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Petition of The Utility Reform Network to
Adopt, Amend, or Repeal a Regulation
Pursuant to Pub. Util. Code § 1708.5
Related to Arrearage Management and
Shutoff Prevention for Residential
Customers of the Major Jurisdictional
Electric and Gas Utilities.

Petition 09-06-022
(Filed June 19, 2009)

**REPLY OF THE DIVISION OF RATEPAYER ADVOCATES
TO THE RESPONSES ON THE PETITION OF THE UTILITY REFORM
NETWORK TO ADOPT, AMEND, OR REPEAL A REGULATION
RELATED TO ARREARAGE MANAGEMENT AND SHUTOFF
PREVENTION FOR RESIDENTIAL CUSTOMERS OF THE MAJOR
JURISDICTIONAL ELECTRIC AND GAS UTILITIES**

RASHID A. RASHID
Staff Attorney
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2705
Email: rhhd@cpuc.ca.gov

Lee-Whei Tan
Regulatory Analyst
Division of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: 415-703-2901
Email: lwt@cpuc.ca.gov

August 3, 2009

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THE MAJOR JURISDICTIONAL ELECTRIC AND GAS UTILITIES**

I. INTRODUCTION

Pursuant to Rule 6.3 of the Commission’s Rules of Practice and Procedure, the Division of Ratepayer Advocates (“DRA”) hereby files this reply to parties’ comments on The Utility Reform Network’s (TURN) Petition asking the Commission to adopt, amend, or repeal a regulation related to arrearage management and shutoff prevention for residential customers of the major jurisdictional electric and gas utilities, (“Petition”).

While DRA agrees with the energy investor owned utilities (“IOUs”) that proactively pursuing and enrolling eligible customers to participate in income-qualified customer assistance programs’ and also providing flexible payment plans are cost-effective means to assist customers facing hardship paying their energy bills, DRA does not support the IOUs' request to reject TURN's Petition. As DRA stated in its response, the Commission should approve TURN's Petition and

commence a new proceeding. As DRA demonstrates below, all the parties that filed responses agree that the Commission needs to take action in some form or another to assist California ratepayers during this severe economic crisis. While the scope of the proceeding can fully be determined after parties conduct discovery, the issues DRA discuss below need to be resolved in the proposed proceeding.

The proposed proceeding is ideal for the Commission to address the needs of many ratepayers facing financial hardship, especially those that are not enrolled in the customer assistance programs. The proceeding will, at minimum, provide a forum for the parties to collect the data needed to assess whether or not the current customer assistance programs, tariff rules, and the IOUS' own initiatives are sufficient to prevent customers from losing essential electric and gas services during this severe economic downturn.

II. DISCUSSION

A. DRA Recommends that the Commission Accept TURN's Petition

While the IOUs state that they support TURN's overall goal of assisting customers to reduce their arrearages and limit or prevent utility service shutoffs, they argue that the Commission should reject TURN's Petition. SDG&E and SoCalGas state that the Commission, the IOUs, and other interested parties should work together to promote and provide available resources and assistance to needy customers.¹ The Commission needs to commence a venue to examine what are the most effective means to assist consumers with either existing tools or developing new tools. There is also some value in sharing best practices among the IOUs and other parties in a public forum because ultimately, most of the existing programs are ratepayer funded.

¹ Response of SDG&E and SoCalGas to TURN'S Petition at 16.

And, DRA reiterates its request for a period of discovery because the data needed is indeed voluminous and parties need the opportunity to gather this data to assess whether or not the current customer assistance programs, tariff rules, and the utilities' own initiatives are adequate in preventing customers from losing essential energy services.

As part of the shutoff prevention, this proceeding can also shed light on IOUs' deployment and effectiveness of customer assistance programs so that the Commission will have information in hand to modify the programs if necessary. Additionally, there is no active proceeding where parties are given a change to submit testimony and conduct hearings so that the Commission can assess and review how the IOUs promote the energy assistance programs.

B. DRA is in Agreement with IOUs that they should Aggressively Pursue and Enroll Eligible Customers as a Means of Assist Needy and Low Income Customers Stay Connected Now

In their opening responses, the IOUs all noted that they have many programs to assist customers in need, and the funding for such programs have been increased substantially from 2008 to 2009.² They also asserted that they have expanded their outreach efforts to increase customer awareness of these assistance programs.³ DRA has been urging the IOUs to do so, and is pleased to hear that the IOUs are actively engaging in such efforts.

In its response to TURN's Petition, SCE noted that its aggressive approach to customer outreach has resulted in increased enrollment in the California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA),

² PG&E response to TURN's petition, at 3-4.SDG&E and SoCalGas' response to TURN's petition, at 4-5, SCE response to TURN's petition at 6-7.

³ PG&E response to TURN's petition, at 6-7.SDG&E and SoCalGas' response to TURN's petition, at 6-11, SCE response to TURN's petition at 3-4.

and Low Income Energy Assistance (LIEE).⁴ These facts support the opening of the proceeding because a central forum will exist where all the IOUs can share their lessons learned about their outreach programs, identify the most effective approaches, and note the methods that should be avoided.

C. DRA commends SCE's Proactive Effort in Modifying its Credit Policies to Avert Large Arrearage and Reduce Disconnections

SCE stated that it has modified its credit policies regarding payment assistance and extensions, and deposit requirements to help more residential customers manage their accounts.⁵ More specifically, SCE asserted that it has modified its Final Call (48-hour) notice to include a payment arrangement offer to residential customers having difficulty paying their bills; and it asserted that it does not require a credit reestablishment deposit from residential customers after one or more delinquent payments and does not intend to do so in the foreseeable future.⁶ SCE also stated that its modified credit policies have help reducing outstanding arrearages and disconnects for both the CARE and non-CARE customers.⁷

However, it seems that other IOUs currently require customers who have late payments or prior disconnections to pay additional deposits.⁸ Both TURN and UCAN noted that customers indeed have faced hardship as a result of the additional deposit. The trouble with this practice is that these customers are already struggling financially, and they are simply not in a position to pay the additional deposits.

⁴ SCE's response to TURN's petition at 10-12.

⁵ Id., at 6-7.

⁶ Id., at 8.

⁷ Id., at 6-8.

⁸ TURN's Petition, at 22, UCAN's response to TURN's petition at 3.

The economic crisis has affected many customers and it will most likely get worse as the unemployment rate continues to rise. SCE's policy is the most reasonable to accommodate customers with serious financial struggles that California ratepayers are facing. The fact that the other IOUs do not practice the same policy only supports the need to open the proposed proceeding to provide an opportunity to establish consistent protections, where appropriate, for all California ratepayers.

D. A Policy to Reduce or Prevent Disconnection is needed

One area that DRA observed, from data submitted by the IOUs, is that the majority of customers who are disconnected are eventually reconnected.² It seems that if the shutoffs for these customers were prevented in the first place, it would reduce the hardship a customer faces as a result of being shutoff (e.g. potentially facing an unsafe environment), and the IOUs would avoid the costs associated with their employees traveling to the customer premises to shut off and later reconnect the customers.

TURN's Petition should be approved so that the Commission can establish a process to track customers, identify those at risk, and take pro-active measures to keep them connected. There is no doubt that this process will reduce both the customers' and the utilities' costs. SCE's modified Final Call (48-hour) notice to include a payment arrangement offer to residential customers having difficulty paying their bills may be one approach toward reducing the number of customers disconnected then reconnected. In the proposed proceeding, parties and other IOUs can determine if other programs are effective and should be added to their methodologies, e.g. SCE's current method of identifying and enrolling new customers. There currently is no active proceeding where parties can file

² The IOUs showed a customer reconnection rate ranging from high 60s to 80% based on their data submission to DRA's inquiries.

testimony and conduct hearings to determine the statewide implementation of these practices. Therefore, the proposed proceeding is essential for the Commission to identify how best to reduce unnecessary shutoffs.

**E. TURN's Proposed Proceeding Will Allow
Necessary Coordination Between Utilities**

DRA is pleased to learn that the energy IOUs are increasing and improving their outreach efforts to raise customer awareness and enrollment in assistance programs. The proposed proceeding will provide the opportunity to examine these improvements and allow the IOUs to share their progress and best practices with one another and the other parties.

It is also important that the Commission, within the proposed proceeding, properly monitor the progress of the customer assistance programs to determine how they are assisting customers and how effective they are.

III. CONCLUSION

DRA supports TURN's Petition to initiate so that the Commission can ensure that consumers are provided with affordable energy services and with sufficient support to avoid service termination. Furthermore, the Commission needs a forum to monitor and analyze aspects of the current customer assistance programs. To achieve these goals (1) the Commission should open the proposed proceeding as petitioned by TURN (2) the IOUs should continue to aggressively champion energy assistance programs to reduce customers' energy bills and prevent shutoffs and share their best practices.

Respectfully submitted,

/s/ LEE-WHEI TAN

Lee-Whei Tan
Regulatory Analyst
Division of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: 415-703-2901
Email: lwt@cpuc.ca.gov

/s/ RASHID A. RASHID

RASHID A. RASHID
Staff Attorney
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2705
Email: rhda@cpuc.ca.gov

August 3, 2009

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**REPLY Of The DIVISION OF RATEPAYER ADVOCATES to the RESPONSES ON THE PETITION OF THE UTILITY REFORM NETWORK TO ADOPT, AMEND, OR REPEAL A REGULATION RELATED TO ARREARAGE MANAGEMENT AND SHUTOFF PREVENTION FOR RESIDENTIAL CUSTOMERS OF the MAJOR JURISDICTIONAL ELECTRIC AND GAS UTILITIES**” in **P.09-06-022, A0805022, A0805024, A0805025, A0805026, A0812002, A0711011, A0612009, A0612010** by using the following service:

☒ **E-MAIL SERVICE:** sending the entire document as an attachment to an e-mail message to all known parties of record to this proceeding who provided e-mail addresses.

☐ **U.S. MAIL SERVICE:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed in San Francisco, California, on the **3rd** day of **Auguts, 2009**.

/s/ **ANGELITA F. MARINDA**
Angelita F. Marinda

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

SERVICE LIST

**Petition 09-06-022, A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026,
A.05-12-002, A.07-11-011, A.06-12-009, A.06-12-010**

californiadockets@pacificorp.com;
case.admin@sce.com;
cem@newsdata.com;
hayley@turn.org;
holly.lloyd@swgas.com;
jpo@cpuc.ca.gov;
lwt@cpuc.ca.gov;
michelle.mishoe@pacificorp.com;
monica.ghattas@sce.com;
rhd@cpuc.ca.gov;
valerie.ontiveroz@swgas.com;
lss@cpuc.ca.gov
rhh@cpuc.ca.gov
kwz@cpuc.ca.gov
hayley@turn.org
holly.lloyd@swgas.com
valerie.ontiveroz@swgas.com
case.admin@sce.com
monica.ghattas@sce.com
cassandra.sweet@dowjones.com
cem@newsdata.com
californiadockets@pacificorp.com
michelle.mishoe@pacificorp.com
jpo@cpuc.ca.gov
lwt@cpuc.ca.gov
mjd@cpuc.ca.gov
rhd@cpuc.ca.gov
rvanderleeden@semprautilities.com
npedersen@hanmor.com
acook@hillfarrer.com
local350@yahoo.com
hmgomez@lcof.net
jlewis@icwuc.org
francis.mculty@sce.com
dwood8@cox.net
fortlieb@sandiego.gov
kmelville@sempra.com
mshames@ucan.org
scott.johansen@navy.mil
carlwood@verizon.net
dennis@local483.org
mdjoseph@adamsbroadwell.com
ljt@cpuc.ca.gov

norman.furuta@navy.mil
bfinkelstein@turn.org
pgg4@pge.com
epoole@adplaw.com
jsqueri@gmssr.com
pucservice@dralegal.org
pucservice@dralegal.org
jweil@aglet.org
glw@eslawfirm.com
jdh@eslawfirm.com
rliebert@cbbf.com
alli@zimmerlucas.com
khojasteh.davoodi@navy.mil
makda.solomon@navy.mil
gbarch@knowledgeinenergy.com

stephen.baker@constellation.com
DDeRonne@aol.com
rwelchlin@overlandconsulting.com

bboyd@twacs.com
robert.pettinato@ladwp.com
cfaber@semprautilities.com
HYao@SempraUtilities.com
centralfiles@semprautilities.com
jpong@sempra.com
mthorp@sempra.com

unionmarti@yahoo.com
klatt@energyattorney.com
sendo@ci.pasadena.ca.us
slins@ci.glendale.ca.us
douglass@energyattorney.com
bjeider@ci.burbank.ca.us
Case.Admin@sce.com
gloria.ing@sce.com
Jairam.gopal@sce.com
uwua@redhabanero.com
dan@energysmarthomes.net
amsmith@sempra.com

jwalsh@sempra.com
art@ucan.org
liddell@energyattorney.com

tblair@sandiego.gov
jleslie@luce.com
ekgrubaugh@iid.com
bruce.foster@sce.com
DSkopec@semprautilities.com
marcel@turn.org
nsuetake@turn.org
bpf2@pge.com
sls@a-klaw.com
sleeper@manatt.com
cem@newsdata.com
bkc7@pge.com
regrelcpuccases@pge.com
ceyap@earthlink.net
mrw@mrwassoc.com
mrw@mrwassoc.com
dmarcus2@sbcglobal.net
kenechukwuo@greenlining.org
robertg@greenlining.org
samuelk@greenlining.org
stephaniec@greenlining.org
jpross@sungevity.com
wendy@econinsights.com
bill@jbsenergy.com
gayatri@jbsenergy.com
rmccann@umich.edu
Audra.Hartmann@Dynegy.com
kellie.smith@sen.ca.gov
sas@a-klaw.com
lls@cpuc.ca.gov
beg@cpuc.ca.gov
ckt@cpuc.ca.gov
dlf@cpuc.ca.gov
dfb@cpuc.ca.gov
dug@cpuc.ca.gov
gxh@cpuc.ca.gov
alf@cpuc.ca.gov
lms@cpuc.ca.gov
mmg@cpuc.ca.gov
ram@cpuc.ca.gov
rmp@cpuc.ca.gov
rim@cpuc.ca.gov
txb@cpuc.ca.gov
bobbi.sterrett@swgas.com
keith.layton@swgas.com

art@ucan.org
liddell@energyattorney.com

tblair@sandiego.gov
jleslie@luce.com
ekgrubaugh@iid.com
bruce.foster@sce.com
DSkopec@semprautilities.com
marcel@turn.org
nsuetake@turn.org
bpf2@pge.com
sls@a-klaw.com
sleeper@manatt.com
cem@newsdata.com
bkc7@pge.com
regrelcpuccases@pge.com
ceyap@earthlink.net
mrw@mrwassoc.com
mrw@mrwassoc.com
dmarcus2@sbcglobal.net
kenechukwuo@greenlining.org
robertg@greenlining.org
samuelk@greenlining.org
stephaniec@greenlining.org
jpross@sungevity.com
wendy@econinsights.com
bill@jbsenergy.com
gayatri@jbsenergy.com
rmccann@umich.edu
Audra.Hartmann@Dynegy.com
kellie.smith@sen.ca.gov
sas@a-klaw.com
lls@cpuc.ca.gov
beg@cpuc.ca.gov
ckt@cpuc.ca.gov
dlf@cpuc.ca.gov
dfb@cpuc.ca.gov
dug@cpuc.ca.gov
gxh@cpuc.ca.gov
alf@cpuc.ca.gov
lms@cpuc.ca.gov
mmg@cpuc.ca.gov
ram@cpuc.ca.gov
rmp@cpuc.ca.gov
rim@cpuc.ca.gov
txb@cpuc.ca.gov
bobbi.sterrett@swgas.com
keith.layton@swgas.com

westgas@aol.com
lperez@cresource.org
cristalfour@aol.com
sberg@shhip.org
michelle.mishoe@pacificcorp.com
sesco@optonline.net
jmeyers@naima.org
dm@getwise.org
chilen@sppc.com
tdillard@sppc.com
spatrick@sempra.com
Senpolanco22@aol.com
ron@reenergy.com
Jose.atilio@gmail.com
wallis@winegardenergy.com
wallis@winegardenergy.com
pssed@adelphia.net
akbar.jazayeri@sce.com
Case.Admin@sce.com
parkhijf@sce.com
jeannie.harrell@sce.com
Jennifer.Shigekawa@sce.com
john.fasana@sce.com
larry.cope@sce.com
monica.ghattas@sce.com
pete.zanzot@sce.com
roberto.delreal@sce.com
markmcnulty@sbcglobal.net
ywhiting@cox.net
jjensen@rhainc.com
CentralFiles@semprautilities.com
lschavrien@semprautilities.com
YVazquez@semprautilities.com
bautistafaith@yahoo.com
thamilton@qualitybuilt.com
jnewc@capsbc.sbcounty.gov
mjuarez@capriverside.org
bill.belansky@masco.com

r-l-shaw@msn.com
jmcnamara@eocslo.org
eadams.assert@verizon.net
hhuerta@rhainc.com
joe@rhainc.com
klucero@rhainc.com
vtvgeneral@aol.com
mjwms@calwes.com
or10sia@aol.com

lperez@cresource.org
cristalfour@aol.com
sberg@shhip.org
michelle.mishoe@pacificcorp.com
sesco@optonline.net
jmeyers@naima.org
dm@getwise.org
chilen@sppc.com
tdillard@sppc.com
spatrick@sempra.com
Senpolanco22@aol.com
ron@reenergy.com
Jose.atilio@gmail.com
wallis@winegardenergy.com
wallis@winegardenergy.com
pssed@adelphia.net
akbar.jazayeri@sce.com
Case.Admin@sce.com
parkhijf@sce.com
jeannie.harrell@sce.com
Jennifer.Shigekawa@sce.com
john.fasana@sce.com
larry.cope@sce.com
monica.ghattas@sce.com
pete.zanzot@sce.com
roberto.delreal@sce.com
markmcnulty@sbcglobal.net
ywhiting@cox.net
jjensen@rhainc.com
CentralFiles@semprautilities.com
lschavrien@semprautilities.com
YVazquez@semprautilities.com
bautistafaith@yahoo.com
thamilton@qualitybuilt.com
jnewc@capsbc.sbcounty.gov
mjuarez@capriverside.org
bill.belansky@masco.com

r-l-shaw@msn.com
jmcnamara@eocslo.org
eadams.assert@verizon.net
hhuerta@rhainc.com
joe@rhainc.com
klucero@rhainc.com
vtvgeneral@aol.com
mjwms@calwes.com
or10sia@aol.com

dstephenson@amwater.com
jim@rhainc.com
pamela@rhainc.com
sberg@shhip.org
jnelson@psrec.coop
Dbjornskov@peci.org
Sami.Khawaja@quantecllc.com
marisa.decristofofo@pacificorp.com
californiadockets@pacificorp.com
davesullivan_71@msn.com
michael@awish.net
vsj@cpuc.ca.gov
ayo@cpuc.ca.gov
atr@cpuc.ca.gov
do2@cpuc.ca.gov
dhn@cpuc.ca.gov
hym@cpuc.ca.gov
hcf@cpuc.ca.gov
msj@cpuc.ca.gov
je3@cpuc.ca.gov
khy@cpuc.ca.gov
kk2@cpuc.ca.gov
mcl@cpuc.ca.gov
mwt@cpuc.ca.gov
mla@cpuc.ca.gov
mvc@cpuc.ca.gov
jpn@cpuc.ca.gov
rhh@cpuc.ca.gov
gig@cpuc.ca.gov
leh@cpuc.ca.gov
sbs@cpuc.ca.gov
ssr@cpuc.ca.gov
tmr@cpuc.ca.gov
kev@cpuc.ca.gov
zca@cpuc.ca.gov
Bguilliams2005@yahoo.com;
Karyn.Gansecki@sce.com;
MtenEyck@ci.rancho-
cucamonga.ca.us;
RHager@wss-law.com;
abb@eslawfirm.com;
ames_doug@yahoo.com;
as2@cpuc.ca.gov;
asteinberg@semprautilities.com;
bcragg@goodinmacbride.com;
ben@cpuc.ca.gov;
bfinkelstein@turn.org;
bill@jbsenergy.com;

jim@rhainc.com
pamela@rhainc.com
sberg@shhip.org
jnelson@psrec.coop
Dbjornskov@peci.org
Sami.Khawaja@quantecllc.com
marisa.decristofofo@pacificorp.com
californiadockets@pacificorp.com
davesullivan_71@msn.com
michael@awish.net
vsj@cpuc.ca.gov
ayo@cpuc.ca.gov
atr@cpuc.ca.gov
do2@cpuc.ca.gov
dhn@cpuc.ca.gov
hym@cpuc.ca.gov
hcf@cpuc.ca.gov
msj@cpuc.ca.gov
je3@cpuc.ca.gov
khy@cpuc.ca.gov
kk2@cpuc.ca.gov
mcl@cpuc.ca.gov
mwt@cpuc.ca.gov
mla@cpuc.ca.gov
mvc@cpuc.ca.gov
jpn@cpuc.ca.gov
rhh@cpuc.ca.gov
gig@cpuc.ca.gov
leh@cpuc.ca.gov
sbs@cpuc.ca.gov
ssr@cpuc.ca.gov
tmr@cpuc.ca.gov
kev@cpuc.ca.gov
zca@cpuc.ca.gov
Bguilliams2005@yahoo.com;
Karyn.Gansecki@sce.com;
MtenEyck@ci.rancho-
cucamonga.ca.us;
RHager@wss-law.com;
abb@eslawfirm.com;
ames_doug@yahoo.com;
as2@cpuc.ca.gov;
asteinberg@semprautilities.com;
bcragg@goodinmacbride.com;
ben@cpuc.ca.gov;
bfinkelstein@turn.org;
bill@jbsenergy.com;

mjd@cpuc.ca.gov;

mjd@cpuc.ca.gov;

mrw@mrwassoc.com;

mrw@mrwassoc.com;

mdjoseph@adamsbroadwell.com;
mk@utilitycostmanagement.com;
mmattes@nossaman.com;
mrafferty805@charter.net;
mrw@mrwassoc.com;
mshames@ucan.org;
nes@a-klaw.com;
nil@cpuc.ca.gov;
norman.furuta@navy.mil;
nwhang@manatt.com;
pfa@cpuc.ca.gov;
pgg4@pge.com;
phanschen@mofo.com;
pjk@eslawfirm.com;
pk@utilitycostmanagement.com;
ppv1@pge.com;
pucservice@dralegal.org;
raj.pankhania@ci.hercules.ca.us;
regrelcpuccases@pge.com;
rhd@cpuc.ca.gov;
rkeen@manatt.com;
rliebert@cbbf.com;
rmccann@umich.edu;
rmp@cpuc.ca.gov;
rob@clfp.com;
robertg@greenlining.org;
rochelle@a4nr.org;
rogerl47@aol.com;
rschmidt@bartlewells.com;
russell.worden@sce.com;
rwetherall@energy.state.ca.us;
sberlin@mccarthyllaw.com;
tim@cpuc.ca.gov;
tomk@mid.org;
txb@cpuc.ca.gov;
wendy@econinsights.com;