



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

FILED

03-09-09
04:59 PM

Order Instituting Rulemaking to Consider Smart
Grid Technologies Pursuant to Federal
Legislation and on the Commission's Own
Motion to Actively Guide Policy in California's
Development of a Smart Grid System

R.08-12-009
(Filed December 18, 2008)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS TO
RESPONSES SUBMITTED IN OIR 08-12-009; ORDER INSTITUTING RULEMAKING
TO CONSIDER SMART GRID TECHNOLOGIES PURSUANT TO FEDERAL
LEGISLATION AND ON THE COMMISSION'S OWN MOTION TO ACTIVELY
GUIDE POLICY IN CALIFORNIA'S DEVELOPMENT OF A SMART GRID SYSTEM**

KRIS G. VYAS

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6613
Facsimile: (626) 302-6997
E-mail: kris.vyas@sce.com

Dated: **March 09, 2009**

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

Order Instituting Rulemaking to Consider Smart
Grid Technologies Pursuant to Federal
Legislation and on the Commission's Own
Motion to Actively Guide Policy in California's
Development of a Smart Grid System

R.08-12-009
(Filed December 18, 2008)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) *REPLY* COMMENTS TO
RESPONSES SUBMITTED IN OIR 08-12-009; ORDER INSTITUTING RULEMAKING
TO CONSIDER SMART GRID TECHNOLOGIES PURSUANT TO FEDERAL
LEGISLATION AND ON THE COMMISSION'S OWN MOTION TO ACTIVELY
GUIDE POLICY IN CALIFORNIA'S DEVELOPMENT OF A SMART GRID SYSTEM**

I.

INTRODUCTION

Southern California Edison Company (SCE) respectfully submits the following comments in reply to the various initial responses filed with the Commission in this Rulemaking. Our reply comments center around two key issues. First, the Commission should *not* require that, prior to undertaking investments in non-advanced grid technologies, an electric utility demonstrate that it considered an investment in a qualified smart grid system. Second, because the utilities (under the regulatory supervision of this Commission) are responsible for the safety, security, and reliability of the system, they cannot cede control of smart grid deployment on the system to third parties.

II.

SCE BELIEVES THAT THE CORRECT ANSWER TO QUESTION NUMBER 2 IS

"NO."

Question number 2 posed by the Commission in its OIR reads as follows:

Question 2

Should the Commission require that, prior to undertaking investments in non-advanced grid technologies, an electric utility demonstrate to the Commission that the electric utility considered an investment in a qualified smart grid system, pursuant to PURPA Section 111(d)(16)(A) added by EISA Section 1307(a)?

In responding to this question, certain parties suggested that the answer to this question is “Yes.”¹ (These parties offered little to no analysis supporting their answer.) SCE respectfully

¹ Community Environmental Council Comments, p. 4; Consumer Federation of California Comments, p. 24; CPower, Inc. Comments, p. 2; Technology Network (TechNet) Comments, p. 6.

submits that these parties are mistaken. The Commission should *not* require that, prior to undertaking investments in non-advanced grid technologies, an electric utility demonstrate to the Commission that it considered an investment in a qualified smart grid system.

While SCE strongly supports the intent of EISA Section 1307(a), which seeks to promote the deployment of a smart grid electric system, we are concerned that the language of this section, if taken to an extreme, might inadvertently delay ongoing and necessary electric utility capital deployment and infrastructure replacement programs. In other words, even with emerging advancements in energy technologies, telecommunications, and computing technology capabilities, the electric power delivery system over the next ten years will largely continue to consist of longstanding and proven technologies, such as conductors, poles, towers, and transformers. Smart grid investments will often add a layer of “smarts” to the existing assets, but in many cases will not eliminate the need for continued investment in traditional assets. Given that the substantial majority of current capital deployment occurs in proven core technologies, it seems unduly burdensome and unreasonable to mandate that electric utilities formally demonstrate their consideration for smart grid processes and technologies that are not commercially available.

In regards to advanced grid technology projects, DRA suggests in its response that, in the course of the AMI proceeding,² “the Commission has already considered requiring that, prior to undertaking investments in non-advanced technologies, an IOU demonstrate to the Commission that the electric utility considered in [sic.] a qualified smart grid system.”³ DRA believes that “the July 21, 2004 Assigned Commissioner’s Ruling (ACR) in Rulemaking 02-06-001 and the subsequent Commission actions hence fulfill the smart grid investment consideration requirement under PURPA Section 111(d)(16).”⁴ SCE agrees with DRA that the consideration

² R. 02-06-001.

³ DRA Initial Comments, pp. 4-5.

⁴ DRA Initial Comments, p. 5.

given in the course of SCE's AMI proceeding fulfilled the PURPA smart grid investment consideration requirement.

III.

THE UTILITIES ARE ULTIMATELY RESPONSIBLE FOR ENSURING THAT SMART GRID IMPLEMENTATION OCCURS IN A SAFE, RELIABLE AND SECURE MANNER.

In its comments, the Western Power Trading Forum (WPTF) appears to suggest that the Commission and the utilities cede control of smart grid implementation to other parties. For example, the WPTF suggests that a utility's deployment plan cannot be approved by the Commission until the plan has received "input from interested parties."⁵ While SCE welcomes and will consider comments and suggestions from other parties, such other parties should not be permitted to exert control over the utilities' actual deployment plan. Unlike other parties, the utilities have a *statutory obligation to serve* Californians.⁶ The safety, security, and reliability of the system is not a matter of energy policy for us -- it is our job. The utilities are the parties that will be tasked with actually building and integrating the smart grid technologies onto their transmission and distribution systems, under the regulatory supervision of this Commission. The utilities are responsible for meeting California's ambitious legislative and regulatory mandates (*e.g.*, California's Renewables Portfolio Standard, AB 32 Greenhouse Gas Reductions), which will require the broad application of energy storage⁷ and other grid reliability assets to meet these

⁵ WPTF Comments, p. 13.

⁶ *See, e.g.*, Cal. Public Util. Code Section 451.

⁷ SCE notes that investment in all types of energy storage technologies should be considered a grid asset and a critical element of any "qualified smart grid system," as is clearly articulated in EISA Section 1301(7). *See also* Department of Energy, Electric Advisory Committee, smart grid subcommittee (subcommittee created as required by EISA Section 1303(b), and defines smart grid to encompass and accommodate "all energy storage options"); CPUC Smart Grid OIR, pp. 12-13 ("In practical terms, the smart grid can include . . . energy storage.").

objectives. When the utilities actually deploy smart grid technologies on the grid, it is not in our customers' best interest to interpose the judgment of third parties that (a) have no obligation to serve those customers, and (b) are not regulated by this Commission.

IV.

CONCLUSION.

SCE continues to look forward to working with the Commission, fellow utilities, and other parties to fulfill our year 2020 vision to modernize the grid to deliver a cleaner energy supply from renewables and integrated distributed resources, energy-smart consumer devices, and electric vehicles while improving reliability, safety, and cost-effectiveness. SCE respectfully requests that this proceeding be structured in accordance with SCE's response filed on February 9, 2009 and its reply comments as set forth herein.

Respectfully submitted,

KRIS G. VYAS

/s/ Kris G. Vyas

By: **Kris G. Vyas**

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone:(626) 302-6613
Facsimile: (626) 302-6997
E-mail: kris.vyas@sce.com

March 09, 2009

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 SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) *REPLY* COMMENTS TO RESPONSES SUBMITTED IN OIR 08-12-009; ORDER INSTITUTING RULEMAKING TO CONSIDER SMART GRID TECHNOLOGIES PURSUANT TO FEDERAL LEGISLATION AND ON THE COMMISSION'S OWN MOTION TO ACTIVELY GUIDE POLICY IN CALIFORNIA'S DEVELOPMENT OF A SMART GRID SYSTEM 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 **9th day of March, 2009**, at Rosemead, California.

/s/ Raquel Ippoliti
Raquel Ippoliti
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R0812009 - CPUC - OIR TO CONSID

FILER: CPUC

LIST NAME: LIST

LAST CHANGED: MARCH 6, 2009

[DOWNLOAD THE COMMA-DELIMITED FILE](#)
[ABOUT COMMA-DELIMITED FILES](#)

[Back to Service Lists Index](#)

Parties

DAVID BOWMAN
GENERAL COUNSEL
ENSPIRIA SOLUTIONS
6560 S. GREENWOOD PLAZA BLVD
GREENWOOD VILLAGE, CO 80111
FOR: GENERAL COUNSEL FOR ENSPIRIA
SOLUTIONS

CINDY MORROW
VALLEY ELECTRIC ASSOCIATION
800 E. HWY 372
PAHRUMP, NV 89048
FOR: VALLEY ELECTRIC ASSOCIATION

MARY SIMMONS
RATE REG. RELATIONS
SIERRA PACIFIC POWER COMPANY
PO BOX 10100, 6100 NEAL ROAD
RENO, NV 89520-0026
FOR: SIERRA PACIFIC POWER COMPANY

AKBAR JAZAYEIRI
SOUTHERN CALIFORNIA EDISON COMPANY
2241 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

RONALD MOORE
SR. REGULATORY ANALYST
GOLDEN STATE WATER CO/BEAR VALLEY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
FOR: GOLDEN STATE WATER COMPANY

JEROME FUCHS
EXECUTIVE DIRECTOR
PADOMA WIND POWER, LLC
7777 FAY AVENUE, SUITE 200
LA JOLLA, CA 92037
FOR: PADOMA WIND POWER

ALLEN K. TRIAL
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC

LEE BURDICK
HIGGS, FLETCHER & MACK LLP
401 WEST A STREET, STE. 2600
SAN DIEGO, CA 92101
FOR: HIGGS, FLETCHER & MACK, LLP

DONALD C. LIDDELL
ATTORNEY AT LAW
DOUGLASS & LIDDELL

STEVE RAHON
DIRECTOR, TARIFF & REGULATORY ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY

2928 2ND AVENUE
 SAN DIEGO, CA 92103
 FOR: COUNSEL FOR CALIFORNIA ENERGY
 STORAGE ALLIANCE/ WAL-MART STORES, INC.
 & SAM'S WEST, INC.

8330 CENTURY PARK COURT, CP32C
 SAN DIEGO, CA 92123-1548
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

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

TAMLYN M. HUNT
 ENERGY PROGRAM DIRECTOR
 COMMUNITY ENVIRONMENTAL COUNCIL
 26 W. ANAPAMU ST., 2ND FLOOR
 SANTA BARBARA, CA 93101
 FOR: COMMUNITY ENVIRONMENTAL COUNCIL

MONA TIERNEY-LLOYD
 ENERNOC, INC.
 PO BOX 378
 CAYUCOS, CA 93430
 FOR: ENEROC, INC

PETER MALTBAEK
 VICE PRESIDENT
 CONSUMERPOWERLINE
 1185 ELENA PRIVADA
 MOUNTAIN VIEW, CA 94040
 FOR: CPOWER, INC.

ERIC L. MILLER
 TRILLIANT INC.
 1100 ISLAND AVE
 REDWOOD CITY, CA 94065
 FOR: TRILLIANT INC.

PAUL F. FOLEY
 ADAMS BROADWELL JOSEPH & CARDOZO
 601 GATEWAY BOULEVARD, STE 1000
 SO. SAN FRANCISCO, CA 94080
 FOR: CALIFORNIA UTILITY EMPLOYEES

MARTY KURTOVICH
 CHEVRON ENERGY SOLUTIONS
 345 CALIFORNIA STREET, 18TH FLOOR
 SAN FRANCISCO, CA 94104
 FOR: CHEVRON ENERGY SOLUTIONS

LARA ETTENSON
 ENERGY POLICY ANALYST & DIRECTOR
 NATURAL RESOURCES DEFENSE COUNCIL
 111 SUTTER STREET, 20TH FLOOR
 SAN FRANCISCO, CA 94105
 FOR: NATURAL RESOURCES DEFENSE COUNCIL

MICHAEL TERRELL
 PROGRAM MANAGER
 GOOGLE.ORG
 345 SPEAR ST., FOURTH FLOOR
 SAN FRANCISCO, CA 94105
 FOR: GOOGLE.ORG

MICHAEL B. DAY
 ATTORNEY AT LAW
 GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
 505 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94111-3133
 FOR: COUNSEL FOR CURRENT GROUP, LLC

SARA STECK MYERS
 ATTORNEY FOR
 CEERT
 122 28TH AVENUE
 SAN FRANCISCO, CA 94121
 FOR: CENTER FOR THE ENERGY EFFICIENCY &
 RENEWABLE TECHNOLOGIES

BRIAN CHERRY
 DIRECTOR, REGULATORY RELATIONS
 PACIFIC GAS AND ELECTRIC COMPANY
 PO BOX 770000, B10C
 SAN FRANCISCO, CA 94177
 FOR: PACIFIC GAS AND ELECTRIC COMPANY

ALEXIS K. WODTKE
 STAFF ATTORNEY
 CONSUMER FEDERATION OF CALIFORNIA
 520 S. EL CAMINO REAL, STE. 340
 SAN MATEO, CA 94402
 FOR: CONSUMER FEDERATION OF CALIFORNIA

KERRY HATTEVIK
 DIRECTOR OF REG. AND MARKET AFFAIRS
 NRG ENERGY
 829 ARLINGTON BLVD.
 EL CERRITO, CA 94530
 FOR: NRG ENERGY

JOHN GUTIERREZ
 DIRECTOR, STATE REGULATORY AFFAIRS
 COMCAST
 3055 TRIAD DRIVE
 LIVERMORE, CA 94551
 FOR: COMCAST

WILLIAM H. BOOTH
 ATTORNEY AT LAW
 LAW OFFICES OF WILLIAM H. BOOTH
 67 CARR DRIVE
 MORAGA, CA 94556
 FOR: COUNSEL FOR CALIFORNIA LARGE
 ENERGY CONSUMERS ASSOCIATION

GREGG MORRIS
 GREEN POWER INSTITUTE
 2039 SHATTUCK AVE., SUITE 402

ANTHONY IVANCOVICH
 REGULATORY COUNSEL
 CALIFORNIA INDEPENDENT SYSTEM OPERATOR

BERKELEY, CA 94704
FOR: GREEN POWER INSTITUTE

151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

RAYMOND R. LEE
CHIEF OPERATING OFFICER
MOUNTAIN UTILITIES (906)
PO BOX 205
KIRKWOOD, CA 95646
FOR: MOUNTAIN UTILITIES

DENNIS W. DE CUIR
ATTY AT LAW
A LAW CORPORATION
2999 DOUGLAS BLVD., SUITE 325
ROSEVILLE, CA 95661
FOR: CALIFORNIA ASSOCIATION OF SMALL
AND MULTI-JURISDICTIONAL UTILITIES
(CASMU)

JIM HAWLEY
VP, CALIFORNIA POLITICS& GENERAL COUNSEL
TECHNET
1215 K STREET, SUITE 1900
SACRAMENTO, CA 95814
FOR: TECHNOLOGY NETWORK

JEFFREY D. HARRIS
ATTORNEY AT LAW
ELLISON & SCHNEIDER
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: LS POWER

LYNN HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: DEPARTMENT OF GENERAL SERVICES,
ENERGY POLICY ADVISORY COMMITTEE

DAN SILVERIA
SURPRISE VALLEY ELECTRIC CORPORATION
PO BOX 691
ALTURAS, CA 96101
FOR: SURPRISE VALLEY ELECTRIC COMPANY

ROBERT MARSHALL
PLUMAS SIERRA RURAL ELECTRIC COOP.
73233 STATE RT. 70
PORTOLA, CA 96122-7069
FOR: PLUMAS SIERRA RURAL ELECTRIC CORP.

JORDAN WHITE
SENIOR ATTORNEY
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 1800
PORTLAND, OR 97232
FOR: ATTORNEY FOR PACIFICORP

Information Only

JOHN QUEALY
CANACCORD ADAMS
99 HIGH STREET
BOSTON, MA 02110

MARK SIGAL
CANACCORD ADAMS
99 HIGH STREET
BOSTON, MA 02110

BRIAN C. PRUSNEK
VP-US MARKET DEVELOPEMNT
CLIMATE CHANGE CAPITAL
900 17TH STREET, NW, SUITE 900
WASHINGTON, DC 20006

JAY BIRNBAUM
GENERAL COUNSEL
CURRENT GROUP, LLC
20420 CENTURY BLVD
GEMANTOWN, MD 20874

BEN BOYD
ACLARA TECHNOLOGIES
3001 RIVER TOWNE WAY, SUITE 403
KNOXVILLE, TN 37920

GREY STAPLES
THE MENDOTA GROUP, LLC
1830 FARO LANE
MENDOTA HEIGHTS, MN 55118

ED MAY
ITRON INC.
6501 WILDWOOD DRIVE
MCKINNEY, TX 75070

JIM SUEUGA
VALLEY ELECTRIC ASSOCIATION
PO BOX 237
PAHRUMP, NV 89041

PHIL JACKSON
SYSTEM ENGINEER
VALLEY ELECTRIC ASSOCIATION
800 E. HWY 372, PO BOX 237

FREEMAN S. HALL
SOLAR ELECTRIC SOLUTIONS, LLC
5353 TOPANGA CANYON BLVD, STE 300
WOODLAND HILLS, CA 91364

PAHRUMP, NV 89041

DAN DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367

KRIS G. VYAS
SOUTHERN CALIFORNIA EDISON COMPANY
QUAD 3-B
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JEFF COX
FUELCELL ENERGY
1557 MANDEVILLE PLACE
ESCONDIDO, CA 92029

KELLY M. FOLEY
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ12
SAN DIEGO, CA 92101-3017

KIM KIENER
504 CATALINA BLVD
SAN DIEGO, CA 92106

REID A. WINTHROP
CORPORATE COUNSEL
PILOT POWER GROUP, INC.
8910 UNIVERSITY CENTER LANE, SUITE 520
SAN DIEGO, CA 92122

CAROL MANSON
REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT CP32D
SAN DIEGO, CA 92123-1530

JERRY MELCHER
ENERNEX
4623 TORREY CIRCLE, APT Q303
SAN DIEGO, CA 92130

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015

SUE MARA
RTO ADVISORS, LLC.
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZA
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

DIANE FELLMAN
NEXTERA ENERGY RESOURCES LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

MARGARITA GUTIERREZ
DEPUTY CITY ATTORNEY
OFFICE OF SF CITY ATTORNEY
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO, CA 94102

NINA SUETAKE
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE. 350
SAN FRANCISCO, CA 94102

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO, CA 94103-1399

KRISTIN GRENFELL
PROJECT ATTORNEY, CALIF. ENERGY PROGRAM
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

ANDREW MEIMAN
SENIOR PROGRAM MANAGER
NEWCAMB ANDERSON MCCORMICK
201 MISSION STREET, SUITE 2000
SAN FRANCISCO, CA 94105

CHRISTOPHER J. WARNER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET B30A
SAN FRANCISCO, CA 94105

TERRY FRY
SR. VP, ENERGY & CARBON MANAGEMENT
NEXANT INC

BRIAN CRAGG
ATTORNEY AT LAW
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY

101 SECOND ST. 10TH FLR
SAN FRANCISCO, CA 94105

505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

STEVE HILTON
STOEL RIVES LLP
555 MONTGOMERY ST., SUITE 1288
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

LYNNE BROWN
VICE PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124

ANGELA CHUANG
ELECTRIC POWER RESEARCH INSTITUTE
PO BOX 10412
PALO ALTO, CA 94303

MICHAEL ROCHMAN
MANAGING DIRECTOR
SPURR
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520

SEAN P. BEATTY
SR. MGR. EXTERNAL & REGULATORY AFFAIRS
MIRANT CALIFORNIA, LLC
PO BOX 192
PITTSBURG, CA 94565

DOCKET COORDINATOR
KEYES & FOX LLP
5727 KEITH ST.
OAKLAND, CA 94618

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
2855 TELEPGRAPH AVENUE SUITE 310
BERKELEY, CA 94705

PHILLIP MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903

MAHLON ALDRIDGE
ECOLOGY ACTION
211 RIVER STREET, 2ND FLOOR
SANTA CRUZ, CA 95060

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073

BARRY F. MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

C. SUSIE BERLIN
MCCARTHY & BERLIN LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

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

TOM KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

DOUGLAS M. GRANDY, P.E.
DG TECHNOLOGIES
1220 MACAULAY CIRCLE
CARMICHAEL, CA 95608

DAVID MORSE
1411 W, COVELL BLVD., SUITE 106-292
DAVIS, CA 95616-5934

MARTIN HOMEC
ATTORNEY AT LAW
LAW OFFICE OF MARTIN HOMEC
PO BOX 4471
DAVIS, CA 95617

DAVID ZLOTLOW
CALIFORNIA INDEPENDENT SYSTEM OPRTR CORP
151 BLUE RAVINE RD
FOLSOM, CA 95630

TOM POMALES
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95812

FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

BRIAN GORBAN
SENIOR FINANCIAL ANALYST
CAEATFA
915 CAPITOL MALL, ROOM 468
SACRAMENTO, CA 95814

BRIAN THEAKER
DYNEGY, INC.
980 NINTH STREET, SUITE 2130
SACRAMENTO, CA 95814

DANIELLE OSBORN MILLS
RENEWABLE TECHNOLOGIES
CENTER FOR ENERGY EFFICIENCY AND
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814

DAVID L. MODISETTE
EXECUTIVE DIRECTOR
CALIFORNIA ELECTRIC TRANSP. COALITION
1015 K STREET, SUITE 200
SACRAMENTO, CA 95814

JAN MCFARLAND
CAEATFA
915 CAPITOL MALL, RM. 468
SACRAMENTO, CA 95814

JOHN SHEARS
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814
FOR: THE CENTER FOR ENERGY EFFICIENCY
AND RENEWABLE TECHNOLOGIES

KELLIE SMITH
SENATE ENERGY/UTILITIES & COMMUNICATION
STATE CAPITOL, ROOM 2195
SACRAMENTO, CA 95814

LINDA KELLY
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 95814

MICHELLE GARCIA
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95814

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: CONSTELLATION COMMODITY GROUP &
CONSTELLATION NEW ENERGY INC./ SIERRA
PACIFIC

BRIAN S. BIERING
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

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 CORP.

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

LOURDES JIMENEZ-PRICE
OFFICE OF THE GENERAL COUNSEL
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, MS B406
SACRAMENTO, CA 95817-1899

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

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

MIKE CADE
ALCANTAR & KAHL, LLP
1300 SE 5TH AVE., 1750
PORTLAND, OR 97201

SHARON K. NOELL
PORTLAND GENERAL ELECTRIC COMPANY
121 SW SALMONT ST.
PORTLAND, OR 97204

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

State Service

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

CHARLOTTE TERKEURST
 CALIF PUBLIC UTILITIES COMMISSION
 DIVISION OF ADMINISTRATIVE LAW JUDGES
 ROOM 5117
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

DAVID PECK
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4103
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

EDWARD HOWARD
 CALIF PUBLIC UTILITIES COMMISSION
 POLICY & PLANNING DIVISION
 ROOM 5119
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

JULIE HALLIGAN
 CALIF PUBLIC UTILITIES COMMISSION
 CONSUMER PROTECTION AND SAFETY DIVISION
 ROOM 2203
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

LISA-MARIE SALVACION
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 4107
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

MARZIA ZAFAR
 CALIF PUBLIC UTILITIES COMMISSION
 PUBLIC ADVISOR OFFICE
 ROOM 2-B
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL
 CALIF PUBLIC UTILITIES COMMISSION
 EXECUTIVE DIVISION
 ROOM 5215
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

MICHAEL COLVIN
 CALIF PUBLIC UTILITIES COMMISSION
 POLICY & PLANNING DIVISION
 ROOM 5119
 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

TIMOTHY J. SULLIVAN
 CALIF PUBLIC UTILITIES COMMISSION
 DIVISION OF ADMINISTRATIVE LAW JUDGES
 ROOM 2106
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

VALERIE BECK
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRIC GENERATION PERFORMANCE BRANCH
 AREA 2-D
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

SANDRA ROVETTI
 REGULATORY AFFAIRS MANAGER
 SAN FRANCISCO PUC
 1155 MARKET STREET, 4TH FLOOR

THERESA BURKE
 REGULATORY AFFAIRS ANALYST
 SAN FRANCISCO PUC
 1155 MARKET STREET, 4TH FLOOR

SAN FRANCISCO, CA 94103

SAN FRANCISCO, CA 94103

ERIN E. GRIZARD
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
770 L STREET, SUITE 1230
SACRAMENTO, CA 95814

THOMAS FLYNN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)