  
FOR: WINEGARD ENERGY, INC.

PAUL DELANEY  
AMERICAN UTILITY NETWORK (A.U.N.)

AKBAR JAZAYEIRI  
SOUTHERN CALIFORNIA EDISON COMPANY (338)

10705 DEER CANYON DRIVE  
ALTA LOMA, CA 91737

2241 WALNUT GROVE AVENUE  
PO BOX 800  
ROSEMEAD, CA 91770

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
LAW DEPARTMENT, ROOM 370  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

JACK F. PARKHILL  
SOUTHERN CALIFORNIA EDISON  
2131 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

JEANNIE HARRELL  
SOUTHERN CALIFORNIA EDISON COMPANY  
2131 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

JENNIFER TSAO SHIGEKAWA  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

JOHN FASANA  
SOUTHERN CALIFORNIA EDISON  
2131 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770

LARRY R. COPE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON  
PO BOX 800, 2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

PETE ZANZOT  
SOUTHERN CALIFORNIA EDISON COMPANY  
2131 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

ROBERTO DEL REAL  
SOUTHERN CALIFORNIA EDISON COMPANY  
2131 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

MARK MCNULTY  
4654 MAYAPAN DR  
LA MESA, CA 91941-7148  
FOR: BEAR VALLEY ELECTRIC/GOLDEN STATE  
WATER

YOLE WHITING  
12532 JACKSON HILL LANE  
EL CAJON, CA 92021

JOHN JENSEN  
REGIONAL MANAGER  
RICHARD HEATH AND ASSOCIATES, INC.  
7847 CONVOY COURT , SUITE 102  
SAN DIEGO, CA 92111

CENTRAL FILES  
REGULATORY AFFAIRS  
SAN DIEGO GAS & ELECTRIC CO.  
8330 CENTURY PARK COURT-CP31E  
SAN DIEGO, CA 92123-1530

STEVE RAHON  
DIRECTOR, TARIFF & REGULATORY ACCOUNTS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548

YVETTE VAZQUEZ  
CUSTOMER ASST. MANAGER  
SAN DIEGO GAS & ELECTRIC  
8335 CENTURY PARK CT.  
SAN DIEGO, CA 92123-1569

FAITH BAUTISTA  
LLOB MEMBER  
LLOB  
9630 BLACK MOUNTAIN ROAD, SUITE G  
SAN DIEGO, CA 92126

JOHN NEWCOMB  
696 SOUTH TIPPECANOE AVENUE  
SAN BERNARDINO, CA 92415  
FOR: COMMUNITY ACTION PARTNERSHIP OF  
SAN BERNARDINO COUNTY

MARIA Y. JUAREZ  
DEPUTY DIRECTOR  
DEPARTMENT OF COMMUNITY ACTION  
2038 IOWA AVENUE, SUITE B-102  
RIVERSIDE, CA 92507

BILL BELANSKY  
WESTERN INSULATION  
680 COLUMBIA AVE  
RIVERSIDE, CA 92507-2144

DAVID J. COYLE  
GENERAL MANAGER  
ANZA ELECTRIC CO-OPERATIVE, INC (909)  
PO BOX 391908 / 58470 HWY 371  
ANZA, CA 92539-1909

COMMERCE ENERGY, INC.  
600 ANTON BLVD., SUITE 2000  
COSTA MESA, CA 92626

RICHARD SHAW  
PRESIDENT

JIM MCNAMARA  
SAN LUIS OBISPO COUNTY, INC.

SOUTHERN CALIFORNIA FORUM  
PO BOX 469  
FILLMORE, CA 93016

1030 SOUTHWOOD DRIVE  
SAN LUIS OBISPO, CA 93401

ELISABETH ADAMS  
ASSERT INC.  
155 W. AVENUE J-5  
LANCASTER, CA 93534

HECTOR HUERTA  
RICHARD HEATH AND ASSOCIATES, INC.  
590 W. LOCUST AVE., SUITE 103  
FRESNO, CA 93650

JOE WILLIAMS  
CEO  
RICHARD HEATH AND ASSOCIATES, INC.  
590 W. LOCUST AVENUE, STE 103  
FRESNO, CA 93650

KRISTINE LUCERO  
EXECUTIVE ASSISTANT  
RICHARD HEATH AND ASSOCIATES, INC.  
590 W. LOCUST AVE., STE. 103  
FRESNO, CA 93650

MARK SHIRIN  
VENTURA TV APPLIANCE CENTER  
3619 E VENTURA BLVD  
FRESNO, CA 93702-5009

MICHAEL WILLIAMS  
LIOB MEMBER  
LIOB  
3045 N. SUNNYSIDE, SUITE 101  
FRESNO, CA 93727

ORTENSIA LOPEZ  
EXECUTIVE DIRECTOR  
EL CONCILIO OF SAN MATEO  
1419 BURLINGAME AVE., SUITE N  
BURLINGAME, CA 94010

ANN KELLY  
DEPT. OF THE ENVIRONMENT  
CITY AND COUNTY OF SAN FRANCISCO  
11 GROVE STREET  
SAN FRANCISCO, CA 94102

BRUCE FOSTER  
SENIOR VICE PRESIDENT  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, STE. 2040  
SAN FRANCISCO, CA 94102

DONNA L. WAGONER  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN  
AREA 3-C  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JEANNE M. SOLE'  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, RM 234  
1 DR. CARLTON B. GOODLET PLACE  
SAN FRANCISCO, CA 94102-4682

BRETT SEARLE  
PROJECT MANAGEMENT ANALYST  
PACIFIC GAS AND ELECTRIC COMPANY  
123 MISSION-ROOM 1464, MCH14F  
SAN FRANCISCO, CA 94105

CASE COORDINATION  
PACIFIC GAS AND ELECTRIC  
PO BOX 770000; MC B9A  
SAN FRANCISCO, CA 94105

CRAIG M. BUCHSBAUM  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

LINDA FONTES  
PACIFIC GAS & ELECTRIC COMPANY  
123 MISSION ROOM 1404 MC H14F  
SAN FRANCISCO, CA 94105

LISE H. JORDAN  
ATTORNEY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

REGULATORY FILE ROOM  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

STEVEN R. HAERTLE  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B9A  
SAN FRANCISCO, CA 94105

TINA NGUYEN  
PACIFIC GAS AND ELECTRIC COMPANY  
123 MISSION-ROOM 1456  
SAN FRANCISCO, CA 94105

STEVEN MOSS  
SAN FRANCISCO COMMUNITY POWER  
2325 THIRD STREET, STE 344  
SAN FRANCISCO, CA 94107  
FOR: SAN FRANCISCO COMMUNITY POWER

JANINE L. SCANCARELLI  
ATTORNEY AT LAW

CALIFORNIA ENERGY MARKTS  
425 DIVISADERO STREET, STE 303

FOLGER, LEVIN & KAHN, LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111

SAN FRANCISCO, CA 94117

SARA BIRMINGHAM  
DIRECTOR, WESTERN POLICY  
SOLAR ALLIANCE  
646 19TH AVE  
SAN FRANCISCO, CA 94121  
FOR: SOLAR ALLIANCE

BRIAN K. CHERRY  
PACIFIC GAS AND ELECTRIC COMPANY (39)  
PO BOX 770000, MAIL CODE: B10C  
SAN FRANCISCO, CA 94177

MARY O'DRAIN  
PACIFIC GAS AND ELECTRIC COMPANY  
123 MISSION - ROOM 1410, MC H14G  
SAN FRANCISCO, CA 94177

ROLAND RISSER  
DIRECTOR, CUSTOMER ENERGY EFFICIENCY  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE N3A  
SAN FRANCISCO, CA 94177

JAMES DEZELL  
RHA, INC.  
SUITE 205  
1151 HARBOR BAY PKWY  
ALAMEDA, CA 94502

BARBARA WILLIAMS  
RHA, INC.  
1151 HARBOR BAY PKWY STE. 205  
ALAMEDA, CA 94502-6561

DUTCHER JOHN  
V.P. REGULATORY AFFAIRS  
MOUNTAIN UTILITIES  
3210 CORTE VALENCIA  
FAIRFIELD, CA 94534  
FOR: MOUNTAIN UTILITIES

STEVEN R. SHALLENBERGER  
SYNERGY COMPANIES  
28436 SATTELITE STREET  
HAYWARD, CA 94545

FRANCES L. THOMPSON  
PACIFIC GAS AND ELECTRIC COMPANY  
3401 CROW CANYON ROAD, 170C  
SAN RAMON, CA 94583

RICK C. NOGER  
PRAXAIR, INC.  
2430 CAMINO RAMON DRIVE, STE. 300  
SAN RAMON, CA 94583

LADONNA WILLIAMS  
EXECUTIVE DIRECTOR  
PO BOX 5653  
VALLEJO, CA 94591

SARAH BESERRA  
CALIFORNIA REPORTS.COM  
39 CASTLE HILL COURT  
VALLEJO, CA 94591  
FOR: CALIFORNIA REPORTS.COM

ALEX KANG  
ITRON, INC.  
1111 BROADWAY, STE. 1800  
OAKLAND, CA 94607

JODY S. LONDON  
JODY LONDON CONSULTING  
PO BOX 3629  
OAKLAND, CA 94609  
FOR: THE LOCAL GOVERNMENT SUSTAINABLE  
ENERGY COALITION

DOCKET COORDINATOR  
5727 KEITH ST.  
OAKLAND, CA 94618

STEPHANIE CHEN  
LEGAL ASSOCIATE  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

KAREN NOTSUND  
ASSISTANT DIRECTOR  
UC ENERGY INSTITUTE  
2547 CHANNING WAY 5180  
BERKELEY, CA 94720-5180

MICHELE RODRIGUEZ  
PLANNING SUSTAINABLE COMMUNITIES  
220 MCALLISTER AVENUE  
KENTFIELD, CA 94904

MARY TUCKER  
ENVIRONMENTAL SERVICES DEPARTMENT  
CITY OF SAN JOSE  
200 E. SANTA CLARA, 10TH FLOOR  
SAN JOSE, CA 95113

DOUGLAS MOIR  
WESTERN APPLIANCE  
1976 W. SAN CARLOS STREET  
SAN JOSE, CA 95128

STEPHANIE BORBA  
WESTERN INSULATION, L.P.  
2400 ROCKEFELLER DRI VE  
CERES, CA 95307

THOMAS S KIMBALL  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95352-4060

BOB HONDEVILLE  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

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

RICHARD MCCANN  
M.CUBED  
2655 PORTAGE BAY ROAD, SUITE 3  
DAVIS, CA 95616

DAVID E. MORSE  
CALIFORNIA AMERICAN WATER CO.  
1411 W. COVELL BLVD., STE. 106-292  
DAVIS, CA 95616-5934

WAYNE AMER  
PRESIDENT  
MOUNTAIN UTILITIES (906)  
PO BOX 205  
KIRKWOOD, CA 95646

JASON WIMBLEY  
DIVISION CHIEF, ENERGY&ENVIRON PROGRAMS  
DEPT. OF COMMUNITY SERVICES & DEVELOPMEN  
700 NORTH 10TH STREET, ROOM 258  
SACRAMENTO, CA 95814

ROBERT J. BICKER  
LEGISLATIVE ANALYST  
CALIFORNIA APARTMENT ASSOCIATION  
980 NINTH STREET, SUITE 200  
SACRAMENTO, CA 95814

RYAN BERNARDO  
BRAUN BLAISING MCLAUGHLIN, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

SHEILA DEY  
EXECUTIVE DIRECTOR  
WESTERN MANUFACTURED HOUSING COMMUNITIES  
455 CAPITAL MALL STE 800  
SACRAMENTO, CA 95814

DEVI EDEN  
ADVISOR TO COMMISSIONER ROSENFELD  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 35  
SACRAMENTO, CA 95814-5512

JEDEDIAH J. GIBSON  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905  
FOR: SIERRA PACIFIC POWER COMPANY

ROBERT E. BURT  
INSULATION CONTRACTORS ASSN.  
4153 NORTHGATE BLVD., NO.6  
SACRAMENTO, CA 95834

DAVE STEPHENSON  
RATE REGULATION MANAGER - WESTERN REGIO  
AMERICAN WATER WORKS SERVICE CO.  
4701 BELOIT DRIVE  
SACRAMENTO, CA 95838

JAMES O'BANNON  
RICHARD HEATH AND ASSOCIATES, INC.  
1026 MANGROVE AVE., STE 20  
CHICO, CA 95926

PAMELA GORSUCH  
PROJECT MANAGER  
RICHARD HEATH AND ASSOCIATES, INC.  
1026 MANGROVE AVENUE, SUITE 20  
CHICO, CA 95926

SCOTT BERG  
SELF HELP HOME IMPROVEMENT PROJECT INC.  
3777 MEADOWVIEW DR., 100  
REDDING, CA 96002  
FOR: SELF HELP HOME IMPROVEMENT PROJECT  
INC.

JESSICA NELSON  
ENERGY SERVICES MANAGER  
PLUMAS SIERRA RURAL ELECTRIC COOP. (908)  
73233 STATE ROUTE 70  
PORTOLA, CA 96122-7069

DIANA BJORNSKOV  
SENIOR PROGRAM MANAGER  
PORTLAND ENERGY CONSERVATION, INC  
1400 SW 5TH AVENUE, STE 700  
PORTLAND, OR 97201

STEPHEN GROVER, PH.D.  
ECONORTHWEST  
888 SW 5TH AVE, SUITE 1460  
PORTLAND, OR 97204

STEVE GROVER  
ECONORTHWEST  
888 SW FIFTH AVENUE, SUITE 1460  
PORTLAND, OR 97204

M. SAMI KHAWAJA, PH.D  
 QUANTEC, LLC  
 SUITE 400  
 720 SW WASHINGTON STREET  
 PORTLAND, OR 97205

MARISA DECRISTOFORO  
 PACIFICORP  
 825 NE MULTNOMAH STREET, SUITE 800  
 PORTLAND, OR 97232

MARK TUCKER  
 PACIFICORP  
 825 NE MULTNOMAH, SUITE 2000  
 PORTLAND, OR 97232

DAVE SULLIVAN P.E.  
 CONSULTING ENGINEER  
 614 38TH PLACE  
 FLORENCE, OR 97439-8216

MICHAEL KARP  
 A.W.I.S.H.  
 PO BOX 812  
 LOPEZ ISLAND, WA 98261

## State Service

---

VAROUJAN JINBACHIAN  
 CALIF PUBLIC UTILITIES COMMISSION  
 PUBLIC ADVISOR OFFICE  
 320 WEST 4TH STREET SUITE 500  
 LOS ANGELES, CA 90013

ALIK LEE  
 CALIF PUBLIC UTILITIES COMMISSION  
 COMMUNICATIONS POLICY BRANCH  
 ROOM 4209  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

AVA N. TRAN  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY DIVISION  
 AREA 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

DAN OLSON  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY DIVISION  
 AREA 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 5036  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214  
 FOR: DRA

HAZLYN FORTUNE  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY DIVISION  
 AREA 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

JOE COMO  
 CALIF PUBLIC UTILITIES COMMISSION  
 DRA - ADMINISTRATIVE BRANCH  
 ROOM 4101  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

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

KELLY HYMES  
 CALIF PUBLIC UTILITIES COMMISSION  
 EXECUTIVE DIVISION  
 ROOM 5306  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

KIMBERLY KIM  
 CALIF PUBLIC UTILITIES COMMISSION  
 DIVISION OF ADMINISTRATIVE LAW JUDGES  
 ROOM 5003  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

MARIANA C. CAMPBELL  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY COST OF SERVICE & NATURAL GAS BRA  
 ROOM 4205  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

MATTHEW TISDALE  
 CALIF PUBLIC UTILITIES COMMISSION  
 ELECTRICITY PLANNING & POLICY BRANCH  
 ROOM 4104  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214  
 FOR: DRA

MEGHA LAKHCHAUHA  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY DIVISION

MELICIA CHARLES  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY DIVISION

AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAMELA NATALONI  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5124  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RISA HERNANDEZ  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ROBERT KINOSIAN  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5202  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

ROBERT LEHMAN  
CALIF PUBLIC UTILITIES COMMISSION  
COMMUNICATIONS POLICY BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARVJIT S. RANDHAWA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

THOMAS M. RENAGHAN  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4205  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TORY FRANCISCO  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KEVIN S. NAKAMURA  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

ZAIDA AMAYA-PINEDA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

---

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