



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

02-10-10
04:59 PM

Order Instituting Rulemaking to Implement
Portions of AB 117 Concerning Community
Choice Aggregation

)
) Rulemaking 03-10-003
) (October 2, 2003)
)
)

**RESPONSE
OF THE
SAN JOAQUIN VALLEY POWER AUTHORITY
TO THE PETITION FOR MODIFICATION OF D.05-12-041**

Scott Blaising
Justin Wynne
Braun Blaising McLaughlin, P.C.
915 L Street, Suite 1270
Sacramento, California 95814
Telephone: (916) 682-9702
E-mail: blaising@braunlegal.com

February 10, 2010

Attorneys for the
San Joaquin Valley Power Authority

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

Order Instituting Rulemaking to Implement)	Rulemaking 03-10-003
Portions of AB 117 Concerning Community)	(October 2, 2003)
Choice Aggregation)	
)	

**RESPONSE
OF THE
SAN JOAQUIN VALLEY POWER AUTHORITY
TO THE PETITION FOR MODIFICATION OF D.05-12-041**

In accordance with Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the San Joaquin Valley Power Authority (“SJVPA”) hereby provides a response to the petition for modification of D.05-12-041 (“Petition”) filed on January 11, 2010 by the city and county of San Francisco.

SJVPA fully supports each of the proposed modifications set forth by San Francisco in the Petition. SJVPA also supports San Francisco’s request for expedited consideration of the requests.

As the Commission is aware, SJVPA’s Community Choice Aggregation (“CCA”) program has been stymied and disrupted by continuing efforts by Pacific Gas and Electric Company (“PG&E”) to market against the program. SJVPA has invested millions of dollars in its CCA program, relying on the express representations made by PG&E before the Commission that its cooperation in regard to CCA programs could be expected. As all CCA parties are now acutely aware, these representations have rung hollow, at best. PG&E is now actively and aggressively marketing against CCA programs with the force and vigor that only the nation’s largest electric utility can muster. It should not surprise the Commission that PG&E’s actions have resulted in casualties. In June 2009, based largely on PG&E’s unending assaults, SJVPA’s Board of Directors suspended the implementation of SJVPA’s CCA program.

Set forth as Exhibit A to this response is a letter from SJVPA's General Manager. The letter provides various real-world observations about the efforts of PG&E to frustrate and impede SJVPA's CCA program. SJVPA believes these observations are relevant as the Commission considers the request by San Francisco in the Petition.

SJVPA appreciates the opportunity to respond to the Petition and looks forward to future action by the Commission that will allow CCA programs to have a reasonable chance of being implemented.

Dated: February 10, 2010

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Blaising". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Blaising
Justin Wynne
Braun Blaising McLaughlin, P.C.
915 L Street, Suite 1270
Sacramento, California 95814
Telephone: (916) 682-9702
E-mail: blaising@braunlegal.com

Attorneys for the
San Joaquin Valley Power Authority

Exhibit A

SAN JOAQUIN VALLEY POWER AUTHORITY

CLOVIS
DINUBA
HANFORD
KERMAN
KINGS COUNTY
KINGSBURG
LEMOORE
PARLIER
REEDLEY
SANGER
SELMA

February 10, 2010

The Honorable Amy Yip-Kikugawa
The Honorable Hallie Yacknin
Assigned Administrative Law Judges
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Petition of the City and County of San Francisco to Modify Decision 05-12-041

Dear Judges Yip-Kikugawa and Yacknin:

The San Joaquin Valley Power Authority (SJVPA) is a public agency currently comprised of ten member cities and one county, formed for the purposes of addressing regional energy issues and implementing a Community Choice Aggregation (CCA) program serving the Greater Fresno region of the San Joaquin Valley. SJVPA has expended significant effort in the development and implementation of what would have been California's first CCA program.

The purpose of this letter is to provide certain practical, real-world observations about the efforts of Pacific Gas and Electric Company (PGE&) to frustrate and impede SJVPA's CCA program. SJVPA believes these observations are relevant as the California Public Utilities Commission (Commission) considers the request by the city and county of San Francisco to modify Decision (D.) 05-12-041.

San Francisco's petition makes five requests: (1) a ban on any utility marketing related to a CCA program; (2) a ban on any other utility conduct that is designed to frustrate or impede a CCA program (except for conduct that a utility can conclusively demonstrate is constitutionally protected); (3) prohibiting utilities from soliciting opt-out requests at any time or dictating the opt-out mechanism, except to the extent the utility is invited to do so by a CCA program; (4) explicitly barring utilities from making deceptive, misleading or untruthful statements regarding a CCA program; (5) clarifying that CCA programs can get temporary injunctive relief to prevent improper utility behavior from inflicting irreparable harm on a CCA program.

SJVPA fully supports each of these proposed modifications as well as the request for expedited consideration. As described below, SJVPA has specific and direct experience with the efforts of PG&E to thwart and derail California's first CCA program. SJVPA believes that, had these measures been implemented earlier,



SJVPA would have had a reasonable chance of actually implementing its CCA program.

SJVPA was formed in November, 2006, following several years of analysis of the feasibility of CCA by the Kings River Conservation District (KRCD). The KRCD Board, and subsequently each of the SJVPA members, determined, in part based on assumptions of cooperation from the incumbent utilities, that CCA was a preferred alternative to the path of developing a municipal electric system, which was also studied during this time. KRCD was aware that PG&E would oppose municipalization efforts, but KRCD relied upon express representations made by PG&E in the processes leading to D.05-12-041 that utility cooperation in regard to CCA programs could be expected. KRCD and SJVPA believed its objectives of expanding regional power supplies and providing customer choice could be attained more efficiently and timely without opposition from the utilities.

SJVPA filed its CCA Implementation Plan with the Commission in January, 2007. SJVPA's plan was the first to be filed with the Commission under California's CCA law. The Plan was modified to address comments provided by both PG&E and Southern California Edison Company (SCE), and the Plan was subsequently certified by the Commission in April, 2007. Initially, service to SJVPA customers was targeted for November 1, 2007, but a series of events initiated by PG&E contributed to repeated delays until the SJVPA Board took action in June, 2009, to temporarily suspend its efforts to implement CCA.

In early 2007, PG&E began arguing in public forums that the joint and several liability provision of the required CCA service agreement would result in extreme risk to each SJVPA member for the combined liabilities of all SJVPA members. Unable to dissuade PG&E from making continuing misstatements about this supposed risk, SJVPA filed a petition at the Commission on December 21, 2007. The Commission issued D.08-04-056 granting SJVPA's request on April 24, 2008. Unwilling to simply accept this determination, PG&E filed an application for rehearing, which was denied by the Commission on September 4, 2008. These challenges required a delay in SJVPA's implementation schedule.

PG&E also began arguments in 2007 that SJVPA's bond requirement would be in excess of \$140 million dollars, thus severely limiting the economic feasibility of the SJVPA CCA program. SJVPA repeatedly sought to dissuade PG&E from continuing to make these misstatements. Unable to secure PG&E's cooperation in this matter, in May 2007, SJVPA requested assistance and guidance from Commission staff to determine the amount and scope of the bond associated with SJVPA's CCA registration packet. The Commission issued Resolution E-4133 on December 20, 2007, finding that an interim bond of \$100,000 was sufficient for SJVPA to post with the Commission as part of its CCA registration packet. The Commission stated its intent to revisit this matter in the "near future," which led to

PG&E's continuing misstatements about the bond requirement and the supposed risk as an open and unresolved issue.

Also, in early 2007, PG&E also began an aggressive campaign and marketing effort against SJVPA, actively pursuing individual members to withdraw from SJVPA. These efforts, which included a full array of PG&E resources (lawyers, account representatives, public affairs staff and consultants), led to action by the SJVPA's two largest members, the City of Fresno on July 31, 2007 and Tulare County on October 30, 2007, to withdraw from the SJVPA.

SJVPA initiated a complaint proceeding against PG&E before the Commission (Complaint) on June 25, 2007, seeking more specific standards of conduct that would provide greater clarity to the impermissibility of various PG&E marketing and related activities conducted at ratepayer expense and requiring PG&E to permanently conduct itself strictly in conformity to such specific standards of conduct. Initial attempts led by the Commission to negotiate a settlement of the Complaint failed and SJVPA proceeded into the discovery and preparation phases.

On February 7, 2008, PG&E contacted SJVPA to discuss the potential of further settlement discussions. A Settlement Agreement, signed and dated April 10, 2008, became effective on July 17, 2008 following Commission approval in June. Applying only to the SJVPA, the Settlement Agreement contained several key provisions including;

- acknowledgement by PG&E that it changed its previously neutral position on CCA in January 2007;
- a statement of intent that the agreement addresses and mitigates the negative effect that SJVPA alleged it experienced as a result of PG&E's changed position;
- PG&E's agreement that it would pay SJVPA for its reasonably incurred litigation costs in connection with the Complaint;
- agreement by the parties that both SJVPA's and PG&E's respective marketing and lobbying efforts will be truthful, non-misleading and capable of substantiation;
- agreement that disclaimers will be used by both the SJVPA and PG&E to clarify the purpose and intent of marketing activity;
- clarification that costs associated with PG&E's marketing activities will be financed by PG&E shareholders;
- agreement by PG&E that it will provide functional separation between its marketing activities and its utility activities;
- and acknowledgement by PG&E that SJVPA member cities and counties have transferred to SJVPA their respective rights to serve customers and that SJVPA's board of directors is responsible for governing the CCA program.

The Settlement did not bar either SJVPA or PG&E from participating in future proceedings including any rulemaking to establish marketing rules of conduct. Section 10.3 of the Settlement Agreement included language preserving “each Party’s rights to participate in Other Matters that may arise . . . including but not limited to prospective marketing rules. . .”. This provision recognized the Settlement Agreement applied to PG&E and SJVPA only, and anticipated the potential of future proceedings that would establish marketing rules and standards of conduct broadly applicable to the utilities.

SJVPA and PG&E representatives met periodically as provided in the Settlement Agreement to discuss issues of concern. In October, 2008, SJVPA representatives learned that PG&E had initiated an “early opt-out” provision on the PG&E website and subsequently learned that PG&E was also distributing opt-out fliers to key customers. One such customer contacted SJVPA and asked for comparative information in order to make an informed decision. SJVPA was unable to provide this information since SJVPA’s CCA program terms and conditions were still being developed.

SJVPA counsel contacted PG&E via e-mail in October 2008 and with a follow-up letter dated November 24, 2008 stating SJVPA’s concerns regarding the early opt-out process and requested removal of the opt-out webpage on PG&E’s website. PG&E refused to cease its activities regarding its early opt-out marketing efforts. Commission Energy Division staff were notified and subsequently contacted PG&E in April, 2009. SJVPA was advised that PG&E agreed to stop offering the early opt-out process voluntarily. However, PG&E did not completely cease early opt-out activities, forcing the Energy Division staff to develop Resolution E-4250, still under consideration. The draft Resolution clarifies that the utilities should not solicit or accept opt-out requests until the necessary information for an informed decision is made available to customers through the initiation of the notification period provided by Public Utilities Code section 366.2(c)(13)(A-C).

PG&E’s efforts have clearly been focused on creating obstruction and uncertainty. Each time an issue was raised, SJVPA was forced into a lengthy and costly process to overcome the obstacle in order that CCA implementation activities could move forward. PG&E clearly understands that obstruction and uncertainty will draw time and financial resources of local governments away from the core objective of CCA implementation. In the case of SJVPA, these activities also prevented local governments and energy suppliers from reaching a required level of certainty necessary to proceed with multi-year energy contracts. This continued activity on the part of PG&E, combined with credit market uncertainties and financial condition of SJVPA members, led to the temporary suspension of SJVPA’s CCA program in June, 2009.

Modifications to D.05-12-041 are necessary to ensure successful implementation of a CCA program in California. PG&E has acknowledged that it *changed its position* on CCA from support and cooperation to a focused effort to retain generation customers and market against CCA programs. The Commission *must* deal with this changed circumstance. PG&E has demonstrated that there are no limits to the amount of resources that will be utilized to obstruct, delay and derail efforts to implement CCA programs. Local governments are simply unable to compete with the level of competition brought by PG&E's aggressive campaign to prevent CCA from actual implementation. Specific and concise restrictions on marketing activities with real and critical consequences for violation are key factors in establishing conditions upon which local governments can reasonably pursue CCA implementation. Expedited consideration and resolution of these critical issues are necessary in order to prevent continued delays and uncertainty.

Sincerely,

A handwritten signature in black ink, appearing to read "David Orth". The signature is fluid and cursive, with the first name "David" and last name "Orth" clearly distinguishable.

David Orth
General Manager
San Joaquin Valley Power Authority

DO/ct

LPA-10-0002
File: PA 200.07

CERTIFICATE OF SERVICE

I certify that the following is true and correct:

On February 10, 2010, I caused to be served an electronic copy of the attached:

**RESPONSE
OF THE
SAN JOAQUIN VALLEY POWER AUTHORITY
TO THE PETITION FOR MODIFICATION OF D.05-12-041**

on all known parties to R.03-10-003, or their attorneys of record, addressed as follows:

See attached service list

Executed this 10th day of February, 2010, at Sacramento, California.

A handwritten signature in black ink, appearing to read "Vicki Ferguson", with a long horizontal flourish extending to the right.

Vicki Ferguson

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0310003 - PUC - OIR TO IMPLEME
Filer: CPUC
List Name: LIST
Last changed: February 9, 2010

Parties

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

ROGER BERLINER
PRESIDENT
BERLINER LAW PLLC
700 12TH STREET NW, STE 700
WASHINGTON, DC 20006
FOR: COUNTY OF LOS ANGELES

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

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064
FOR: CITY OF CORONA

SUSAN MUNVES
ENERGY AND GREEN BLDG. PROG. ADMIN.
CITY OF SANTA MONICA
1212 5TH STREET, FIRST FLOOR
SANTA MONICA, CA 90401
FOR: CITY OF SANTA MONICA

MIKE BURKE
ENERGY CHOICE, INC.
8714 LINDANTE DRIVE
WHITTIER, CA 90603
FOR: ENERGY CHOICE, INC.

COLIN M. LONG
A PROFESSIONAL CORPORATION
201 SOUTH LAKE AVENUE, SUITE 400
PASADENA, CA 91101
FOR: CALIFORNIA CLEAR ENERGY RESOURCES
AUTHORITY (CAL-CLERA)

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS
AND WESTERN POWER TRDG FORUM

MATTHEW GORMAN
CITY ATTORNEY'S OFFICE
CITY OF POMONA
500 S. GAREY AVE. BOX 660
POMONA, CA 91769
FOR: CITY OF POMONA

JANET COMBS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

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

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

MATTHEW GORMAN
ALVAREZ-GLASMAN & COLVIN
100 N. BARRANCA AVE., SUITE 1050
WEST COVINA, CA 91791
FOR: CITIES IN SOUTHERN CALIFORNIA

MICHAEL T. MEACHAM
CITY OF CHULA VISTA
276 FOURTH AVENUE
CHULA VISTA, CA 91910
FOR: CITY OF CHULA VISTA

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

GLORIA BRITTON
GENERAL MANAGER
ANZA ELECTRIC CO-OPERATIVE, INC (909)
PO BOX 39109 / 58470 HWY 371
ANZA, CA 92539-1909
FOR: ANZA ELECTRIC COOPERATIVE, INC

DAVID ORTH
SAN JOAQUIN VALLEY POWER AUTHORITY
4886 EAST JENSEN AVENUE
FRESNO, CA 93725
FOR: KINGS RIVER CONSERVATION DISTRICT,
SAN JOAQUIN VALLEY POWER AUTHORITY

PAUL FENN
LOCAL POWER
35 GROVE STREET
SAN FRANCISCO, CA 94102
FOR: LOCAL POWER

STEPHEN A.S. MORRISON
CITY ATTORNEY'S OFFICE
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102
FOR: OFFICE OF CITY ATTY. DENNIS J
HUERRERA

THOMAS J. LONG
ATTORNEY AT LAW
OFFICE OF THE CITY ATTORNEY
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102
FOR: CITY AND COUNTY OF SAN FRANCISCO

JONATHAN J. REIGER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5035
505 VAN NESS AVENUE

FRASER D. SMITH
CITY AND COUNTY OF SAN FRANCISCO
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

SAN FRANCISCO, CA 94102-3214
FOR: ORA

FOR: SFPUC

JIM HENDRY
SAN FRANCISCO PUBLIC UTILITIES COMM.
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
FOR: SAN FRANCISCO PUBLIC UTILITIES
COMM.

MIKE FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
FOR: NATURAL RESOURCES DEFENSE COUNCIL

JONATHAN D. PENDLETON
COUNSEL
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS & ELECTRIC COMPANY

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD STREET, STE 344
SAN FRANCISCO, CA 94107
FOR: GOLDEN STATE COOPERATIVE/SF CO-OP

HOWARD V. GOLUB
NIXON PEABODY LLP
1 EMBARCADERO CENTER, STE. 1800
SAN FRANCISCO, CA 94111
FOR: MARIN ENERGY AUTHORITY

DAVID L. HUARD
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, STE 2900
SAN FRANCISCO, CA 94111-3736
FOR: CITY OF CHULA VISTA

PETER W. HANSCHEN
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596
FOR: CONSTELLATION NEWENERGY, INC.

GERALD LAHR
ASSOCIATION OF BAY AREA GOVERNMENTS
101 8TH STREET, PO BOX 2050
OAKLAND, CA 94607
FOR: ASSOCIATION OF BAY AREA GOVERNMENTS

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

SCOTT WENTWORTH, P.E.
ENERGY ENGINEER
CITY OF OAKLAND
7101 EDGEWATER DRIVE
OAKLAND, CA 94621
FOR: CITY OF OAKLAND

CYNTHIA WOOTEN
NAVIGANT CONSULTING, INC.
1126 DELAWARE STREET
BERKELEY, CA 94702

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714
FOR: CALIFORNIA CITY-COUNTY STREET
LIGHT ASSOCIATION (CAL-SLA)

NEAL DE SNOO
ENERGY OPFFICER
CITY OF BERKELEY
2180 MILVIA STREET
BERKELEY, CA 94704
FOR: CITY OF BERKELEY

CLYDE MURLEY
CONSULTANT TO NRDC
1031 ORDWAY STREET
ALBANY, CA 94706
FOR: NRDC

JAMES M. TOBIN
TOBIN LAW GROUP
1628 TIBURON BOULEVARD
TIBURON, CA 94920
FOR: PAC-WEST TELECOMM, INC.

TIM ROSENFELD
MARIN ENERGY MANAGEMENT TEAM
131 CAMINO ALTO, SUITE D
MILL VALLEY, CA 94941
FOR: THE COUNTY OF MARIN

SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 W SAN FERNANDO ST., STE 501
SAN JOSE, CA 95113
FOR: CITY OF MORENO VALLEY

JIM STONE
CITY OF MANTECA DEPARTMENT OF PUBLIC WOR
1001 WEST CENTER STREET
MANTECA, CA 95337
FOR: THE CITY OF MANTECA

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
FOR: CITY & COUNTY OF SAN FRANCISCO

MICHAEL KYES
7423 SHAUN CT.
SEBASTOPOL, CA 95472

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

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814
FOR: INLAND VALLEY DEV/CITY OF
VICTORVILLE

KEVIN SMITH
BRAUN & BLAISING, P.C.
915 L ST STE. 1270
SACRAMENTO, CA 95814-3765
FOR: CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATION

EDWARD J. TIEDEMANN
ATTORNEY AT LAW
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4416
FOR: KINGS RIVER CONSERVATION DISTRICT

G. PATRICK STONER
LOCAL GOVERNMENT COMMISSION
1303 J STREET, SUITE 250
SACRAMENTO, CA 95816
FOR: LOCAL GOVERNMENT COMMISSION

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP (1359)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: DEPARTMENT OF GENERAL SERVICES

LYNN HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: EAST BAY MUNICIPAL UTILITY
DISTRICT (EBMUD)

DAVID R. HAMMER
COUNTY COUNSEL
COUNTY OF TRINITY
PO BOX 1428
WEAVERVILLE, CA 96093-1426
FOR: CITY OF TRINITY

JESSICA NELSON
ENERGY SERVICES MANAGER
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA, CA 96122-7064
FOR: PLUMAS-SIERRA RURAL ELECTRIC CO-OP

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

Information Only

KATHRYN GILLYCK
SAN FRANCISCO PUC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

RICHARD SMITH
SAN FRANCISCO PUC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

TAM HUNT
HUNT CONSULTING
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: COMMUNITY ENVIRONMENTAL COUNCIL

JAMES MCMAHON
CRA INTERNATIONAL
50 CHURCH ST.
CAMBRIDGE, MA 02138
FOR: NAVIGANT CONSULTING

STEVE HASTIE
NAVIGANT CONSULTING, INC.
1717 ARCH STREET
PHILADELPHIA, PA 19103

DAVID SAUL
PACIFIC SOLAR & POWER CORPORATION
2850 W. HORIZON RIDGE PKWY, SUITE 200
HENDERSON, NV 89052
FOR: SOLEL, INC.

CITY6 ADMINISTRATOR
CITY OF VERNON
4305 SANTA FE AVENUE
VERNON, CA 90058

CITY ADMINISTRATOR
CITY OF VERNON
4305 SANTA FE AVENUE
VERNON, CA 90058

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
FOR: GOLDMAN, SACHS & CO.

STEVEN R. ORR
RICHARDS, WATSON & GERSHON
355 SOUTH GRAND AVENUE, 40TH FLOOR
LOS ANGELES, CA 90071-3101

GREGORY S.G. KLATT
ATTORNEY AT LAW
DOUGLASS & LIDDELL
411 E. HUNTINGTON DRIVE, SUITE 107-356
ARCADIA, CA 91007
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS
/ WESTERN POWER TRADE FORUM

AKBAR JAZAYERI
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM 370
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

GINA M. DIXON
SOUTHERN CALIFORNIA EDISON
MAIL STOP: GO-1C 162P
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM 370
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941
FOR: PACIFIC ENERGY POLICY CENTER

MELANIE MCCUTCHAN
RESEARCH ASSOCIATE
ENVIRONMENTAL HEALTH COALITION
401 MILE OF CARS WAY, SUITE 310

REBECCA PEARL
POLICY ADVOCATE, CLEAN BAY CAMPAIGN
ENVIRONMENTAL HEALTH COALITION
401 MILE OF CARS WAY, STE. 310

NATIONAL CITY, CA 91950
FOR: ENVIRONMENTAL HEALTH COALITION

NATIONAL CITY, CA 91950
FOR: ENVIRONMENTAL HEALTH COALITION

JOHN W. LESLIE, ESQ.
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
600 WEST BROADWAY, STE. 2600
SAN DIEGO, CA 92101

PAUL SZYMANSKI
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRICCOMPANY

DONALD C. LIDDELL P. C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

MICHAEL SHAMES
UTILITY CONSUMERS ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
FOR: UTILITY CONSUMERS' ACTION NETWORK

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC

KARI KLOBERDANZ
REGULATORY CASE MANAGER
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123

WENDY KEILANI
REGULATORY CASE MANAGER
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP32B
SAN DIEGO, CA 92123

KURT J. KAMMERER
K.J. KAMMERER & ASSOCIATES
PO BOX 60738
SAN DIEGO, CA 92166-8738

JUNE M. SKILLMAN
CONSULTANT
2010 GREENLEAF STREET
SANTA ANA, CA 92706

JASON DE LA TOVA
WINDWARD ENERGY COMPANY
14609 FLINSTONE DRIVE
LAKE HUGHES, CA 93532
FOR: WINDWARD ENERGY COMPANY

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES

DENNIS J. HERRERA
CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102
FOR: CITY AND COUNTY OF SAN FRANCISCO

DIANE I. FELLMAN
NEXTERA ENERGY RESOURCES, LLC.
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
FOR: LAW OFFICES OF DIANE FELLMAN

MICHAEL CAMPBELL
SAN FRANCISCO PUBLIC UTILITIES COMISSION
1155 MARKET STREET 4TH FLOOR
SAN FRANCISCO, CA 94102

THERESA MUELLER
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102

DAN ADLER
DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
5 THIRD STREET, SUITE 1125
SAN FRANCISCO, CA 94103
FOR: CALIFORNIA CLEAN ENERGY FUND

SANDRA ROVETTI
REGULATORY AFFAIRS MANAGER
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

NORMAN J. FURUTA
ATTORNEY AT LAW
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO, CA 94103-1399
FOR: FEDERAL EXECUTIVE AGENCIES

AUDREY CHANG
DIRECTOR-CALIFORNIA CLIMATE PROGRAM
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
FOR: NATURAL RESOURCES DEFENSE COUNCIL

NINA SUETAKE
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

NOAH LONG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

CASE ADMINISTRATION
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105

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

KIMBERLY C. JONES
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A, ROOM 904
SAN FRANCISCO, CA 94105

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

ROGER GOLDSTEIN
PACIFIC GAS AND ELECTRIC COMPANY
ONE MARKET, SPEAR TOWER, SUITE 2400
SAN FRANCISCO, CA 94105-1126

JANINE L. SCANCARELLI
ATTORNEY AT LAW
CROWELL & MORING LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

MARC THEOBALD
EMCOR ENERGY SERVICES, INC.
505 SANSOME ST., 16/F
SAN FRANCISCO, CA 94111
FOR: EMCOR ENERGY SERVICES, INC.

IRENE K. MOOSEN
ATTORNEY AT LAW
53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112

MARVIN FELDMAN
ECONOMIST
RESOURCE DECISIONS
934 DIAMOND STREET
SAN FRANCISCO, CA 94114
FOR: RESOURCE DECISIONS

MEG MEAL
120 JERSEY STREET
SAN FRANCISCO, CA 94114

JIM BURKE
BURKE TECH SERVICES
PO BOX 15055
SAN FRANCISCO, CA 94115-0055
FOR: BURKE TECH SERVICES

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST., STE 303
SAN FRANCISCO, CA 94117
FOR: CALIFORNIA ENERGY MARKETS

PAUL V. HOLTON
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177-0001
FOR: PACIFIC GAS AND ELECTRIC COMPANY

ED CHANG
FLYNN RESOURCE CONSULTANTS INC.
5440 EDGEVIEW DRIVE
DISCOVERY BAY, CA 94514

PETER DRAGOVICH
ASSISTANT TO THE CITY MANAGER
CITY OF CONCORD
1950 PARKSIDE DRIVE, MS 01/A
CONCORD, CA 94519
FOR: CITY OF CONCORD

MICHAEL ROCHMAN
MANAGING DIRECTOR
SCHOOL PROJECT UTILITY RATE REDUCTION
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520
FOR: SCHOOL PROJECT FOR UTILITY RATE
REDUCTION

MICHAEL ROUSH
CITY ATTORNEY
CITY OF PLEASANTON
123 MAIN STREET
PLEASANTON, CA 94566
FOR: CITY OF PLEASANTON

SUE KATELEY
EXECUTIVE DIRECTOR
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN
PO BOX 782
RIO VISTA, CA 94571
FOR: CALIFORNIA SOLAR ENERGY INDUSTRIES
ASSN

MICHAEL NELSON
1119 GLEN CT
WALNUT CREEK, CA 94595-2318

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607
FOR: EAST BAY MUNICIPAL UTILITY DISTRICT

SAJI THOMAS PIERCE
EAST BAY MUNICIPAL UTILITY DISTRICT
375 11TH STREET
OAKLAND, CA 94607-4240
FOR: EAST BAY MUNICIPAL UTILITY DISTRICT

DAVID ROOM
5807 FREMONT ST
OAKLAND, CA 94608

CAROL MISSELDINE
MAYOR'S OFFICE
CITY OF OAKLAND
1 FRANK OGAWA PLAZA, 3/F
OAKLAND, CA 94612
FOR: CITY OF OAKLAND

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

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

DAWN WEISZ
PRINCIPAL PLANNER
MARIN COUNTY COMMUNITY DEVELOPMENT
3501 CIVIC CENTER DRIVE, RM 308
SAN RAFAEL, CA 94903-4157

MICHAEL DIETRICK
MARIN CLIMATE SHIFT-LEAP CAMPAIGN
THE WATERPLANET ALLIANCE
573 SEAVER DRIVE
MILL VALLEY, CA 94941

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX, CA 94978-0548
FOR: WOMEN'S ENERGY MATTERS

RITA NORTON
RITA NORTON AND ASSOCIATES, LLC
18700 BLYTHSWOOD DRIVE,
LOS GATOS, CA 95030

BARRY F. MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP

THOMAS S KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET

100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

MODESTO, CA 95352-4060
FOR: MODESTO IRRIGATION DISTRICT

CHRIS L. KIRIAKOU
CORNERSTONE CONSULTING, INC.
1565 E. TUOLUMNE RD.
TURLOCK, CA 95382

MICHAEL R. WOODS
ATTORNEY AT LAW
MICHAEL R. WOODS P.C.
18880 CARRIGER ROAD
SONOMA, CA 95476

HENRY NANJO
ASSISTANT CHIEF COUNSEL, LEGAL SERVICES
DEPARTMENT OF GENERAL SERVICES
707 3RD STREET, SUITE 7-330
WEST SACRAMENTO, CA 95605

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

JIM DOOLITTLE
ORADO MANAGEMENT GROUP
1116 ELM AVENUE
PLACERVILLE, CA 95667-4712

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

KRYSTY EMERY
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

STEVEN A GREENBERG
REALENERGY
4100 ORCHARD CANYON LANE
VACAVILLE, CA 95688
FOR: REALENERGY

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

DAN GEIS
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO, CA 95814

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814

JUSTIN C. WYNNE
ATTORNEY AT LAW
BRAUN BLAISING MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES, INC.
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814

KAREN LINDH
CALIFORNIA ONSITE GENERATION
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843

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

ANNE FALCON
EES CONSULTING, INC.
570 KIRKLAND AVE
KIRLAND, WA 98033
FOR: EES CONSULTING, INC.

State Service

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

AMY C. YIP-KIKUGAWA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE E. SIMON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

JOEL TOLBERT
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
ROOM 4004
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LOUIS M. IRWIN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

TRUMAN L. BURNS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARGARET L. TOBIAS
ATTORNEY AT LAW
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVE
SAN FRANCISCO, CA 94107
FOR: DWR

CRAIG MCDONALD
NAVIGANT CONSULTING
3100 ZINFANDEL DR., SUITE 600
RANCHO CORDOVA, CA 95670-6078
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES

MARSHALL D. CLARK
MANAGER
COGENERATION CONTRACT SERVICES
PO BOX 989052, MS-408; ORIM ROOM 1-435
WEST SACRAMENTO, CA 95798-9052

HASSAN MOHAMMED
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS43
SACRAMENTO, CA 95814

JOHN PACHECO
1416 9TH STREET
SACRAMENTO, CA 95814
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES

LISA DECARLO
STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-14
SACRAMENTO, CA 95814
FOR: CALIFORNIA ENERGY COMMISSION

IRYNA KWASNY
DEPT. OF WATER RESOURCES-CERS DIVISION
3310 EL CAMINO AVE., STE.120
SACRAMENTO, CA 95821
FOR: DEPT. OF WATER RESOURCES-CERS
DIVISION

JACQUELINE GEORGE
CALIF. ENERGY RESOURCES SCHEDULING
CALIF. DEPT OF WATER RESOURCES
3310 EL CAMINO AVE, RM. 120
SACRAMENTO, CA 95821
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES

MICHAEL WOFFORD
CA DEPT OF WATER RESOURCES, CERS DIV
2030 HOWE AVENUE
SACRAMENTO, CA 95825