

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



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Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the California
Solar Initiative, the Self-Generation Incentive
Program and Other Distributed Generation
Issues

Rulemaking 06-03-004
(Filed March 2, 2006)

COMMENTS OF DEBENHAM ENERGY, LLC

Donald C. Liddell
DOUGLASS & LIDDELL
2928 2nd Avenue
San Diego, California 92103
Telephone: (619) 993-9096
Facsimile: (619) 296-4662
Email: liddell@energyattorney.com

Counsel for
DEBENHAM ENERGY, LLC

February 22, 2008

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

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar Initiative,
the Self-Generation Incentive Program and Other
Distributed Generation Issues

Rulemaking 06-03-004
(Filed March 2, 2006)

COMMENTS OF DEBENHAM ENERGY, LLC

Pursuant to Rule 14.3 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Debenham Energy, LLC (“Debenham”) submits these comments in response to Administrative Law Judge (“ALJ”) Dorothy Duda’s February 14, 2008 “Ruling Requesting Comments on the Amended Petition for Modification of Decision 04-12-045” (“Ruling”).

I. INTRODUCTION.

These comments respond first, and primarily, to the ALJ’s specific question that relates to the FuelCell Energy Amended Petition for Modification of D.04-12-045¹ (“Amended Petition”). As invited by the ALJ, they also briefly address the related Motion for Leave to File Confidential Material Under Seal and for Protective Order filed on February 8, 2008, by FuelCell Energy (“Confidentiality Motion”). ALJ Duda posed the following specific question:

“Given the current record in this proceeding, should the Commission consider increasing the cap on incentives in SGIP from 1 MW to 3 MW for all renewable technologies (i.e. wind and fuel cells) or limit this change to renewable fuel cells?” (Ruling, page 1).²

¹ Decision 04-12-045, issued December 16, 2004, established a physical size limit of 5 MW, but limited eligibility for incentive payments to 1 MW.

² AB 2778 (Lieber) enacted in 2006 amended California Public Utilities (“P.U.”) Code Section 379.6 to limit technologies eligible for the SGIP to fuel cells and wind turbines. The statute does not limit fuel cells to those that are fueled by renewable energy resources, but Debenham’s comments are limited to the ALJ’s question and the Amended Petition.

Of course, any response to the ALJ's question necessarily invites discussion of the substance of the Amended Petition, and Debenham does so in these comments. The ALJ'S invitation to address the Confidentiality Motion can be, and is, addressed separately. The Short answer to the ALJ's question is "yes." Debenham's view, completely independent of the policy question of increasing the cap, is that the Commission should deny FuelCell Energy's Confidentiality Motion in any event for the reasons set forth below.

II. DISCUSSION.

A. Reasons for Increasing the Cap for Wind.

As stated above, the short answer to the Question of whether or not the cap should be increased from 1 MW to 3 MW is unequivocally "yes." The reasons for Debenham's answer that wind technologies merit equal treatment to that requested by FuelCell Energy are twofold. The first reason is based in turn on two technical and financial premises that apply to wind technology for on-site generation of electricity in distributed generation ("DG") applications: (a) the fundamental nature of wind technology is that it is intermittent. This means that wind needs a higher cap for technology-specific reasons that are completely unrelated to those claimed by FuelCell Energy,³ and (b) the prevailing business circumstances of the wind turbine market have evolved considerably since the Commission last addressed the question of whether or not the incentive cap should be raised (D.04-12-045). The second reason relates to fundamental fairness and adherence to the apparent intent of the legislature and the Commission that fuel cells and wind (and no other DG technologies) should share equally in the benefits of the SGIP beginning in 2008. If the Commission decides to consider the Amended Petition, Debenham asks that the Commission take care to include safeguards that ensure that half of the funds allocated to the utilities under the SGIP are made available to wind technology and half to any other eligible technologies.⁴

³ Again, Debenham makes no comment on claims made by FuelCell Energy in the Amended Petition and the Confidentiality Motion, or in the original Petition for Modification filed by FuelCell Energy.

⁴ The Commission has recently approved a 2008 Budget of \$83 million for the SGIP. As stated in Conclusion of Law Number 4 that "SGIP funds should be equally available to all eligible technologies," D.08-01-029, issued January 31, 2008.

There is an economically viable, yet underserved, niche market for large and economical wind turbines in DG applications.⁵ This niche market includes, for example, industrial mines and cement plants in remote locations suitable for large turbines. Although this is the same technology as conventional large wind farm projects, most industrial customers want to see ‘someone else’ in the industry go first to prove out the concept. SGIP funding for larger DG projects will justify the investment for obtaining permits and measuring the wind resource. However, the Commission’s ability to spur greater market potential through the vehicle of the SGIP has been severely limited since the inception due to the SGIP size limit of 1 MW on all technologies that were based solely on the operating characteristics designed to be favorable to photovoltaic technology. The intermittent nature of wind technology constrained by sizing assumptions favorable to photovoltaics put a nearly complete damper on wind participation in the SGIP that has become increasingly clear over time. Photovoltaic technology does not have the benefits of economies of scale like wind, as shown in Attachment A.⁶ Additionally, the initial 1 MW size limit did not anticipate the fact that most wind turbine manufacturers would discontinue manufacturing turbines of 1 MW over the intervening years in order to focus on the industry trend of using wind turbines of turbines sized at greater than 2 MW. The 1 MW SGIP size limit has thus had the (presumably unintended) consequence of stifling the ability of the SGIP to incent the DG wind market for commercial and industrial customers to invest in on-site DG using wind technology due to a mistaken sizing assumption and unanticipated changes in turbine supply.

Of course the wind electricity generation industry has grown, and continues to grow exponentially, but this niche wind DG market will never be able to take advantage of the SGIP to grow in step without a sizing policy that reflects the attributes of wind technology, not photovoltaic technology. The 1 MW size limit was intentionally based on the variability of photovoltaic technology. Wind is far more variable, or intermittent, and this should be factored in when setting policy. The Statewide SGIP database lists only six projects using utility-scale

⁵ Owners of industrial facilities with large loads in remote areas that are interested in DG wind are awaiting the resolution of the problem of matching SGIP funding eligibility with current technical and economic realities of developing DG wind projects.

⁶ Power output increases with the square of the rotor diameter (swept area). Cost increases at less than the square of rotor diameter. Attachment A shows the increase in turbine size over 20 years.

wind turbines as shown in Attachment B.⁷ The SGIP should reflect the realities of the current wind turbine marketplace, and Debenham asks that the Commission take the procedural opportunity presented by the Amended Petition to help achieve that goal.

B. Equitable Application of the Cap.

If the Commission decides to consider increasing the cap on incentive payments for the two remaining technologies that are included in the SGIP from 1 MW to 3 MW per project then the cap should be increased for wind technologies at the same time. This is fair and reasonable for the same reasons that the Commission articulated in its Proposed Decision (“PD”) issued on January 15, 2008, that would deny the original Petition related solely to fuel cell technologies. The Commission reasoned in the PD that fuel cell technology should not be allowed to effectively preempt smaller wind projects from competing for a chance at a fair share of the SGIP budget as follows:

“We will deny FCE’s petition because it does not contain information to persuade us that incentives of more than \$4.5 million are necessary to any one project. Moreover, we remain concerned that without this cap, a few projects could deplete a program administrator’s entire annual budget. San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) have annual SGIP budgets of \$11 million and \$8 million respectively. If we raised the maximum subsidy to individual projects to \$13.5 million, as FCE suggests, this could limit the ability of either SDG&E or SoCalGas to fund more than one DG project in a given year.” (Mimeo, pp. 8-9).

That such an outcome is fair and reasonable was strongly suggested by an October 26, 2007, ruling requesting comments on the 2008 SGIP budget that proposed *inter alia*: “SGIP funds would be equally available to wind and fuel cell projects.” The ALJ’s proposal was explicitly embraced by the Commission on January 31, 2008, in D.08-01-029, as follows:

“SGIP funds should be equally available to all eligible technologies (i.e. wind and fuel cell projects), but in conformance with previous Commission guidance in D.01-03-073 regarding allocation of incentive funds between

⁷ These projects all reflect special circumstances such as public ownership or indifference to cost. One project is listed as Completed, three as Reserved, one as Advancement and one as Under Review according to Statewide SGIP Data (updated January 2008) set forth in Attachment B.

renewable and non-renewable incentive categories.” [footnote deleted and emphasis added]. (Mimeo, page 6).⁸

Presumably, any carry-over funds remaining from prior budget years would be equitably allocated, and Debenham trusts that the Commission will give the SGIP program administrators ample guidance to assure this outcome.

C. Confidentiality Motion.

Debenham need not, and does not comment on the merits of any claims made by FuelCell Energy in the Confidentiality Motion, in part because there is no way to tell if material proposed by FuelCell Energy to be redacted is meaningful in any way. Since the purpose of the SGIP is to advance development of environmentally favored technologies, neither the statute nor the Program Handbook contain any provision for prohibiting disclosure of information that is relevant to any aspect of the SGIP. If only for that reason, the Confidentiality Motion should be denied because FuelCell Energy has failed to make the faintest effort to state any valid legal reason that the Confidentiality Motion should be granted. First, there is no basis (or even reason stated) for restricting disclosure “for a minimum of 60 days (or for any period of time) after the effective date of a ruling or adjudication of the Motion.”

The Confidentiality Motion inexplicably argues that the primary (but completely inapposite) reason that it should be granted is a provision of the P.U. Code that relates to utility procurement plans that “would place a utility at an unfair disadvantage.” Although it is characterized as an “additional” reason for protection from disclosure, the reference in the Confidentiality Motion to the Public Records Act (Government Code Section 6250, *et seq.*) is on point. However, the Confidentiality Motion neglects taking the next required step by identifying the potentially applicable provision of law that arguably provides the necessary privilege from disclosure.

There are very clear requirements in Government Code Section 6254(k) and Evidence Code Section 1060 that must be supported by substantial evidence in order to restrict disclosure

⁸The Commission also made the following explicit statement: “Any unspent SGIP non-PV funds from prior budget years shall carry over into 2008 and beyond and be available for SGIP project funding until the end of the SGIP or until further Commission order. Unspent non-PV funds include funds from non-PV applications that have dropped out or withdrawn from the program. The program administrators should keep records of all carryover funds and the budget year from which those funds originated. Carryover of funds from PV projects that have dropped out or withdrawn should be handled in the manner described in D.06-12-033.” (Mimeo, page 6).

of trade secrets, but they are not mentioned in the Confidentiality Motion at all. Instead, the Confidentiality Motion asserts that information that FuelCell Energy “normally keeps confidential” (Motion, page 3) and that the information is “known only by *certain* FCE employees” (Motion, page 3). The only support claimed for granting the Confidentiality Motion (at page 1) is the statement in the Declaration of Jeff Cox attached to the Amended Petition that “the information is proprietary and sensitive.” (Declaration of Jeff Cox, Numbered paragraph 8). For the foregoing reasons, Debenham Energy submits that it would simply be a bad precedent in administration of the SGIP to grant the Confidentially Motion.

III. CONCLUSION.

For the reasons set forth above, the Commission should only consider approving the Amended Petition if it is made very clear that wind technologies will be afforded equal benefits. The Commission should also, if it decides to consider the Amended Petition, adopt safeguards and give clear direction to the utilities and SGIP program administrators that any funds that are, have been, or may in the future, be budgeted for the SGIP should be divided equally between wind and fuel cell technologies going forward. Finally, the Commission should deny the Confidentiality Motion because there is no basis in the SGIP, applicable law, or Commission policy suggesting that it should be granted.

Respectfully submitted,

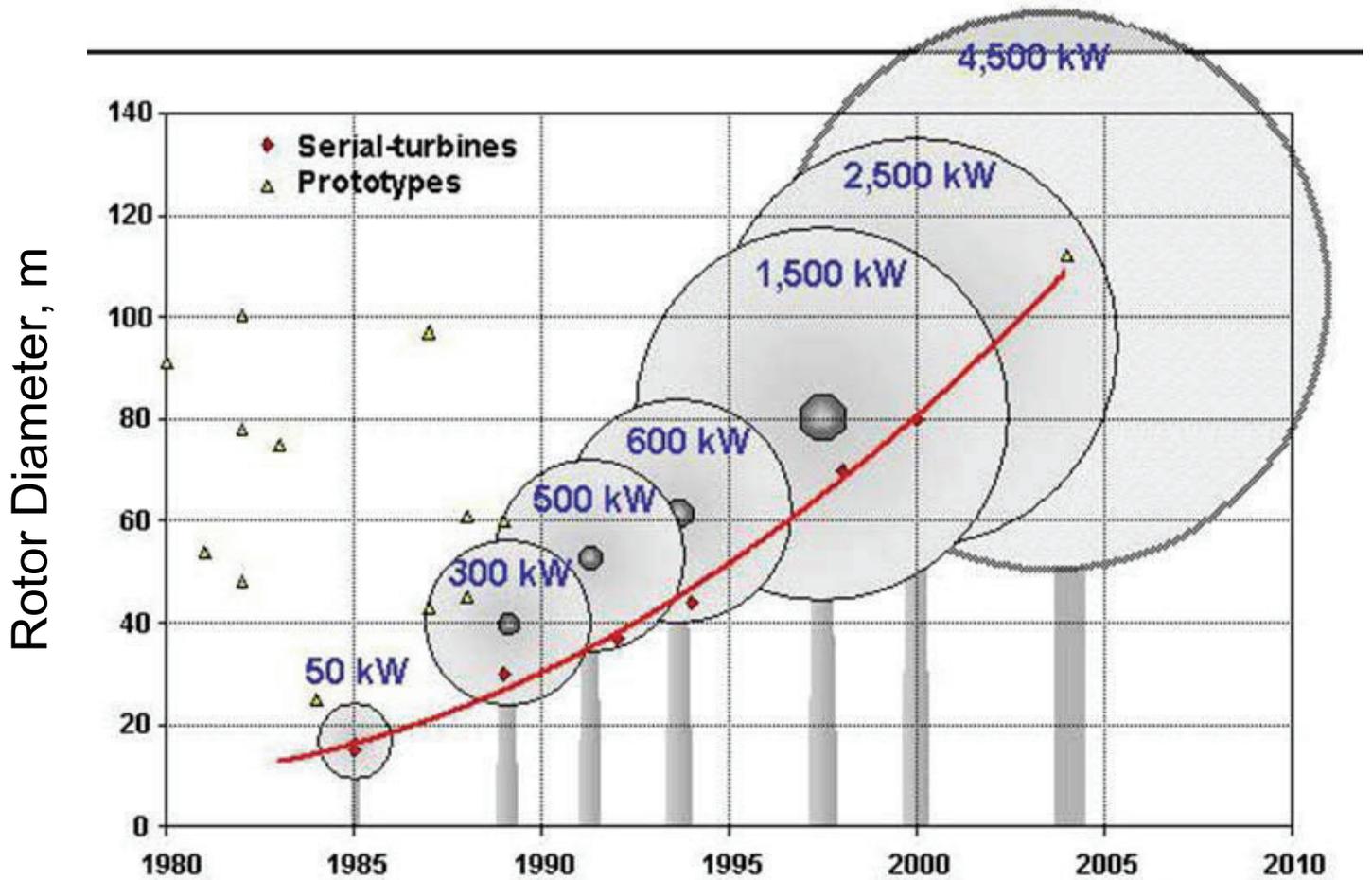


Donald C. Liddell
DOUGLASS & LIDDELL
2928 2nd Avenue
San Diego, California 92103
Telephone: (619) 993-9096
Facsimile: (619) 296-4662
Email: liddell@energyattorney.com

Counsel for
DEBENHAM ENERGY, LLC

Date: February 22, 2007

Attachment A



Most turbine manufactures have discontinued production of turbines 1 MW and smaller. Economics substantially favor larger turbines.

Attachment B

Self-Generation Incentive Program Data & Reports

[Statewide Self-Generation Incentive Program Data](#)
(updated January 2008, 1.3 MB XLS)



Project Status Legend

Under Review - Funding available, Program Administrator is screening for eligibility.
Reserved - Project has received a Conditional Reservation.
Advancement - Project has met Proof of Project Advancement & received Confirmed Reservation.
Pending Payment - Incentive Claim has been submitted to Program Administrator.
Completed - Incentive has been paid.
Wait List - Funding is not available; Project has been screened as eligible for funding.

Summary Chart by Technology

Technology	Project Count	MW Total	Incentive Dollars
Photovoltaics	1021	173.266	\$ 550,181,322.59
Fuel Cells - Ren	18	15.769	\$ 65,539,999.00
Fuel Cells - Non-Ren	21	10.401	\$ 24,557,173.87
Wind Turbine	6	4.700	\$ 5,980,671.00
IC Engines - Ren	24	13.823	\$ 12,738,659.92
IC Engines - Non-Ren	273	172.258	\$ 95,743,548.79
Microturbines - Ren	24	5.034	\$ 6,234,749.60
Microturbines - Non-Ren	129	23.886	\$ 19,396,580.95
Gas Turbines - Ren	1	0.750	\$ 600,000.00
Gas Turbines - Non-Ren	11	30.088	\$ 7,364,285.40
Total	1528	449.975	\$ 788,336,991.12

Summary Chart by Status

Status	Project Count	MW Total	Incentive Dollars
Under Review	63	41.938	\$ 29,291,900.00
Reserved	77	37.605	\$ 73,719,900.00
Advancement	195	70.228	\$ 143,530,697.23
Pending Payment	55	22.117	\$ 35,105,084.80
Completed	1138	278.086	\$ 506,689,409.09

SGIP Administrator	Incentive Level (1, 2, or 3)	System Type	Fuel Type	Status	System Capacity (kW)	Project Developer/	Date Received	Date Incentive Paid
PG&E	2	Wind Turbine		Reserved	500.000	Renewable Energy	05/14/2007	
PG&E	2	Wind Turbine		Reserved	225.000	Morita Construction	12/04/2007	
SCE	1	Wind Turbine		Completed	875.000	Black & Veatch	09/17/2003	03/23/2005
SCE	2	Wind Turbine		Advancement	600.000	Brownco Constructi	07/24/2006	
SCE	2	Wind Turbine		Reserved	1000.000		08/08/2007	
SCE	2	Wind Turbine		Under Review	1500.000		12/31/2007	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Comments of Debenham Energy, LLC* on all parties of record in proceeding *R.06-03-004* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on February 22, 2008, at Woodland Hills, California.



Michelle Dangott

SERVICE LIST

R.06-03-004

david.kopans@fatspaniel.com
jeff@grosolar.com
tim@drakerlabs.com
Michael.Brown@utcpower.com
keith.mccrea@sablaws.com
info@solarpathfinder.com
manjusuri@yahoo.com
lglover@solidsolar.com
spatrick@sempra.com
hchoy@isd.co.la.ca.us
npedersen@hanmor.com
bob@energydynamix.net
mmazur@3phasesRenewables.com
susan.munves@smgov.net
mluevano@globalgreen.org
ph@phatmedia.com
steve@energyinnovations.com
djamison@capstoneturbine.com
douglass@energyattorney.com
akbar.jazayeri@sce.com
amber.dean@sce.com
annette.gilliam@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
kirk@NoElectricBill.com
gbeck@etfinancial.com
rod.larson@sbcglobal.net
dhardy@cabrilloedc.org
legislative@recsolar.com
shallin@recsolar.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
ebrussell@suntechamerica.com
arno@recurrentenergy.com
bcragg@goodinmacbride.com
enriqueg@lif.org
jsqueri@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
cp@kacosolar.com
bk7@pge.com
grant.kolling@cityofpaloalto.org
lex@consumercal.org
anewman@solarcity.com
gopal@recolteenergy.com
info@calseia.org
jharris@volkerlaw.com
svolker@volkerlaw.com
LMerry@vervesolar.com
elarsen@rcmdigesters.com
gmorris@emf.net
robertg@greenlining.org
thaliag@greenlining.org
pucservice@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
johnredding@earthlink.net
michaelkyes@sbcglobal.net
vschwent@sbcglobal.net
cmkehrein@ems-ca.com
jjensen@kirkwood.com
meganmmyers@yahoo.com
glw@eslawfirm.com
janmcfar@sonic.net
jluckhardt@downeybrand.com
j.marston@suntechnics.com
cte@eslawfirm.com
lmh@eslawfirm.com
kmills@cbbf.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
john.schuster@utcpower.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@sppc.com
robert.pettinato@ladwp.com
cfaber@semprautilities.com
Marshall.Taylor@dlapiper.com
joel.davidson@sbcglobal.net
akawnov@yahoo.com
david@nemtzwow.com
tbardacke@globalgreen.org
ron@reenergy.com
sendo@ci.pasadena.ca.us
slins@ci.glendale.ca.us
thamilton5@charter.net
Jose.atilio@gmail.com
David.Townley@townleytech.com
bjeider@ci.burbank.ca.us
Javier.Burgos@sce.com
mponceatty@aol.com
mkay@aqmd.gov
Case.Admin@sce.com
james.lehrer@sce.com
mike.montoya@sce.com
paul.kubasek@sce.com

jwmctarnaghan@duanemorris.com
placourciere@thelen.com
rishii@aesc-inc.com
yonah@powerbreathing.com
lwrazen@sempraglobal.com
liddell@energyattorney.com
mshames@ucan.org
jim@dshsolar.com
rob@teamryno.com
usdepic@gmail.com
scottanders@sandiego.edu
cmanson@semprautilities.com
cmanzuk@semprautilities.com
jennifer.porter@energycenter.org
john.sup@energycenter.org
jon.bonk-vasko@energycenter.org
sephra.ninow@energycenter.org
bautistafaith@yahoo.com
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
hgreen@sunedison.com
johnperlin@physics.ucsb.edu
jlanderos@proteusinc.org
lfultz@sbcglobal.net
mjwms@calwes.com
mstout@unlimited-energy.com
cbressanitanko@rsgrp.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
nes@a-klaw.com
sdhilton@stoel.com
david.felix@mmarenew.com
abonds@thelen.com
scott.son@newresourcebank.com
kfox@wsgr.com
lauren.purnell@pge-corp.com
LATc@pge.com
matt.scullin@newresourcebank.com
SGraham@navigantconsulting.com
S2B9@pge.com

ksoares@usc.edu
www@eslawfirm.com
joshdavidson@dwt.com
vprabhakaran@goodinmacbride.com
sara@solaralliance.org
jhamrin@resource-solutions.org
CLHs@pge.com
jwwd@pge.com
paul@tiogaenergy.com
ben@solarcity.com
jpigott@optisolar.com
cpucsolar@rahus.org
tomhoff@clean-power.com
andy.vanhorn@vhcenergy.com
sandidgeo@aol.com
sewayland@comcast.net
sbeserra@sbcglobal.net
josephhenri@hotmail.com
pthompson@summitblue.com
dietrichlaw2@earthlink.net
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
ken.krich@ucop.edu
ciece@ucop.edu
mrw@mrwassoc.com
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
rhwisner@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

Robert.F.LeMoine@sce.com
jyamagata@semprautilities.com
barbara@earthskysolar.com
sberlin@mccarthylaw.com
njfolly@tid.org
nick@npcsolar.com
rob@dcpower-systems.com
janh@pacpower.biz
rmccann@umich.edu
demorse@omsoft.com
saeed.farrokhpay@ferc.gov
kenneth.swain@navigantconsulting.com
kdusel@navigantconsulting.com
gpickering@navigantconsulting.com
lpark@navigantconsulting.com
scott.tomashefsky@ncpa.com
george@utilityconservationservices.com
karly@solardevelop.com
bernadette@environmentcalifornia.org
dcarroll@downeybrand.com
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
abcstatelobbyist@sbcglobal.net
karen@klingdh.com
Tenorio@sunset.net
jmaskrey@sopogy.com
deb@a-klaw.com
cathie.allen@pacificcorp.com
kyle.l.davis@pacificcorp.com
George.Simons@itron.com
patrick.lilly@itron.com
arr@cpuc.ca.gov
as2@cpuc.ca.gov
aes@cpuc.ca.gov
tam@cpuc.ca.gov
css@cpuc.ca.gov
dsh@cpuc.ca.gov
dot@cpuc.ca.gov
eah@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

CEM@newsdata.com
jwiedman@goodinmacbride.com
nao@cpuc.ca.gov
pw1@cpuc.ca.gov
psd@cpuc.ca.gov
rl4@cpuc.ca.gov
tdp@cpuc.ca.gov

bstewart@solarcraft.com
Elizabeth.Ferris@spgsolar.com
edward.randolph@asm.ca.gov
pnarvand@energy.state.ca.us
rberke@csd.ca.gov
smiller@energy.state.ca.us
zca@cpuc.ca.gov

mts@cpuc.ca.gov
nlc@cpuc.ca.gov
gyee@arb.ca.gov
brd@cpuc.ca.gov
dks@cpuc.ca.gov
mscheibl@arb.ca.gov
ppetillingill@caiso.com