



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and)
Refine Procurement Policies and Consider Long-)
Term Procurement Plans.)

Rulemaking 10-05-006
(Filed May 6, 2010)

**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO
PACIFIC GAS AND ELECTRIC COMPANY'S PETITION FOR MODIFICATION OF
DECISION 10-12-034 REGARDING CONVERGENCE BIDDING AUTHORIZATION**

MICHAEL D. MONTOYA
MELISSA A. HOVSEPIAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6054
Facsimile: (626) 302-3990
E-mail: Melissa.Hovsepian@sce.com

Dated: **March 11, 2011**

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Pursuant to Commission Rule of Practice and Procedure 16.4(f), Southern California Edison Company (SCE) hereby responds to the Petition for Modification filed by Pacific Gas and Electric Company (PG&E) on February 9, 2011 (Petition). In PG&E’s Petition, it requests that the California Public Utilities Commission (Commission) clarify two issues in its Decision (D.) 10-12-034 authorizing the investor-owned utilities (IOUs) to participate in the California Independent System Operator’s (CAISO) convergence bidding market (Decision): (1) Strategy No. 1 includes the submission of convergence bids related to long-start generation units that would otherwise be excluded from participating in the CAISO’s Day-Ahead Integrated Forward Market (IFM) and (2) all three strategies include bids submitted at interties. SCE supports PG&E’s request that the Commission authorize the IOUs to bid under Strategy No. 1 where long-start resources are not scheduled in the IFM. Although SCE believes that the IOUs may submit bids at interties under all three strategies based on the existing Decision, SCE also supports the Commission modifying the Decision to make explicit this authorization.

I.

STRATEGY NO. 1 INCLUDES BIDS RELATED TO LONG-START UNITS THAT CANNOT PARTICIPATE IN THE IFM

PG&E's Petition requests clarification that the IOUs may submit bids for long-start thermal units under Strategy No. 1 where CAISO rules or software limitations would otherwise exclude such resources from participating in the IFM. PG&E states that the Decision did not specifically address this issue, even though PG&E had included it in its convergence bidding proposal.¹ For Strategy No. 1, the Decision authorized, among other things, "the IOUs to participate in convergence bidding to manage Real-Time price exposure resulting from . . . uncertain generation performance for resources scheduled by the IOUs in the CAISO's Day-Ahead Market."² Since it is potentially unclear whether this strategy encompasses long-start thermal resources that CAISO rules or software limitations can effectively preclude from being successfully bid by the IOUs in the IFM, SCE supports PG&E's request for the Commission to clarify in a modified decision that convergence bids can be submitted under Strategy No. 1 for such long-start units.

II.

ALL THREE STRATEGIES INCLUDE BIDS AT INTERTIES

PG&E's also requests in its Petition that the Commission clarify that the IOUs may submit bids at interties under all strategies.³ PG&E points to what it interprets to be restrictive language in the Decision stating that ". . . convergence bids under all strategies shall be limited to the nodes or locations where the IOU-owned or IOU-contracted resources or load are physically located."⁴ SCE understands that the Decision already authorizes convergence bids at interties

¹ Petition, pp.2-4.

² D.10-12-034, p.22 and Ordering Paragraph (OP) 2.

³ Petition, pp.4-5.

⁴ D.10-12-034, p.21.

under all three strategies as SCE's imports are physically delivered to CAISO interties. Nonetheless, SCE would support the Commission modifying the Decision to make clear this authority.

III.
CONCLUSION

For the reasons stated above, the Commission should modify the Decision in accordance with PG&E's Petition.

Respectfully submitted,

MICHAEL D. MONTOYA
MELISSA A. HOVSEPIAN

/s/Melissa A. Hovsepian

By: Melissa A. Hovsepian

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6054
Facsimile: (626) 302-3990
E-mail: Melissa.Hovsepian@sce.com

March 11, 2011

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 **RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO PACIFIC GAS AND ELECTRIC COMPANY'S PETITION FOR MODIFICATION OF DECISION 10-12-034 REGARDING CONVERGENCE BIDDING AUTHORIZATION** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **11th day of March, 2011**, at Rosemead, California.

/s/Cynthia Childs

Cynthia Childs
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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



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Parties

AUDREY CHANG
 CA ENERGY EFFICIENCY INDUSTRY COUNCIL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CALIFORNIA ENERGY EFFICIENCY
 INDUSTRY COUNCIL

DANIEL W. DOUGLASS
 DOUGLASS & LIDDELL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: WESTERN POWER TRADING FORUM /
 DIRECT ACCESS CUSTOMER
 COALITION/ALLIANCE FOR RETAIL ENERGY
 MARKETS/ MARIN ENERGY AUTHORITY

DONALD C. LIDDELL
 DOUGLASS & LIDDELL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: THE CALIFORNIA ENERGY STORAGE
 ALLIANCE

KENNETH SAHM WHITE
 FIT COALITION
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: FIT COALITION

KRISTIN BURFORD
 LARGE-SCALE SOLAR ASSOCIATION
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: LARGE SCALE SOLAR ASSOCIATION

L. JAN REID
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: L. JAN REID

SIERRA MARTINEZ
 NATURAL RESOURCES DEFENSE COUNCIL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: NATURAL RESOURCES DEFENSE COUNCIL

TAM HUNT
 HUNT CONSULTING
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CLEAN COALITION

AIMEE M. SMITH
 ATTORNEY
 SAN DIEGO GAS & ELECTRIC COMPANY

LAURA WISLAND
 UNION OF CONCERNED SCIENTISTS
 EMAIL ONLY

EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

EMAIL ONLY, CA 00000-0000
 FOR: UNION OF CONCERNED SCIENTISTS

MARTIN HOMEC
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: WOMEN'S ENERGY MATTERS

NANCY RADER
 EXECUTIVE DIRECTOR
 CALIFORNIA WIND ENERGY ASSOCIATION
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: CALIFORNIA WIND ENERGY ASSOCIATION

ABRAHAM SILVERMAN
 SR. COUNSEL, REGULATORY
 NRG ENERGY, INC.
 211 CARNEGIE CENTER DRIVE
 PRINCETON, NJ 08540
 FOR: NRG ENERGY, INC.

B. MARIE PIENIAZEK
 DEMAND RESPONSE & ENERGY CONSULTING, LLC
 1328 BOZENKILL ROAD
 DELANSON, NY 12053
 FOR: ENERGY CURTAILMENT SPECIALISTS INC.

MELISSA DORN
 MCDERMOTT WILL & EMERY LLP
 600 13TH ST. NW
 WASHINGTON, DC 20005
 FOR: MORGAN STANLEY CAPITAL GROUP INC.

JAMES P. WHITE
 TRANSCANADA CORPORATION
 4547 RINCON PLACE
 MONTCLAIR, VA 22025
 FOR: ZEPHYR POWER TRANSMISSION, LLC

JASON ARMENTA
 CALPINE POWERAMERICA-CA, LLC
 717 TEXAS AVENUE, SUITE 1000
 HOUSTON, TX 77002
 FOR: CALPINE POWERAMERICA-CA, LLC

BO BUCHYNSKY
 DIAMOND GENERATING CORPORATION
 333 SOUTH GRAND AVE., SUITE 1570
 LOS ANGELES, CA 90071
 FOR: DIAMOND GENERATING CORPORATION

JERRY R. BLOOM
 WINSTON & STRAWN, LLP
 333 SOUTH GRAND AVENUE, 38TH FLOOR
 LOS ANGELES, CA 90071-1543
 FOR: CALIFORNIA COGENERATION COUNCIL

DON VAWTER
 AES ALAMITOS, LLC
 690 N. STUDEBAKER RD.
 LONG BEACH, CA 90803
 FOR: AES SOUTHLAND

CAROL SCHMID-FRAZEE
 SOUTHERN CALIFORNIA EDISON CO.
 2244 WALNUT GROVE AVE./PO BOX 800
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

MARY C. HOFFMAN
 PRESIDENT
 SOLUTIONS FOR UTILITIES, INC.
 1192 SUNSET DRIVE
 VISTA, CA 92081
 FOR: SOLUTIONS FOR UTILITIES, INC.

DANIEL A. KING
 SEMPRA GENERATION
 101 ASH STREET, HQ 14
 SAN DIEGO, CA 92101
 FOR: SEMPRA GENERATION

MONA TIERNEY-LLOYD
 SENIOR MANAGER WESTERN REG. AFFAIRS
 ENERNOC, INC.
 PO BOX 378
 CAYUCOS, CA 93430
 FOR: ENERNOC, INC.

EVELYN KAHL
 ALCANTAR & KAHL, LLP
 33 NEW MONTGOMERY STREET, SUITE 1850
 SAN FRANCISCO, CA 94015
 FOR: ENERGY PRODUCERS AND USERS
 COALITION

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

NOEL OBIORA
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 4107
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: DIVISION OF RATEPAYER ADVOCATES

JOSHUA ARCE
 BRIGHTLINE DEFENSE PROJECT
 1028A HOWARD STREET
 SAN FRANCISCO, CA 94103
 FOR: BRIGHTLINE DEFENSE PROJECT

MARYBELLE C. ANG
STAFF ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME STREET, STE. 900
SAN FRANCISCO, CA 94104
FOR: TURN

TIM LINDL
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO, CA 94105
FOR: COGENERATION ASSOCIATION OF
CALIFORNIA/ENERGG PRODUCERS AND USERS
COALITION

DEBORAH N. BEHLES
GOLDEN GATE UNIVERSITY SCHOOL OF LAW
536 MISSION STREET
SAN FRANCISCO, CA 94105-2968
FOR: NNHEIM

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: INDEPENDENT ENERGY PRODUCERS
ASSOCIATION

STEVEN F. GREENWALD
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111
FOR: CAPITAL POWER CORPORATION

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: CALPINE CORPORATION

LISA A. COTTLE
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO, CA 94114
FOR: MIRANT CALIFORNIA, LLC

CHARLES R. MIDDLEKAUFF
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94120
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SARA STECK MYERS
ATTORNEY AT LAW
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES (CEERT)

MICHAEL ROCHMAN
MANAGING DIRECTOR
SCHOOL PROJECT UTILITY RATE REDUCTION
1850 GATEWAY BLVD., STE. 235
CONCORD, CA 94520
FOR: SCHOOL PROJECT FOR UTILITY RATE
REDUCTION

JENNIFER CHAMBERLIN
LS POWER DEVELOPMENT, LLC
5000 HOPYARD ROAD, SUITE 480
PLEASANTON, CA 94588
FOR: LS POWER ASSOCIATES, L.P.

WILLIAM H. BOOTH
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94596
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION (CLECA)

JOSEPH F. WIEDMAN
KEYES & FOX LLP
436 14TH STREET, SUITE 1305
OAKLAND, CA 94612
FOR: INTERSTATE RENEWABLE ENERGY COUNCIL

PAUL CORT
EARTHJUSTICE
426 17TH STREET, 5TH FLOOR
OAKLAND, CA 94612
FOR: SIERRA CLUB CALIFORNIA

SHANA LAZEROW
ATTORNEY
COMMUNITIES FOR BETTER ENVIRONMENT
1904 FRANKLIN STREET, STE 600
OAKLAND, CA 94612
FOR: COMMUNITIES FOR A BETTER
ENVIRONMENT

WILLIAM B. ROSTOV
EARTHJUSTICE
426 17TH STREET, 5TH FLOOR
OAKLAND, CA 94612
FOR: SIERRA CLUB CALIFORNIA

GREGG MORRIS
DIRECTOR
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
FOR: GREEN POWER INSTITUTE

JASMIN ANSAR
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
FOR: UNION OF CONCERNED SCIENTISTS

LINDA AGERTER

R. THOMAS BEACH

51 PARKSIDE DRIVE
BERKELEY, CA 94705
FOR: LARGE-SCALE SOLAR ASSOCIATION

CALIFORNIA COGENERATION COUNCIL
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557
FOR: CALIFORNIA COGENERATION COUNCIL
(CCC) / CALIFORNIA WIND ENERGY
ASSOCIATION

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073-2659
FOR: CALIFORNIANS FOR RENEWABLE ENERGY

JUDITH B. SANDERS
SR. COUNSEL
CALIF. INDEPENDENT SYSTEM OPERATOR CORP
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

KELLY M. FOLEY
ATTORNEY
THE VOTE SOLAR INITIATIVE
2089 TRACY COURT
FOLSOM, CA 95630
FOR: THE VOTE SOLAR INITIATIVE

SYDNEY MANHEIM DAVIES
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR

ROBERT E. BURT
INSULATION CONTRACTORS ASSN.
3479 ORANGE GROVE AVE., STE. A
NORTH HIGHLANDS, CA 95660
FOR: INSULATION CONTRACTORS ASSN.

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND, CA 95776
FOR: ENERGY USERS FORUM

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS, L.L.P.
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: CONSTELLATION NEWENERGY, INC.

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

DONALD E. BROOKHYSER
ATTORNEY AT LAW
ALCANTAR & KAHL
1300 S.W. FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201
FOR: COGENERATION ASSN. OF CALIFORNIA

Information Only

ANDRA PLIGAVKO
FIRST SOLAR DEVELOPMENT, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

BETH VAUGHAN
CALIFORNIA COGENERATION COUNCIL
EMAIL ONLY
EMAIL ONLY, CA 00000

GENE VARANINI
SPECIAL COUNSEL
DEMAND RESERVES PARTNERSHIP
EMAIL ONLY
EMAIL ONLY, CA 00000

JESSIE BAIRD
EARTHJUSTICE
EMAIL ONLY
EMAIL ONLY, CA 00000

JOHN W. LESLIE, ESQ.
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

MALCOLM D. AINSPAN
ENERGY CURTAILMENT SPECIALISTS
EMAIL ONLY
EMAIL ONLY, NY 00000

MATTHEW FREEDMAN
THE UTILITY REFORM NETWORK
EMAIL ONLY

NOAH LONG
NATURAL RESOURCES DEFENSE COUNCIL
EMAIL ONLY

EMAIL ONLY, CA 00000

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
EMAIL ONLY
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

DONALD GILLIGAN
NATIONAL ASSC. OF ENERGY SVC. COMPANIES
EMAIL ONLY
EMAIL ONLY, DC 00000-0000
FOR: NATIONAL ASSOCIATION OF ENERGY
SERVICE COMPANIES

MELISSA SCHARY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

MICHELLE GRANT
DYNEGY, INC.
EMAIL ONLY
EMAIL ONLY, TX 00000-0000

WILLIAM CHEN, ESQ.
CORPORATE COUNSEL
ENERGY CURTAILMENT SPECIALISTS, INC.
4455 GENESEE STREET, BLDG. 6
NEW YORK, NY 14225

STEVEN A. WEILER
LEONARD STREET AND DEINARD, PA
1350 I STREET, NW, STE. 800
WASHINGTON, DC 20005
FOR: ZEPHYR POWER TRANSMISSION, LLC

CAITLIN COLLINS LIOTIRIS
ENERGY STRATEGIES, LLC
215 SOUTH STATE STREET, STE 200
SALT LAKE CITY, UT 84111

CYNTHIA K. MITCHELL
ENERGY ECONOMICS, INC.
530 COLGATE COURT
RENO, NV 89503

FRED MOBASHERI
CONSULTANT
ELECTRIC POWER GROUP, LLC
201 SOUTH LAKE AVE., SUITE 400
PASADENA, CA 91101

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770

RICH METTLING

EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

CYNTHIA BRADY
CONSTELLATION ENERGY RESOURCES, LLC
EMAIL ONLY
EMAIL ONLY, IL 00000-0000

JOHN NIMMONS
JOHN NIMMONS & ASSOCIATES, INC.
EMAIL ONLY
EMAIL ONLU, CA 00000-0000

MICHAEL O'KEEFE
CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

STEVEN HUHMAN
MORGAN STANLEY CAPITAL GROUP INC.
2000 WESTCHESTER AVENUE
PURCHASE, NY 10577

MICHAEL A. YUFFEE
HOGAN LOVELLS
555 13TH ST., N.W.
WASHINGTON, DC 20004

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 E. THIRD AVE.
DURANGO, CA 81301

JUSTIN FARR
ENERGY STRATEGIES, LLC
215 SOUTH STATE ST., STE. 200
SALT LAKE CITY, UT 84111

HANS LAETZ, J.D.
ZUMA IMPACT LLC
6402 SURFSIDE WAY
MALIBU, CA 90265

AMBER DEAN WYATT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

MELISSA HOVSEPIAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

GREG BASS

SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

NOBLE AMERICAS ENERGY SOLUTIONS LLC
401 WEST A STREET, SUITE 500
SAN DIEGO, CA 92101-3017

JOHN A. PACHECO
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ12B
SAN DIEGO, CA 92101-3017

WENDY KEILANI
REGULATORY CASE MGR
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK CT, CP32D, RM CP31-E
SAN DIEGO, CA 92123-1530

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

RORY COX
RATEPAYERS FOR AFFORDABLE CLEAN ENERGY
251 KEARNY STREET, 2ND FLOOR
SAN FRANCISCO, CA 94102
FOR: PACIFIC ENVIRONMENT

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYER ADVOCATES

KAREN P. PAULL
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

MARCEL HAWIGER
ENERGY ATTY
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

ALEX BECK
COMPETITIVE POWER VENTURES, INC.
55 2ND STREET, SUITE 525
SAN FRANCISCO, CA 94105

ALICE GONG
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST. MC B9A
SAN FRANCISCO, CA 94105

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., PO BOX 770000 MC B9A
SAN FRANCISCO, CA 94105

CHRISTINE MUNCE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B9A
SAN FRANCISCO, CA 94105

EVAN HOUSE
GOLDEN GATE UNIVERSITY SCHOOL OF LAW
536 MISSION STREET
SAN FRANCISCO, CA 94105

GEORGE ZAHARIUDAKIS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, RM. 904, MC B9A
SAN FRANCISCO, CA 94105

GLORIA D. SMITH
SIERRA CLUB ENVIRONMENTAL LAW PROGRAM
85 SECOND STREET
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

KEVIN HIETBRINK
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B9A
SAN FRANCISCO, CA 94105

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

LUCAS WILLIAMS
GOLDEN GATE UNIVERSITY SCHOOL OF LAW
536 MISSION STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC ENVIRONMENT

MATTHEW GONZALES
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 918
SAN FRANCISCO, CA 94105

MICHAEL P. ALCANTAR

WILLIAM MITCHELL

ALCANTAR & KAHL LLP
 33 NEW MONTGOMERY STREET, SUITE 1850
 SAN FRANCISCO, CA 94105
 FOR: COGENERATION ASSOCIATION OF
 CALIFORNIA

COMPETITIVE POWER VENTURES, INC.
 55 2ND STREET, SUITE 525
 SAN FRANCISCO, CA 94105

ADAM BROWNING
 THE VOTE SOLAR INITIATIVE
 300 BRANNAN STREET, SUITE 609
 SAN FRANCISCO, CA 94107
 FOR: THE VOTE SOLAR INITIATIVE

STEPHANIE WANG
 ATTORNEY AT LAW
 PACIFIC ENVIRONMENT
 251 KEARNY STREET, 2ND FLOOR
 SAN FRANCISCO, CA 94108
 FOR: PACIFIC ENVIRONMENT

DEVIN MCDONELL
 BINGHAM MCCUTCHEN
 THREE EMBARCADERO CENTER
 SAN FRANCISCO, CA 94111

JAMES D. SQUERI, ESQ.
 GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
 505 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94111
 FOR: POWEREX CORPORATION

JAMES L. FILIPPI
 NEXTLIGHT RENEWABLE POWER, LLC
 353 SACRAMENTO STREET, SUITE 2100
 SAN FRANCISCO, CA 94111

RAFI HASSAN
 SUSQUEHANNA FINANCIAL GROUP, LLLP
 101 CALIFORNIA STREET, SUITE 3250
 SAN FRANCISCO, CA 94111

ROBERT GEX
 DAVIS WRIGHT TREMAINE LLP
 505 MONTGOMERY STREET, SUITE 800
 SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN
 DAVIS WRIGHT & TREMAINE LLP
 505 MONTGOMERY STREET, SUITE 800
 SAN FRANCISCO, CA 94111

TODD EDMISTER
 ATTORNEY AT LAW
 BINGHAM MCCUTCHEN LLP
 THREE EMBARCADERO CENTER
 SAN FRANCISCO, CA 94111-4067

DIANE I. FELLMAN
 DIR - REGULATORY & GOV'T AFFAIRS
 NRG WEST & SOLAR
 73 DOWNEY STREET
 SAN FRANCISCO, CA 94117

CALIFORNIA ENERGY MARKETS
 425 DIVISADERO ST. STE 303
 SAN FRANCISCO, CA 94117-2242

REGULATORY FILE ROOM
 PACIFIC GAS AND ELECTRIC COMPANY
 PO BOX 7442
 SAN FRANCISCO, CA 94120

RYAN HEIDARI
 ENDIMENSIONS LLC
 1670 SOUTH AMPHLETT BLVD., SUITE 105
 SAN MATEO, CA 94402

BRAD WETSTONE
 ALAMEDA MUNICIPAL POWER
 2000 GRAND STREET, PO BOX H
 ALAMEDA, CA 94501-0263

GOPAL SHANKER
 PRESIDENT
 RECOLTE ENERGY
 3901 LAKE COUNTY HIGHWAY
 CALISTOGA, CA 94515
 FOR: RECOLTE ENERGY

SEAN P. BEATTY
 GENON CALIFORNIA NORTH LLC
 696 WEST 10TH STREET
 PITTSBURG, CA 94565

AVIS KOWALEWSKI
 CALPINE CORPORATION
 4160 DUBLIN BLVD., SUITE 100
 DUBLIN, CA 94568

MATTHEW BARMACK
 DIR
 CALPINE CORPORATION
 4360 DUBLIN BLVD., SUITE 100
 DUBLIN, CA 94568

DOCKET COORDINATOR
 KEYES & FOX LLP
 436 14TH STREET, SUITE 1305
 OAKLAND, CA 94612

SKY C. STANFIELD
 KEYES & FOX LLP
 436 14TH STREET, SUITE 1305
 OAKLAND, CA 94612

DAVID MARCUS

REED V. SCHMIDT

ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY, CA 94701-1287

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

PATRICK G. MCGUIRE
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710

ELIZABETH RASMUSSEN
PROJECT MGR.
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, SUITE 320
SAN RAFAEL, CA 94901

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

BRUCE PERLSTEIN, PH.D
MANAGING DIRECTOR
STRATEGY, FINANCE & ECONOMICS, LLC
366 EDGEWOOD AVENUE
MILL VALLEY, CA 94941

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

PUSHKAR WAGLE, PH.D.
FLYNN RESOURCE CONSULTANTS INC.
2900 GORDON AVENUE, SUITE 100-3
SANTA CLARA, CA 95051

DEVRA WANG
STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 95104

BARRY F. MCCARTHY
MCCARTHY & BERLIN, LLP
100 WEST SAN FERNANDO ST., STE. 501
SAN JOSE, CA 95113

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

WILLIAM B. MARCUS
CONSULTING ECONOMIST
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605

BETH ANN BURNS
SR. COUNSEL - LEGAL & REGULATORY DEPT
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630

BRIAN THEAKER
DYNEGY
3161 KEN DEREK LANE
PLACERVILLE, CA 95667

MARY LYNCH
CONSTELLATION ENERGY COMMODITIES GRP
2377 GOLD MEADOW WAY, STE 100
GOLD RIVER, CA 95670

GRANT ROSENBLUM
CALIF. INDEPENDENT SYSTEM OPERATOR CORP.
151 BLUE RAVINE ROAD
FOLSOM, CA 95678

MARK ROTHLEDER
CALIF. INDEPENDENT SYSTEM OPERATOR CORP.
151 BLUE RAVINE ROAD
FOLSOM, CA 95678

UDI HELMAN
CALIF. INDEPENDENT SYSTEM OPERATOR CORP.
151 BLUE RAVINE ROAD
FOLSOM, CA 95678

RAY PINGLE
7140 STEEPLE CHASE DR.
SHINGLE SPRINGS, CA 95682

DANIEL KIM
THE ANTHEM GROUP
PO BOX 582844
ELK GROVE, CA 95758-0051

DANIELLE OSBORN MILLS
POLICY DIRECTOR
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES (CEERT)

DAVID MILLER
RENEWABLE TECHNOLOGIES
CENTER FOR ENERGY EFFICIENCY AND
1100 ELEVENTH ST., SUITE 311
SACRAMENTO, CA 95814

DOUGLAS DAVIE
WELLHEAD ELECTRIC COMPANY
650 BERGUT DRIVE, SUITE C
SACRAMENTO, CA 95814

JIM METROPULOS
SR. ADVOCATE
SIERRA CLUB CALIFORNIA
801 K STREET, SUITE 2700
SACRAMENTO, CA 95814

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

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

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSOCIATION
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

SHANNON EDDY
EXECUTIVE DIRECTOR
LARGE SCALE SOLAR ASSOCIATION
2501 PORTOLA WAY
SACRAMENTO, CA 95818
FOR: LARGE-SCALE SOLAR ASSOCIATION

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DAY CARTER MURPHY LLC
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864
FOR: CALIFORNIA CLEAN DG COALITION.

DIANA SANCHEZ
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

ANNIE STANGE
ALCANTAR & KAHL LLP
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97201

DONALD W. SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660

JOHN DUNN
TRANSCANADA CORPORATION
450 1ST ST. S.W.
CALGARY, AB T2P 5H1
CANADA

MEREDITH LAMEY
TRANSCANADA CORPORATION
450 1ST STREET S.W.
CALGARY, AB T2P 5H1
CANADA

DANIEL JURIJEW
SR. MGR - REGULATORY AFFAIRS WEST
CAPITAL POWER CORPORATION
10065 JASPER AVENUE
EDMONTON, AB T5J 3B1
CANADA
FOR: CAPITAL POWER CORPORATION

GIFFORD JUNG
POWEREX CORPORATION
666 BURRARD STREET, SUITE 1400
VANCOUVER, BC V5R 4Y2
CANADA
FOR: POWEREX CORPORATION

State Service

ANNE GILLETTE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

ANNE GILLETTE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CHERYL LEE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

SARA KAMINS
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CONNIE LENI
CALIFORNIA ENERGY COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

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

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

CHLOE LUKINS
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4101
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CLAIRE EUSTACE
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4104
 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
 FOR: DRA

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

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

JORDAN PARRILLO
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4104
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

KARL MEEUSEN
 CALIF PUBLIC UTILITIES COMMISSION
 EXECUTIVE DIVISION
 ROOM 5217
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

KE HAO OUYANG
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PRICING AND CUSTOMER PROGRAM
 ROOM 4104
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

MARY JO STUEVE
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4101
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

NIKA ROGERS
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4101
 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

PETER SPENCER
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4104
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

PETER V. ALLEN
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 5031
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

RAHMOM MOMOH
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4102
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: DIVISION OF RATEPAYER ADVOCATES

REBECCA TSAI-WEI LEE
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY DIVISION
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

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

YULIYA SHMIDT
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLARE LAUFENBER GALLARDO
STRATEGIC TRANSMISSION INVESTMNT PROGRAM
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 17
SACRAMENTO, CA 95814

JIM WOODWARD
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 20
SACRAMENTO, CA 95814

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

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

MICHAEL NYBERG
CALIFORNIA ENERGY COMMISSION
PROCUREMENT UNIT, ELECTRICITY ANALYSIS
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814

IVIN RHYNE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 95814-5512

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