BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

F I L E D
10-16-09
04:59 PM

Application of Pacific Gas and Electric Company for Authority to Increase Electric Rates and Charges to Recover Smart Grid Costs Relating to American Recovery and Reinvestment Act of 2009 (U39E).	Application 09-09-018
Application of Pacific Gas and Electric Company for Authority to Increase Electric Rates and Charges to Recover Smart Grid Costs Relating to Compressed Air Energy Storage Demonstration Project Under American Recovery and Reinvestment Act of 2009	Application 09-09-019

PROTEST TO

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR AUTHORITY TO INCREASE ELECTRIC RATES AND CHARGES TO RECOVER SMART GRID COSTS RELATING TO AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 (A.09-09-018).

AND

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR PHASE 1 OF COMPRESSED AIR ENERGY STORAGE SMART GRID DEMONSTRATION PROJECT (A.09-09-019)

On October 14, 2009, the Chief Administrative Law Judge issued a Ruling which consolidated two PG&E Applications and shortened the period for protests to both, as permitted by the Commission in D.09-09-029. That rulemaking order, creating expedited procedures for handling utilities' requests for funds to match a DOE grant, [1] is not yet final because an Application for Rehearing has been filed.[2] The Chief Administrative Law Judge informed the parties of the shortened protest period two days before protests were due.

---

[1] Department of Energy
[2] CFC Application for Rehearing filed in R.08-12-009, filed October 14, 2009.

According to the October 14, 2009, Ruling of the Chief ALJ, "In A.09-09-018, PG&E is asking to increase electric rates so that it can collect "the balance of non-federal matching funds to support an award of $42.5 million in federal funds for a Smart Grid investment project from the United States Department of Energy (DOE) under the American Recovery and Reinvestment Act of 2009 (ARRA). PG&E's Notice of its Application for DOE funds states the funds will be used to "provide 75,000 mid-sized commercial, industrial and residential customers with in-premise energy use displays and controllers to understand and control their energy usage and to help with the transition to dynamic pricing on PG&E's system."[3] PG&E will contribute $12.4 million to match DOE's grant from funds left over from the allowance for its Smart Meter Upgrade,[4] and its partners (the City of San Jose, the California Independent System Operator, the California Energy Commission, the Stanford University Precourt Energy Efficiency Center, IBM, Cisco Systems, Inc., ABB, Inc., and Utility Integration Solutions, Inc.) are contributing $6.6 million. PG&E wants to collect the remaining $23.5 million from customers. PG&E is contributing none of its own money – it's $12.4 million contribution came from customers.

In PG&E's second Application, it asks for $24.9 million from ratepayers to match $24.9 million in DOE funding to investigate the feasibility of using off-peak energy (like wind energy) to inject compressed air into an underground saline porous rock formation and then to use the compressed air to generate electricity at peak periods when the renewable energy would not otherwise be available. The feasibility study is Phase I of a three-phase project:

> The combined $49.8 million is expected to support all permitting, transmission interconnection, and plant design (Phase I) costs leading up to plant construction. Plant construction (Phase II) and plant monitoring (Phase III) will be financed with non- DOE ARRA sources if approved by the CPUC in a subsequent formal PG&E application or procurement proceeding.[5]

---

[3] Notice Of Pacific Gas And Electric Company (U 39 E) Pursuant To Ordering Paragraph 1 And Section 3.2 Of D. 09-09-029, at 1.

[4] D.09-03-026

[5] Notice Of Pacific Gas And Electric Company (U 39 E) Pursuant To Ordering Paragraph 1 And Section 3.2 Of D. 09-09-029, at 3.

The total anticipated cost of the 300 MW project is $356 million. PG&E is contributing none of its own money to this feasibility study.

For its Protest, the Consumer Federation of California ("CFC") states:

1. Funds are Improperly Requested From Utility Customers.

DOE funds are available because of the passage of the 'stimulus bill,' the American Recovery and Reinvestment Act of 2009. DOE funds are not raised from rates fixed by the Federal Energy Regulatory Commission; they are raised through the taxing process. Matching funds for PG&E's projects should also be provided through taxes. If the Commission were to 'take' customers' money and transfer it to a private utility,[6] thereby socializing any risk associated with the investment, the Commission would need to find authority to levy this amount.[7]

It is generally held that a charge, like the contribution of matching funds required by the Commission, must be made for the benefit of those asked to pay, and may not exceed the amount of the benefit they receive.[8] ." "[T]he public is entitled to demand … that no more be exacted from it for the use of a public highway than the services rendered by it are reasonably worth."[9]

PG&E's application demonstrates the project is not designed solely for ratepayers, but for the general public as well: "The key reasons for the requested increase in revenue requirements are: … To obtain for the benefit of California consumers, businesses and government institutions a "fair share" of Federal stimulus funds made available under ARRA to create jobs, foster economic recovery and stimulate technology innovation and competitiveness" [10] PG&E should ask the Governor to fund the projects, or fund them itself.

2. Taking Money from Customers and Giving it to A Utility Constitutes an Unconstitutional ''Taking.'

---

[6] *20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th 216, 251.

[7] *Knox v. City of Orland*, 4 Cal. 4th 132, 142 (Cal. 1992)

[8] *Isaac v. City of L.A.*, 66 Cal. App. 4th 586, 596 (Cal. App. 2d Dist. 1998)

[9] Market S. R. Co. v. Railroad Com., 24 Cal. 2d 378, 391 (Cal. 1944); Howard Jarvis Taxpayers Ass'n v. City of Roseville, 97 Cal. App. 4th 637, 647 (Cal. App. 3d Dist. 2002).

[10] Application at 6.

If the Commission grants PG&E's Applications, it will be taking tens of millions of dollars from Californians to pay for Smart Grid projects, without determining the taking is necessary and will result in reasonable and just rates, as required by Constitution and statute.[11] That is confiscation under the US and California Constitutions.[12] When confiscating property from customers, the Commission must give the public notice of the nature of the public use for which the property is to be taken.[13] Customers have an interest in being charged non-exploitative rates.[14]

3. Customers Don't Contribute Capital, Utility Corporations Do.

The Commission has no authority to order customers to contribute capital to a utility. No statute authorizes such a gift. Ratemaking awards a return on capital contributed by a utility, as more fully described by the Supreme Court:

> [T]he general approach employed by the commission, and followed in the present case, is to determine with respect to a "test period" (1) the rate base of the utility, i.e., value of the property devoted to public use, (2) gross operating revenues, and (3) costs and expenses allowed for rate-making purposes, resulting in (4) net revenues produced, sometimes termed "results of operations." Then, by determining the fair and reasonable rate of return to be fixed or allowed the utility upon its rate base, and comparing the net revenue which would be achieved at that rate with the net revenue of the test period, the commission determines whether and how much the utility's rates and charges should be raised or lowered.[15]

The Commission may not 'take' customers' money and transfer it to a private utility[16] without first finding that the public interest and necessity require the proposed contribution.[17] Funding of PG&E's proposed projects is not necessary, particularly at a

---

[11] *City of Stockton v. Marina* Towers LLC (2009) 171 Cal.App.4th 93, 104.

[12] U.S. Const.Amend. 5; Cal. Const. Art. 1, § 19.

[13] PU Code § 454; City of *Stockton v. Marina Towers LLC* (2009) 171 Cal.App.4th 93.

[14] *Jersey Cent. Power & Light Co. v. Federal Energy Regulatory Com.*, 810 F.2d 1168, 1178 (D.C. Cir. 1987)

[15] *Pac. Tel. & Tel. V. Pub. Util. Comm'n* (1965) 62 Cal. 2d 634, 644-45.

[16] *See, 20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th 216, 293-94, *citing, Power Comm'n v. Hope Gas Co.,* 320 U.S. 591, 610*] [recognizing that "exploitation" of consumers "at the hands of natural gas companies" was an "evil[]"];.*

[17] U.S. Const.Amend. 5; Cal. Const. Art. 1, § 19; Code of Civ. Proc. § 1245.245(a)(3)(A); *City of Stockton v. Marina* Towers LLC (2009) 171 Cal.App.4th 93, 104.

time when the unemployment rate is over 12 percent for the third straight month,[18] the default rate on commercial mortgages may rise to the highest in 17 years in Q4′09,[19] and reports for September 2009 indicate "[f]rom August, [foreclosure] filings in California increased only 1.08% in September, but the volume has grown by 123% from last year."[20] There are times when research and technology must give way to food, clothing and shelter. This is one of those times.

4. PG&E Asks the Commission to Make an Unlawful Levy on Customer Funds.

Some years ago, the Commission, with the Supreme Court's approval, refused to require customers to pay for dues and donations, finding such gifts were more properly covered by shareholders:

> "Dues, donations and contributions, if included as an expense for rate-making purposes, become an involuntary levy on ratepayers, who, because of the monopolistic nature of utility service, are unable to obtain service from another source and thereby avoid such a levy. Ratepayers should be encouraged to contribute directly to worthy causes and not involuntarily through an allowance in utility rates. [Pacific] should not be permitted to be generous with ratepayers' money but may use its own funds in any lawful manner." [21]

The same rationale applies here. Ratepayers cannot avoid the levy of millions of dollars to pay for experimental meter and storage projects, without losing access to electricity. Contributions to the projects proposed by PG&E should not be imposed on them.

5. PG&E has Supplied No Proof That Rates It Proposes to Impose On Customers are Just and Reasonable.

PG&E has not addressed the question of reasonableness in its Application, perhaps because the Commission said in its rulemaking (R.08-12-009) that "[a] party

---

[18] http://www.calmis.ca.gov/file/lfmonth/countyur-400c.pdf

[19] http://wallstreetpit.com/4906-commercial-mortgage-default-rates-may-rise-to-the-highest-in-17-years

[20] http://www.housingwire.com/2009/10/15/ca-foreclosures-flatten-az-foreclosures-soar/

[21] *Pac. Tel. & Tel. V. Pub. Util. Comm'n* (1965) 62 Cal. 2d 634

protesting the Advice Letter should demonstrate that the Advice Letter does not meet the conditions set forth herein."[22] Shifting the burden of proof would constitute legal error.

PU Code section 454(a) places the burden on utilities to prove that a rate is reasonable before it is placed in effect: "No public utility shall change any rate … except upon a showing before the commission and a finding by the commission that the new rate is justified." There is a presumption that rates fixed by a lawful rate-fixing body are reasonable, fair and lawful; the burden is upon the person contending otherwise to overcome this presumption. *Hansen v. City of San Buenaventura* (1986) 42 Cal. 3d 1172, 1180. PG&E must produce evidence, and the Commission must find on a record of substantial evidence, that the capital is being prudently invested,[23] that the projects will make operation of the grid safe, reliable, and efficient,[24] affordable, and environmentally sustainable once the project is installed, [25] that the project would minimize the cost to society of electric service,[26] that the project will be in compliance with Commission inspection, maintenance, repair, and replacement standards,[27] that customers' right to privacy is protected,[28] and that rates will be reasonable.[29] Such findings are not possible on the record of this case. None of this evidence has been offered by PG&E.

WHEREFORE, for all the reasons set forth herein, the Application must be dismissed and the Commission should explain that its decision in D.09-09-029 does not allow a utility to collect capital from customers.

DATE: October 16, 2009 CONSUMER FEDERATION OF CALIFORNIA

---

22 D.09-09-029 at 5. This requirement, when read together with ¶ A and other parts of the decision, tends to refute the Commission's statement that "the approach we adopt today does not include a rebuttable presumption." (D.09-09-029 at 36, 38). The words may no longer be there, but the concept remains.

23 *See E.g.,* PU Code §§ 399, 463.

24 PU Code § 399.2.

25 PU Code § 399.8

26 PU Code § 701.1(a)).

27 PU Code § 364.

28 Cal. Const.

29 PU Code § 451.

By: _____//s//_____

Alexis K. Wodtke
520 S. El Camino Real, Suite 340
San Mateo, CA 94402
Phone: (650) 375-7847
Email: lex@consumercal.org

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority to Increase Electric Rates and Charges to Recover Smart Grid Costs Relating to American Recovery and Reinvestment Act of 2009 (U39E).	Application 09-09-018
Application of Pacific Gas and Electric Company for Authority to Increase Electric Rates and Charges to Recover Smart Grid Costs Relating to Compressed Air Energy Storage Demonstration Project Under American Recovery and Reinvestment Act of 2009	Application 09-09-019

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2009, I served by e-mail all parties on the service lists for A.09-09-018, A.09-09-019, and R.08-12-009 for which an email address was known, true copies of the original of the following document which is attached hereto:

PROTEST TO
APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
FOR AUTHORITY TO INCREASE ELECTRIC RATES AND CHARGES
TO RECOVER SMART GRID COSTS RELATING TO AMERICAN
RECOVERY AND REINVESTMENT ACT OF 2009 (A.09-09-018),

AND

TO APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
FOR PHASE 1 OF COMPRESSED AIR ENERGY STORAGE
SMART GRID DEMONSTRATION PROJECT (A.09-09-019)

On October 21, 2009, I re-served by e-mail the same document with a corrected certificate of service. The names and e-mail addresses of parties upon whom the document was served a third time are shown on an attachment.

Dated: October 21, 2009

Respectfully submitted,

_____//s//_____

Alexis K. Wodtke
520 S. El Camino Real, Suite 340
San Mateo, CA 94402
Phone: (650) 375-7840
Fax: (650) 343-1238

Service List for A.09-09-018 and A.09-09-019:

Sarah R.	Thomas	srt@cpuc.ca.gov
MARCEL	HAWIGER	marcel@turn.org
CHRISTOPHER J.	WARNER	cjw5@pge.com
DON	LIDDELL	liddell@energyattorney.com
DIONNE	ADAMS	DNG6@pge.com
HILARY	CORRIGAN	cem@newsdata.com
		mrw@mrwassoc.com
JEFF	NAHIGIAN	jeff@jbsenergy.com
ANDREW B.	BROWN	abb@eslawfirm.com
ANNIE	STANGE	sas@a-klaw.com
Katherine	MacDonald	kk3@cpuc.ca.gov

Service List for R.08-12-009

npedersen@hanmor.com	NORMAN A.	PEDERSEN
slins@ci.glendale.ca.us	STEVEN G.	LINS
douglass@energyattorney.com	DAN	DOUGLASS
ffletcher@ci.burbank.ca.us	FREDRIC C.	FLETCHER
kris.vyas@sce.com	KRIS G.	VYAS
atrial@sempra.com	ALLEN K.	TRIAL
lburdick@higgslaw.com	LEE	BURDICK
troberts@sempra.com	THEODORE E.	ROBERTS
liddell@energyattorney.com	DONALD C.	LIDDELL
ctoca@utility-savings.com	CHARLES R.	TOCA
bobsmithttl@gmail.com	ROBERT	SMITH, PH.D.
tam.hunt@gmail.com	TAM	HUNT
mtierney-lloyd@enernoc.com	MONA	TIERNEY-LLOYD
mdjoseph@adamsbroadwell.com	MARC D.	JOSEPH
margarita.gutierrez@sfgov.org	MARGARITA	GUTIERREZ
lms@cpuc.ca.gov	Lisa-Marie	Salvacion
fsmith@sfwater.org	FRASER D.	SMITH
srovetti@sfwater.org	SANDRA	ROVETTI
tburke@sfwater.org	THERESA	BURKE
lettenson@nrdc.org	LARA	ETTENSON
marcel@turn.org	MARCEL	HAWIGER
mkurtovich@chevron.com	MARTY	KURTOVICH
SSchedler@foe.org	SARAH	SCHEDLER
cjw5@pge.com	CHRISTOPHER J.	WARNER
mterrell@google.com	MICHAEL	TERRELL
nes@a-klaw.com	NORA	SHERIFF
	HAROLD	GALICER
pcasciato@sbcglobal.net	PETER A.	CASCIATO
steven@sfpower.org	STEVEN	MOSS
mday@goodinmacbride.com	MICHAEL B.	DAY
ssmyers@worldnet.att.net	SARA STECK	MYERS
lex@consumercal.org	ALEXIS K.	WODTKE
farrokh.albuyeh@oati.net	FARROKH	ALUYEK, PH.D.
wbooth@booth-law.com	WILLIAM H.	BOOTH
gmorris@emf.net	GREGG	MORRIS

kerry.hattevik@nrgenergy.com	MIKE	TIERNEY
seboyd@tid.org	STEVE	BOYD
martinhomec@gmail.com	MARTIN	HOMEC
dzlotlow@caiso.com	DAVID	ZLOTLOW
dennis@ddecuir.com	DENNIS	DE CUIR
scott.tomashefsky@ncpa.com	SCOTT	TOMASHEFSKY
dcarroll@downeybrand.com	DAN L.	CARROLL
jhawley@technet.org	JIM	HAWLEY
cbk@eslawfirm.com	CHASE B.	KAPPEL
jordan.white@pacificorp.com	JORDAN	WHITE
jlin@strategen.com	JANICE	LIN
john.quealy@canaccordadams.com	JOHN	QUEALY
mark.sigal@canaccordadams.com	MARK	SIGAL
barbalex@ctel.net	BARBARA R.	ALEXANDER
crjohnson@lge.com	CHRISTOPHER	JOHNSON
julien.dumoulin-smith@ubs.com	JULIEN	DUMOULIN-SMITH
	KEVIN	ANDERSON
jay.birnbaum@currentgroup.com	JAY	BIRNBAUM
bboyd@aclaratech.com	BEN	BOYD
gstaples@mendotagroup.net	GREY	STAPLES
bob.rowe@northwestern.com	ROBERT C.	ROWE
monica.merino@comed.com	MONICA	MERINO
sthiel@us.ibm.com	STEPHEN	THIEL
ed.may@itron.com	ED	MAY
cameron@tolerableplanet.com	CAMERON	BROOKS
	JIM	SUEUGA
	PHIL	JACKSON
leilani.johnson@ladwp.com	LEILANI JOHNSON	KOWAL
dschneider@lumesource.com	DAVID	SCHNEIDER
david@nemtzow.com	DAVID	NEMTZOW
cjuennen@ci.glendale.us	CRAIG	KUENNEN
fhall@solarelectricsolutions.com	FREEMAN S.	HALL
mark.s.martinez@sce.com	MARK S.	MARTINEZ
case.admin@sce.com	CASE	ADMINISTRATION
michael.backstrom@sce.com	MICHAEL A.	BACKSTROM
nquan@gswater.com	NGUYEN	QUAN
Jcox@fce.com	JEFF	COX
esther.northrup@cox.com	ESTHER	NORTHRUP
kfoley@sempra.com	KELLY M.	FOLEY
kmkiener@cox.net	KIM	KIENER
ygross@sempra.com	YVONNE	GROSS
rwinthrop@pilotpowergroup.com	REID A.	WINTHROP
CentralFiles@semprautilities.com	CENTRAL	FILES
tcahill@semprautilities.com	TODD	CAHILL
cmanson@semprautilities.com	CAROL	MANSON
jerry@enernex.com	JERRY	MELCHER
traceydrabant@bves.com	TRACEY L.	DRABANT
peter.pearson@bves.com	PETER T.	PEARSON
dkolk@compenergy.com	DAVID X.	KOLK
ek@a-klaw.com	EVELYN	KAHL

jellis@resero.com	JACK	ELLIS
rboland@e-radioinc.com	RICK	BOLAND
sue.mara@rtoadvisors.com	SUE	MARA
juan.otero@trilliantinc.com	JUAN	OTERO
mozhi.habibi@ventyx.com	MOZHI	HABIBI
faramarz@ieee.org	FARAMARZ	MAGHSOODLOU
diane.fellman@nexteraenergy.com	DIANE	FELLMAN
elaine.duncan@verizon.com	ELAINE M.	DUNCAN
mandywallace@gmail.com	AMANDA	WALLACE
norman.furuta@navy.mil	NORMAN J.	FURUTA
achang@nrdc.org	AUDREY	CHANG
kgrenfell@nrdc.org	KRISTIN	GRENFELL
mcarboy@signalhill.com	MICHAEL E.	CARBOY
nsuetake@turn.org	NINA	SUETAKE
bfinkelstein@turn.org	ROBERT	FINKELSTEIN
andrew_meiman@newcomb.cc	ANDREW	MEIMAN
ayl5@pge.com	ANNABELLE	LOUIE
DNG6@pge.com	DIONNE	ADAMS
fsc2@pge.com	FRANCES	YEE
filings@a-klaw.com	KAREN	TERRANOVA
Kcj5@pge.com	KIMBERLY C.	JONES
rcounihan@enernoc.com	RICHARD H.	COUNIHAN
stephen.j.callahan@us.ibm.com	STEPHEN J.	CALLAHAN
tmfry@nexant.com	TERRY	FRY
bcragg@goodinmacbride.com	BRIAN	CRAGG
bdille@jmpsecurities.com	BRYCE	DILLE
cassandra.sweet@dowjones.com	CASSANDRA	SWEET
jas@cpdb.com	JEFFREY	SINSHEIMER
mgo@goodinmacbride.com	MARLO A.	GO
nml@cpdb.com	NORENE	LEW
SDHilton@stoel.com	STEVE	HILTON
cem@newsdata.com		
lisa_weinzimer@platts.com	LISA	WEINZIMER
prp1@pge.com	PAUL	PRUDHOMME
achuang@epri.com	ANGELA	CHUANG
caryn.lai@bingham.com	CARYN	LAI
	MEGAN	KUIZE
epetrill@epri.com	ELLEN	PETRILL
ali.ipakchi@oati.com	ALI	IPAKCHI
chris@emeter.com	CHRIS	KING
sharon@emeter.com	SHARON	TALBOTT
jennifer.chamberlin@directenergy.com	JENNIFER	CHAMBERLIN
Service@spurr.org	MICHAEL	ROCHMAN
ralf1241a@cs.com	JOHN	DUTCHER
sean.beatty@mirant.com	SEAN P.	BEATTY
john_gutierrez@cable.comcast.com	JOHN	GUTIERREZ
t_lewis@pacbell.net	THOMAS W.	LEWIS
ewoychik@comverge.com	DR. ERIC C.	WOYCHIK
Valerie.Richardson@us.kema.com	VALERIE	RICHARDSON
nellie.tong@us.kema.com	NELLIE	TONG

Douglas.Garrett@cox.com	DOUG	GARRETT
rstuart@brightsourceenergy.com	BOB	STUART
cpucdockets@keyesandfox.com	DOCKET	COORDINATOR
dmarcus2@sbcglobal.net	DAVID	MARCUS
rschmidt@bartlewells.com	REED V.	SCHMIDT
kco@kingstoncole.com	KINGSTON	COLE
philm@scdenergy.com	PHILLIP	MULLER
j_peterson@ourhomespaces.com	JANET	PETERSON
rquattrini@energyconnectinc.com	RICH	QUATTRINI
joe.weiss@realtimeacs.com	JOSEPH	WEISS
michaelboyd@sbcglobal.net	MICHAEL E.	BOYD
bmcc@mccarthylaw.com	BARRY F.	MCCARTHY
sberlin@mccarthylaw.com	C. SUSIE	BERLIN
	MICHAEL G.	NELSON
mnelson@mccarthylaw.com	MICHAEL G.	NELSON
mary.tucker@sanjoseca.gov	MARY	TUCKER
tomk@mid.org	TOM	KIMBALL
joyw@mid.org	JOY A.	WARREN
	DAVID	KATES
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH
gayatri@jbsenergy.com	GAYATRI	SCHILBERG
dgrandy@caonsitegen.com	DOUGLAS M.	GRANDY, P.E.
demorse@omsoft.com	DAVID	MORSE
martinhomec@gmail.com	MARTIN	HOMEC
e-recipient@caiso.com		E-RECIPIENT
jgoodin@caiso.com	JOHN	GOODIN
wamer@kirkwood.com	WAYNE	AMER
brian.theaker@dynegy.com	BRIAN	THEAKER
tpomales@arb.ca.gov	TOM	POMALES
bgorban@treasurer.ca.gov	BRIAN	GORBAN
danielle@ceert.org	DANIELLE	OSBORN-MILLS
dave@ppallc.com	DAVID L.	MODISETTE
jmcfarland@treasurer.ca.gov	JAN	MCFARLAND
shears@ceert.org	JOHN	SHEARS
kellie.smith@sen.ca.gov	KELLIE	SMITH
lkelly@energy.state.ca.us	LINDA	KELLY
mgarcia@arb.ca.gov	MICHELLE	GARCIA
steven@lipmanconsulting.com	STEVEN A.	LIPMAN
lmh@eslawfirm.com	LYNN	HAUG
abb@eslawfirm.com	ANDREW B.	BROWN
bsb@eslawfirm.com	BRIAN S.	BIERING
glw@eslawfirm.com	GREGGORY L.	WHEATLAND
jjg@eslawfirm.com	JEDEDIAH J.	GIBSON
jparks@smud.org	JIM	PARKS
ljimene@smud.org	LOURDES	JIMENEZ-PRICE
ttutt@smud.org	TIMOTHY N.	TUTT
vzavatt@smud.org	VICKY	ZAVATTERO
vwood@smud.org	VIKKI	WOOD
dan.mooy@ventyx.com	DAN	MOOY
kmills@cfbf.com	KAREN NORENE	MILLS

rogerl47@aol.com	ROGER	LEVY
	JESSICA	NELSON
michael.jung@silverspringnet.com	MICHAEL	JUNG
wmc@a-klaw.com	MIKE	CADE
bschuman@pacific-crest.com	BENJAMIN	SCHUMAN
sharon.noell@pgn.com	SHARON K.	NOELL
californiadockets@pacificorp.com	MARK	TUCKER
ag2@cpuc.ca.gov	Aloke	Gupta
agc@cpuc.ca.gov	Andrew	Campbell
am1@cpuc.ca.gov	Anthony	Mazy
crv@cpuc.ca.gov	Christopher R	Villarreal
df1@cpuc.ca.gov	Damon A.	Franz
dbp@cpuc.ca.gov	David	Peck
trh@cpuc.ca.gov	Edward	Howard
fxg@cpuc.ca.gov	Farzad	Ghazzagh
gtd@cpuc.ca.gov	Gretchen T.	Dumas
jw2@cpuc.ca.gov	Jake	Wise
jym@cpuc.ca.gov	Joy	Morgenstern
jdr@cpuc.ca.gov	Joyce	de Rossett
jmh@cpuc.ca.gov	Julie	Halligan
kar@cpuc.ca.gov	Karin M.	Hieta
kd1@cpuc.ca.gov	Kevin R.	Dudney
lau@cpuc.ca.gov	Laurence	Chaset
zaf@cpuc.ca.gov	Marzia	Zafar
mjd@cpuc.ca.gov	Matthew	Deal
mts@cpuc.ca.gov	Merideth	Sterkel
mc3@cpuc.ca.gov	Michael	Colvin
wtr@cpuc.ca.gov	Rebecca	Tsai-Wei Lee
rhh@cpuc.ca.gov	Risa	Hernandez
srt@cpuc.ca.gov	Sarah R.	Thomas
scl@cpuc.ca.gov	Scarlett	Liang-Uejio
scr@cpuc.ca.gov	Steve	Roscow
tjs@cpuc.ca.gov	Timothy J.	Sullivan
vjb@cpuc.ca.gov	Valerie	Beck
BLee@energy.state.ca.us	BRYAN	LEE
ab2@cpuc.ca.gov	Allen	Benitez