

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Order Instituting Investigation on the Commission's own motion into the operations, practices, and conduct of Contractors Strategies Group, Inc., Intella II, Inc., A&M Communications, TNT Financial Services, Limo Services, Inc., Calnev Communications, Inc., 1st Capital Source Funding & Financial Services, Inc., and their owners to determine whether Respondents violated the laws, rules and regulations of this State regarding the connection of Automatic Dialing-Announcing Devices to Customer-Owned Pay Telephones.

Investigation 10-02-004
(Filed February 4, 2010)

**MOTION OF THE CONSUMER PROTECTION AND SAFETY
DIVISION'S FOR SUMMARY ADJUDICATION AS TO THE FACTS
REGARDING LIABILITY; MOTION TO FOREGO HEARINGS AND
PROCEED TO BRIEFING THE REMAINING LEGAL ISSUES**

I. INTRODUCTION

Pursuant to the Commission's Rule 11.1, the Consumer Protection and Safety Division ("CPSD") hereby moves for summary adjudication with respect to the issue of whether Respondents violated Pub. Util. Code Sections 2872-2875.5.¹ Summary adjudication should be granted in favor of CPSD because there are no triable issues of material fact and judgment may be rendered as a matter of law.

¹ All references to sections are to the Public Utilities Code, unless otherwise specified.

In the underlying Order Instituting Investigation (“OII”), the Commission ordered Respondents to appear and show cause why the Commission should not impose penalties and refunds on Respondents for their unlawful use of automatic dialing-announcing devices (“ADADs”). Though Respondents were given the opportunity to present testimony to defend their case, they failed to do so. Without any testimony or other evidence refuting any of CPSD’s allegations that Respondents violated Sections 2872-2875.5, Respondents failed to raise any triable issue of material fact regarding their liability. Therefore, the Commission may enter summary adjudication with regards to the following issue from Ordering Paragraph 1, namely whether:

- a) Respondents violated PU Code Sections 2871-2875.5 by unlawfully connecting and operating automatic dialing-announcing devices to a telephone line in California.

CPSD requests that the Commission summarily adjudicate this issue in the affirmative and admit CSPD’s Testimony served on June 7, 2010, into evidence, which conclusively forms the basis for liability. CPSD further requests that the Commission forego the evidentiary hearing set for July 21-22, 2010. The purpose of evidentiary hearings is to resolve disputed facts. Here, there are none. Thus in the interest of judicial economy, CPSD requests that the remaining legal issues regarding penalties and restitution be addressed in briefs.

II. PROCEDURAL BACKGROUND

On February 9, 2010 the Commission ordered a formal investigation, I.10-02-004, into the operations, practices, and conduct of Respondents and their owners for alleged violations of Pub. Util. Code Sections 2872-2875.5. In the Order Instituting Investigation (“OII”) I.10-02-004, the Commission found that Respondents connected ADADs to their customer-owned pay telephone (“COPT”) lines and programmed the ADADs to make calls to toll-free numbers for no legitimate business purpose. Respondents’ sole purpose was to collect a Federal Communications Commission (“FCC”) mandated fee for

payphone service providers, known as dial-around compensation (“DAC”).² Consequently, the OII ordered Respondents to show cause why the Commission should not order Respondents to permanently cease and desist the practice of using ADADs, why the Commission should not order Respondents to refund and/or forfeit the DAC revenue generated by Respondents’ payphones, and why Respondents should not be penalized for utilizing ADADs on their COPT lines in violation of California laws and Commission rules and regulations.³

On May 5, 2010, the Administrative Law Judge held a Prehearing Conference, where CPSD and Respondents attended and discussed the procedural schedule and scope of the evidentiary hearing. On May 24, 2010, the Assigned Commissioner issued a ruling and scoping memo that set forth the schedule, issues, and procedural requirements for the proceeding. CPSD’s opening testimony was due and served on June 7, 2010, with Rebuttal testimony from Respondents due June 28, 2010 and CPSD’s Reply Testimony due July 6, 2010. No further discovery or requests for Alternate Dispute Resolution would be permitted after July 2, 2010. An evidentiary hearing was set for July 21-22, 2010.

CPSD timely served its Opening Testimony on June 7, 2010. The ALJ granted Respondents additional time to serve Rebuttal Testimony by July 2, 2010. Respondents did not serve any Rebuttal Testimony or offer any other type of evidence to refute CPSD’s testimony. On June 29, 2010, Mr. Freeman moved to dismiss the case claiming that the Commission’s enforcement action is barred by the one-year statute of limitations in Code of Civil Procedure section 340.⁴ On June 30, 2010, CPSD timely filed and served an opposition to the motion to dismiss on the ground that the statute of limitations contained in the Code of Civil Procedure does not apply to administrative actions. On July 1, 2010, Mr. Freeman brought another motion to dismiss the case, arguing the

² OII at 15-16.

³ OII at 17, Ordering Paragraph (O.P.) 17.

⁴ While Mr. Freeman filed the motion to dismiss on June 16, 2010, he did not properly serve the parties
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applicability of the statute of limitations under Pub. Util. Code section 736 and the inapplicability of section 734, such that the Commission should “dismiss the allegations of a violation of Public Utilities Code § 734.”⁵ On July 14, 2010, CPSD timely filed and served an opposition to Mr. Freeman’s second motion to dismiss on the grounds that section 736 does not apply to Commission enforcement actions and that CPSD did not allege a cause of action under section 734, as that section pertains to remedies available to individuals who have brought a complaint case against a public utility. These motions are currently under consideration by the Commission.

CPSD notes that it has reached full settlement of the allegations contained in the OII with Respondents Intella II, Inc., Limo Services Inc., and TNT Financial Services.⁶

III. DISCUSSION

A. Order To Show Cause

The Commission has viewed an order to show cause as “a citation to a party to appear at a stated time and place to show cause why the requested relief should not be granted.” I.02-03-023, 2002 Cal. PUC LEXIS 208, 11 (March 21, 2002), *citing Difani v. Riverside County Oil Co.* 201 Cal. 210, 213-214 (Cal. 1927), *confirmed* by D.02-09-004, 2002 Cal. PUC LEXIS 525. In an order to show cause proceeding, the burden is on the respondent to show good cause why the proposed legal action should not go forward. *Id.*

In the OII, the Commission ordered Respondents to appear and show cause why the Commission: a) should not order Respondents to permanently cease and desist the practice of using ADADs; b) should not order Respondents to refund and/or forfeit the DAC revenue generated by Respondents’ payphones; and c) should not penalize

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until June 29, 2010.

⁵ Freeman Motion to Dismiss, at 1, filed July 1, 2010.

⁶ CPSD’s Motion for Summary Adjudication pertains to all Respondents because the settlements have not yet been approved by the Commission.

Respondents for utilizing ADADs on their COPT lines.⁷ In effect, this order placed the burden on Respondents to present some kind of defense to the OII's preliminary findings against Respondents.

Respondents could have presented evidence showing that they did not violate any laws; or that penalties should not be imposed because of mitigating factors, for example. Respondents' could also have disputed CPSD's evidence presented in its Staff Report. However, they presented nothing in their defense. Moreover, at the Prehearing Conference on May 5, 2010, Respondents indicated that they did not dispute the substance of the allegations.⁸

As a result, the Commission may summarily adjudicate the facts and enter a decision as a matter of law because there are no disputed material facts at issue in this proceeding.

B. The Legal Standard For Commission Consideration Of A Motion For Summary Judgment Or Adjudication

When considering motions for summary judgment or summary adjudication, the Commission has looked to the legal standards of Rule 11.2 (motions to dismiss) of the Commission's Rules of Practice and Procedure and Code of Civil Procedure § 437c(c) (motions for summary judgment) as guidance. D.02-04-051, 2002 Cal. PUC LEXIS 275, 8; see also D.07-01-004, 2007 Cal. PUC LEXIS 8.

Rule 11.2 (previously Rule 56) governs motions to dismiss based on pleadings, stating that they must be made no later than five days before the first day of hearing. The Commission has explained that the purpose of such a motion is "to permit 'determination before hearing whether there are any triable issues as to any material fact.' "

D.02-04-051, 2002 Cal. PUC LEXIS 275, 10, *citing Westcom Long Distance Inc. v. Pacific Bell et al.* D.94-04-082, (1994) 54 CPUC 2d 244, 249. A second purpose of a Rule 11.2 motion to dismiss is that 'it promotes and protects the administration of justice

⁷ OII at 17, O.P. 2.

⁸ PHC Transcript, p.9:17-26.

and expedites litigation by the elimination of needless trials.’ *Ibid.* As these purposes are similar to the purposes of a motion for summary judgment under Code of Civil Procedure § 437c(c), the Commission has applied the legal standards of that section to motions for summary judgment or summary adjudication. D.02-04-051, 2002 Cal. PUC LEXIS 275, 8; *see also* D.07-01-004, 2007 Cal. PUC LEXIS 8.

Code of Civil Procedure § 437c(c) states in relevant part:

The motion for summary judgment shall be granted if all the papers submitted show that there is no triable issue as to any material fact and that the moving party is entitled to judgment as a matter of law. In determining whether the papers show that there is no triable issue as to any material fact the court shall consider all of the evidence set forth in the papers . . . and all inferences reasonably deducible from the evidence, except summary judgment shall not be granted by the court based on inferences reasonably deducible from the evidence, if contradicted by other inferences or evidence, which raise a triable issue as to any material fact.

“[D]eclarations and evidence offered in opposition to the motion must be liberally construed, while the moving party’s evidence must be construed strictly, in determining the existences of a ‘triable issue’ of fact. D.02-04-051, 2002 Cal. PUC LEXIS 275, 10, *citing Sprecher v. Adamson Companies* (1981) 30 C3d 358, 373.

These clear standards can and should be applied to CPSD’s motion for summary adjudication in the instant proceeding. The evidence presented by CPSD, through the Testimony of Kenneth Bruno, demonstrates that CPSD is entitled to a summary adjudication of its allegations against Respondents.

1. There Are No Triable Issues Of Material Fact With Respect To Respondents’ Liability Under Public Utilities Code Sections 2872-2875.5

The Commission made a preliminary determination that Respondents violated Sections 2872-2875.5 based on the evidence contained in Staff’s Report.² The OII ordered Respondents to show cause why Respondents should not refund and/or forfeit the

DAC revenue generated from Respondents' illegal use of ADADs, as well as to show cause why Respondents should not be penalized for their illegal activities. However, Respondents failed to proffer any proof by way of testimony or other evidence to rebut any of the facts contained in CPSD's Testimony¹⁰ which provides the factual basis for Respondents' liability under Sections 2872-2875.5. Therefore, the pleadings demonstrate that there is no triable issue as to any material fact regarding Respondents' violation of Sections 2872-2875.5 and CPSD is entitled to summary adjudication as a matter of law on that issue.

CPSD's Testimony demonstrates the underlying, undisputed facts. As shown in the Testimony of Kenneth Bruno, the Commission can issue a ruling that finds Respondents violated Sections 2872-2875.5 based on the following undisputed facts:

- The Federal Communications Commission has a compensation plan, known as dial-around compensation ("DAC") which compensates all payphone service providers \$.494 for every toll free call completed on the payphone service provider's payphone line.¹¹
- G-Five, LLC ("G-Five") provides Dial-Around services for Pay Telephone Providers, which means that G-Five collects monies from carriers and remits monies to Pay Telephone Providers when end user customers call toll free numbers from the Pay Telephone Provider's payphone line. G-Five handled the Dial-Around services for all Respondents at all times.¹²
- CPSD's investigation of Respondents was initiated by an informal complaint filed by G-Five concerning unusual call activity with respect to DAC generated by Respondents' customer owned pay telephone ("COPT") lines.¹³
- An average normal payphone generates anywhere from \$40 to \$50 of dial around compensation per quarter.¹⁴

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⁹ OII at 15-16.

¹⁰ CPSD's Testimony of Kenneth Bruno, served on June 7, 2010, incorporated the Staff Report in its entirety.

¹¹ Testimony of Kenneth Bruno, Staff Report at 5.

¹² *Id.* at 15, Appendix J (Declaration of Robert J. Berg).

¹³ *Id.* at 15.

- Respondents CSGI, Intella II, Limo Services, and TNT were averaging DAC in the 4th Quarter 2007 ranging from \$1,500 to \$5,651 per COPT line.¹⁵
- Normal payphone usage would include calls to 1-800-CALLATT or 1-800-COLLECT.¹⁶
- None of the calls placed over Respondents CSGI, Intella II, Limo Services, and TNT COPT lines were to 1-800-CALLATT or 1-800-COLLECT.¹⁷
- Alterber Tekulsky Freeman, aka Al Freeman, at all times owned and operated Respondents CALNEV Communications, Inc. (“CALNEV”), 1st Capital Source Funding & Financial Services, Inc. (“1st Capital”), and Contractor Strategies Group, Inc. (“CSGI”).¹⁸
- Al Freeman owns and operates Flat Rate Limos (Passenger ID PSG0023525) since May 2008. Mr. Freeman has worked in the Limousine business since 2000, owning and acting as director of various other limousine companies.¹⁹
- CALNEV ordered 200 COPT lines from SBC/AT&T and operated them in California between January 2002 and December 2005. G-Five’s records that were available showed CALNEV received \$47,274.51 in DAC revenue from 59 of those 200 lines. At least 553,847 toll free calls were placed from the 200 CALNEV COPT lines.²⁰
- 1st Capital ordered four COPT lines from SBC/AT&T and operated them in California between the years 2002-2004. 1st Capital received \$438.48 in DAC from these four lines.²¹

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¹⁴ *Ibid.*

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ *Ibid.*

¹⁸ *Id.* at 7-11.

¹⁹ *Id.* at 8, Appendix K (Al Freeman Data Request 2.0 Response, p.2)

²⁰ *Id.* at 10, 14, 16, 17.

²¹ *Id.* at 10-11.

- CSGI ordered twelve COPT lines from SBC/AT&T and operated them between April 13, 2007 and March 5, 2008. Two lines, registered solely to CSGI, were located at CSGI’s business address in San Jose, CA. Of the remaining 10 lines, CSGI co-registered 8 lines with Intella II, Inc. (“Intella II”) and placed them at 2188 San Diego Avenue, San Diego, California, the business address for Intella II, Inc. CSGI also co-registered 2 lines with Limo Services Inc. (“Limo Services”) and placed them at 11961 Francis Drive, San Jose, California.²²
- The twelve CSGI/Intella II/Limo Services COPT lines placed 385,326 calls to toll-free numbers. These calls generated \$73,138.12 in DAC; of this amount \$67,815.83 (plus any accrued interest) is currently held in an escrow account by Respondents’ billing aggregator, G-Five.²³
- Prior to ordering the COPT lines for CALNEV, 1st Capital, and CSGI, Al Freeman learned about how dial around compensation for payphone operators worked.²⁴
- Al Freeman ordered a single COPT line at first, collected some DAC money, saw it worked and then helped everyone else order their lines for them.²⁵
- A&M Communications (“A&M”) is an informal partnership between Al Freeman and Massimo Cavallaro.²⁶
- A&M ordered seven COPT lines from SBC/AT&T and operated them between July 2007 and April 25, 2008. Four lines were located at 3610 Bassett Street, Santa Clara, California, one of A&M’s business addresses. The other three lines were located at 775 Partridge Avenue, Menlo Park, California, A&M’s business address as well as Massimo Cavallaro’s personal address.²⁷
- The seven A&M COPT lines placed 118,417 calls to toll-free numbers. These calls generated \$25,041.85 in DAC revenue, of which \$24,829.92 (plus any accrued interest) is currently held in an escrow account by G-Five.²⁸

²² *Id.* at 8-10.

²³ *Id.* at 9.

²⁴ *Id.* at 21.

²⁵ *Id.* at 21, Attachment K (Al Freeman Data Request Response 1.0, CPUC Additional Information Letter, p.2)

²⁶ *Id.* at 11.

²⁷ *Ibid.*

²⁸ *Id.* at 14.

- Intella II, Inc. (“Intella II”) is an S-corporation organized and existing under the laws of Texas, with its principal place of business located at 2188 San Diego Avenue, Ste. P, San Diego, California 92110.²⁹
- Intella II co-registered with CSGI to operate the eight CSGI/Intella II COPT lines located at Intella II’s business address (2188 San Diego Avenue, San Diego, California).³⁰
- Limo Services Inc. (“Limo Services”) is a California corporation with its principal place of business located at 11961 Francis Drive, San Jose, California 95133 (the same address listed for CSGI). Limo Services currently operates as a Passenger Carrier and is registered with the Commission (ID number PSG0010184 and TCP number 10184-P). Barbara Quezada is listed as the C.E.O.³¹
- Limo Services ordered six COPT lines from SBC/AT&T and operated them at 11961 Francis Drive, San Jose, California, between August 20, 2007 and February 6, 2008. As described above, two of the six COPT lines were co-registered with CSGI. The four COPT lines solely operated by Limos Services placed 18,057 calls to toll free numbers. These calls generated \$6,002.10 in DAC, of which \$6002.10 (plus any accrued interest) is currently held in an escrow account by G-Five.³²
- TNT Financial Services is a business owned and operated by John and Norma Tomlinson, with its principal place of business located at 2723 Thoreau, Inglewood, California. TNT ordered one COPT line from SBC/AT&T and operated it at its business address between July 27, 2007 and January 14, 2008. TNT’s COPT line placed 24,467 calls to toll free numbers. These calls generated \$4,661.39 in DAC, of which \$4,545.79 (plus any accrued interest) is currently held in an escrow account by G-Five.³³
- On March 2, 2009, CPSD Staff submitted data requests to Respondents CSGI, Intella II, Limo Services, A&M, and TNT inquiring about the use of automatic dialing announcing devices (“ADADs”) to place calls over the twenty-four payphone lines operated by these Respondents. Al Freeman, owner of CSGI and a partner in A&M, responded on behalf of CSGI, Intella II, Limo Services,

²⁹ *Id.* at 11-12.

³⁰ *Ibid.*

³¹ *Id.* at 12.

³² *Ibid.*

³³ *Id.* at 12-13.

A&M, and TNT. Mr. Freeman stated that ADADs were used to dial 1-8xx-xxx-xxxx numbers from these Respondents' twenty- four COPT lines for the purpose of soliciting new business for a new telemarketing venture.³⁴

- On April 23, 2009, CPSD Staff submitted data requests to CALNEV and 1st Capital inquiring about the use of ADADs to place calls over the COPT lines operated by these Respondents. Al Freeman responded on behalf of these entities and stated that ADADs were used to market the services of 1st Capital.³⁵
- The ADADs Respondents used to place calls over their COPT lines disseminated a prerecorded message. A live person was not made available during any of those calls.³⁶
- Al Freeman prepared and installed the “telemarketing message” that was played on the ADADs connected to all Respondents' COPT lines.³⁷
- Al Freeman provided technical support to Respondents CSGI, Intella II, Limo Services, and TNT, acting as the liaison between the software and hardware equipment manufacturer for the ADADs.³⁸
- Al Freeman programmed the toll free numbers into the ADADs that were used to place calls over Respondents CSGI, Intella II, Limo Services, and TNT COPT lines.³⁹
- The call records for the COPT lines operated by Respondents CSGI, Intella II, Limo Services, and TNT show that the calls placed from these lines followed a sequential dialing pattern where the prefix numbers either ascended or descended with each call placed.⁴⁰
- Jose and Barbara Quezada of Limo Services, Massimo Cavallaro of A&M, and John and Norma Tomlinson of TNT Financial aided Mr. Freeman by providing

³⁴ *Id.* at 20-21.

³⁵ *Id.* at 22-23.

³⁶ *Id.* at 21, 23.

³⁷ *Ibid.*

³⁸ *Id.* at 21.

³⁹ *Id.* at 21.

⁴⁰ *Id.* at 18-19.

him with toll-free numbers of businesses found in 8xx directories, to program into the ADAD equipment.⁴¹

- Respondents did not have prior business relationships with the subscribers of the telephone numbers that were called from Respondents COPT lines through the use of ADADs.⁴²
- Subscribers of the telephone numbers that were called from Respondents COPT lines through the use of ADADs did not request such calls to be placed.⁴³
- Subscribers of the telephone numbers that were called from Respondents COPT lines through the use of ADADs did not consent to such calls pursuant to a prior agreement with Respondents.⁴⁴
- Respondents CSGI, Intella II, Limo Services, and TNT had the ADADs programmed to run almost 24 hours a day, Monday through Friday.⁴⁵
- Respondents did not receive approval to connect ADADs to their COPT lines from any telephone corporation within whose service area telephone calls through the use of ADADs were placed.⁴⁶
- After Respondents CSGI, Intella II, Limo Services, and TNT learned in January 2008 that G-Five was going to report Respondents suspicious activity to the Commission, they disconnected the COPT lines, got rid of the equipment, and disposed of all papers and files.⁴⁷

⁴¹ *Id.* at 21

⁴² *Ibid.*

⁴³ *Ibid.*

⁴⁴ *Ibid.*

⁴⁵ *Id.* at Appendix K (Al Freeman Data Request 1.0 Response, p. 3, Question 10), M (Jose and Barbara Quezada Data Request 1.0 Response, p. 2, Q.10).

⁴⁶ *Id.* at Appendices K, L, M, N, O.

⁴⁷ *Id.* at 22.

C. An Evidentiary Hearing Would Waste The Commission's And Parties' Resources As The Undisputed Facts Demonstrate Respondents' Liability Under Section 2872-2875.5 As A Matter Of Law

The purpose of evidentiary hearings is to resolve disputed facts. D.00-03-020, *mimeo*, at 11; 2000 Cal. PUC LEXIS 215. Here, there are no facts in dispute.

Respondents have completely failed in their obligation to present evidence to show cause why the Commission should not proceed with ordering penalties and refunds and/or forfeiture against Respondents for violating Sections 2872-2875.5. As the undisputed facts show, Respondents' own statements in their data request responses prove that they used ADADs to place toll-free calls over their COPT lines without complying with the various provisions of Sections 2872-2875.5. These statements form the primary basis of Respondents' violations.

Moreover, Respondents have presented no evidence upon which to support any mitigating circumstances relevant to the imposition of penalties. CPSD's pleadings provide the Commission with undisputed and sufficient evidence for the Commission to determine the appropriate penalties and remedies against Respondents. As these remaining issues are legal in nature, they can be appropriately addressed in briefs. Thus, to preserve judicial resources and avoid the time and expense of hearings, CPSD requests that the evidentiary hearing set for July 21-22, 2010 be taken off calendar and the Commission allow the parties to address the remaining legal issues in briefs.

IV. CONCLUSION

Respondents failed to carry their burden of proof to show cause why the Commission should not penalize them and order restitution for violating Public Utilities Code Sections 2872-2875.5. Respondents had the opportunity to defend their case, but decided not to present any evidence on their behalf or to rebut any of CPSD's evidence. Therefore, the undisputed facts demonstrate that Respondents violated Sections 2872-2875.5 because Respondents did not operate the ADAD equipment in the manner prescribed by law. As no triable issue of material fact exists as to Respondents' liability,

CPSD requests that the Commission find as a matter of law that Respondents violated PU Code Sections 2871-2875.5 by unlawfully connecting and operating automatic dialing-announcing devices to a telephone line in California. CPSD further requests that the evidentiary hearing set for July 21-22, 2010 be taken off calendar. Instead, the Commission should allow the parties to address the remaining legal issues concerning penalties and restitution in briefs.

Respectfully submitted,

/s/ HIEN C. VO

Hien C. Vo

Attorney for the Consumer Protection
& Safety Division

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-3651
Email: hcv@cpuc.ca.gov

July 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **MOTION OF THE CONSUMER PROTECTION AND SAFETY DIVISION'S FOR SUMMARY ADJUDICATION AS TO THE FACTS REGARDING LIABILITY; MOTION TO FOREGO HEARINGS AND PROCEED TO BRIEFING THE REMAINING LEGAL ISSUES** to the official service list in **I.10-02-004** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

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

Executed on **July 15, 2010** at San Francisco, California.

/s/ Joanne Lark
JOANNE LARK

SERVICE LIST
I.10-02-004

johntom6601@sbcglobal.net
paul@intella2.com
mlcavallaro@msn.com
tff@cpuc.ca.gov
mralfreeman@yahoo.com
mralfreeman@yahoo.com
mralfreeman@yahoo.com
barbquez@yahoo.com
MCS@cpuc.ca.gov
hcv@cpuc.ca.gov
jwh@cpuc.ca.gov
kab@cpuc.ca.gov
md2@cpuc.ca.gov
pwu@cpuc.ca.gov
rwc@cpuc.ca.gov
stl@cpuc.ca.gov