

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)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES
ON THE INVESTOR OWNED UTILITIES' PROPOSALS
FOR VIRTUAL BIDDING PARTICIPATION**

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	DISCUSSION.....	2
A.	Commission Approval of IOU Participation in Virtual Bidding Market Should Be Contingent on FERC Approval of the Safeguards Requested by the CAISO	2
B.	Authority To Participate in Virtual Bidding Should Be Circumscribed At First	3
1.	The Authority that SCE Requests Is too Broad.....	3
2.	PG&E’s Proposed Tier One Advice Letter Process Is Inappropriate.....	4
C.	IOU VB Participation Should Be Approved on an Interim Basis with an Assessment After One Year.....	6
D.	Some Consistency Across All Proposals Should Be Required	7
1.	Specific VB Applications Should Be Consistently Defined.....	8
2.	Monthly Reporting of VB Activity Is Appropriate for First Year of Participation.....	9
3.	Monthly Loss Limits Are Appropriate	9
4.	Tier 3 Advice Letter Process Is Appropriate for Requesting Changes to VB Authority.....	10
E.	The Record Needs To Be Better Developed To Determine What Upfront Standards Are Appropriate.....	10
1.	Are the strategies and parameters proposed by each IOU appropriate?	11
2.	Will there be safeguards in place adequate to protect consumers from market manipulation and market failure?	11
3.	What loss limits, if any, should be established?	12
4.	What would it cost the IOUs to participate in VB?	12
5.	Does CAISO have the ability to monitor the market effectively?	13
III.	CONCLUSION.....	13

CERTIFICATE OF SERVICE

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I. INTRODUCTION

Pursuant to the Administrative Law Judge's July 16, 2010 ruling modifying the schedule for virtual bidding matters, the Division of Ratepayer Advocates (DRA) submits these comments on the Investor Owned Utilities' (IOUs) proposals for participation in the virtual bidding (VB) market. The IOUs submitted these proposals following a workshop on July 26, 2010, at which the California Independent System Operator (CAISO) presented information on its virtual bidding proposal pending before the Federal Energy Regulatory Commission (FERC), and two rounds of comments addressing questions about virtual bidding posed in the Administrative Law Judge (ALJ's) July 1st ruling.

These comments focus on the specific proposals submitted by each of the IOUs.

DRA recommends:

- If the Commission authorizes IOU participation in VB, authorization should be contingent on FERC's approval of the safeguards CAISO has proposed (and which the Commission supports).

- Initially, authority to participate should be circumscribed, so that the IOUs may gain experience and develop expertise in VB while limiting the inherent risks. The record needs to be further developed in order to determine what parameters, or “upfront standards,” should be adopted for each of the IOUs, and for all of them.
- After an initial period (perhaps one year), the Commission should conduct an evaluation of the impact VB has had on IOU procurement and the relative success or failure of the bidding strategies employed, based on actual bid data. The evaluation would be for the purpose of determining whether any changes are warranted in the “upfront standards” adopted initially.

II. DISCUSSION

A. Commission Approval of IOU Participation in Virtual Bidding Market Should Be Contingent on FERC Approval of the Safeguards Requested by the CAISO

As discussed in previous comments of DRA and other parties, the CAISO has requested FERC approval of certain safeguards to be applied to VB activities in the CAISO markets, some of them for a transitional period.¹ The Commission has supported the CAISO’s request for these safeguards, which is still pending before FERC. A decision from FERC is anticipated this Fall, but in the event that FERC has still not ruled and the Commission wishes to issue a decision authorizing IOU participation in VB,

¹See DRA’s Comments and Supplemental Responses to Questions Concerning Virtual) Bidding filed July 30, 2010, pp. 4-6; Public Proposal of Southern California Edison for Participation in the Convergence Bidding Market filed on August 12, 2010 (“SCE Proposal”), pp. 3-4 (discussing proposed position limits).

The safeguards were proposed as part of CAISO’s Proposed Tariff Amendment to Implement Virtual Bidding submitted to FERC on June 25, 2010. They include:

- Position limits at nodes and interties (gradually phased out)
- Registration of all scheduling coordinators authorized to submit VBs
- Credit and collateral requirements
- Congestion Revenue Rights (CRR) revenue “clawback rule” to deter manipulation to increase the value of CRRs
- Market monitoring by CAISO and referral to FERC for market manipulation
- CAISO authority to temporarily suspend VB.

that decision should be contingent on FERC approval of the safeguards requested by CAISO.²

B. Authority To Participate in Virtual Bidding Should Be Circumscribed At First

VB participation by the IOUs will not provide direct services to ratepayers in the nature of the safety or reliability of electricity delivery, though it may have an impact on the prices at which electricity is sold to ratepayers. While participating in VB may be used to mitigate actions taken by other market participants that could drive up clearing prices, it is not the only way to achieve such mitigation. The fact that each IOU is requesting authority to use VB in different ways makes that plain. Whereas PG&E is primarily requesting authority for two specific VB strategies, SDG&E requests authority for five specific VB strategies, and SCE requests broad authority that is only restricted (and not entirely) to locations where SCE has a “physical presence.”

The Commission needs to determine which specific VB strategies (and limits) are reasonable and conducive to CPUC oversight. At least until some experience with VB is gained, it should not grant broad VB authority but only to engage in specific reasonable strategies that can be clearly defined by physical resources, locations, bid quantities, bid frequency, and monthly loss limits.

1. The Authority that SCE Requests Is too Broad

SCE seeks authority to participate in the VB market but gives only examples of the kinds of transactions it would engage in, without explaining how each strategy serves its ratepayers or protects against adverse activities in the market. The authority SCE seeks is overly broad. SCE contends that its proposal strikes a balance between Commission oversight and utility flexibility to seek the benefits of VB, but fails to explain how it weighed these factors given the uncertainty surrounding VB and the fact that the FERC has not yet approved the safeguards proposed by the CAISO. SCE’s proposal would allow it to participate in VB much like other market participants, subject

² CAISO Proposed Tariff Amendment to Implement Virtual Bidding submitted to FERC on June 25, 2010.

only to a limitation if it loses a certain dollar limit in its transactions. DRA believes this latitude cannot afford ratepayers adequate protection.

The Commission should exercise some restraint in whatever VB authority it grants the utilities until the state has had some experience with VB implementation. One such restraint would be to direct SCE to adopt a model similar to that of PG&E and SDG&E, including a showing of what kinds of bids SCE expects to engage in, conditions when such bids would be submitted, and a description of the strategies that support each type of bid.

SCE states that AB 57 does not require the Commission to adopt the same upfront standards for each investor owned utility (IOU) procurement practices. That is true, but AB 57 does not preclude the same standards, allowing for differences in load and resources. In gas hedging and Time-to-expiration Value at Risk (TEVaR) which measures the volatility of gas prices and is designed to protect ratepayers from price swings, the Commission uses the same standard for all three utilities. VB is more like gas hedging and TEVaR than any traditional power transactions that the utilities might make.

2. PG&E's Proposed Tier One Advice Letter Process Is Inappropriate

In its proposal, PG&E requests emergency VB authority to be approved through the Tier 1 Advice Letter (AL) process. PG&E explains that it needs this authority to respond quickly to sudden changes in market conditions that could result in “extremely adverse consequences” for its ratepayers. PG&E acknowledges that it is impossible to know in advance the nature of the conditions that may support the exercise of this emergency authority or the frequency with which PG&E may need to exercise that authority (if at all). DRA opposes this emergency authority because it is an inappropriate use of the Tier 1 AL process and inconsistent with Assembly Bill (AB) 57³ upfront reasonableness standard.

³ Codified in Public Utilities Code section 454.5.

DRA shares PG&E's concern that it have the ability to address unforeseen VB market issues, but the Tier 1 AL is inappropriate for granting essentially undefined emergency authority to respond to a situation that could rise to a level "similar to the market circumstances that occurred during the 2000-2001 energy crisis". General Order (GO) 96B provides that Tier 1 ALs are for non-substantive, editorial matters or changes to established tariffs.

5.1 Matters Appropriate to Tier 1 (Effective Pending Disposition)

... Matters appropriate to Tier 1 are:

- (1) A tariff change in compliance with specific requirements of a statute or Commission order where the wording of the change follows directly from the statute or Commission order.
- (2) A non-substantive editorial change to the text of a tariff, such as correcting a typographical error. A non-substantive change does not affect a rate, charge, term, or condition under the tariff.
- (3) A change in a rate or charge pursuant to an index or formula that the Commission has approved for use in an advice letter by the Utility submitting the advice letter, not including the first time the Utility uses that index or formula. This Industry Rule does not cover a change in a methodology, such as a methodology approved by the Commission for use by a Utility for performance-based ratemaking.
- (4) A Contract that conforms to a Commission order authorizing the Contract, and that requests no deviation from the authorizing order (e.g., a gas storage Contract in exact conformity with Decision 93-02-013).
- (5) Establishment of tariff rates and charges for an oil pipeline that has not previously filed any tariffs with the Commission.
- (6) Initial tariffs for a new service by an oil pipeline, including service on a pipeline segment commencing Utility service.
- (7) A change to an existing tariff rate by an oil pipeline, as provided in Industry Rule 8.
- (8) Withdrawing a service, abandoning service within an area, canceling a rate schedule, or closing a rate schedule to new customers when authorized by a prior Commission decision, resolution, or order.

(General Order 96B, Section 5.1)

The Commission has stated that utilities may not use Tier 1 ALs to implement controversial matters.⁴ PG&E's recommendation for use of Tier 1 AL to implement undefined VB strategies exceeds the authority the Commission can grant under the law.

PG&E explains that it proposes to use the Tier 1 process because it appears to be the only vehicle that would afford it the flexibility to respond as quickly as necessary to such sudden changes in the VB market without waiting for Commission decision that may come too late to protect its ratepayers. Under GO 96B, Tier 1 ALs are effective immediately⁵. However, even if the Commission were to find another vehicle consistent with its laws and decisions for granting PG&E this expedited authority, PG&E's actions under such authority would still be inconsistent with AB 57, which requires that the Commission approve upfront standards for the utilities procurement decisions in order to eliminate the need for after-the-fact reasonableness reviews. Identifying a Commission process that a utility may use to seek authority for approval of a procurement action does not suffice as an upfront standard under AB 57⁶. PG&E must provide some specific description of procurement actions it expects to undertake under a particular set of contemplated or anticipated circumstances before the Commission can decide whether it is reasonable or unreasonable for PG&E to act. Although the concern underlying this proposal for emergency authority is valid, another solution consistent with AB 57 and GO 96B must be found.

C. IOU VB Participation Should Be Approved on an Interim Basis with an Assessment After One Year

Given the acknowledged uncertainty about the impacts of VB on the CAISO markets and prices (and other potential indirect impacts, such as the impact on forward

⁴ Re Southern California Edison Company, Decision 08-05-003 (May 15, 2008); Re Assess and Revise the Regulation of Telecommunications Utilities, Decision 07-09-019 (September 6, 2007).

⁵ A matter appropriate to Tier 1 may be designated by a Utility in its advice letter as effective pending disposition. (For advice letters pursuant to General Rule 8.2.3, see Industry Rule 5.3.)

⁶ Public Utilities Code § 454.5(c).

contracting), if the Commission authorizes IOUs to participate in VB participation, authorization should be granted initially on an *interim basis* only with an assessment after a trial period, such as one year.⁷ Then the Commission should conduct an assessment of IOU participation on the basis of actual experience. At that point, the IOUs' actual bid data will be available, and the Commission will also have the benefit of the CAISO market monitors' assessments of the impact of VB on the CAISO markets as a whole. The Commission assessment would be for the purpose of evaluating:

- whether the benefits to IOU ratepayers outweighed the costs and risks of IOU participation
- the relative success or failure of specific bidding strategies employed by the IOUs;
- whether to extend authorization to participate in VB and if so, whether to modify the “upfront standards” authorized initially.

To be clear, the purpose of the assessment would not be to review the reasonableness of past bids, but to determine whether continued participation of the IOUs is beneficial to IOU ratepayers and whether changes should be made to the upfront standards prospectively.

D. Some Consistency Across All Proposals Should Be Required

To insure that the Commission can evaluate and measure the costs and benefits of each IOU's VB participation, some aspects should be consistent across all three IOUs.

⁷ The Commission has granted interim authority before, for example, with respect to: Utility ownership of generation (interim rules set in D. 04-01-050); Renewable energy solicitation prior to full implementation of the RPS program (interim rules set out via ACR, August 8th, 2003, terminated with D. 04-12-048, December 16th, 2004); Role of the Independent Evaluator (interim approach set out in D. 04-12-048, noting FERC guidance but reserving the right to refine the guidelines at a later date based on gained experience); and most recently, Renewable Energy Credits (see Proposed Decision by President Peevey Modifying Decision 10-03-021 Authorizing Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by D. 10-05-018 (interim annual procurement targets using TRECs “*given ongoing concerns regarding the value to ratepayers of REC-only procurement and our ability to assess that value in a reasonable and consistent way*” (p. 19) (emphasis added))).

Specifically, VB application definition, VB activity reporting, loss limits, and the process for requesting changes/additions to the IOUs VB plan.

1. Specific VB Applications Should Be Consistently Defined

To ensure that VB is used by the IOUs as a tool to provide cost reduction or risk mitigation benefits to ratepayers, rather than increasing risk through speculative trading between the DA and RT markets, specific VB applications proposed by the IOUs should be consistently defined so that each VB application lends to efficient Commission oversight. The three IOUs VB proposals vary greatly in terms of how the specific VB applications are defined. On one hand, PG&E and SDG&E provide a high level of detail regarding each specific VB application, whereas SCE provides much less detail on each VB application they propose to implement. Though each IOU may request Commission authority for a different number of VB applications, the definition of each application should be consistent among the IOUs. Doing so will enhance regulatory simplicity and efficiency. This will also provide a consistent process to address requests for expanded VB authority in the future. Also, consistent VB application definition will enhance Commission oversight of the IOUs VB activity and reporting.

The elements of a consistent VB application definition can be found through a combination of all three IOUs' VB proposals. In some cases, it may be reasonable to grant confidential treatment to a VB application definition. DRA recommends that each IOU VB application be defined consistently as follows:

- **VB Application Name**
- **VB Application Description** – Detailed description of the specific VB application and why it is necessary
- **Type of Bids** – i.e., virtual supply or virtual demand
- **Conditions When Bids Are Submitted** – Description of market conditions or resource conditions that necessitate submitting virtual bids for this application

- **Location of Bids** – Detailed description of all physical resources and or all locations or nodes where virtual bids will be made
- **Bid Quantity** – Maximum quantity of MW/h being bid
- **Bid Price** – Expected bid price
- **Frequency** – e.g., daily, weekly, quarterly, once a year

2. Monthly Reporting of VB Activity Is Appropriate for First Year of Participation

The uncertainty about the impact of VB on the California electricity markets is enormous, and it is impossible to determine the magnitude of the major risks from the record evidence available at this time.⁸ Given this great uncertainty, it is critical that the IOUs provide timely and consistent reporting of their activity and results in this new unknown market. IOU VB reporting should be consistent and lend itself to efficient Commission oversight and review.

Though the IOUs propose to report on a quarterly basis, DRA recommends the level of uncertainty that exists in the VB market lends itself to monthly reporting during the first year of IOU participation. Monthly reporting is also consistent with Commission requirements for both IOU Energy Procurement Risk reporting and the IOUs Interruptible Load and Demand Response Program reporting.

3. Monthly Loss Limits Are Appropriate

One of the known risks that ratepayers face if IOUs do participate in the VB market is that the IOUs do not virtually bid in an effective way and they lose money. The three IOUs have stated that shareholders should bear no risk related to IOU VB activity, therefore under their proposals ratepayers would bear all of the risk related to virtual bids that lose money. Given this unbalanced risk sharing proposal, it is critical that the Commission bound the potential losses that ratepayers may be exposed to. Loss limits

⁸ DRA Comments and Supplemental Responses to Questions Concerning IOU Participation in Virtual (Convergence) Bidding, July 30, 2010.

should be consistent and proportional across the IOUs. Likewise the action taken when loss limits are reached should also be consistent across the IOUs.

SDG&E proposes a simple monthly loss limit equal to losses exceeding \$.001/kWh of its bundled load forecast for any calendar month. SCE proposes a more complex rolling ninety day window of losses up to \$10 million. PG&E does not propose any loss limit. DRA favors the simple and transparent monthly loss limit proposed by SDG&E as it can be easily monitored, is consistent with a monthly reporting requirement, and can be proportionally applied to each IOU. The amount of the loss limit may need to be examined.

In terms of actions taken when the loss limit is reached, SDG&E proposes to halt VB activity until a Procurement Review Group meeting is held. DRA finds this to be a reasonable outcome given the ratepayer risk that is at stake.

4. Tier 3 Advice Letter Process Is Appropriate for Requesting Changes to VB Authority

Given each IOU is requesting different numbers of VB applications in their VB proposals, DRA anticipates that over time, IOUs may seek to adjust the VB applications that they may want to employ. DRA suggests that, consistent with the process that IOUs use to obtain Commission approval for new procurement products, the Tier 3 Advice Letter process is the appropriate vehicle for requesting Commission approval for new VB applications.

E. The Record Needs To Be Better Developed To Determine What Upfront Standards Are Appropriate

Each of the IOUs has proposed quite different upfront standards for participation in VB. While there may be valid reasons for the IOUs to employ different VB strategies, the Commission needs a better-developed record in order to determine whether the parameters and strategies proposed are appropriate in each case, and whether certain parameters should be applicable to all three of the IOUs. More information is needed to answer certain key questions about the proposed parameters. Some of these key questions are noted below, in this section.

DRA recognizes that hearings could delay a Commission decision on virtual bidding and also that it may be possible to develop the record adequately by other means. But if hearings are necessary, they should nevertheless be held. The decision before the Commission is too important to be made on an inadequate record or to be rushed. There are no exigent circumstances. Were virtual bidding to begin without IOU participation at the outset, it is by no means clear that ratepayers would be harmed. A brief period to observe how VB impacts the markets before the IOUs jump in might actually be a reasonable course of action.⁹ There is time to address pertinent questions in this proceeding, particularly questions about what upfront standards should be adopted. DRA identifies some of them below.

1. Are the strategies and parameters proposed by each IOU appropriate?

Each IOU is requesting different authority for VB participation. There is no record evidence available to the Commission that explains why one VB strategy is reasonable for one utility but not the others. There needs to be record evidence on why strategies proposed by each IOU are or are not appropriate for the IOU proposing the strategy as well as for the other IOUs.

2. Will there be safeguards in place adequate to protect consumers from market manipulation and market failure?

As discussed in Section A above, the safeguards proposed by CAISO have not yet been approved by FERC. Independent of the safeguards requested by the CAISO, parties in this proceeding have suggested different forms of upfront standards for the IOUs to protect ratepayers, including a range of position limits and a cap on the maximum losses from virtual bidding. The three IOUs have offered different proposals for upfront standards, and have suggested that the upfront standards need not be the same for all three IOUs. For example, the IOU's differing proposals raise the question of

⁹ DRA recognizes that the IOUs would need time and resources to prepare for participation.

whether the upfront standards should be prescriptive, at least initially, or should allow maximum flexibility to participate in VB.

Significant questions remain as to what combination of safeguards best protects ratepayer interests. The record needs to be developed to better understand what standards should be adopted by the Commission in addition to the FERC-imposed safeguards, and what process should be used to review and evaluate the impact of virtual bidding on IOU procurement.

3. What loss limits, if any, should be established?

The Commission has posed the question of what limits should be imposed on the IOUs' daily energy procurement costs, and whether there should be a total dollar, total MW, or percentage of MW limit on the IOUs. Each IOU has answered these questions differently in their proposals. PG&E has not proposed any loss limits, while SCE and SDG&E have proposed different ways of measuring and reporting loss limits. The record needs to be developed to determine how to measure losses consistently for all three IOUs, and how to establish a reasonable loss limit for VB participation that is not arbitrary.

4. What would it cost the IOUs to participate in VB?

There is no record evidence on what the IOUs' participation in the VB market would cost ratepayers both from a start-up perspective and long-run annual basis. There has been no worst case analysis presented to show what the maximum financial risk ratepayers could be taking on. The Commission itself has posed the question: if ratepayer funds are used, should the Commission impose a limit on the amount of losses that an IOU incurs? The IOUs have not sufficiently answered this question and the Commission should not authorize the IOUs to participate in the VB market until the expected costs and worst case costs and loss limits are projected, tested and understood.

5. Does CAISO have the ability to monitor the market effectively?

The record to date is unclear on whether the CAISO will have the ability and authority to monitor effectively the impact of VB on the CAISO markets, and under what conditions the CAISO will be able to intervene to protect against the exercise of market power and other problematic bidding behavior. Additional questions that need further evidence on record include: How will the impact of virtual bidding on the market be measured? Does CAISO have the ability to rerun the market results without virtual bidding in order to understand the impacts of virtual bids and to determine if prices have converged higher or lower than they would have without virtual bidding? For the CPUC's purposes, how should the impacts of virtual bidding on procurement costs be measured?

III. CONCLUSION

There may be good reasons to authorize the IOUs to participate in VB, but it would be prudent to ascertain first whether FERC has approved adequate safeguards for the market as a whole; to establish upfront standards that are clearly defined, specific, and capable of being monitored; and to establish a process to evaluate the IOUs experience with VB after an initial period, such as one year, to determine whether IOUs should continue to participate in VB and if so, whether the upfront standards established should be modified.

Respectfully submitted,

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August 30, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the following document:

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES
ON THE INVESTOR OWNED UTILITIES' PROPOSALS FOR VIRTUAL
BIDDING PARTICIPATION**

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Executed on **August 30, 2010**, at San Francisco, California.

/s/ ALBERT HILL

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