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

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Annual
Local Procurement Obligations.

Rulemaking No. 09-10-032

**JOINT MOTION OF THE CITY OF OXNARD AND
THE UTILITY REFORM NETWORK FOR CONSIDERATION OF ISSUES TO BE
ADDRESSED IN PHASE 2 OF THE PROCEEDING**

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October 20, 2010

**JOINT MOTION OF THE CITY OF OXNARD AND
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ADDRESSED IN PHASE 2 OF THE PROCEEDING**

Pursuant to Rule 11.1 of California Public Utilities Commission (Commission) Rules of Practice and Procedure, the City of Oxnard (City)¹ and The Utility Reform Network (TURN) (hereinafter “Moving Parties”) move for a ruling determining that Phase 2 of this proceeding will include consideration of the need for the proposed peaker plant to be located in Oxnard, California,² including a review of the particular local reliability needs that such a plant would serve and alternatives to the peaker plant as presently proposed.

I. INTRODUCTION AND SUMMARY OF REQUEST

Southern California Edison Company (SCE) is pursuing the construction of a 45 MW gas-fired peaker plant to be built on the beach in Oxnard, California. The Commission has to date never directly addressed the need for any plant in the proposed location, whether for broad resource adequacy purposes or due to any local reliability needs. Thus unless the Commission takes steps to direct review of the underlying issues, the first electric generation plant will be constructed on California’s coast in decades without the need for the plant ever having been addressed by the state agency charged with determining and planning for meeting such need.

To illustrate this point, the Moving Parties urge the Commission to consider a few fundamental questions regarding the process to date for the proposed Oxnard peaker plant.

¹ The City of Oxnard has filed a Motion for Party Status with the Commission’s Docket Office on October 20, 2010.

² This proposed facility is also referred to as the “McGrath peaker plant.”

- SCE has contended elsewhere that the proposed Oxnard location is necessary to address specific local reliability needs in this portion of its service territory.³ Where has SCE ever presented evidence to the Commission supporting its claim that such local reliability needs exist? What opportunity did other interested parties have to challenge such evidence or present evidence of their own? And where has a state agency with expertise in assessing such local reliability needs found that this claim is valid?
- SCE cites with favor positions attributed to the California Independent System Operator (ISO) regarding the need for the Oxnard peaker. Other than the ISO's general support for additional black-start resources in southern California, as set forth in the two single-page letters from the ISO's executive director,⁴ what analysis has the ISO performed or presented on the need for this particular peaker?
- Adding "black start" capability in the form of a 45-MW plant will on its own improve local reliability for a relatively small area close to the plant. But SCE has claimed the plant would achieve local reliability benefits to the entire coastal region of SCE's service territory. This is true only to the extent the peaker is linked to the Mandalay gas-fired plant, which in past years had its own "black start" capability. Where has SCE presented evidence regarding the option of restoring the "black start" capability at Mandalay itself, rather than building a new and separate generation plant? And in light of Mandalay's reliance on once-through cooling and the emerging restrictions on such environmentally damaging technology, where has SCE addressed or the Commission considered the reasonableness of building a new peaker plant proposed in large part as a means

³ For example, in a July 2, 2009 filing in A.07-12-029, SCE claimed "the fifth peaker's proposed site is located in an area of the grid that is especially in need of black start capability (i.e. it will provide valuable local reliability benefits to the entire coastal region of SCE's territory), and will bring ancillary reliability and transmission benefits to the overall system." (p. 3)

⁴ A copy of each of these letters is attached to this pleading as Appendix A.

of providing “black start” capability to a 1950’s vintage gas-fired plant that only operates a relatively few hours per year and that could well shut down in the near future? And again, what opportunity was there for other interested parties to present evidence on the reasonableness of this approach?

The need for this particular plant in this particular location is something that the California Public Utilities Commission should consider and determine. The Commission is the agency with jurisdiction over such determinations of need and the agency with a process that would enable the full airing of the related issues. Where the utility can at most point to a determination of need from a Coastal Commission decision and supporting letters from the Executive Director of the ISO, the Commission should recognize that it owes it to Oxnard residents, SCE’s general body of ratepayers, and all those interested in the well-being of California’s coastline to address the need for this plant BEFORE construction begins. This rulemaking devoted to identifying and addressing resource adequacy issues is the appropriate forum for the consideration of this issue.

II. BACKGROUND AND CURRENT STATUS

Prior to the summer of 2006, there was no proposal for an SCE-constructed peaker plant in Oxnard. The original justification for the plant was premised on conditions that no longer exist and a timeline that has long since expired. The heat storm and increased electricity load that Southern California faced in the summer of 2006 resulted in the issuance of an Assigned Commissioner Ruling (ACR) in August 2006 that directed SCE to undertake certain measures to increase electric generating capacity, including “the development and installation of up to 250 MW of black-start, dispatchable generation capacity within its service territory for summer

2007.” (August 2006 ACR, p. 2)⁵ The August 2006 ACR noted the need for additional measures to “assure reliability in 2007, particularly in parts of southern California,” the 2006 heat storm, and the “surprising” growth in electricity demand throughout the state at that time (August 2006 ACR, p. 2). Based solely on the existence of these exigent circumstances, and the concerns about the then-immediate conditions, the Commission suspended the regular procurement practices regarding development of new electric generation facilities and authorized SCE to pursue the development of a limited number of facilities within a limited time frame.

The ACR was a product of the circumstances in existence at that time. Specifically, in the summer of 2006 the ISO recommended that the Commission direct the IOUs to develop “a combination of quick-start generation and demand response opportunities that can be developed **over the next six to twelve months** to increase available supply at the peak hours and enhance grid reliability.”⁶ Accordingly, “**in response to critical near-term needs in southern California that have been recently identified by the CAISO**” (August 2006 ACR, p. 5, emphasis added) the August 2006 ACR directed “SCE to pursue new utility-owned generation that can be **online in time for summer 2007.**” (August 2006 ACR, p. 6, emphasis added)

The August 2006 ACR went so far as to explain that its unusual approach was appropriate in light of the **extenuating circumstances** in existence **at that time** and “out of concern that SCE’s current, ongoing request for procurement process may not be completed in time for summer 2007.” (*Id.*) In an attempt to balance the Commission’s procurement process

⁵ Ordering Paragraph 1 of the ACR stated that “[i]n order to address and resolve potential resource inadequacies that could affect reliability in southern California in the summer of 2007, [SCE] is directed to take necessary steps to expand its demand response programs and to develop black-start, dispatchable resources in accordance with the foregoing discussions.” ACR, p. 7.

⁶ August 2006 ACR, p. 5, quoting, from a letter from Yakout Mansour, President and Chief Executive Officer of CAISO, date August 9, 2006 [emphasis added].

with the more immediate-term need identified in the ACR, the ruling stated, “[t]o avoid undue impacts on the ongoing RFO process, SCE should pursue development of not more than five non-RFO generation units.” (August 2006 ACR, p. 6)

On August 24, 2006, SCE filed Advice Letter 2031-E, *Establishment of Peakers Generation Memorandum Account* (PGMA). The Advice Letter noted that the PGMA was in response to the ACR directive to SCE to “pursue the development and installation of **up to 250 MW** of black start dispatchable generation capacity within its service territory **for summer 2007 operation.**” (Advice Letter, p. 2, emphasis added) SCE’s Advice Letter requested Commission authorization “**to establish the PGMA** to record the revenue requirement associated with the acquisition costs, installation costs, and other related costs associated with peaking generation units and non-ISO transmission facilities’ upgrades associated with interconnection the peaker units.” (*Id.*, emphasis added) Not surprisingly, given how soon it followed the ACR directing SCE to pursue these new unidentified resources, the utility’s advice letter presented no information as to any of the specific plant sites or any other detail of how it intended to comply with the ACR.⁷

In Resolution E-4031, issued on November 9, 2006, the Commission approved SCE’s request to establish the PGMA. In the Resolution, the Commission again noted that the resource identification and acquisition approach initiated by the August 2006 ACR strayed from the agency’s commitment to competitive bidding through an RFO process, but concurred that

⁷ It is important to note that nothing in Advice Letter 2031-E sought authorization to construct the “not more than five non-RFO generation units”, but only addressed the request to establish a memorandum account for cost recording purposes. Accordingly, neither the City nor TURN filed a protest to the advice letter, as the locations of the future plants were still unknown at the time the Advice Letter was filed and approved by the Commission.

“*mitigating circumstances* compel deviating from standard Commission procedure.”

(Resolution, p. 5, emphasis added) Specifically, the Resolution notes that in order to have up to 250 MW of new generation online in time for August 1, 2007, there is insufficient time for SCE to engage in the competitive solicitation that would otherwise be required pursuant to D.04-12-048. The Commission concluded that *only* because of these mitigating circumstances⁸ was it “reasonable to permit SCE to proceed with the development of **this limited amount of utility-owned resources outside of a competitive procurement process.**” (Resolution, pp. 5-6, emphasis added)

SCE constructed four peaker plants in other areas of its service territory that it was able to bring on-line before the summer of 2007 ended. The fifth peaker proposed for Oxnard has not been constructed to date. In a recently-filed advice letter regarding its proposed construction of a substation project tied to the proposed peaker plant, SCE states its expectation that construction will be completed by July 2011.⁹ Even if everything else associated with getting the proposed Oxnard peaker constructed and operational were to be completed within the same time frame, SCE’s anticipated completed date is *approximately 4 years after* the anticipated on-line date for generation authorized in the August 2006 Assigned Commissioner’s Ruling. However, it is unclear whether SCE could even achieve this target date, since the utility has not yet obtained the

⁸ “Mitigating circumstances that require a limited exception from the competitive solicitation requirement of D.04-12-048 and standard Commission practice for requesting changes in authorized revenue requirements include: the unanticipated conditions arising in summer 2006 that prompted the CAISO to identify an urgent need for quick-start peaker units in southern California by summer 2007, the length of time for SCE to initiate and conduct a separate RFO for peaker units that would include new utility-owned resources and third party resources, the length of a formal application process associated with a revenue requirement request, the peaking units not being forecasted in the 2006 GRC, and the anticipated accrual of operational expenses by summer 2007.” Resolution E-4031, Finding 17.

⁹ SCE Advice Letter 2517-E (*Notice of Proposed Construction Project, McGrath 66 kV Substation Project*), September 30, 2010, p. 3.

permits that it needs to proceed with construction. SCE has failed to satisfy the City's water requirement, which require complete life-cycle maximum water demand of over 700 acre feet. SCE has requested that the City allow the utility to demonstrate only 100 acre feet, an approach that the City has deemed unacceptable.

III. THE COMMISSION SHOULD INCLUDE THIS MATTER WITHIN THE SCOPE OF THIS PROCEEDING

The full Commission has never addressed the need for the proposed Oxnard peaker plant under current circumstances. The appropriate place for consideration of the associated issues is the Commission's current resource adequacy proceeding. The Phase 1 Scoping Memo provides that a Phase 2 scoping memo will issue in the third quarter of 2010.¹⁰ Accordingly, the Moving Parties contend that the current proceeding is the proper venue for the Commission to review the need for this plant under the *current* circumstances.

Whatever authorization the 2006 ACR provided SCE to pursue the Oxnard peaker under the circumstances described in that ACR, those exigent circumstances no longer exist. Therefore the Commission should review the need for the plant and consider alternatives based on **present conditions** in the current resource adequacy proceeding. Given the fact that the facility has not been constructed, the circumstances under which approval and development of the plant occurred, and the clear disconnect between the exigent circumstances that precipitated the initial authorization and the current conditions surrounding both the need and the economics for the proposed plant in Oxnard, the Moving Parties believe that it is in the public interest to grant the requested relief and review the need and location for the facility at issue *de novo*.

SCE may well contend that the Commission already authorized construction of the fifth peaker in the August 2006 ACR and the subsequent Resolution E-4031. The Moving Parties contend that whatever authorization the August 2006 ruling and November 2006 resolution provided to pursue a plant that neither identified by name nor location, expired once the exigent circumstances that both cited in detail were no longer present and once it became clear that the fifth peaker would not be constructed in time to meet the specified timeline. There is simply no basis for any contention that the Oxnard plant will serve to address the critical near term needs that led to the ACR's issuance, nor will it "be online in time for **summer 2007.**" (ACR, p. 6, emphasis added)

In a January 2010 Ruling issued in R.05-12-013, the Assigned Commissioner noted that "even though the intent of the ACR was to have the new generation developed and online for summer 2007, and even though SCE was directed to pursue that outcome, there was no directive, implied or otherwise, that SCE should cease pursuing development of the peaking resources at the end of the summer of 2007 to the extent it had not fully carried out the ACR's directive by that time." (January 2010 Ruling, p. 5) The Moving Parties respectfully contend that while this rationale might be relevant were the Commission addressing the reasonableness of SCE's decision not to unilaterally abandon its pursuit of the project, it does not address the Commission's obligation to address the current need for the plant in light of current circumstances. Such a review is something that the Commission can and should do in the context of the current resource adequacy proceeding.

¹⁰ *Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Determining the Scope, Schedule, And Need for Hearing in This Proceeding*, dated December 23, 2009.

Furthermore, the 2006 ACR and Resolution E-4031 both addressed exigent circumstances present in southern California in 2006 and 2007, when high summer temperatures and higher-than-expected electricity loads posed a particular challenge to the ability of the then-existing resources to meet demand. The conditions have changed dramatically since then, with new generation resources coming on-line and the sustained economic downturn causing reduced demand. In recent years SCE has anecdotally described a localized reliability concern that the utility contends the McGrath peaker plant is needed to address. Again, to date the utility has not presented evidence in any Commission proceeding that describes the analysis that led the utility to recognize this purported local reliability concern or to identify the McGrath peaker plant as the solution to that concern. Certainly there is no decision from the Commission or any other agency that “approves” the plant on a local reliability basis.

It is indisputable that present-day conditions are very different than those that existed at the time the ruling issued in 2006, and that an Oxnard peaker will never meet the specific and strict conditions set forth both in the Assigned Commissioner’s Ruling and the subsequent resolution. The Moving Parties urge the Commission to recognize and act upon the need to address the need for the plant based on those present-day conditions, rather than continuing to rely on circumstances as they existed in 2006 and 2007 and the failure to date to consider whether the changed circumstances since that time warrant a different approach.

IV. CONCLUSION

Prior to August 2006, SCE had never publicly mentioned any plan to pursue construction of a peaker plant in Oxnard. The proposed location on Oxnard’s beach was one of five SCE selected in its rush to comply with an Assigned Commissioner’s Ruling issued in August of 2006 in an effort to have new power plants on-line within a year. Whatever authority exists for the plant’s construction is found in a single Assigned Commissioner’s Ruling issued more than four

years ago, and a resolution issued a few months later adopting ratemaking mechanisms for what was then still an unidentified plant to be built at an unspecified location. Neither addressed the Oxnard peaker specifically. The full Commission has never addressed or determined 1) the current need for such generation capacity in SCE's service territory, 2) the attributes of the proposed peaker (coupled with the Oxnard location) that make it the best fit to address that need, or 3) the existence of potential alternative resources and sites.

Furthermore, SCE has never made a formal showing in a Commission proceeding in support of the need for this plant, nor has the utility ever presented a formal estimate of the costs of this plant for adoption before plant construction begins. The arguments the utility most regularly presents in support of the plant is that it is following the August 2006 directive of Commission President Peevey, and that the utility has already spent a substantial amount of money on the plant.¹¹ Even if these arguments were entirely valid, the Moving Parties submit that the full Commission must still review the need for this plant before permitting construction of this generation facility on the California coast.

The Moving Parties understand and respect the authority of the Assigned Commissioner to take actions necessary to address exigent circumstances when warranted. The Moving Parties are further aware of the certainty that must be granted utilities in the development of resources where the Commission has authorized that development pursuant to the processes established by state laws and regulations. However, the circumstances of this case – the absence of any formal showing in support of the specific proposal for the Oxnard peaker, the amount of time that has

¹¹ The utility has in the past also cited a more recent letter from the ISO that generally supports the addition of peaking capacity in Southern California. Nothing in that letter is specific to the proposed Oxnard peaker plant. The Moving Parties understanding is that the ISO has never performed any analysis of the need for this particular plant.

transpired¹² since the issuance of the August 2006 ACR, the substantial differences between conditions today and the exigent circumstances surrounding the issuance of the ruling in the first place, and the fact that actual plant construction has not yet begun – warrant the Commission granting this motion and identifying the issues surrounding the need for the Oxnard peaker as within the scope of Phase 2 of this rulemaking.

Dated: October 20, 2010

Respectfully submitted,

/s/

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¹² As SCE has noted, one of the reasons for the delay in construction of the facility is the opposition faced by the City of Oxnard and area community groups. However, it is important to note that all of the actions taken by the City and the surrounding community advocacy organizations were fully lawful and within their rights. Indeed, the City has an obligation to follow its own laws in the granting of all permits, and was doing so in this instance. Despite SCE's contentions to the contrary, the *reasons* why the plant was delayed are irrelevant in reviewing the underlying circumstances brought before this Commission.

APPENDIX A
LETTERS FROM YAKOUT MANSOUR OF ISO



Yakout Mansour
President & Chief Executive Officer



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August 9, 2006

Mr. Michael R. Peevey, President
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Dear President Peevey:

The California Independent System Operator Corporation (CAISO) appreciates the cooperation and support we received from the California Public Utilities Commission (CPUC) during the heat wave of late July, 2006. Your staff and many others worked closely with us to coordinate communications on the urgency of the situation and to ensure that we were doing everything possible to maintain reliable electric service. California successfully weathered July's unprecedented system conditions because of help from you and others in the West.

I value the relationship that has developed between our organizations and respect the steps you took earlier this year to implement meaningful resource adequacy policies for the State. It was largely the supply requirements you adopted that gave the CAISO a reasonable level of comfort as this summer began. The weather and system conditions that we faced in July, however, were well in excess of anything previously anticipated. With that in mind, it is not too soon to begin planning for next year, which we know is likely to be an even greater challenge, especially in Southern California.

Time does not allow permitting and development of new, large projects between now and next summer. However, other options that merit our priority attention may be available. I urge the CPUC to direct the state's investor-owned utilities to use the CPUC-established and approved procurement processes to solicit a combination of quick-start generation and demand response opportunities that can be developed over the next six to twelve months to increase available supply at the peak hours and enhance grid reliability. The CAISO stands ready to support these efforts in any way possible – with the expertise of our staff or in our operations and markets, as appropriate.

Again, thank you for your ongoing support. I look forward to our continued, close collaboration in maintaining electric service reliability for the State of California.

Sincerely yours,

Yakout Mansour
President & Chief Executive Officer

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Yakout Mansour
President & Chief Executive Officer

March 10, 2009

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California 94105-2219

RE: Appeal No. A-4-OXN-07-096 (So. California Edison Co., Oxnard)

Dear Members of the Commission:

The California Independent System Operator Corporation ("ISO") would like to express its support for Southern California Edison's Oxnard peaker project.

The ISO is a not-for-profit public-benefit corporation charged with operating the majority of California's high-voltage wholesale power grid. We are responsible for maintaining electric system reliability in compliance with applicable reliability standards and are the impartial link between power plants and the utilities that serve more than 30 million consumers.

In 2006, the ISO urged the California Public Utilities Commission to direct the state's investor-owned utilities to procure additional quick start generation to increase peak energy supplies and enhance grid reliability. Although new peaking resources have been procured and constructed during the last three years, Southern California has a continuing strong need for additional quick start peakers. In addition to providing peak power during times of high electricity demand, plants such as the Oxnard peaker provide the quick-start and power-ramping capabilities that are needed to maintain transmission system stability while integrating additional renewable resources into the transmission system.

In closing, we urge the Commission to approve the Oxnard peaker project as a necessary and important addition to the California electric system.

Sincerely,

A handwritten signature in black ink that reads "Y. Mansour".

Yakout Mansour
President & Chief Executive Officer

CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On October 20, 2010, I served the attached:

**JOINT MOTION OF THE CITY OF OXNARD AND
THE UTILITY REFORM NETWORK FOR CONSIDERATION OF ISSUES TO BE
ADDRESSED IN PHASE 2 OF THE PROCEEDING**

on all eligible parties on the attached list **R.09-10-032** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this October 20, 2010, at San Francisco, California.

/S/
Larry Wong

Service List for R.09-10-032

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