



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

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(Filed February 16, 2006)

Order Instituting Rulemaking to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program.

**POST WORKSHOP REPLY COMMENTS
ON TRADABLE RENEWABLE ENERGY CREDITS
BY MOUNTAIN UTILITIES (U 906-E)**

Dan L. Carroll
DOWNEY BRAND LLP
555 Capitol Mall, 10th Floor
Sacramento, California 95814
Telephone: (916) 444-1000
FAX: (916) 444-2100
E-mail: dcarroll@downeybrand.com
Attorneys for Mountain Utilities

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

Order Instituting Rulemaking to Develop
Additional Methods to Implement the
California Renewables Portfolio Standard
Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

**POST WORKSHOP REPLY COMMENTS
ON TRADABLE RENEWABLE ENERGY CREDITS
BY MOUNTAIN UTILITIES (U 906-E)**

Pursuant to the Administrative Law Judge's Ruling Requesting Post-Workshop Comments on Tradable Renewable Energy Credits (Ruling), issued on October 16, 2007, and subsequent Administrative Law Judge's Ruling Revising Schedule for Post-Workshop Comments, issued on November 21, 2007, Mountain Utilities (MU) submits the following reply comments and Opposition to Request for Evidentiary Hearing..

A. MU's Reply Comments

Agreement on Tradable Renewable Energy Credits (TREC)s benefits.

Many post-workshop commenters noted the potential for Tradable Renewable Energy Credits (TREC)s to ease transmission constraints. More precisely, TREC)s would not exacerbate existing transmission constraints. For new sources of REC)s, with a TREC)s protocol in place, null energy may be generated and used in one part of the state while the associated TREC)s could be divorced from the null energy and credited to the benefit of a REC deficient party in another part of the state. Otherwise, to reach the party desiring the REC)s, the null energy and associated REC)s must travel together, impacting currently constrained parts of the transmission grid or potentially creating new constraints.

One example is contained in Pacific Gas and Electric Company's (PG&E's) Post-Workshop Comment:

PG&E notes, however, that a REC program would help alleviate the need for certain in-state transmission system upgrades since it would no longer be necessary to have the capability to transmit power from renewable generation projects to points all over the state. Instead, the underlying power from a renewable project in southern California, for example, could remain in southern California while the REC)s associated with the project could be purchased by an entity in another part of the state without the need to physically get the power to the distant buyer of the REC)s or for the buyer to make alternate commercial arrangements." (PG&E pp. 3 and 4)

Thus, MU, which, as is by now well known, has **no access** to transmission, could benefit from and satisfy its renewables obligation through TRECs where the REC was totally divorced from the underlying generation. MU has already made clear that the use of TRECs may be one of only two ways for it to address any RPS obligations (the other being using biodiesel for generation). MU is gratified that others realize that TRECs can address transmission issues, since MU has the ultimate transmission issue – it has no access to transmission.

Some parties' fixation on long term contracts.

Parties such as The Utility Reform Network (TURN) seek specific limitations on the use of TRECs, such as:

The amount of RECs purchased under short term contracts should be limited to a percentage of the Annual Procurement Target (APT). (TURN p.2)

This position is apparently based upon a concern that TRECs will somehow satisfy the current and impending shortage of renewable energy and thereby blunt efforts to encourage and procure additional long term renewable energy supplies. This position appears to be at odds with the projected shortfalls of renewable energy aptly put but understated by Powerex:

REC trading should be available as a means to enhance and improve, rather than replace, RPS compliance. Because of transmission constraints, mandated RPS goals for 2010 may be difficult to meet. In this respect, RECs will be a useful tool in meeting RPS goals even in the face of anticipated limitations on transmission capacity. (Powerex p.3)

Putting constraints and hobbles on an emerging TREC market is counter-productive and would serve only to exacerbate an already dicey situation.

MU supports TURN's Advice Letter approach to TREC contracts.

TURN also recommends that the staff Straw Proposal be modified to state "Long-term REC contracts must be submitted by Advice Letter for authorization." (TURN p.17) Thus, if TURN's recommendation were adopted, apparently MU could negotiate a long term output contract with another IOU for MU's TRECs created in excess of its requirements by using 100% biodiesel at its generating plant while retaining the null energy for its customers' requirements. Then such a contract could be submitted by Advice Letter to the CPUC for approval. If MU's understanding is correct, MU believes this approach makes good sense and supports it.

B. Opposition to Request for Evidentiary Hearing

By a joint motion filed on November 28, 2007, TURN and the Aglet Consumer Alliance (Aglet) (TURN/Aglet) requested limited evidentiary hearings on factual issues related to the authorization of tradable renewable energy credits (TRECs). In addition to three issues which

TURN/Aglet claim are in dispute, they make the further statement:

Additionally, at least one party still proclaimed that TRECs would solve transmission constraints. However, TURN and Aglet suggest that the vast majority of parties agreed that TRECs provide a contractual means for compliance without flowing power across congested transmission lines, but that existing flexible delivery rules already solve this problem. There seems little genuine dispute that TRECs will not solve the limitations on new renewable project development caused by inadequate transmission access. (TURN/Aglet Motion for Evidentiary Hearing pp. 2-3.)

Whatever currency (if any) this argument may have for other utilities, it has none for MU. TRECs will not solve MU's transmission constraints. However, TRECs, if approved, may allow MU to satisfy its renewable requirements. TURN/Aglet imply that existing flexible delivery rules solve the TREC problem. However, flexible delivery rules for transmission-constrained utilities in this context have not yet been promulgated by the CPUC. TREC protocols and flexible delivery rules for transmission constrained utilities, once adopted by the CPUC, may indeed solve the problem of how MU may make TRECs available from a biodiesel generation project. Since they have not been adopted, however, no one can know that yet.

MU lacks the resources, both personnel and monetary, to pursue evidentiary hearings on abstruse issues regarding what utilities might or might not do.

MU respectfully requests that the Commission either deny TURN/Aglet's request or, in the alternative, excuse MU from participation in such hearings due to its status as an electric microutility.

Dated: December 5, 2006

Respectfully Submitted,

Downey Brand LLP

By: _____ /s/
Dan L. Carroll
Attorneys for Mountain Utilities

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the POST WORKSHOP REPLY COMMENTS ON TRADABLE RENEWABLE ENERGY CREDITS BY MOUNTAIN UTILITIES (U 906-E) on December 5, 2007, on all known parties to proceeding R. 06-02-012 via electronic mail to those whose addresses are available and via U.S. mail to those who do not have an electronic address.

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

Dated this 5th day of December, 2007, at Sacramento, California.

/s/

Colleen Bullock

Service list R.06-02-012

VIA ELECTRONIC MAIL:

dgulino@ridgewoodpower.com; rick_noger@praxair.com; keith.mccrea@sablaw.com;
csmoots@perkinscoie.com; rresch@seia.org; garson_knapp@fpl.com;
Cynthia.A.Fonner@constellation.com; ej_wright@oxy.com; stacy.aguayo@apses.com;
jenine.schenk@apses.com; rsnichol@srpnet.com; rprince@semprautilities.com;
dhuard@manatt.com; rkeen@manatt.com; bill.chen@constellation.com; energy@3phases.com;
mmazur@3phasesRenewables.com; susan.munves@smgov.net; douglass@energyattorney.com;
klatt@energyattorney.com; aimee.barnes@ecosecurities.com; pssed@adelphia.net;
pssed@adelphia.net; cathy.karlstad@sce.com; william.v.walsh@sce.com;
kswitzer@gswater.com; kswitzer@gswater.com; amoore@ci.chula-vista.ca.us;
customerrelations@sel.com; amsmith@sempra.com; fortlieb@sandiego.gov;
email@semprasolutions.com; troberts@sempra.com; hharris@coral-energy.com;
rwinthrop@pilotpowergroup.com; tdarton@pilotpowergroup.com;
tdarton@pilotpowergroup.com; jleslie@luce.com; GloriaB@anzaelectric.org;
wplaxico@heliosenergy.us; lalehs101@hotmail.com; kerry.eden@ci.corona.ca.us;
thunt@cecmail.org; Joe.Langenberg@gmail.com; dorth@krcd.org; jaturnbu@ix.netcom.com;
pepper@cleanpowermarkets.com; marcel@turn.org; stephen.morrison@sfgov.org;
gtd@cpuc.ca.gov; nao@cpuc.ca.gov; theresa.mueller@sfgov.org; mhyams@sfgwater.org; ek@a-
klaw.com; rsa@a-klaw.com; alhj@pge.com; crmd@pge.com; bill.chen@constellation.com;
bcragg@goodinmacbride.com; jsqueri@goodinmacbride.com; jwiedman@goodinmacbride.com;
jkarp@winston.com; mday@goodinmacbride.com; jkarp@winston.com; jeffgray@dwt.com;
sho@ogradys.com; MAFv@pge.com; ssmyers@worldnet.att.net; gpetlin@3degreesinc.com;
jhamrin@resource-solutions.org; ECL8@pge.com; jchamberlin@strategicenergy.com;
ralf1241a@cs.com; wbooth@booth-law.com; sherifl@calpine.com;
jeremy.weinstein@pacificcorp.com; jody_london_consulting@earthlink.net; cchen@ucsusa.org;
gmorris@emf.net; ndesnoo@ci.berkeley.ca.us; clyde.murley@comcast.net;
jpross@sungevity.com; tomb@crossborderenergy.com; janreid@coastecon.com;

johnredding@earthlink.net; jweil@aglet.org; cmkehrin@ems-ca.com; jsanders@caiso.com; jdalessi@navigantconsulting.com; www@eslawfirm.com; abb@eslawfirm.com; Carroll, Dan; dkk@eslawfirm.com; glw@eslawfirm.com; janmcfar@sonic.net; steven@iepa.com; ryan.flynn@pacificorp.com; Tom.Elgie@powerex.com; sfinnerty@cpv.com; dhecht@sempratrading.com; bshort@ridgewoodpower.com; steven.schleimer@barclayscapital.com; ACRoma@hhlaw.com; MASullivan@hhlaw.com; obrienc@sharpsec.com; vsuravarapu@cera.com; porter@exeterassociates.com; tjaffe@energybusinessconsultants.com; ralph.dennis@constellation.com; smindel@knowledgeinenergy.com; cswoollums@midamerican.com; ssiegel@biologicaldiversity.org; abiecunasjp@bv.com; ahendrickson@commerceenergy.com; rmccoy@ercot.com; jsniffen@elementmarkets.com; bbaker@summitblue.com; kjsimonsen@ems-ca.com; stacy.aguayo@apses.com; dsaul@pacificsolar.net; emello@sppc.com; tdillard@sierrapacific.com; jgreco@caithnessenergy.com; elizabeth.douglass@latimes.com; harveyederpspc.org@hotmail.com; steve@energyinnovations.com; jackmack@suesec.com; David.Townley@townleytech.com; case.admin@sce.com; frank.w.harris@sce.com; gary.allen@sce.com; woodrujb@sce.com; lizabeth.mcdannel@sce.com; rkmoore@gswater.com; Dan@EnergySmartHomes.net; daking@sempra.com; lwrazen@sempraglobal.com; tcorr@sempra.com; ygross@sempraglobal.com; liddell@energyattorney.com; mshames@ucan.org; scottanders@sandiego.edu; marcie.milner@shell.com; centralfiles@semprautilities.com; dneihaus@semprautilities.com; thamilton@qualitybuilt.com; billm@enxco.com; csteen@bakerlaw.com; jleblanc@bakerlaw.com; michaelgilmore@inlandenergy.com; hal@rwitz.net; mdjoseph@adamsbroadwell.com; wblattner@semprautilities.com; diane_fellman@fpl.com; nsuetake@turn.org; bfinkelstein@turn.org; Dan.adler@calcef.org; whgolove@chevron.com; dwang@nrdc.org; dcover@esassoc.com; jamesstack@fscgroup.com; filings@a-klaw.com; sls@a-klaw.com; sdhilton@stoel.com; snuller@ethree.com; abonds@thelen.com; evk1@pge.com; gcooper@cpv.com; lennyh@evomarkets.com; mfalls@cpv.com; pvalen@thelen.com; lawcpucases@pge.com; spauker@wsgr.com; vjw3@pge.com; nxk2@pge.com; rreinhard@mofo.com; diarmuid@greenwoodenv.com; cem@newsdata.com; cem@newsdata.com; jscancarelli@flk.com; judypau@dwt.com; bobgex@dwt.com; lisa_weinzimer@platts.com; cpucases@pge.com; arno@recurrentenergy.com; BRBc@pge.com; ELL5@pge.com; gxl2@pge.com; KEBD@pge.com; MMCL@pge.com; S1L7@pge.com; rwalther@pacbell.net; keithwhite@earthlink.net; jpigott@optisolar.com; andy.vanhorn@vhcenergy.com; rick_noger@praxair.com; kowalewskia@calpine.com; duggank@calpine.com; phanschen@mofo.com; pthompson@summitblue.com; pletkarj@bv.com; philha@astound.net; dietrichlaw2@earthlink.net; nellie.tong@us.kema.com; ramonag@ebmud.com; pdh9@columbia.edu; paulfenn@local.org; mrw@mrwassoc.com; bepstein@fablaw.com; cwooten@lumenxconsulting.com; rschmidt@bartlewells.com; elarsen@rcmdigesters.com; janice@strategenconsulting.com; brenda.lemay@horizonwind.com; nrader@calwea.org; rhwiser@lbl.gov; brad@mp2capital.com; michael@mp2capital.com; whitney@mp2capital.com; brian@banyansec.com; downen@ma.org; lynn@lmaconsulting.com; sberlin@mccarthylaw.com; davido@mid.org; tomk@mid.org; joyw@mid.org; brbarkovich@earthlink.net; rmccann@umich.edu; demorse@omsoft.com; e-recipient@caiso.com; grosenblum@caiso.com; saeed.farrokhpay@ferc.gov; dennis@ddecuir.com; kevin@solardevelop.com; david.oliver@navigantconsulting.com; kdusel@navigantconsulting.com; cpucrulings@navigantconsulting.com;

lpark@navigantconsulting.com; dougdpuemail@yahoo.com; jjg@eslawfirm.com;
mclaughlin@braunlegal.com; dseperas@calpine.com; pstoner@lgc.org;
bernardo@braunlegal.com; blaising@braunlegal.com; lmh@eslawfirm.com; rroth@smud.org;
mlemes@smud.org; mdeange@smud.org; vwood@smud.org; rlauckhart@globalenergy.com;
karen@klindh.com; Anne-Marie_Madison@TransAlta.com; californiadockets@pacificorp.com;
kyle.l.davis@pacificorp.com; cbreidenich@yahoo.com; dws@r-c-s-inc.com;
castille@landsenergy.com; pbrehm@infiniacorp.com; ab1@cpuc.ca.gov; as2@cpuc.ca.gov;
aes@cpuc.ca.gov; aeg@cpuc.ca.gov; blm@cpuc.ca.gov; bds@cpuc.ca.gov; bwm@cpuc.ca.gov;
cf1@cpuc.ca.gov; cnl@cpuc.ca.gov; dsh@cpuc.ca.gov; dot@cpuc.ca.gov; esl@cpuc.ca.gov;
jm3@cpuc.ca.gov; jf2@cpuc.ca.gov; jmh@cpuc.ca.gov; lmi@cpuc.ca.gov; mrl@cpuc.ca.gov;
psd@cpuc.ca.gov; smk@cpuc.ca.gov; svn@cpuc.ca.gov; skorosec@energy.state.ca.us;
JMcMahon@navigantconsulting.com; claufenb@energy.state.ca.us; hrait@energy.state.ca.us;
kzocchet@energy.state.ca.us; rmiller@energy.state.ca.us; bknox@energy.state.ca.us;
hcronin@water.ca.gov

VIA U.S. MAIL:

Anne E. Simon
Calif Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue, Room 5024
San Francisco, CA 94102-3214

Burton Mattson
Calif Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue, Room 5104
San Francisco, CA 94102-3214

Energy America, LLC
One Stamford Plaza, 8th Floor
263 Tresser Blvd.
Stamford, CT 6901

William Cronin
Energy America, LLC
One Stamford Plaza, 8th Floor
263 Tresser Blvd.
Stamford, CT 6901

Larry F. Eisenstat
Dickstein Shapiro LLP
CPV Renewable Energy Company, LLC
1825 Eye Street, NW
Washington, DC 20006

Richard Lehfeltd
Dickstein Shapiro LLP
CPV Renewable Energy Company, LLC
1825 Eye Street, NW
Washington, DC 20006

Donald N. Furman
Senior Vice President
PPM Energy, Inc.
1125 NW Couch Street, Suite 700
Portland, OR 97209

Mark L. Perlis
Dickstein Shapiro LLP
1825 Eye Street, NW
Washington, DC 20006

Kenneth Swain
Navigant Consulting, Inc.
3100 Zinfandel Dr., Suite 600
Rancho Cordova, CA 95670

Service List for R. 06-05-027

VIA ELECTRONIC MAIL:

dgulino@ridgewoodpower.com; rick_noger@praxair.com; keith.mccrea@sablaw.com;
csmoots@perkinscoie.com; rresch@seia.org; garson_knapp@fpl.com;
ssiegel@biologicaldiversity.org; kevin.boudreaux@calpine.com; ej_wright@oxy.com;

stacy.aguayo@apses.com; rsnichol@srpnet.com; dsaul@pacificsolar.net;
rprince@semprautilities.com; dhuard@manatt.com; rkeen@manatt.com;
npedersen@hanmor.com; energy@3phases.com; mmazur@3phasesRenewables.com;
susan.munves@smgov.net; douglass@energyattorney.com; klatt@energyattorney.com;
pssed@adelphia.net; cathy.karlstad@sce.com; mike.montoya@sce.com;
william.v.walsh@sce.com; kswitzer@gswater.com; rkmoore@gswater.com; amoore@ci.chula-
vista.ca.us; customerrelations@sel.com; amsmith@sempra.com; fortlieb@sandiego.gov;
email@semprasolutions.com; gbass@semprasolutions.com;
svongdeuane@semprasolutions.com; troberts@sempra.com; liddell@energyattorney.com;
marcie.milner@shell.com; rwinthrop@pilotpowergroup.com; tdarton@pilotpowergroup.com;
GloriaB@anzaelectric.org; llund@commerceenergy.com; rgunnin@commerceenergy.com;
wplaxico@heliosenergy.us; lalehs101@hotmail.com; kerry.eden@ci.corona.ca.us;
phil@reesechambers.com; thunt@cecmail.org; Joe.Langenberg@gmail.com; dorth@krcd.org;
jaturmbu@ix.netcom.com; pepper@cleanpowermarkets.com; bruce.foster@sce.com;
marcel@turn.org; gtd@cpuc.ca.gov; stephen.morrison@sfgov.org; ek@a-klaw.com; rsa@a-
klaw.com; alhj@pge.com; crmd@pge.com; cmb3@pge.com; evk1@pge.com; ecl8@pge.com;
bill.chen@constellation.com; bcragg@goodinmacbride.com; jsqueri@goodinmacbride.com;
jkarp@winston.com; jeffgray@dwt.com; ssmyers@worldnet.att.net; arno@recurrentenergy.com;
gpetlin@3degreesinc.com; jhamrin@resource-solutions.org; jchamberlin@strategicenergy.com;
ralf1241a@cs.com; wbooth@booth-law.com; kowalewskia@calpine.com; sherifl@calpine.com;
jody_london_consulting@earthlink.net; elarsen@rcmdigesters.com; gmorris@emf.net;
ndesnoo@ci.berkeley.ca.us; clyde.murley@comcast.net; jpross@sungevity.com;
nrader@calwea.org; tomb@crossborderenergy.com; janreid@coastecon.com;
meganmmyers@yahoo.com; johnrredding@earthlink.net; jweil@aglet.org; cmkehrein@ems-
ca.com; jsanders@caiso.com; kdusel@navigantconsulting.com;
jdalessi@navigantconsulting.com; abb@eslawfirm.com; dgeis@dolphingroup.org; Carroll, Dan;
davidb@cwo.com; janmcfar@sonic.net; jhofmann@rercnet.org; www@eslawfirm.com;
lmh@eslawfirm.com; kmills@cfbf.com; notice@psrec.coop; ryan.flynn@pacificcorp.com;
Tom.Elgie@powerex.com; bshort@ridgewoodpower.com;
steven.schleimer@barclayscapital.com; obrienc@sharpsec.com; vsuravarapu@cera.com;
porter@exeterassociates.com; tjaffe@energybusinessconsultants.com;
ralph.dennis@constellation.com; cswoollums@midamerican.com;
Cynthia.A.Fonner@constellation.com; abiecunasjp@bv.com;
ahendrickson@commerceenergy.com; tcarlson@reliant.com; echiang@elementmarkets.com;
jon.jacobs@paconsulting.com; bbaker@summitblue.com; kjsimonsen@ems-ca.com;
jenine.schenk@apses.com; emello@sppc.com; tdillard@sierrapacific.com;
jgreco@caithnessenergy.com; HYao@SempraUtilities.com; harveyederpspc.org@hotmail.com;
steve@energyinnovations.com; THAMILTON5@CHARTER.NET; jackmack@suesec.com;
case.admin@sce.com; frank.w.harris@sce.com; gary.allen@sce.com; woodrujb@sce.com;
lizbeth.mcdannel@sce.com; kswitzer@gswater.com; aabed@navigantconsulting.com;
lwrazen@sempraglobal.com; tcorr@sempra.com; mshames@ucan.org;
scottanders@sandiego.edu; centralfiles@semprautilities.com; cmanzuk@semprautilities.com;
susan.freedman@sdenergy.org; dnehaus@semprautilities.com; jleslie@luce.com;
csteen@bakerlaw.com; jleblanc@bakerlaw.com; michaelgilmore@inlandenergy.com;
hal@rwitz.net; mdjoseph@adamsbroadwell.com; wblattner@semprautilities.com;
diane_fellman@fpl.com; nsuetake@turn.org; Dan.adler@calcef.org; mhyams@sfwater.org;

whgolove@chevron.com; dwang@nrdc.org; dcover@esassoc.com; filings@a-klaw.com; sls@a-klaw.com; sdhilton@stoel.com; snuller@ethree.com; abonds@thelen.com; craig.lewis@greenvolts.com; ell5@pge.com; jay2@pge.com; jsp5@pge.com; lennyh@evomarkets.com; mreicher@evomarkets.com; placourciere@thelen.com; kfox@wsgr.com; nxk2@pge.com; cem@newsdata.com; cem@newsdata.com; jscancarelli@flk.com; koconnor@winston.com; judypau@dwt.com; bobgex@dwt.com; sho@ogrady.us; cpuccases@pge.com; BRBc@pge.com; gxl2@pge.com; KEBD@pge.com; MMCL@pge.com; S1L7@pge.com; vjw3@pge.com; rwalther@pacbell.net; keithwhite@earthlink.net; jpigott@optisolar.com; andy.vanhorn@vhcenergy.com; duggank@calpine.com; robert.boyd@ps.ge.com; phanschen@mofo.com; pthompson@summitblue.com; pletkarj@bv.com; dietrichlaw2@earthlink.net; nellie.tong@us.kema.com; ramonag@ebmud.com; paulfenn@local.org; mrw@mrwassoc.com; bepstein@fablaw.com; cwooten@lumenxconsulting.com; rschmidt@bartlewells.com; adamb@greenlining.org; cchen@ucsusa.org; janice@strategenconsulting.com; timmason@comcast.net; brenda.lemay@horizonwind.com; elvine@lbl.gov; rhwiser@lbl.gov; brian@banyansec.com; downen@ma.org; DCDG@pge.com; lynn@lmaconsulting.com; tim@marinemt.org; cpechman@powereconomics.com; sobrien@mccarthyllaw.com; davido@mid.org; joyw@mid.org; brbarkovich@earthlink.net; rmccann@umich.edu; demorse@omsoft.com; e-recipient@caiso.com; grosenblum@caiso.com; saeed.farrokhpay@ferc.gov; dennis@ddecuir.com; kevin@solardevelop.com; david.oliver@navigantconsulting.com; kenneth.swain@navigantconsulting.com; cpucrulings@navigantconsulting.com; lpark@navigantconsulting.com; karly@solardevelop.com; dougdpuccmail@yahoo.com; jjg@eslawfirm.com; mclaughlin@braunlegal.com; dkk@eslawfirm.com; jluckhardt@downeybrand.com; pstoner@lgc.org; rachel@ceert.org; blaising@braunlegal.com; steveb@cwo.com; steven@iepa.com; rroth@smud.org; mdeange@smud.org; vwood@smud.org; hurlock@water.ca.gov; lterry@water.ca.gov; rlauckhart@globalenergy.com; rliebert@cbbf.com; karen@kclindh.com; californiadockets@pacificorp.com; kyle.l.davis@pacificorp.com; dws@r-c-s-inc.com; castille@landsenergy.com; MoniqueStevenson@SeaBreezePower.com; ab1@cpuc.ca.gov; as2@cpuc.ca.gov; aes@cpuc.ca.gov; aeg@cpuc.ca.gov; blm@cpuc.ca.gov; bds@cpuc.ca.gov; bwm@cpuc.ca.gov; cnl@cpuc.ca.gov; ctd@cpuc.ca.gov; dsh@cpuc.ca.gov; dot@cpuc.ca.gov; esl@cpuc.ca.gov; fjs@cpuc.ca.gov; jm3@cpuc.ca.gov; jjw@cpuc.ca.gov; jxm@cpuc.ca.gov; jf2@cpuc.ca.gov; jmh@cpuc.ca.gov; mrl@cpuc.ca.gov; mjd@cpuc.ca.gov; mts@cpuc.ca.gov; ner@cpuc.ca.gov; nil@cpuc.ca.gov; nao@cpuc.ca.gov; psd@cpuc.ca.gov; smk@cpuc.ca.gov; svn@cpuc.ca.gov; tbo@cpuc.ca.gov; skorosec@energy.state.ca.us; JMcMahon@navigantconsulting.com; claufenb@energy.state.ca.us; claufenb@energy.state.ca.us; cleni@energy.state.ca.us; hrait@energy.state.ca.us; kzocchet@energy.state.ca.us; mpryor@energy.state.ca.us; rmiller@energy.state.ca.us; trf@cpuc.ca.gov; bknox@energy.state.ca.us; hcronin@water.ca.gov

VIA U.S MAIL:

Energy America, LLC
One Stamford Plaza, 8th Floor
263 Tresser Blvd.
Stamford, CT 6901

Michael Meacham
Environmental Resource Manager
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

Jeanne McKinney
Thelen Reid Brown Raysman & Steiner
101 Second Street, Suite 1800
San Francisco, CA 94105

Andy Wuellner
Mountain Utilities
P.O. Box 1
Kirkwood, CA 95646

Mwirigi Imungi
The Energy Coalition
15615 Alton Parkway, Suite 245
Irvine, CA 92618

Service List for R. 06-03-004

VIA ELECTRONIC MAIL:

david.kopans@fatspaniel.com; jeff@grosolar.com; john.schuster@utcpower.com;
kmcree@sablaw.com; info@solarpathfinder.com; manjusuri@yahoo.com;
lglover@solidsolar.com; spatrack@sempra.com; hchoy@isd.co.la.ca.us;
npedersen@hanmor.com; mmazur@3phasesRenewables.com; bob@energydynamix.net;
susan.munves@smgov.net; mluevano@globalgreen.org; ph@phatmedia.com;
steve@energyinnovations.com; douglass@energyattorney.com; akbar.jazayeri@sce.com;
amber.dean@sce.com; Case.Admin@sce.com; mike.montoya@sce.com; olivia.samad@sce.com;
rkmoore@gswater.com; brad@bradburkearchitect.com; dfield@openenergycorp.com;
michaely@sepcor.net; Dan@EnergySmartHomes.net; troberts@sempra.com;
andrew.mcallister@energycenter.org; irene.stillings@energycenter.org;
lschavrien@semprautilities.com; gbeck@etfinancial.com; rod.larson@sbcglobal.net;
legislative@recsolar.com; shallin@recsolar.com; Jacques@cerox.com;
pepper@cleanpowermarkets.com; mdjoseph@adamsbroadwell.com; nsuetake@turn.org;
dil@cpuc.ca.gov; stephen.morrison@sfgov.org; theresa.mueller@sfgov.org;
emackie@gridalternative.org; matt.golden@sustainablespaces.com; ek@a-klaw.com; sls@a-
klaw.com; jwmctarnaghan@duanemorris.com; placourciere@thelen.com;
bcragg@goodinmacbride.com; enriqueg@lif.org; jsqueri@goodinmacbride.com;
jwiedman@goodinmacbride.com; mday@goodinmacbride.com;
tmacbride@goodinmacbride.com; jkarp@winston.com; sarahtuntland@yahoo.com;
rjl9@pge.com; sww9@pge.com; ssmyers@att.net; l_brown246@hotmail.com;
arno@recurrentenergy.com; cp@kacosolar.com; bkc7@pge.com;
grant.kolling@cityofpaloalto.org; lex@consumercal.org; anewman@solarcity.com;
gopal@recolteenergy.com; info@calseia.org; jharris@volkerlaw.com; lmerry@norcalsolar.org;
elarsen@rcmdigesters.com; gmorris@emf.net; nonyac@greenlining.org;
robertg@greenlining.org; thaliag@greenlining.org; general@dralegal.org;
janice@strategenconsulting.com; jpross@sungevity.com; gary@sunlightandpower.com;
tomb@crossborderenergy.com; stephen@seiinc.org; tdr-hmw@sbcglobal.net;
sebesq@comcast.net; ronnie@energyrecommerce.com; rbelur@enphaseenergy.com;
michaelboyd@sbcglobal.net; julie.blunden@sunpowercorp.com; rob@consol.ws;
meganmmyers@yahoo.com; johnredding@earthlink.net; michaelkyes@sbcglobal.net;
vschwent@sbcglobal.net; cmkehrrein@ems-ca.com; jjensen@kirkwood.com;
glw@eslawfirm.com; janmcfar@sonic.net; Luckhardt, Jane; j.marston@suntechnics.com;
ksoares@usc.edu; lmh@eslawfirm.com; www@eslawfirm.com; www@eslawfirm.com;
cte@eslawfirm.com; kmills@cfbf.com; atrowbridge@daycartermurphy.com; ksheldon@sma-

america.com; notice@psrec.coop; markgsp@sbcglobal.net; bills@clearEdgepower.com;
ryan.flynn@pacificcorp.com; rogerlaubacher@pvpowered.com; pbrehm@infiniacorp.com;
hfhunt@optonline.net; michelle.breyer@gs.com; obrienc@sharpsec.com;
rdennis@knowledgeinenergy.com; cswoollums@midamerican.com; jimross@r-c-s-inc.com;
tcarlson@reliant.com; ghinners@reliant.com; bbaker@summitblue.com;
dprall@solarpowerinc.net; kstokes@solarpowerinc.net; kjsimonsen@ems-ca.com;
eshafner@solel.com; kennyk@solel.com; emello@sppc.com; tdillard@sierrapacific.com;
robert.pettinato@ladwp.com; cfaber@semprautilities.com; Marshall.Taylor@dlapiper.com;
joel.davidson@sbcglobal.net; akawnov@yahoo.com; david@nemtzw.com;
tbardacke@globalgreen.org; ron@reenergy.com; sendo@ci.pasadena.ca.us;
slins@ci.glendale.ca.us; THAMILTON5@CHARTER.NET; David.Townley@townleytech.com;
bjeider@ci.burbank.ca.us; roger.pelote@williams.com; mponceatty@aol.com;
mkay@aqmd.gov; annette.gilliam@sce.com; james.lehrer@sce.com; paul.kubasek@sce.com;
Robert.F.LeMoine@sce.com; jyamagata@semprautilities.com; rishii@aesc-inc.com;
yonah@powerbreathing.com; lwrazen@sempraglobal.com; liddell@energyattorney.com;
mshames@ucan.org; jim@dhsolar.com; rob@teamryno.com; usdepic@gmail.com;
scottanders@sandiego.edu; CManson@semprautilities.com; cmanzuk@semprautilities.com;
jennifer.porter@energycenter.org; john.supp@energycenter.org; jon.bonk-
vasko@energycenter.org; nathalie.osborn@energycenter.org; sephra.ninow@energycenter.org;
bob.ramirez@itron.com; ofoote@hkcf-law.com; ekgrubaugh@iid.com;
vincent@vincentbattaglia.com; traceydrabant@bves.com; gwiltsee@dricompanies.com;
TFlanigan@EcoMotion.us; LowryD@sharpsec.com; johnperlin@physics.ucsb.edu;
jlanderos@proteusinc.org; lfultz@sbcglobal.net; mstout@unlimited-energy.com;
cbressanitanko@rsgp.com; marigruner@yahoo.com; zingher@ieee.org;
mark.mah@glunetworks.com; jrichman@bloomenergy.com; diane_fellman@fpl.com;
felazzouzi@gridalternatives.org; fsmith@sfwater.org; mhyams@sfwater.org;
zfranklin@gridalternatives.org; filings@a-klaw.com; sdhilton@stoel.com; abonds@thelen.com;
scott.son@newresourcebank.com; kfox@wsgr.com; lauren.purnell@pge-corp.com;
LATc@pge.com; matt.scullin@newresourcebank.com; david.felix@mmarenew.com;
CEM@newsdata.com; joshdavidson@dwt.com; david@pvnw.com; sara@solaralliance.org;
jhamrin@resource-solutions.org; jwwd@pge.com; paul@tiogaenergy.com; ben@solarcity.com;
jpigott@optisolar.com; cpucsolar@rahus.org; tomhoff@clean-power.com;
andy.vanhorn@vhcenergy.com; seawayland@comcast.net; sbeserra@sbcglobal.net;
josephhenri@hotmail.com; pthompson@summitblue.com; ted@energy-solution.com;
nehemiah.stone@kema.com; nellie.tong@us.kema.com; karin.corfee@kema.com;
phillip_mcleod@lecg.com; jody_london_consulting@earthlink.net; ciece@ucop.edu;
mrw@mrwassoc.com; ken.krich@ucop.edu; rschmidt@bartlewells.com;
adamb@greenlining.org; bobakr@greenlining.org; cchen@ucsusa.org; jesser@greenlining.org;
stephaniec@greenlining.org; ksmith@powerlight.com; kate@sunlightandpower.com;
Sarah@sunlightandpower.com; elvine@lbl.gov; GLBarbose@LBL.gov; mwbeck@lbl.gov;
MABolinger@lbl.gov; NJPadgett@lbl.gov; rhwiser@lbl.gov; knotsund@berkeley.edu;
Dan.Thompson@SPGsolar.com; eric.carlson@spgsolar.com; iris.chan@spgsolar.com;
joelene.monestier@spgsolar.com; darmanino@co.marin.ca.us; juliettea7@aol.com;
downen@ma.org; rb@greenrockcapital.com; jcluboff@lmi.net; cdickason@solarcraft.com;
Elizabeth.Ferris@spgsolar.com; barbara@earthskysolar.com; sberlin@mccarthyllaw.com;
njfolly@tid.org; nick@npcsolar.com; rob@dcpower-systems.com; janh@pacpower.biz;

rmccann@umich.edu; demorse@omsoft.com; saeed.farrokhpay@ferc.gov;
kdusel@navigantconsulting.com; cpucrulings@navigantconsulting.com;
gpickering@navigantconsulting.com; lpark@navigantconsulting.com;
scott.tomashefsky@ncpa.com; george@utilityconservationservices.com;
karly@solardevelop.com; bernadette@environmentcalifornia.org; Carroll, Dan;
d.miller@suntechnics.com; h.dowling@suntechnics.com; jwimbley@csd.ca.gov;
rachel@ceert.org; blaising@braunlegal.com; Sgupta@energy.state.ca.us; mrawson@smud.org;
sfrantz@smud.org; abcestatelobbyist@sbcglobal.net; karen@klindh.com; Tenorio@sunset.net;
jmaskrey@sopogy.com; deb@a-klaw.com; californiadockets@pacificcorp.com;
kyle.l.davis@pacificcorp.com; George.Simons@itron.com; patrick.lilly@itron.com;
jack.burke@energycenter.org; arr@cpuc.ca.gov; as2@cpuc.ca.gov; aes@cpuc.ca.gov;
tam@cpuc.ca.gov; dsh@cpuc.ca.gov; dot@cpuc.ca.gov; jm3@cpuc.ca.gov; jjw@cpuc.ca.gov;
jxm@cpuc.ca.gov; cln@cpuc.ca.gov; jci@cpuc.ca.gov; jf2@cpuc.ca.gov; lp1@cpuc.ca.gov;
meb@cpuc.ca.gov; mvc@cpuc.ca.gov; mts@cpuc.ca.gov; nlc@cpuc.ca.gov; pw1@cpuc.ca.gov;
psd@cpuc.ca.gov; tdp@cpuc.ca.gov; ppettingill@caiso.com; mscheibl@arb.ca.gov;
gyee@arb.ca.gov; brd@cpuc.ca.gov; dks@cpuc.ca.gov; edward.randolph@asm.ca.gov;
pnarvand@energy.state.ca.us; rberke@csd.ca.gov; smiller@energy.state.ca.us; zca@cpuc.ca.gov

VIA U.S. MAIL:

Terence Parker
United Solar Ovonic, LLC
3800 Lapeer Road
Auburn Hills, MI 48326

Harvey M. Eder
Public Solar Power Coalition
1218 12th Street, No. 25
Santa Monica, CA 90401

David J. Coyle
Anza Electric Cooperative, Inc
58470 Highway 371
Anza, CA 92539-1909

Mwirigi Imungi
The Energy Coalition
15615 Alton Parkway, Suite 245
Irvine, CA 92618

Heather J. Richman
Standford University, First Floor
University Of Public Affairs Bldg. 170
Stanford, CA 94305

Kenneth Swain
Navigant Consulting, Inc.
3100 Zinfandel Dr., Suite 600
Rancho Cordova, CA 95670

Renee Webster-Hawkins
Acting Chief Deputy Director
Dept. of Community Services and Development
P.O. Box 1947
Sacramento, CA 95812-1947

California Environmental Protection
P.O. Box 2815
Sacramento, CA 95812-2815

Service List for R. 06-04-009

VIA ELECTRONIC MAIL:

cadams@covantaenergy.com; steven.schleimer@barclayscapital.com;
steven.huhman@morganstanley.com; rick_noger@praxair.com; keith.mccrea@sablaw.com;
ajkatz@mwe.com; ckupka@mwe.com; kyle_boudreaux@fpl.com;
cswoollums@midamerican.com; Cynthia.A.Fonner@constellation.com;

kevin.boudreaux@calpine.com; trdill@westernhubs.com; ej_wright@oxy.com;
pseby@mckennalong.com; todil@mckennalong.com; steve.koerner@elpaso.com;
jenine.schenk@apses.com; jbw@slwplc.com; kelly.barr@srpnet.com; rrtaylor@srpnet.com;
smichel@westernresources.org; roger.montgomery@swgas.com; Lorraine.Paskett@ladwp.com;
ron.deaton@ladwp.com; snewsom@semprautilities.com; dhuard@manatt.com;
curtis.kebler@gs.com; dehling@klng.com; gregory.koiser@constellation.com;
npedersen@hanmor.com; mmazur@3phasesRenewables.com; vitaly.lee@aes.com;
tiffany.rau@bp.com; klatt@energyattorney.com; rhelgeson@scppa.org;
douglass@energyattorney.com; pssed@adelphia.net; bwallerstein@aqmd.gov;
akbar.jazayeri@sce.com; annette.gilliam@sce.com; cathy.karlstad@sce.com;
Laura.Genao@sce.com; rkmoore@gswater.com; dwood8@cox.net; amsmith@sempra.com;
atrial@sempra.com; apak@sempraglobal.com; dhecht@sempratradng.com;
daking@sempra.com; svongdeuane@semprasolutions.com; troberts@sempra.com;
liddell@energyattorney.com; marcie.milner@shell.com; rwinthrop@pilotpowergroup.com;
tdarton@pilotpowergroup.com; lschavrien@semprautilities.com; GloriaB@anzaelectric.org;
llund@commerceenergy.com; thunt@cecmil.org; jeanne.sole@sfgov.org;
john.hughes@sce.com; llorenz@semprautilities.com; marcel@turn.org; nsuetake@turn.org;
dil@cpuc.ca.gov; fjs@cpuc.ca.gov; achang@nrdr.org; rsa@a-klaw.com; ek@a-klaw.com;
kgrenfell@nrdr.org; mpa@a-klaw.com; sls@a-klaw.com; bill.chen@constellation.com;
bkc7@pge.com; epoole@adplaw.com; agrimaldi@mckennalong.com;
bcragg@goodinmacbride.com; jsqueri@gmssr.com; jarmstrong@goodinmacbride.com;
kbowen@winston.com; lcottle@winston.com; sbeatty@cwclaw.com;
vprabhakaran@goodinmacbride.com; jkarp@winston.com; jeffgray@dwt.com; cjw5@pge.com;
ssmyers@att.net; lars@resource-solutions.org; alho@pge.com; aweller@sel.com;
jchamberlin@strategicenergy.com; beth@beth411.com; kerry.hattevik@mirant.com;
kowalewska@calpine.com; wbooth@booth-law.com; hoerner@redefiningprogress.org;
janill.richards@doj.ca.gov; cchen@ucsusa.org; gmorris@emf.net;
tomb@crossborderenergy.com; kjinnovation@earthlink.net; bmcc@mccarthyllaw.com;
sberlin@mccarthyllaw.com; Mike@alpinenaturalgas.com; joyw@mid.org;
UHelman@caiso.com; jjensen@kirkwood.com; mary.lynch@constellation.com; lrdevanna-
rf@cleanenergysystems.com; abb@eslawfirm.com; mclaughlin@braunlegal.com;
glw@eslawfirm.com; Luckhardt, Jane; jd@eslawfirm.com;
vwelch@environmentaldefense.org; www@eslawfirm.com; westgas@aol.com;
scohn@smud.org; atrowbridge@daycartermurphy.com; dansvec@hdo.net; notice@psrec.coop;
deb@a-klaw.com; cynthia.schultz@pacificorp.com; kyle.l.davis@pacificorp.com;
ryan.flynn@pacificorp.com; carter@ieta.org; jason.dubchak@niskags.com;
bjones@mjbbradley.com; kcolburn@symbioticstrategies.com; rapcowart@aol.com;
Kathryn.Wig@nrgenergy.com; sasteriadis@apx.com; george.hopley@barcap.com;
ez@pointcarbon.com; burtraw@rff.org; vb@pointcarbon.com;
andrew.bradford@constellation.com; gbarch@knowledgeinenergy.com;
ralph.dennis@constellation.com; smindel@knowledgeinenergy.com; brabe@umich.edu;
bpotts@foley.com; james.keating@bp.com; jimross@r-c-s-inc.com; tcarlson@reliant.com;
ghinners@reliant.com; zaiontj@bp.com; julie.martin@bp.com; fiji.george@elpaso.com;
echiang@elementmarkets.com; fstern@summitblue.com; nenbar@energy-insights.com;
nlenssen@energy-insights.com; bbaker@summitblue.com; william.tomlinson@elpaso.com;
kjsimonsen@ems-ca.com; Sandra.ely@state.nm.us; bmcquown@reliant.com;

dbrooks@nevp.com; anita.hart@swgas.com; randy.sable@swgas.com; bill.schrand@swgas.com; jj.prucnal@swgas.com; sandra.carolina@swgas.com; ckmitchell1@sbcglobal.net; chilene@sppc.com; emello@sppc.com; tdillard@sierrapacific.com; dsoyars@sppc.com; jgreco@caithnessenergy.com; leilani.johnson@ladwp.com; randy.howard@ladwp.com; Robert.Rozanski@ladwp.com; robert.pettinato@ladwp.com; HYao@SempraUtilities.com; rprince@semprautilities.com; rkeen@manatt.com; nwhang@manatt.com; pjazayeri@stroock.com; derek@climateregistry.org; david@nemtzow.com; harveyederpspc.org@hotmail.com; sendo@ci.pasadena.ca.us; slins@ci.glendale.ca.us; THAMILTON5@CHARTER.NET; bjeider@ci.burbank.ca.us; rmorillo@ci.burbank.ca.us; roger.pelote@williams.com; aimee.barnes@ecosecurities.com; case.admin@sce.com; tim.hemig@nrgenergy.com; bjl@bry.com; aldyn.hoekstra@paceglobal.com; ygross@sempraglobal.com; jlaun@apogee.net; kmkiener@fox.net; scottanders@sandiego.edu; jkloberdanz@semprautilities.com; andrew.mcallister@energycenter.org; jack.burke@energycenter.org; jennifer.porter@energycenter.org; sephra.ninow@energycenter.org; dniehaus@semprautilities.com; jleslie@luce.com; ofoote@hkcf-law.com; ekgrubaugh@iid.com; pepper@cleanpowermarkets.com; gsmith@adamsbroadwell.com; mdjoseph@adamsbroadwell.com; Diane_Fellman@fpl.com; hayley@turn.org; mflorio@turn.org; Dan.adler@calcef.org; mhyams@sfwater.org; tburke@sfwater.org; norman.furuta@navy.mil; amber@ethree.com; annabelle.malins@fco.gov.uk; dwang@nrdc.org; filings@a-klaw.com; nes@a-klaw.com; obystrom@cera.com; sdhilton@stoel.com; scarter@nrdc.org; abonds@thelen.com; cbaskette@enernoc.com; colin.petheram@att.com; jwmctarnaghan@duanemorris.com; kfox@wsgr.com; kkhoja@thelenreid.com; pvalen@thelen.com; spauker@wsgr.com; rreinhard@mofoc.com; cem@newsdata.com; hgolub@nixonpeabody.com; jscancarelli@flk.com; jwiedman@goodinmacbride.com; mmattes@nossaman.com; jen@cnt.org; lisa_weinzimer@platts.com; steven@moss.net; sellis@fypower.org; arno@recurrentenergy.com; BRBc@pge.com; ELL5@pge.com; gxl2@pge.com; jxa2@pge.com; JDF1@PGE.COM; RHHJ@pge.com; sscb@pge.com; sv6@pge.com; S1L7@pge.com; vjw3@pge.com; karla.dailey@cityofpaloalto.org; farrokh.albuyeh@oati.net; dtibbs@aes4u.com; jhahn@covantaenergy.com; andy.vanhorn@vhcenergy.com; Joe.paul@dynegey.com; info@calseia.org; gblue@enxco.com; sbeserra@sbcglobal.net; monica.schwebs@bingham.com; phanschen@mofoc.com; josephhenri@hotmail.com; pthompson@summitblue.com; dietrichlaw2@earthlink.net; Betty.Seto@kema.com; JerryL@abag.ca.gov; jody_london_consulting@earthlink.net; steve@schiller.com; mrw@mrwassoc.com; rschmidt@bartlewells.com; adamb@greenlining.org; stevek@kromer.com; clyde.murley@comcast.net; brenda.lemay@horizonwind.com; carla.peterman@gmail.com; elvine@lbl.gov; rhwiser@lbl.gov; C_Marnay@lbl.gov; philm@scedenergy.com; rita@ritanortonconsulting.com; cpechman@powereconomics.com; emahlon@ecoact.org; richards@mid.org; rogerv@mid.org; tomk@mid.org; fwmonier@tid.org; brbarkovich@earthlink.net; johnredding@earthlink.net; clark.bernier@rlw.com; rmccann@umich.edu; cmkehrin@ems-ca.com; e-recipient@caiso.com; grosenblum@caiso.com; rsmutny-jones@caiso.com; saeed.farrokhpay@ferc.gov; david@branchcomb.com; kenneth.swain@navigantconsulting.com; kdusel@navigantconsulting.com; gpickering@navigantconsulting.com; lpark@navigantconsulting.com; davidreynolds@ncpa.com; scott.tomashefsky@ncpa.com; ewolfe@resero.com; Audra.Hartmann@Dynegey.com; Bob.lucas@calobby.com;

curt.barry@iwpnews.com; danskopec@gmail.com; dseperas@calpine.com; dave@ppallc.com; dkk@eslawfirm.com; wynne@braunlegal.com; kgough@calpine.com; kellie.smith@sen.ca.gov; kdw@woodruff-expert-services.com; mwaugh@arb.ca.gov; pbarthol@energy.state.ca.us; pstoner@lgc.org; rachel@ceert.org; bernardo@braunlegal.com; steven@lipmanconsulting.com; steven@iepa.com; wtsat@arb.ca.gov; etiedemann@kmtg.com; ltenhope@energy.state.ca.us; bushinskyj@pewclimate.org; lmh@eslawfirm.com; obartho@smud.org; bbeebe@smud.org; bpurewal@water.ca.gov; dmacmull@water.ca.gov; kmills@cfbf.com; karen@klindh.com; ehadley@reupower.com; Anne-Marie_Madison@TransAlta.com; sas@a-klaw.com; egw@a-klaw.com; akelly@climatetrust.org; alan.comnes@nrgenergy.com; kyle.silon@ecosecurities.com; californiadockets@pacificorp.com; Philip.H.Carver@state.or.us; samuel.r.sadler@state.or.us; lisa.c.schwartz@state.or.us; cbreidenich@yahoo.com; dws@r-c-s-inc.com; jesus.arredondo@nrgenergy.com; charlie.blair@delta-ee.com; Tom.Elgie@powerex.com; clarence.binninger@doj.ca.gov; david.zonana@doj.ca.gov; agc@cpuc.ca.gov; aeg@cpuc.ca.gov; blm@cpuc.ca.gov; cfl@cpuc.ca.gov; cft@cpuc.ca.gov; tam@cpuc.ca.gov; dsh@cpuc.ca.gov; edm@cpuc.ca.gov; cpe@cpuc.ca.gov; hym@cpuc.ca.gov; hsl@cpuc.ca.gov; jm3@cpuc.ca.gov; jnm@cpuc.ca.gov; jbf@cpuc.ca.gov; jkl@cpuc.ca.gov; jst@cpuc.ca.gov; jtp@cpuc.ca.gov; jol@cpuc.ca.gov; jci@cpuc.ca.gov; jf2@cpuc.ca.gov; krd@cpuc.ca.gov; lrm@cpuc.ca.gov; ltt@cpuc.ca.gov; mjd@cpuc.ca.gov; ner@cpuc.ca.gov; pw1@cpuc.ca.gov; psp@cpuc.ca.gov; pzs@cpuc.ca.gov; rmm@cpuc.ca.gov; ram@cpuc.ca.gov; smk@cpuc.ca.gov; sgm@cpuc.ca.gov; svn@cpuc.ca.gov; scr@cpuc.ca.gov; tcx@cpuc.ca.gov; ken.alex@doj.ca.gov; ken.alex@doj.ca.gov; bdicapo@caiso.com; jsanders@caiso.com; jgill@caiso.com; ppettingill@caiso.com; mscheibl@arb.ca.gov; jdoll@arb.ca.gov; pburmich@arb.ca.gov; bblevins@energy.state.ca.us; dmetz@energy.state.ca.us; deborah.slom@doj.ca.gov; dks@cpuc.ca.gov; kgriffin@energy.state.ca.us; ldecarlo@energy.state.ca.us; mpryor@energy.state.ca.us; mgarcia@arb.ca.gov; pduvair@energy.state.ca.us; wsm@cpuc.ca.gov; hurlock@water.ca.gov; hcronin@water.ca.gov; rmiller@energy.state.ca.us

VIA U.S. MAIL:

Downey Brand LLP
Sacramento Municipal
555 Capitol Mall, 10th Floor
Sacramento, CA 95814-4686

Matthew Most
Edison Mission Marketing & Trading, Inc.
160 Federal Street
Boston, MA 02110-1776

Thomas McCabe
Edison Mission Energy
18101 Von Karman Avenue, Suite 1700
Irvine, CA 92612

Karen Edson
151 Blue Ravine Road
Folsom, CA 95630

Mary McDonald
Director of State Affairs
California Independent System Operator
CAISO
151 Blue Ravine Road
Folsom, CA 95630