

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**FILED**01-29-08
01:50 PM

January 29, 2008

Agenda ID #7332
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 07-08-031

This is the proposed decision of Administrative Law Judge (ALJ) Douglas Long. It will not appear on the Commission's agenda for at least 30 days after the date it is mailed. The Commission may act then, or it may postpone action until later.

When the Commission acts on the proposed decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at www.cpuc.ca.gov. Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

Comments must be filed either electronically pursuant to Resolution ALJ-188 or with the Commission's Docket Office. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Long at dug@cpuc.ca.gov and the assigned Commissioner. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

/s/ ANGELA K. MINKIN

Angela K. Minkin, Chief
Administrative Law Judge

ANG:tcg

Attachment

Decision PROPOSED DECISION OF ALJ LONG (Mailed 1/29/2008)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 M) and Southern California Gas Company (U 904 G) for Approval of Proposals Set Forth in their Joint Climate Action Initiative.

Application 07-08-031
(Filed August 31, 2007)

OPINION DISMISSING APPLICATION WITHOUT PREJUDICE

1. Summary

San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas), jointly Sempra Utilities, filed Application (A.) 07-08-031 on August 31, 2007, seeking approval of and funding for a number of proposals that the utilities state would “advance implementation of California’s climate change policy.”¹ Sempra Utilities’ Joint Climate Action Initiative has four program areas: (1) clean energy facilities; (2) clean transportation initiatives; (3) utility clean fleet, facilities and infrastructure; and (4) customer assistance and programs. This decision dismisses the application without prejudice and provides guidance on where to pursue certain issues identified in this proceeding in other existing fora.

¹ Application, p. 1.

2. Background

Western Power Trading Forum (WPTF),² The Utility Reform Network (TURN), Indicated Producers,³ Southern California Generation Coalition, Energy Users and Producers Coalition,⁴ Division of Ratepayer Advocates (DRA), and Western States Petroleum Association⁵ timely protested the application. Two parties supported the application, California Natural Gas Vehicle Coalition (after it withdrew its initial protest and late-filed comments in support),⁶ and the South

² WPTF is a California non-profit, mutual benefit corporation. It is a broadly based membership organization dedicated to enhancing competition in Western electric markets in order to reduce the cost of electricity to consumers throughout the region while maintaining the current high level of system reliability. WPTF actions are focused on supporting development of competitive electricity markets throughout the region and developing uniform operating rules to facilitate transactions among market participants. (From a statement of counsel, by electronic mail dated November 7, 2007.) Sempra Generating, an affiliate of Sempra Utilities, is a member, thus an affiliate is protesting the application. (<http://wptf.org/www/memberslist.htm>)

³ Indicated Producers is an ad hoc coalition which includes, for the purposes of this protest, Aera Energy LLC, BP Energy Company, BP America Inc. (including Atlantic Richfield Company), ConocoPhillips Company, Chevron U.S.A. Inc., and Occidental Energy Marketing Inc. (Protest, p. 1.)

⁴ Energy Users and Producers Coalition is an ad hoc group representing the electric end-use and customer generation interests of the following companies: Aera Energy LLC, BP West Coast Products LLC, Chevron U.S.A. Inc., ConocoPhillips Company, ExxonMobil Power and Gas Services Inc., Shell Oil Products US, THUMS Long Beach Company, Occidental Elk Hills, Inc., and Valero Refining Company-California. (Protest, p. 1.)

⁵ Western States Petroleum Association is a non-profit trade association that represents approximately 30 companies that account for the bulk of petroleum exploration, production, refining, transportation and marketing in the six western states of Arizona, California, Hawaii, Nevada, Oregon and Washington. (Protest, p. 8.)

⁶ California Natural Gas Vehicle Coalition is a California mutual benefit corporation, the members are a coalition of more than 40 businesses committed to natural gas transportation technology and infrastructure, and the rapid development of the

Footnote continued on next page

Coast Air Quality Management District, which late-served a letter of support of the application.⁷ On October 29, 2007, the assigned Commissioner and assigned ALJ conducted a prehearing conference and heard further oral argument on the scope, schedule and disputed issues for the proceeding.

3. Categorization

Rule 2.1(c) of the Commission's Rules of Practice and Procedure (Rules) requires that an application include a proposed procedural category and indicate whether hearings will be needed. The Commission preliminarily categorized this application as ratesetting and requiring hearings in Resolution ALJ 176-3198, dated September 6, 2007.⁸ The ratesetting categorization is affirmed. We determine at this time, however, that hearings are not required.

4. Hearing and Record

The record is composed of all documents filed and served on parties, including the application, the filed protests and reply, and the prehearing conference transcript. SDG&E and SoCalGas served testimony with the application. Because this testimony provides more detailed descriptions of the request, we admit the testimony into the record, identified as Exhibit Sempra-1.

alternate fuel transportation market. Members include auto and truck engine manufacturers and Sempra Utilities, and Pacific Gas & Electric Company (PG&E), among many others. (Protest, p. 1.) Thus, for a few days, Sempra Utilities protested its own application. We accept for filing the late-filed comments of the California Natural Gas Vehicle Coalition.

⁷ This letter is correspondence, and has been placed in the correspondence file, and is therefore not part of the official record for the proceeding. The Administrative Law Judge (ALJ) granted South Coast Air Quality Management District party status at the prehearing conference.

⁸ The application appeared on the Commission's September 6, 2007 calendar.

We admit the exhibit not for the truth of the matters stated, because there have been no hearings, but only to more fully describe the applicants' request.

5. Overview of the Request

Sempra Utilities describes the application as a proposal "achieving [greenhouse gas] reductions through (i) voluntary measures that SDG&E and SoCalGas have implemented in order to reduce [greenhouse gas] emission; (ii) actions pursued in the context of current Commission proceedings; and (iii) certain enhancements to existing programs or additional measures designed to produce even greater [greenhouse gas] emissions [reductions]." (Exhibit Sempra-1, p. I-1.) Sempra Utilities links this application to both the Commission's Energy Action Plan II and the October 6, 2005 Policy Statement. Sempra Utilities also states this application helps achieve the goals of greenhouse gas reductions in advance of the requirements embodied in Assembly Bill (AB) 32 (Stats. 2006, Ch. 488).

One of the most compelling arguments presented in the protests to dismiss the application is that much of this application is already the subject of other proceedings, and is therefore untimely, duplicative, or both. Sempra Utilities responds that the application's proposals are incremental to any existing programs and important to meeting the policy goals of AB 32, and, therefore, the application should not be dismissed.

Sempra Utilities' proposed Joint Climate Action Initiative has four program areas: (1) clean energy facilities; (2) clean transportation initiatives; (3) utility clean fleet, facilities and infrastructure; and (4) customer assistance and programs as described below.

5.1. Clean Energy Facilities

Sempra Utilities requests an incentive mechanism similar to that established by Pub. Util. Code § 454.3; a finding that “use of utility subsidiary ownership structures to secure federal tax benefits . . . is in the interest of ratepayers . . .”; \$1.12 million per year for six years of incremental funding for research and development of renewable and clean energy facilities, allocated to bundled customers as a procurement cost; and modification of Tariff Rule 39 to provide an “interconnect allowance” to pursue biofuel resources. (Application, pp. 8-9; Ex. Sempra-1, Chapter 3.)

5.2. Clean Transportation Initiatives

Sempra Utilities seeks to include in rate base the costs of natural gas vehicle fueling facilities at government-owned sites; \$1.5 million per year of incremental funding to construct natural gas vehicles fueling facilities and to demonstrate small-scale liquefied natural gas facilities; \$1.75 million per year of incremental funding for research, development and demonstration programs for natural gas vehicles and compressed natural gas vehicles; \$3 million per year of incremental funding for public information programs; and \$1.455 million per year of incremental funding for development of, and public information programs related to, zero-emission electric vehicles. (Application, p. 9; Ex. Sempra-1, Chapter 4.)

5.3. Utility Clean Fleet, Facilities, and Infrastructure

Sempra Utilities seeks \$2 million annual incremental funding for 2008-2012 to purchase compressed natural gas and/or other hybrid vehicles; \$2.52 million per year of incremental capital in 2009-2013 for compressed natural gas fueling stations and \$50,000 annually per station for operations and maintenance costs;

and \$1.407 million per year for three years to reduce non-hazardous methane leaks. (Application, p.10; Ex. Sempra-1, Chapter 5.)

5.4. Customer Assistance Programs

Sempra Utilities seeks approval to develop a new customer information and education center; development of new and/or modified energy efficiency and demand response programs; and a finding that “utility ownership of energy efficient, major energy systems on customer property is in the interest of ratepayers to the extent that those projects are cost-effective and secure energy savings” (Application, p.11; Ex. Sempra-1, Chapter 6.)

5.5. Proposed Cost Recovery

Sempra Utilities seeks approximately \$13 million for each of six years, totaling \$74.7 million in incremental funding (Ex. Sempra-1, Chapter 7, p. VII-10). Sempra Utilities proposes a cost recovery in a new regulatory account, the Climate Action Initiative Balancing Account (Climate Action Account), to be recovered in the next general rate cases for SDG&E and SoCalGas. Sempra Utilities also proposes that certain future projects with costs under \$5 million should be approved by the advice letter process, whereas those future projects with costs over \$5 million, and not already proposed here, should be approved by application. Lastly, the Sempra Utilities would provide annual reporting on the Climate Action Initiative activities. (Application, p.12; Ex. Sempra-1, Chapter 7.)

6. Dismissing the Application Without Prejudice

We dismiss the application without prejudice because the application proposes programs or projects that are premature and should be raised in other pending proceedings or are untimely and should have been included in recent proceedings. We will discuss these in detail below.

DRA opposes the piecemeal approach taken by the Sempra Utilities to seek separate funding for future projects and argues in its protest that the application also raises issues that may more appropriately belong in other proceedings. Accordingly, DRA recommends that the application be rejected in its entirety.

6.1. Duplicative of Pending Proceedings

DRA and the other protestants argue two of Sempra Utilities' proposed measures for Clean Energy Facilities and Customer Assistance Programs should be addressed in other Commission proceedings. They argue these issues belong variously in the energy efficiency, demand response and renewables dockets and the climate change related rulemakings, rather than here in a redundant application.

The Southern California Generation Coalition recommends that if we proceed with this application, we should wait for guidance in the pending Rulemaking (R.) 06-04-009 where the California Air Resources Board and this Commission will address greenhouse gas issues.⁹ (TR pp. 3-8.)

DRA argues the Customer Assistance Programs address energy efficiency and demand response programs, all of which are already the subject of ongoing proceedings, R.06-04-010¹⁰ and R. 07-01-041.¹¹ For example, applicants will file

⁹ Order Instituting Rulemaking to implement the Commission's procurement incentive framework and to examine the integration of Greenhouse Gas Emissions Standards into procurement policies. (Filed April 13, 2006.)

¹⁰ Order Instituting Rulemaking to examine the Commission's post-2005 energy efficiency policies, programs, evaluation, measurement, and verification, and related issues. (Filed April 13, 2006.)

¹¹ Order Instituting Rulemaking regarding policies and protocols for demand response load impact estimates, cost-effectiveness methodologies, megawatt goals and alignment

Footnote continued on next page

individual utility energy efficiency portfolios and a Joint California Energy Efficiency Strategic Plan for 2009 -2011 on May 15, 2008 following the process in Decision (D.) 07-10-032 (Ordering Paragraphs (OP) 10 and 4).

We find the Clean Energy Facilities portion of the proposed scope of this proceeding is duplicative of the existing scope for R.06-04-009 addressing greenhouse gases. We also find the Customer Assistance portion of the proposed scope of this proceeding is duplicative of the existing scope of the individual utility energy efficiency portfolios and a Joint California Energy Efficiency Strategic Plan for 2009-2011 required by D.07-10-032 (OP 10 and 4) in R.06-04-010. We therefore find these programs to be premature and they should be pursued as a part of the open (and any subsequent) proceedings on greenhouse gas reduction, energy efficiency and/or demand response.

6.2. Duplicative of the General Rate Cases and Untimely

DRA argues two other of Sempra Utilities' proposed measures raise issues that should have been addressed in the utilities' general rate case, or should be addressed in a future rate case rather than here in a redundant application. In the pending general rate case (A.06-12-010), SoCalGas requested \$935,000 for its natural gas vehicles research, development and demonstration program for test year 2008, which DRA argues it did not dispute. SDG&E in its rate case (A.06-12-009) requested \$1.2 million in additional operating and maintenance expenses for a Clean Transportation Program to begin in 2008. DRA recommended in the rate case that funding be maintained at \$439,000, the level

with California Independent System Operator Market Design Protocols. (Filed January 25, 2007.)

authorized in D.03-10-086, because SDG&E indicated that it “had already achieved most of the benefits envisioned by the authorization, and therefore chose not to initiate a new program in 2004 and 2005.” (See Prepared Direct Testimony of DRA, A.06-12-009/A.06-12-010, Ex. DRA-43, p. 4, quoting Ex. SDG&E-10, p. JSV-32.) DRA argues the Commission will determine the appropriate funding level for SDG&E in the pending rate case, and that is where these issues should be addressed.¹²

SDG&E and SoCalGas have very broad latitude following a general rate case to deploy the adopted revenue requirement in the most appropriate and cost-effective manner to offer safe and reliable service to customers, including projects in the proposed Utility Clean Fleet, Facilities, and Infrastructure program. For example, Applicants do not need our separate authority to purchase much higher mileage hybrid vehicles replacing the vehicles the companies have typically purchased. We note, in this example, SDG&E and SoCalGas could have easily included these existing hybrid technologies in the 2008 test year forecasts for fleet purchases.

Also, for Clean Transportation Initiatives, in D.05-05-010, the Commission specified the contents of applications that SDG&E, SoCalGas, and the other California investor-owned utilities should file in seeking future funding for their low emission vehicle (“Lelectric vehicles”) programs. (*Re Southern California Gas Company, et al.*, D.05-05-010, 2005 Cal. PUC LEXIS 177, May 5, 2005.) The Commission noted that “IOUs are free to offer Lelectric vehicles programs

¹² The general rate cases for SDG&E and SoCalGas are well advanced with a proposed decision likely in early 2008. The cases have been fully litigated, subsequently, on December 20, 2007, applicants late-filed proposed settlements with DRA.

indefinitely, but they may not presume indefinite ratepayer funding.”

(D.05-05-010, *mimeo.* at 10.)

The Commission concluded that it would “evaluate future requests for discretionary Lelectric vehicles [programs] on a multi-year basis in each of the utilities’ next General Rate Cases (GRCs) or other cost of service (COS) proceedings according to the schedules for these proceedings otherwise set by the CPUC.” (D.05-05-010, OP 4, *mimeo.* at 16.) DRA argues in the Sempra Utilities’ current general rate cases (A.06-12-009 and A.06-12-010), the companies seek funding for various activities that appear to DRA to be related to, if not the same, activities for which funding is sought here.

We find that the Clean Transportation Initiatives portion of the proposed scope of this proceeding is duplicative of the existing scope of the pending general rate cases, A.06-12-009 and A.06-12-010. We also find the Utility Clean Fleet, Facilities and Infrastructure portion of the proposed scope of this proceeding is duplicative of the existing scope of the pending general rate cases, A.06-12-009 and A.06-12-010. The specific proposals should have been addressed in the general rate cases. However, as stated above, these programs are within the operating discretion of SDG&E and SoCalGas management to pursue using the base rate revenues set in the general rate cases as necessary to provide safe and reliable service during the multi-year rate cycle until the next general rate case.

7. Advice Letter Proposal

In light of dismissing all four components of this application, it is also reasonable to reject the advice letter proposal which would allow piecemeal filings for projects under \$5 million (or at any price) rather than as a part of a comprehensive general rate case or a program-specific application. SDG&E and

SoCalGas should not resubmit any of the dismissed projects, or their component parts, by subsequent advice letter without specific authority from a Commission decision in a related matter.

8. Comments on Proposed Decision

The proposed decision of the ALJ in this matter was mailed to the parties in accordance with Pub. Util. Code § 311 and Rule 14.3.

9. Assignment of Proceeding

John A. Bohn is the assigned Commissioner and Douglas M. Long is the assigned ALJ in this proceeding.

Findings of Fact

1. The Clean Energy Facilities portion of the proposed scope of this proceeding is premature and duplicative of the existing scope for R.06-04-009 addressing greenhouse gases.
2. The Clean Transportation Initiatives portion of the proposed scope of this proceeding is untimely and duplicative of the existing scope of the pending general rate cases, A.06-12-009 and A.06-12-010.
3. The Utility Clean Fleet, Facilities and Infrastructure portion of the proposed scope of this proceeding is untimely and duplicative of the existing scope of the pending general rate cases, A.06-12-009 and A.06-12-010.
4. The Customer Assistance portion of the proposed scope of this proceeding is premature and duplicative of the existing scope of the individual utility energy efficiency portfolios and a Joint California Energy Efficiency Strategic Plan for 2009-2011 required by D.07-10-032 (OP 10 and 4) in R.06-04-010.
5. The Customer Assistance portion of the proposed scope of this proceeding is duplicative of the existing scope of the demand response programs in R.07-01-041.

6. The proposed advice letter procedure would unreasonably allow SDG&E and SoCalGas to seek recovery of potential projects on a piecemeal basis.

Conclusions of Law

1. It is within the Commission's discretion to dismiss this application without prejudice. The relief sought is more appropriately raised, or should have been raised, in other Commission proceedings.

2. It is reasonable to include Exhibit Sempra-1 in the record. We admit the testimony, not for the truth of the matters stated, because there have been no hearings, but only to more fully describe the applicants' request.

3. This decision should be effective today.

O R D E R

IT IS ORDERED that:

1. Application 07-08-031 is denied without prejudice. San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) may seek authority for certain of the proposed projects, to the extent they can be appropriately raised in subsequent issue-specific proceedings, as set forth in this decision.

2. Exhibit Sempra-1 is received in the record, as conditioned herein.

3. SDG&E and SoCalGas shall not file for recovery of any of the dismissed projects, or their component parts, by an advice letter without specific authority from a Commission decision in a related matter.

4. The preliminary ratesetting categorization in Resolution ALJ 176-3198 is affirmed and the preliminary determination of the need for hearings is no longer necessary.

5. Application 07-08-031 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated January 29, 2008, at San Francisco, California.

/s/ TERESITA C. GALLARDO
Teresita C. Gallardo

***** SERVICE LIST *****

Last Updated on 29-JAN-2008 by: AJH
A0708031 LIST

***** PARTIES *****

Evelyn Kahl
Attorney At Law
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO CA 94104
(415) 421-4143
ek@a-klaw.com
For: Western States Petroleum Association

Henry Nanjo
Attorney At Law
DEPARTMENT OF GENERAL SERVICES
707 3RD STREET, SUITE 7-330
WEST SACRAMENTO CA 95605
(916) 376-5113
Henry.Nanjo@dgs.ca.gov
For: Department of General Services

Daniel W. Douglass
Attorney At Law
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS CA 91367
(818) 961-3001
douglass@energyattorney.com
For: Western Power Trading Forum

Don Liddell
Attorney At Law
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO CA 92103
(619) 993-9096
liddell@energyattorney.com
For: Clean Energy and California Natural Gas Vehicle Coalition

Brian Cragg
Attorney At Law
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
bcragg@goodinmacbride.com
For: Independent Energy Producers Association

Norman A. Pedersen
Attorney
HANNA AND MORTON LLP
444 SOUTH FLOWER ST. SUITE 1500
LOS ANGELES CA 90071-2916
(213) 430-2510
npedersen@hanmor.com
For: Southern California Generation Coalition

Sara Steck Myers
Attorney At Law
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO CA 94121
(415) 387-1904
ssmyers@att.net
For: Center for Energy Efficiency and Renewable Technologies
(CEERT)

David Huard
Attorney At Law
MANATT, PHELSP & PHILLIPS
111 SUTTER STREET, SUITE 700
SAN FRANCISCO CA 94104
(415) 291-7430
dhuard@manatt.com
For: Los Angeles County

Evelyn C. Lee
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO CA 94105
(415) 973-2786
ecl8@pge.com
For: Pacific Gas and Electric Company

Marion Peleo
Legal Division
RM. 4107
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-2130
map@cpuc.ca.gov
For: DRA

Aimee M. Smith
Attorney
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO CA 92101
(619) 699-5042
amsmith@sempra.com
For: San Diego Gas & Electric Co./Southern California Gas Co.

Keith W. Melville
Attorney At Law
SEMPRA ENERGY
101 ASH STREET, HQ 12
SAN DIEGO CA 92101
(619) 699-5039
kmelville@sempra.com
For: Sempra Energy

***** SERVICE LIST *****

Last Updated on 29-JAN-2008 by: AJH

A0708031 LIST

Paul Wuebben
SOUTH COAST AIR QUALITY MANAGEMENT DIST
21865 COPLEY DRIVE
DIAMOND BAR CA 91765-4178
(909) 396-3247
pwuebben@aqmd.gov
For: South Coast Air Quality Management District

Laura Genao
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-6842
laura.genao@sce.com
For: Southern California Edison Company

Nina Suetake
ROBERT F. FINKELSTEIN
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE. 350
SAN FRANCISCO CA 94102
(415) 929-8876
nsuetake@turn.org
For: TURN

***** STATE EMPLOYEE *****

Clare Laufenberg
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO CA 95814
(916) 654-4859
claufenb@energy.state.ca.us

Eugene Cadenasso
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-1214
cpe@cpuc.ca.gov
For: Energy Division

Jacqueline Greig
Division of Ratepayer Advocates
RM. 4102
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-1079
jnm@cpuc.ca.gov
For: DRA

Douglas M. Long
Administrative Law Judge Division
RM. 5023
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-3200
dug@cpuc.ca.gov

Scott Murtishaw
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-5863
sgm@cpuc.ca.gov
For: Energy Division

Richard A. Myers
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-1228
ram@cpuc.ca.gov
For: Energy Division

Steve Roscow
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-1189
scr@cpuc.ca.gov
For: Energy Division

***** INFORMATION ONLY *****

Karen Terranova
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO CA 94104
(415) 421-4143
filings@a-klaw.com

Elizabeth Westby
Attorney At Law
ALCANTAR & KAHL, LLP
1300 SW FIFTH AVE., SUITE 1750
PORTLAND OR 97201
(503) 402-8709
egw@a-klaw.com

***** SERVICE LIST *****

Last Updated on 29-JAN-2008 by: AJH
A0708031 LIST

Nora Sheriff
Attorney At Law
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO CA 94104
(415) 421-4143
nes@a-klaw.com

Bruno Jeider
BURBANK WATER & POWER
164 WEST MAGNOLIA BLVD.
BURBANK CA 91502
(818) 238-3700
bjeider@ci.burbank.ca.us

Andrew Mcallister
Director Of Operations
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., SUITE 100
SAN DIEGO CA 92123
(858) 244-1177
andrew.mcallister@energycenter.org

Irene M. Stillings
Executive Director
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., STE. 100
SAN DIEGO CA 92123
(858) 244-1177
irene.stillings@energycenter.org

Jack Burke
Legislative Affairs Manager
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., SUITE 100
SAN DIEGO CA 92123
(858) 244-1177
jack.burke@energycenter.org

Jennifer Porter
Policy And Outreach Manager
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., SUITE 100
SAN DIEGO CA 92123
(858) 244-1177
jennifer.porter@energycenter.org

Sephra A. Ninow
Policy Analyst
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVENUE, SUITE 100
SAN DIEGO CA 92123
(858) 244-1177
sephra.ninow@energycenter.org

Ronald Liebert
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5657
rliebert@cfbf.com

George Dehart
CITY OF ANAHEIM
200 SOUTH ANAHEIM BOULEVARD
ANAHEIM CA 92805
(714) 765-4257
gdehart@anaheim.net

Steven Sciortino
CITY OF ANAHEIM
200 SOUTH ANAHEIM BOULEVARD
ANAHEIM CA 92805
(714) 765-5177
ssciortino@anaheim.net

Ronald M. Cerniglia
Director- National Advocacy
DIRECT ENERGY SERVICES, LLC
40 COLUMBINE DRIVE
GLENMONT NY 12077-2966
(518) 439-2195
ron.cerniglia@directenergy.com
For: DIRECT ENERGY SERVICES, LLC

Audra Hartmann
DYNEGY, INC.
980 NINTH STREET, SUITE 2130
SACRAMENTO CA 95814
(916) 441-6242
Audra.Hartmann@Dynergy.com
For: Dynergy Inc.

Matthew Deal
Executive Division
RM. 5215
505 VAN NESS AVE
San Francisco CA 94102 3298
(415) 703-2576
mjd@cpuc.ca.gov

Jeffery D. Harris
Attorney At Law
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
jdh@eslawfirm.com
For: Dynergy Inc.

***** SERVICE LIST *****

Last Updated on 29-JAN-2008 by: AJH
A0708031 LIST

Norman J. Furuta
Attorney At Law
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO CA 94103-1399
(415) 503-6994
norman.furuta@navy.mil

Norman J. Furuta
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO CA 94103-1399
(415) 503-6994
norman.furuta@navy.mil
For: Federal Executive Agencies

Steven G. Lins
General Counsel
GLENDALE WATER AND POWER
613 EAST BROADWAY, SUITE 220
GLENDALE CA 91206-4394
(818) 548-3397
slins@ci.glendale.ca.us

Joseph F. Wiedman
Attorney At Law
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
jwiedman@goodinmacbride.com

Vidhya Prabhakaran
GOODIN,MACBRIDE,SQUERI,DAY,LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
vprabhakaran@goodinmacbride.com

Jose Govea
PO BOX 50992
LOS ANGELES CA 90050

Alana Steele
Attorney At Law
HANNA AND MORTON, LLP
444 SOUTH FLOWER STREET, SUITE 1500
LOS ANGELES CA 90071-2916
(213) 430-2502
asteel@hanmor.com

Steve Endo
PASADENA DEPARTMENT OF WATER & POWER
45 EAST GLENARM STREET
PASADENA CA 91105

Jeffrey M. Garber
General Counsel
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BOULEVARD
IMPERIAL CA 92251
(760) 339-9574
jmgarber@iid.com

Michael E. Campbell
Interim General Manager
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BOULEVARD
IMPERIAL CA 92251
(760) 339-9224
mecampbell@iid.com

Gayatri Schulberg
JBS ENERGY INC
311 D STREET
WEST SACRAMENTO CA 95605
(916) 372-0534
gayatri@jbsenergy.com

Robert L. Pettinato
LOS ANGELES DEPARTMENT OF POWER & WATER
NATURAL GAS GROUP
111 NORTH HOPE STREET, ROOM 1151
LOS ANGELES CA 90012-0100
(213) 367-1735
robert.pettinato@ladwp.com

Richard J. Morillo
PO BOX 6459
BURBANK CA 91510-6459
(818) 238-5702
rmorillo@ci.burbank.ca.us

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND CA 94612
(510) 834-1999
mrw@mrwassoc.com

Ren Zhang
PASADENA DEPARTMENT OF WATER & POWER
45 EAST GLENARM STREET
PASADENA CA 91105
(626) 744-7904
rzhang@cityofpasadena.net

***** SERVICE LIST *****
Last Updated on 29-JAN-2008 by: AJH
A0708031 LIST

(626) 744-6246
sendo@ci.pasadena.ca.us

Eric Klinkner
PASADENA DEPARTMENT OF WATER AND POWER
150 LOS ROBLES AVENUE, SUITE 200
PASADENA CA 91101-2437
(626) 744-4478
eklinkner@ci.pasadena.ca.us

Gary Hinnners
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON TX 77001-0148
(713) 497-4321
ghinnners@reliant.com

Attention: Central Files
SEMPRA ENERGY UTILITIES
8330 CENTURY PARK COURT
SAN DIEGO CA 92123-1548
centralfiles@semprautilities.com
For: Sempra Energy Utilities Central Files

Prince Rasha
SEMPRA ENERGY UTILITIES
555 W. FIFTH STREET, GT14D6
LOS ANGELES CA 90013-1011
(213) 244-5141
rprince@semprautilities.com
For: Sempra Energy Utilites

Ronald S. Cavalleri
SEMPRA ENERGY UTILITIES
555 W. FIFTH STREET, GT14D6
LOS ANGELES CA 90013-1011
(213) 244-3732
rcavalleri@semprautilities.com

Hugh Yao
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES CA 90013
(213) 244-3619
HYao@SempraUtilities.com

(END OF SERVICE LIST)