



FILED

01-19-10

04:59 PM

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

Application of Pacific Gas and Electric Company
for Approval of its 2009 Rate Design Window
Proposals for Dynamic Pricing and Recovery of
Incremental Expenditures Required for
Implementation.

(U 39 E)

Application 09-02-022
(Filed February 27, 2009)

**2009 RATE DESIGN WINDOW
REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ON PROPOSED DECISION OF ALJ FUKUTOME**

J. MICHAEL REIDENBACH
DEBORAH S. SHEFLER
MARK R. HUFFMAN
SHIRLEY A. WOO

Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-2248
Facsimile: (415) 973-5520
E-Mail: SAW0@pge.com

January 19, 2010

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

TABLE OF CONTENTS

	Page
A. PG&E’S RESPONSES TO DRA’S COMMENTS	1
1. DRA’s IT-Based Arguments for Deferring the February 1, 2011 Implementation Date for Small and Medium Commercial and Industrial Customers Are Misconceived	1
2. PG&E Should Recover \$31.3 Million For Upgrading CC&B Directly To Version 2.3, With Any Additional Actual Costs Subject To Reasonableness Review	2
3. The PD Correctly Declines To Require PG&E To Track Outreach And Education Costs Specific To Small C&I Customers	2
4. The Commission Should Decline To Micromanage Outreach To Small And Medium C&I Customers	3
B. THE FARM BUREAU’S PROPOSED CHANGE TO OP 15 SIGNIFICANTLY REDUCES ED FLEXIBILITY TO ADDRESS ISSUES THAT MAY BE RAISED BY THE TIER 2 ADVICE LETTER REQUIRED BY PD OP 15	4
C. DACC’S PROPOSALS TO CHANGE THE PD COST ALLOCATION METHOD SHOULD BE REJECTED.....	4
D. FEA MISCHARACTERIZES THE SCOPE OF THE SETTLEMENT APPROVED IN D.07-09-004.....	5
E. CONCLUSION.....	5

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

Application of Pacific Gas and Electric Company for Approval of its 2009 Rate Design Window Proposals for Dynamic Pricing and Recovery of Incremental Expenditures Required for Implementation.

Application 09-02-022
(Filed February 27, 2009)

2009 RATE DESIGN WINDOW REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON PROPOSED DECISION OF ALJ FUKUTOME

Pursuant to Rule 14.3(d) of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) submits its reply comments to opening comments filed by the Division of Ratepayer Advocates (DRA), the California Farm Bureau (Farm Bureau), the Agricultural Energy Consumers Association (AECA), the Direct Access Customer Coalition (DACC) and the Federal Executive Agencies (FEA) on the Proposed Decision of ALJ Fukutome (PD).¹

A. PG&E'S RESPONSES TO DRA'S COMMENTS

1. DRA's IT-Based Arguments for Deferring the February 1, 2011 Implementation Date for Small and Medium Commercial and Industrial Customers Are Misconceived.

DRA's comments cite several risks associated with the Customer Care and Billing (CC&B) upgrade, and argue that delaying small and medium commercial and industrial (SMB C&I) customer Peak Day Pricing (PDP) default to 2012 would mitigate those risks. (DRA comments, pp. 12 to 13.) The first two risks are no longer relevant since PG&E is moving directly from CC&B Version (V) 1.5 to 2.3 now. The third risk, "oversubscription of PG&E's Information Technology (IT) department," still exists, but DRA errs in suggesting that deferral of the SMB C&I customers' default date to 2012 would mitigate that risk. Oversubscription of PG&E's IT resources could arise from the multitude of initiatives in 2010 and 2011 requiring IT systems work, not just default PDP for SMB C&I customers. For instance, implementation of the 2-part Peak Time Rebate (PTR) in 2011 for all PG&E's residential customers and the start of Real-Time Pricing (RTP) on May 1, 2011 are significant projects that contribute to oversubscription of PG&E's IT resources. DRA's idea that deferring default PDP for SMB C&I customers would solve the oversubscription of IT resources is incorrect because it ignores other PG&E projects.

¹ Comments on the PD were also filed by The Utility Reform Network, the Energy Producers & Users Coalition and EnerNOC, Inc.

2. PG&E Should Recover \$31.3 Million For Upgrading CC&B Directly To Version 2.3, With Any Additional Actual Costs Subject To Reasonableness Review.

DRA objects to provisions in the PD that allow PG&E to include in rates costs for the CC&B upgrade.² (DRA comments, pp. 1 to 2 and 8 to 9.) It is not clear if DRA now opposes inclusion of that amount in rates for an upgrade directly to CC&B V2.3, with rate recovery of any actual amounts above \$31.3 million only after reasonableness review. PG&E maintains that the \$31.3 million estimated upgrade cost should go into the 2011 General Rate Case (GRC 1) rate base, as discussed in PG&E's comments at pp. 2 to 4, using the treatment presented in PG&E's comments at pp. 8 to 9. As described on pp. 8 to 9, cost recovery will require careful coordination with GRC 1.³

As noted in PG&E's comments at p. 3, footnote 2,⁴ GRC 1 includes \$8 million in upgrade capital additions for CC&B that should be removed from GRC 1, if PG&E's proposal for the upgrade cost recovery is approved in this case. GRC 1 also includes the estimated \$110.5 million capital forecast for PDP IT projects. GRC 1 explains this preliminary estimate was included for the purpose of developing 2011 rate base and should be replaced by the final capital cost estimate found reasonable in this case. The capital costs approved in this case for PDP would then be recovered in rates by being included in the GRC 1 rate base. If the Commission adopts the PD, but also approves \$31.3 million for the Upgrade, the PDP capital amount to be included in GRC 1 for purposes of estimating 2011 rate base would be approximately \$82.9 million.⁵

3. The PD Correctly Declines To Require PG&E To Track Outreach And Education Costs Specific To Small C&I Customers.

DRA reiterates its untimely argument that PG&E should be required to segregate costs for outreach and education for small C&I customers. (DRA Comments, p. 10.) As the PD properly

² DRA's comments at p. 9 cite a \$28.5 million upgrade cost. That figure was corrected to \$31.3 million in PG&E errata, Ex. 5, p. 8-3a, Table 8-1, line 19.

³ The original proposal reflected in GRC 1 and in this Application was a two-step upgrade to CC&B. The \$31.3 million cost (excluding contingency) of the upgrade from V1.5 to V2.2 was included in this Application. The \$8 million cost of the upgrade from V2.2 to V2.3 was included in GRC 1. GRC 1 also included the entire \$110.5 million PDP IT capital cost, which includes the \$31.3 million for the V2.2 CC&B upgrade, the CSOL Updates, the CC&B Dynamic Pricing Phase 1 changes, and contingency. The \$110.9 million was included in GRC 1 as a placeholder, solely for the purpose of ensuring that the PDP IT capital amounts adopted by the Commission in this proceeding are included in the GRC 1 plant balance used to develop Beginning-Of-Year 2011 rate base. (A.09-12-020, PG&E (Ex. 4), Ch. 8, p. 8-31; Workpapers supporting PG&E (Ex. 7), Ch. 2, p. 261.)

⁴ Footnote 2 referenced A.09-012-020, PG&E Ex. 7, Ch. 2, Appendix 2A, p. 2A-3, Table 2A-4, line 1.

⁵ The \$82.9 million amount is the sum of \$50.2 million (2009) and \$32.7 million (2010), the total PDP IT capital cost without contingency. (PG&E errata, Ex. 5, Table 8-1, line 21)

concludes, “[t]he further segregation of costs for small commercial customers will not likely be that revealing with respect to our outreach and education goals, and DRA’s proposal to require such segregation will not be adopted.” (COL 36; see also, PD, section 17, pp. 77 to 81, FOF 57 and 58.) As the PD recognizes, PG&E’s efforts will be judged on the basis of results, not accounting. (PD, p. 81.) Further, DRA does not suggest there are benchmarks to assess what level of spending might be appropriate for small businesses. Thus, PG&E agrees that it is unclear what separate cost accounting would accomplish in terms of measuring the effectiveness of its outreach to this customer class.

4. The Commission Should Decline To Micromanage Outreach To Small And Medium C&I Customers.

DRA for the first time proposes that in addition to working with the Commission’s Business and Community Outreach Branch (BCOB) on outreach efforts to SMB C&I customers, that PG&E be directed to work with “[T]he Women, Minority and Disabled Veterans Business Enterprise program, . . . and representatives from small businesses and small business organizations as well as DRA and other interested consumer groups.” (DRA comments, p. 11.) The PD, in addition to requiring PG&E to work with the BCOB, imposes significant meeting, reporting and presentation requirements “to provide a means for parties to express concerns and a means to address any such concerns.” (PD, p. 87; see also, FOF 59 to 65, COL 37 to 39, OP 10 to 13.) The only such requirement with which PG&E has taken exception is the directive to work with the Demand Response Evaluation and Measurement Committee. (PG&E comments, pp. 10 to 11.) PG&E has proposed instead that it work with the Energy Division (ED) to determine the best means of evaluating the effectiveness of outreach to these C&I customers. It should be up to the BCOB and the ED, in consultation with PG&E, to determine such details as which groups or individuals might best be involved in assisting with and/or evaluating outreach, instead of including such details in a final decision. This is especially true since there is no evidentiary record as to what groups or individuals have the appropriate expertise.⁶

For the first time DRA “[u]rges the Commission [to] set quantifiable goals for the outreach plan, and require that PG&E meet them or return the funds to ratepayers.” (DRA comments, p. 11.) The first

⁶ It is not clear whom DRA means by the “Women, Minority and Disabled Veteran Business Enterprise program.” PG&E has a supplier diversity program pursuant to General Order 156. However, there is no specific group of diverse businesses associated with that program. Moreover, businesses interested in that program want to provide goods and services to PG&E, not necessarily assist with outreach respecting new tariff opportunities.

bullet point in OP 13 of the PD requires PG&E to file an advice letter “[C]learly identifying and describing the specific performance measurements for each of its customer classes, which it will use to determine that its outreach and education campaign is successful.” The advice letter process is the appropriate approach to evaluating performance, since there is no record to guide the Commission.

B. THE FARM BUREAU’S PROPOSED CHANGE TO OP 15 SIGNIFICANTLY REDUCES ED FLEXIBILITY TO ADDRESS ISSUES THAT MAY BE RAISED BY THE TIER 2 ADVICE LETTER REQUIRED BY PD OP 15.

The Farm Bureau would add language to OP 15 that modifies the advice letter process so as to alter the ED’s discretion in handling Tier 2 letters. (Farm Bureau comments, p.5.) The Farm Bureau’s addition builds on the requirement for PG&E to file a Tier 2 advice letter once it has completed its proposed incremental Customer Service On-line (CSOL) PDP functionality so ED can verify that the website appropriately suits ratepayer needs. The Farm Bureau wants to delay the February 1, 2011 default date until “at least 45 days after the Energy Division formally verifies that Pacific Gas and Electric Company has met these conditions.” This proposal would create an “all-or-nothing” prerequisite for all the default dynamic pricing scheduled to start February 1, 2011, i.e., 1) default PDP for SMB C&I and large agricultural customers, and 2) default Time-of-Use (TOU) for other agricultural customers. The Farm Bureau’s approach is overly rigid. The normal process for handling Tier 2 advice letters will allow ED flexibility to focus on functionality where further inquiry may be needed, if any, without delaying the start of default rates generally.⁷ Therefore, the Farm Bureau’s addition to OP 15 should be rejected.

C. DACC’S PROPOSALS TO CHANGE THE PD COST ALLOCATION METHOD SHOULD BE REJECTED.

DACC wants to change the method for allocating costs to rates in order to avoid allocating PDP implementation costs to Direct Access (DA) customers. As DACC acknowledges, however, the PD refers parties to PG&E’s 2011 GRC Phase 2 proceeding as the appropriate forum to litigate different revenue allocation methodologies, where the allocation of all costs are considered. (DACC comments, p. 8.) The PD correctly applies the current methodology to the costs in this case, and refers the parties to the GRC 2 case to litigate any changes to the methodology. Also, the two sentences on page 133 of the PD, which DACC wants deleted (DACC comments, p. 9), are factual references to the character of the PDP

⁷ AECA’s comments request a forum to address the November 2010 report on agricultural customers and TOU rates, before the February 2011 date for agricultural customers to start migrating to TOU rates. AECA’s proposal would likely result in delaying that migration for months beyond February 2011.

implementation costs that are consistent with the PD cost allocation. It is appropriate to retain them in the final decision.

D. FEA MISCHARACTERIZES THE SCOPE OF THE SETTLEMENT APPROVED IN D.07-09-004.

FEA misunderstands the settlement in PG&E's 2007 GRC 2 case. FEA claims that "[t]he settlement approved by D.07-09-004 does not apply to PG&E's PDP tariffs in the instant proceeding" and then argues that the allocation of PDP charges is not governed by that settlement. (FEA comments, pp. 2 to 3.) Although the settlement does not bar adopting PDP credits and charges, the method used to design the rates for under- and over-collections affects the standard rate. Hence, although PG&E supports FEA's rate design, that design is inconsistent with the settlement approved in D.07-09-004 because FEA's design affects the standard rate, not just the PDP tariff (as FEA suggests at p. 2 of its comments). Hence it is reasonable for the Commission to consider compliance with this earlier decision.

E. CONCLUSION

WHEREFORE, PG&E requests that the Commission approve PG&E's proposals for default PDP, including recovery of the approved capital costs in the GRC 1 rate base, and reject the arguments and proposals contained in DRA, Farm Bureau, AECA, DACC, and FEA comments.

Respectfully submitted,

J. MICHAEL REIDENBACH
DEBORAH S. SHEFLER
MARK R. HUFFMAN
SHIRLEY A. WOO

By: _____ /s/ SHIRLEY A. WOO

P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-2248
Facsimile: (415) 973-5520
E-mail: SAW0@pge.com
Attorneys for

January 19, 2010

PACIFIC GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, Post Office Box 7442, San Francisco, CA 94120.

On the **19th day of January, 2010** I served a true copy of:

**2009 RATE DESIGN WINDOW
REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ON PROPOSED DECISION OF ALJ FUKUTOME**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed with an e-mail address on the official service list for **Application 09-02-022**.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed without an e-mail address on the official service list for **Application 09-02-022**.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this **19th day of January, 2010** at San Francisco, California.

/s/

TAUVELA U’U

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

Total number of addressees: 65

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MC B9A
77 BEALE ST
SAN FRANCISCO CA 94177
Email: RegRelCPUCcases@pge.com
Status: INFORMATION

KASIA SMOLEN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B10A
SAN FRANCISCO CA 94105
Email: kmsn@pge.com
Status: INFORMATION

Robert Benjamin
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: bkb@cpuc.ca.gov
Status: STATE-SERVICE

Taaru Chawla
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: tar@cpuc.ca.gov
Status: STATE-SERVICE

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5215
SAN FRANCISCO CA 94102-3214
Email: mjd@cpuc.ca.gov
Status: STATE-SERVICE

Donald J. Lafrenz
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: dlf@cpuc.ca.gov
Status: STATE-SERVICE

Robert Levin
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: rl4@cpuc.ca.gov
Status: STATE-SERVICE

LAUREN ROHDE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: LDRi@pge.com
Status: INFORMATION

SHIRLEY A. WOO ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST / PO BOX 7442
SAN FRANCISCO CA 94120-7442
FOR: Pacific Gas & Electric Company
Email: saw0@pge.com
Status: PARTY

Andrew Campbell
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5203
SAN FRANCISCO CA 94102-3214
Email: agc@cpuc.ca.gov
Status: STATE-SERVICE

Christopher Danforth
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ctd@cpuc.ca.gov
Status: STATE-SERVICE

David K. Fukutome
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5042
SAN FRANCISCO CA 94102-3214
Email: dkf@cpuc.ca.gov
Status: STATE-SERVICE

Elaine Chan Lau
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: ec2@cpuc.ca.gov
Status: STATE-SERVICE

Dina S. Mackin
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: dm1@cpuc.ca.gov
Status: STATE-SERVICE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

Total number of addressees: 65

Steve Roscow
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: scr@cpuc.ca.gov
Status: STATE-SERVICE

DAN GEIS
2325 THIRD ST., STE 344
SAN FRANCISCO CA 94107
FOR: Agricultural Energy Consumer Association
Email: steven@moss.net
Status: PARTY

NORA SHERIFF
ALCANTAR & KAHL
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94105
Email: nes@a-klaw.com
Status: INFORMATION

GREGORY KLATT ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367-8102
FOR: Alliance for Retail Energy Markets
Email: klatt@energyattorney.com
Status: PARTY

RICHARD MCCANN
ASPEN GROUP FOR WESTERN MANUFACTURED
2655 PORTAGE BAY AVE E, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

MAURICE BRUBAKER
BRUBAKER & ASSOCIATES, INC.
16690 SWINGLEY RIDGE ROAD, STE 140
CHESTERFIELD MO 63017
Email: mbrubaker@consultbai.com
Status: INFORMATION

HILARY CORRIGAN
CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST, STE 303
SAN FRANCISCO CA 94117
Email: cem@newsdata.com
Status: INFORMATION

Christopher R Villarreal
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: crv@cpuc.ca.gov
Status: STATE-SERVICE

DANIEL GEIS
AGRICULTURAL ENERGY CONSUMERS ASSN.
925 L ST, STE 800
SACRAMENTO CA 95814
Email: dgeis@dolphingroup.org
Status: INFORMATION

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94105
Email: filings@a-klaw.com
Status: INFORMATION

DAN DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367-8102
FOR: Alliance For Retail Energy Markets/Direct Access
Customer Coalition
Email: douglass@energyattorney.com
Status: PARTY

BARBARA R. BARKOVICH
BARKOVICH & YAP
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
Email: brbarkovich@earthlink.net
Status: INFORMATION

BILL F. ROBERTS, PH. D.
ECONOMIC SCIENCES CORPORATION
1516 LEROY AVE
BERKELEY CA 94708
FOR: Building Owners & Managers Association of
California
Email: bill@econsci.com
Status: PARTY

RONALD LIEBERT ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
FOR: California Farm Bureau Federation
Email: rliebert@cfbf.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

Total number of addressees: 65

WILLIAM H. BOOTH ATTORNEY
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA CA 94556
FOR: California Large Energy Consumers Association
Email: wbooth@booth-law.com
Status: PARTY

KEITH MC CREA ATTORNEY
SUTHERLAND ASBILL & BRENNAN LLP
1275 PENNSYLVANIA AVE, NW
WASHINGTON DC 20004-2415
FOR: California Manufacturers & Technology Association
Status: PARTY

SARAH BESERRA
CALIFORNIA REPORTS
39 CASTLE HILL CT
VALLEJO CA 94591
Email: sbeserra@sbcglobal.net
Status: INFORMATION

PETER MALTBAEK VICE PRESIDENT
CPOWER, INC.
1185 ELENA PRIVADA
MOUNTAIN VIEW CA 94040
FOR: CPOWER, INC.
Email: peter.maltbaek@cpowered.com
Status: PARTY

Laura J. Tudisco
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5032
SAN FRANCISCO CA 94102-3214
FOR: Division or Ratepayer Advocates
Email: ljt@cpuc.ca.gov
Status: PARTY

CASSANDRA SWEET
DOW JONES NEWSWIRES
201 CALIFORNIA ST., 13TH FLR
SAN FRANCISCO CA 94111
Email: cassandra.sweet@dowjones.com
Status: INFORMATION

ANDREW B. BROWN ATTORNEY
ELLISON SCHNEIDER & HARRIS, LLP (1359)
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
Email: abb@eslawfirm.com
Status: INFORMATION

ROB NEENAN DIRECTOR OF REGULATORY AFFAIRS
CALIFORNIA LEAGUE OF FOOD PROCESSORS
1755 CREEKSIDE OAKS DRIVE, STE 250
SACRAMENTO CA 95833
Email: rob@clfp.com
Status: INFORMATION

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND CA 95776
FOR: California Manufacturers and Technology
Association/Energy Users Forum
Email: cmkehrein@ems-ca.com
Status: PARTY

CARLOS LAMAS-BABBINI
COMVERGE, INC.
58 MT TALLAC CT
SAN RAFAEL CA 94903
Email: clamasbabbini@comverge.com
Status: INFORMATION

LARRY R. ALLEN UTILITY RATES AND STUDIES OFFICE
DEPARTMENT OF THE NAVY
1322 PATTERSON AVE, SE, STE 1000
WASHINGTON NAVY YARD DC 20374-5018
Email: larry.r.allen@navy.mil
Status: INFORMATION

DON LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
Email: liddell@energyattorney.com
Status: INFORMATION

WENDY L. ILLINGWORTH
ECONOMIC INSIGHTS
320 FEATHER LANE
SANTA CRUZ CA 95060
Email: wendy@econinsights.com
Status: INFORMATION

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO CO 81301
Email: kjsimonsen@ems-ca.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

Total number of addressees: 65

MELANIE GILLETTE WESTERN REGULATORY AFFAIRS
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM CA 95630
FOR: Enernoc, Inc.
Email: mgillette@enernoc.com
Status: PARTY

MONA TIERNEY-LLOYD SENIOR MANAGER WESTERN
REG. AFFAIRS
ENERNOC, INC.
PO BOX 378
CAYUCOS CA 93430
FOR: EnerNoc, Inc.
Email: mtierney-lloyd@enernoc.com
Status: PARTY

NORMAN J. FURUTA ATTORNEY
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., STE 1744
SAN FRANCISCO CA 94103-1399
FOR: Federal Executive Agencies
Email: norman.furuta@navy.mil
Status: PARTY

SARA STECK MYERS ATTORNEY
122 28TH AVE.
SAN FRANCISCO CA 94121
Email: ssmyers@att.net
Status: INFORMATION

BILL MARCUS
J B S ENERGY, INC.
311 D ST, STE A
WEST SACRAMENTO CA 95605
Email: bill@jbsenergy.com
Status: INFORMATION

BRYCE DILLE CLEAN TECHNOLOGY RESEARCH
JMP SECURITIES
600 MONTGOMERY ST. STE 1100
SAN FRANCISCO CA 94111
Email: bdille@jmpsecurities.com
Status: INFORMATION

STEVEN MOSS
M-CUBED
673 KANSAS ST
SAN FRANCISCO CA 94107
Email: steven@moss.net
Status: INFORMATION

SEAN BEATTY SR. MGR. EXTERNAL & REGULATORY
AFFAIRS
MIRANT CALIFORNIA, LLC
696 WEST 10TH ST
PITTSBURG CA 94565
Email: Sean.Beatty@mirant.com
Status: INFORMATION

MRW & ASSOCIATES, INC
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

JIM ROSS
RCS, INC.
500 CHESTERFIELD CENTER, STE 320
CHESTERFIELD MO 63017
Email: jimross@r-c-s-inc.com
Status: INFORMATION

TODD CAHILL REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO CA 92123
Email: tcahill@semprautilities.com
Status: INFORMATION

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO CA 92123
Email: CentralFiles@semprautilities.com
Status: INFORMATION

CAROL MANSON REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT CP32D
SAN DIEGO CA 92123-1530
Email: cmanson@semprautilities.com
Status: INFORMATION

THERESA BURKE REGULATORY AFFAIRS ANALYST
SAN FRANCISCO PUC
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
Email: tburke@sflower.org
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

Total number of addressees: 65

MANUEL RAMIREZ
SAN FRANCISCO PUC - POWER ENTERPRISE
1155 MARKET ST, 4TH FLR
SAN FRANCISCO CA 94103
Email: mramirez@sflower.org
Status: INFORMATION

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
Email: case.admin@sce.com
Status: INFORMATION

EVELYN KAHL ATTORNEY
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY ST, STE 1850
SAN FRANCISCO CA 94015
FOR: The Energy Producers and Users Coalition
Email: ek@a-klaw.com
Status: PARTY

HAYLEY GOODSON ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
FOR: THE UTILITY REFORM NETWORK
Email: hayley@turn.org
Status: PARTY

KHOJASTEH DAVOODI
UTILITY RATES AND STUDIES OFFICE
1322 PATTERSON AVE SE
WASHINGTON NAVY YARD DC 20374-5018
Email: khojasteh.davoodi@navy.mil
Status: INFORMATION

PHILLIP MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL CA 94903
Email: philm@scedenergy.com
Status: INFORMATION

BRUCE REED SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: Bruce.Reed@sce.com
Status: INFORMATION

MARCEL HAWIGER ENERGY ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
Email: marcel@turn.org
Status: INFORMATION

PAUL KERKORIAN
UTILITY COST MANAGEMENT LLC
6475 N. PALM AVE, STE 105
FRESNO CA 93704
Email: pk@utilitycostmanagement.com
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
EMAIL SERVICE LIST**

Last Updated: January 13, 2010

CPUC DOCKET NO. A0902022

abb@eslawfirm.com;agc@cpuc.ca.gov;bdille@jmpsecurities.com;bill@econsci.com;bill@jbsenergy.com;bkb@cpuc.ca.gov;brbarkovich@earthlink.net;Bruce.Reed@sce.com;case.admin@sce.com;cassandra.sweet@dowjones.com;cem@newsdata.com;CentralFiles@semprautilities.com;clamasbabbini@comverge.com;cmanson@semprautilities.com;cmkehrrein@ems-ca.com;crv@cpuc.ca.gov;ctd@cpuc.ca.gov;dgeis@dolphingroup.org;dkf@cpuc.ca.gov;dlf@cpuc.ca.gov;dm1@cpuc.ca.gov;douglass@energyattorney.com;ec2@cpuc.ca.gov;ek@a-klaw.com;filings@a-klaw.com;hayley@turn.org;jimross@r-c-s-inc.com;khojasteh.davoodi@navy.mil;kjsimonsen@ems-ca.com;klatt@energyattorney.com;kmsn@pge.com;larry.r.allen@navy.mil;LDRi@pge.com;liddell@energyattorney.com;ljt@cpuc.ca.gov;marcel@turn.org;mbrubaker@consultbai.com;mgillette@enernoc.com;mjd@cpuc.ca.gov;mramirez@sflower.org;mrw@mrwassoc.com;mtierney-lloyd@enernoc.com;nes@a-klaw.com;norman.furuta@navy.mil;peter.maltbaek@cpowered.com;philm@scdenergy.com;pk@utilitycostmanagement.com;RegRelCPUCcases@pge.com;r14@cpuc.ca.gov;riebert@cbbf.com;rmccann@umich.edu;rob@clfp.com;saw0@pge.com;sbeserra@sbcglobal.net;scr@cpuc.ca.gov;Sean.Beatty@mirant.com;ssmyers@att.net;steven@moss.net;steven@moss.net;tar@cpuc.ca.gov;tburke@sflower.org;tcahill@semprautilities.com;wbooth@booth-law.com;wendy@econinsights.com;