

DRAFT

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
I.D.# 8212
ENERGY DIVISION **RESOLUTION E-4220**
January 29, 2009

R E S O L U T I O N

Resolution E-4220. Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) are authorized to modify the trigger condition for the Base Interruptible Program (BIP).

By Advice Letter (AL) 3360-E filed on November 12, 2008 by PG&E, AL 2288-E filed on November 12, 2008 by SCE, and AL 2040-E filed on November 12, 2008 by SDG&E.

SUMMARY

This Resolution approves PG&E's, SCE's, and SDG&E's proposal to modify the BIP by adding a new trigger condition for the program: a Warning notice issued by the California Independent System Operator (CAISO) along with a determination by the CAISO that a Stage 1 emergency is imminent consistent with its operating procedure E-508B. Other triggers for the program will remain in effect, and no changes will be made to program incentives.

A one-time thirty day adjustment period is also authorized to give BIP participants the opportunity to adjust their Firm Service Level (FSL) or to opt-out of the program after they have been informed of the additional trigger condition.

The trigger condition change adopted here is an interim solution to a long-standing debate on how to best align emergency-triggered programs with CAISO operational practices. Further refinements to emergency-triggered programs are expected to occur in Phase 3 Order Instituting Rulemaking (OIR)¹.

¹ R.07-01-041

This resolution does not require a mandatory test event for BIP, but instead directs SCE to modify its BIP tariff to include an option to call a test event, consistent with PG&E's and SDG&E's BIP tariffs.

This Resolution also directs PG&E, SCE and SDG&E to make efforts to retain BIP participants in demand response programs, not just the BIP.

BACKGROUND

BIP is a demand response program that provides load reductions during emergency situations

The BIP is an emergency-triggered demand response program that the CAISO can dispatch for system emergencies, and the utilities (PG&E, SCE, and SDG&E) can dispatch for local emergencies to provide load relief. Customers enrolled in BIP receive incentive payments in exchange for committing to reduce their electrical usage to a contractually-established amount of kW, also called their Firm Service Level (FSL). Participants who fail to reduce their load to their FSL are subject to a financial penalty assessed on a kW per hour basis. Participants in the BIP program statewide are able to provide approximately 880 MWs of load drop in the event the program is triggered.

Currently, the BIP is triggered when the CAISO declares a Stage 2 Emergency (when operating reserves are less than 5 percent). CAISO has expressed opposition to current Commission policy that allows the utilities to count the BIP towards meeting their Resource Adequacy (RA) requirement on the grounds that BIP can only be called after an emergency has been declared, and thus do not contribute to the CAISO's operating reserve requirements. The utilities have asserted that BIP should continue to count for RA because it allows the utilities to avoid procuring additional generation capacity. Representatives of the large customers who participate in BIP have asserted that not counting BIP for RA will substantially reduce the incentives offered for the program, and thereby risk customer migration from the program and the loss of reliable MWs for emergencies. The issue of aligning emergency-triggered demand response programs (like BIP) with CAISO operational practices has been raised in the DR OIR Phase 3 Assigned Commissioner's Ruling dated July 18, 2008².

² <http://docs.cpuc.ca.gov/efile/RULC/85507.pdf>

The Utilities Propose to Trigger the BIP Prior to a Stage 1 Emergency

The utilities, the CAISO, and the large customer representatives - the California Manufacturers and Technology Association (CMTA) and the California Large Energy Consumers Association (CLECA) - met to discuss these issues and negotiate a revision to the BIP. The aforementioned parties reached an agreement to modify BIP by adding a new trigger condition: a Warning notice issued by the CAISO and when Stage 1 is imminent. Specifically the following steps would be followed for the new trigger:

- CAISO forecasts a Stage 1 emergency and issues a Warning.
- CAISO will then take all necessary steps to prevent the further degradation of its operating reserves as outlined in CAISO's emergency operating procedure E-508B.
- If CAISO still determines that a Stage 1 emergency is imminent, it may then dispatch the BIP resource.

To effectuate the new trigger conditions as outlined above, the utilities filed advice letters on November 12, 2008. The proposed changes in the tariff will effectively allow the CAISO to call BIP before a Stage 1 emergency once it has exhausted all other options to prevent further degradation of its operating reserves. The other triggering conditions for the BIP (local emergencies, Stage 2 alerts or test events) will remain. No change is proposed for the BIP incentive.

Upon approval of the BIP tariff modification, the utilities also proposed a one-time thirty day adjustment period to allow participants the opportunity to adjust their FSLs or to opt-out of the program. The utilities requested that this adjustment period (or opt-out window) commence 15 days after approval of the advice letter filings.

Upon the modification of BIP in accordance with the above proposal, CAISO has agreed to support the continued inclusion of BIP capacity as RA capacity. The aforementioned parties have also agreed to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive DR program during the 2010 to 2011 timeframe.

NOTICE

Notice of PG&E AL 3360-E, SCE AL 2288-E, and SDG&E AL 2040-E were made by publication in the Commission's Daily Calendar. PG&E, SCE and SDG&E state that a copy of its Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-B. The Utilities also notified the service lists of R.07-01-041 and A.08-06-001 et al. by email.

PROTESTS

Responses to PG&E's AL 3360-E and SCE's AL 2288-E were filed by EnerNOC, Inc (EnerNOC) on December 1, 2008. The CAISO filed comments on all three advice letters on December 2, 2008. Replies to EnerNOC's response were filed by PG&E on December 8, 2008 and by SCE on December 9, 2008.

DISCUSSION

The new BIP trigger will resolve CAISO's concern about counting BIP for RA purposes and should be approved.

CAISO and EnerNOC support the proposed BIP trigger condition as described above. The proposed BIP trigger will result in the CAISO counting BIP for RA purposes which is important because CAISO will then avoid procurement of redundant supply-side resources, at least for the time being. We appreciate the collaborative efforts among the parties and support the proposed additional BIP trigger condition. The new trigger is an interim solution, as the DR Phase 3 of the OIR³ will make final determinations regarding emergency-triggered demand response program policy and the ultimate design of these programs.

Requiring mandatory annual test events for BIP should be deferred to Phase 3 of R.07-01-041. SCE should however amend its BIP tariff so that it has the discretion to test its BIP program.

For both of PG&E's and SCE's BIP programs, EnerNOC encourages the Commission to require at least one test event per year because it will 1) increase the level of assurance that BIP resources are firm resources and should continue to qualify for RA purposes, 2) provide more information on how much actual

³ R.07-01-041

load reduction is likely to be available in the event of a real emergency, and 3) ensure that only performing customers remain in the program.

SCE argues that EnerNOC's request for annual testing is unnecessary because the program's performance in the past has proven BIP to be a reliable resource. SCE claims that it has already determined the likely load impact from BIP based on the difference between each participant's average maximum demand and their respective FSL given the fact that a financial penalty is applied if a participant fails to reduce load to their FSL. Based on two events that had occurred in the past, SCE states that its participants' compliance rates were 98.5 percent for August 25, 2005 and 96 percent for July 24, 2006. In addition, SCE also tests the Remote Terminal Unit notification devices and phone system on a monthly basis and believes this is sufficient enough to remind customers of their responsibility to perform.

In its reply comments, PG&E argued that it has the option to call up to two test events per year and believes that it should retain the flexibility to avoid calling a test event when an actual event had been called for that year.

Through a data request, Energy Division found out that in the last five years, PG&E and SDG&E operated the BIP three times while SCE triggered the program twice⁴. EnerNOC's position implies that triggering BIP on an average of once every other year is not enough to determine the firmness of the resource for either RA or day-to-day operational purposes. EnerNOC also believes that mandatory test events will ferret out customers who do not perform.

The issue of mandatory test events for the BIP program is a technical question (how many data points are considered sufficient to determine the firmness of a resource for RA and/or day-to-day operational needs) as well as a policy question (eg. does the absence of mandatory test events in IOU-operated DR programs impact the integration of emergency-triggered demand response with the CAISO's Market Redesign and Technology Upgrade (MRTU)?). Phase 3 of the Demand Response OIR (R.07-01-041) is the appropriate forum to further evaluate and vet this issue as that proceeding is reviewing our policies with respect to emergency-triggered demand response programs, their potential

⁴ Only one of the utility events noted here was a test event.

alignment with the CAISO's wholesale markets, and their design. Furthermore the advice letter process is limited to just the utilities and parties who have filed comments on the advice letters, and we believe formal input from other stakeholders would be appropriate. For example more information is needed from the CAISO as to what it believes is necessary to evaluate the firmness of these programs and if mandatory test events have an impact on MRTU integration. Therefore at this time, we decline to adopt a mandatory test event for the BIP program as recommended by EnerNOC, but we will take up this issue in Phase 3 of R.07-01-041.

Currently both PG&E and SDG&E have the discretion to call test events for BIP. SCE's BIP tariff does not provide a test event option. While we decline to adopt a mandatory annual test event for BIP at this time, we believe that SCE should have at least the discretion to test the program just as PG&E and SDG&E does. We will direct SCE to modify its BIP tariff so that it has the discretion to test the program.

The 30 day adjustment period is sufficient time for BIP customers to adjust their FSL or to opt-out of the program.

EnerNOC requested the proposed one-time 30-day adjustment period be changed from 30 days to 60 days, because 30 days is not sufficient time for all customers to make an informed decision. In its reply comments, PG&E and SCE argue that a period of 30 days, starting 15 days after final approval of the advice letter, is sufficient and is the standard norm. PG&E and SCE claim that customers have been notified that the proposed new trigger for BIP was being considered. We approve the one-time adjustment period for BIP customers to adjust their FSLs or opt-out of the program and we agree with the utilities that 30 days is a sufficient amount of time for BIP customers to understand the new trigger and make decisions on their participation in the program.

The Utilities should use the 30 day adjustment period to inform their BIP participants of other DR options.

EnerNOC takes issue with PG&E's statement that it "will make a strong effort to retain all customers in the (BIP) program" when it contacts participants about the trigger modification. EnerNOC argues that during the BIP opt-out period, PG&E should be focused on retaining customers in DR programs, not just in BIP. EnerNOC believes PG&E should devote its sales and service representatives to be indifferent as to whether an existing BIP customer stays in BIP, or join other PG&E DR programs such as Peak Choice, AMP contract portfolios, and etc. In

its reply comment, PG&E states that its primary goal is to retain existing customers in BIP and offer customers other DR options if customers feel BIP is not a viable option. We see the one-time adjustment period for BIP participants as an opportunity to inform these customers of other DR opportunities that may be better suited for them. While EnerNOC's recommendation was directed specifically at PG&E, we direct all three utilities to make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days of public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived or reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. The BIP is an emergency-triggered demand response program that the CAISO can dispatch for system emergencies, and the utilities (PG&E, SCE, and SDG&E) can dispatch for local emergencies to provide load relief.
2. Customers enrolled in BIP receive incentive payments in exchange for committing to reduce their electrical usage to a contractually-established amount of kW, also called their Firm Service Level (FSL).
3. The utilities propose to modify BIP by adding a new trigger condition: a Warning notice issued by the CAISO and when Stage 1 is imminent.
4. If the new BIP trigger is approved, CAISO has agreed to support the continued inclusion of BIP capacity as RA capacity.
5. The parties who support the new BIP trigger have also agreed to continue to engage in meaningful discussions to promote the voluntary transition of

large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive DR program during the 2010 to 2011 timeframe.

6. The proposed BIP trigger should be approved as it will result in the CAISO counting BIP for RA purposes which is important because CAISO will then avoid procurement of redundant supply-side resources.
7. The issue of requiring mandatory annual test events for BIP should be deferred to Phase 3 of R.07-01-041.
8. Unlike PG&E and SDG&E, SCE does not have the discretion to call a BIP test event.
9. SCE should modify its BIP tariff so that it has the discretion to test the program.
10. A 30 day adjustment period is sufficient time for BIP customers to adjust their FSL or to opt-out of the program.
11. The utilities shall make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.

THEREFORE IT IS ORDERED THAT:

1. The requests of Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric to add a new trigger condition for BIP as requested by Advice Letter 3360-E filed by PG&E, Advice Letter 2288-E filed by SCE, and Advice Letter 2040-E filed by SDG&E, are approved.
2. Southern California Edison shall modify its BIP tariff to include an option to call a test event at its discretion.
3. The utilities shall make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.
4. Southern California Edison shall file a supplemental advice letter in compliance with this resolution within 3 business days of the effective date of this resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 29, 2009; the following Commissioners voting favorably thereon:

Paul Clanon
Executive Director

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



I.D.# 8212
December 23, 2008

RESOLUTION E-4220
Commission Meeting Date: January 29, 2009

TO: PARTIES TO PG&E AL 3360-E; SCE AL 2288-E; SDG&E AL 2040-E; and
SERVICE LISTS FOR R.07-01-041 and A.08-06-001 et al.

Enclosed is draft Resolution Number E-4220 of the Energy Division. It is in response to PG&E AL 3360-E, SCE AL 2288-E, and SDG&E AL 2040-E and it will appear on the agenda at the next Commission meeting held 37 days after the date of this letter. The Commission may vote on this Resolution at that time or it may postpone a vote until a later meeting. When the Commission votes on a draft Resolution, it may adopt all or part of it as written, amend, modify or set it aside and prepare a different Resolution. Only when the Commission acts does the Resolution become binding on the parties.

All comments on the draft Resolution are due by **January 14, 2009**. Comments shall be served on parties, as outlined below.

1) An original and two copies, along with a certificate of service to:

Honesto Gatchalian
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Email: JNJ@cpuc.ca.gov

2) Parties described above (attached).

3) Dorris Lam

Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Email: DNL@cpuc.ca.gov

Comments shall be limited to five pages in length plus a subject index listing the recommended changes to the draft Resolution, a table of authorities and an appendix setting forth the proposed findings and ordering paragraphs.

Comments shall focus on factual, legal or technical errors in the proposed draft Resolution.

Replies to comments on the draft resolution may be filed (i.e., received by the Energy Division) on **January 20, 2009**, and shall be limited to identifying misrepresentations of law or fact contained in the comments of other parties. Replies shall not exceed five pages in length, and shall be filed and served as set forth above for comments.

Late submitted comments or replies will not be considered.

An accompanying declaration under penalty of perjury shall be submitted setting forth all the reasons for the late submission.

Please contact Dorris Lam at 415-703-5284 if you have questions or need assistance.

Sincerely,

Bruce Kaneshiro
Program Supervisor
Energy Division

Enclosure: Service List
Certificate of Service

CERTIFICATE OF SERVICE

I certify that I have by electronic mail this day served a true copy of Draft Resolution E-4220 on all parties on the service list for PG&E Advice Letter 3360-E; SCE Advice Letter 2288-E; SDG&E Advice Letter 2040-E; and Service List for R.07-01-041 and A.08-06-001 et al.; or their attorneys as shown on the attached list.

Dated December 23, 2008 at San Francisco, California.

Dorris Lam

NOTICE

Parties should notify the Energy Division, Public Utilities Commission, 505 Van Ness Avenue, Room 4002 San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the Resolution number on the service list on which your name appears.

Parties to PG&E Advice Letter 3360-E, SCE Advice Letter 2288-E; and SDG&E Advice Letter 2040-E

<p>Pacific Gas and Electric Company Attn: Brian K. Cherry Vice President, Regulatory Relations 77 Beale Street, Mail Code B10C P.O. Box 770000 San Francisco, CA 94177 FAX: (415) 973-7226 Email: PGETariffs@pge.com</p>	<p>EnerNOC, Inc. Attn: Richard H. Counihan Vice President Regulatory Affairs- Western Region 594 Howard Street, Suite 400 San Francisco, CA 94105 FAX: (415)227-1645 Email: rcounihan@enernoc.com</p>
<p>Southern California Edison Company Attn: Akbar Jazayeri Vice President of Regulatory Operations 2244 Walnut Grove Avenue Rosemead, CA 91770 FAX: (626) 302-4829 Email: AdviceTariffManager@sce.com</p>	<p>EnerNOC, Inc. Attn: Sara Steck Myers Attorney at Law 122 - 28th Avenue San Francisco, CA 94121 FAX: (415)387-1904 Email: ssmyers@att.net</p>
<p>Southern California Edison Company Attn: Bruce Foster Senior Vice President, Regulatory Affairs c/o Karyn Gansecki 601 Van Ness Avenue, Suite 2040 San Francisco, CA 94102 FAX: (415) 673-1116 Email: Karyn.Gansecki@sce.com</p>	<p>California Independent System Operator Corporation Attn: Baldassaro "Bill" Di Capo Counsel 151 Blue Ravine Road Folsom, California 95630 FAX: (916)608-7222 Email: bdicapo@caiso.com</p>
<p>San Diego Gas & Electric Company Attn: Todd Cahill Regulatory Tariff Manager 8330 Century Park Court, Room 32C San Diego, CA 92123-1548 FAX: (858)654-1788 Email: tcahill@semprautilities.com</p>	

Parties to A. 08-06-001 et al

spatrick@sempra.com	STEVEN D.	PATRICK
douglass@energyattorney.com	DANIEL W.	DOUGLASS
Stacie.Schaffer@sce.com	STACIE	SCHAFFER
liddell@energyattorney.com	DONALD C.	LIDDELL
ames_doug@yahoo.com	DOUGLAS A.	AMES
marcel@turn.org	MARCEL	HAWIGER
lms@cpuc.ca.gov	Lisa-Marie	Salvacion
magq@pge.com	MARY A.	GANDESBERY
epoole@adplaw.com	EDWARD G.	POOLE
bcragg@goodinmacbride.com	BRIAN T.	CRAGG
salleyoo@dwt.com	SALLE	YOO
ssmyers@att.net	SARA STECK	MYERS
wbooth@booth-law.com	WILLIAM H.	BOOTH
bdicapo@caiso.com	BALDASSARO	DI CAPO
cmkehrein@ems-ca.com	CAROLYN	KEHREIN
marie.pieniazek@cpowered.com	B.MARIE	PIENIAZEK
dara@ecsgrid.com	DARA	BILTEKOFF
dserio@ecsgrid.com	DENISE	SERIO
gesmith@ecsny.com	GLEN	SMITH
ptyno@ecsny.com	PAUL	TYNO
pmelton@energyconnect.com	PAM	MELTON
kjsimonsen@ems-ca.com	KEVIN J.	SIMONSEN
klatt@energyattorney.com	GREGORY	KLATT
case.admin@sce.com	CASE	ADMINISTRATION
janet.combs@sce.com	JANET	COMBS
Jennifer.Shigekawa@sce.com	JENNIFER	SHIGEKAWA
jyamagata@semprautilities.com	JOY C.	YAMAGATA
LWrazen@semprautilities.com	LINDA	WRAZEN
nprivitt@semprautilities.com	NANCY	PRIVITT
hvidstenj@kindermorgan.com	JOEL M.	HVIDSTEN
shawn_cox@kindermorgan.com	SHAWN	COX
mtierney-lloyd@enernoc.com	MONA	TIERNEY-LLOYD
pk@utilitycostmanagement.com	PAUL	KERKORIAN
jellis@resero.com	JACK	ELLIS
peter.maltbaek@cpowered.com	PETER	MALTBECK
tburke@sflower.org	THERESA	BURKE
hxag@pge.com	HELEN	ARRICK
jwwd@pge.com	JOSEPHINE	WU
rcounihan@enernoc.com	RICHARD H.	COUNIHAN
	STEVE	HAERTLE

4010@pacbell.net	STEVEN	MOSS
vprabhakaran@goodinmacbride.com	VIDHYA	PRABHAKARAN
judypau@dwt.com	JUDY	PAU
cem@newsdata.com		
saw0@pge.com	SHIRLEY A.	WOO
regrelcuccases@pge.com		
ewoychik@comverge.com	ERIC	WOYCHIK
mrw@mrwassoc.com		
mrw@mrwassoc.com		
cpucdockets@keyesandfox.com	DOCKET	COORDINATOR
rquattrini@energyconnectinc.com	RICH	QUATTRINI
tomk@mid.org	THOMAS S.	KIMBALL
joyw@mid.org	JOY A.	WARREN
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH
gayatri@jbsenergy.com	GAYATRI	SCHILBERG
jeff@jbsenergy.com	JEFF	NAHIGIAN
jgoodin@caiso.com	JOHN	GOODIN
mgillette@enernoc.com	MELANIE	GILLETTE
remmert@caiso.com	ROBERT	EMMERT
e-recipient@caiso.com		
rmettling@bluepointenergy.com	JAMES R.	METTLING
rliebert@cbbf.com	RONALD	LIEBERT
bschuman@pacific-crest.com	BENJAMIN	SCHUMAN
tylerb@poweritsolutions.com	TYLER J.	BERGAN
bsk@cpuc.ca.gov	Bruce	Kaneshiro
dbp@cpuc.ca.gov	David	Peck
dnl@cpuc.ca.gov	Dorris	Lam
hcf@cpuc.ca.gov	Hazlyn	Fortune
jc8@cpuc.ca.gov	Jennifer	Caron
jhe@cpuc.ca.gov	Jessica T.	Hecht
skg@cpuc.ca.gov	Sudheer	Gokhale
ys2@cpuc.ca.gov	Yuliya	Shmidt

Parties to R.07-01-041

sdebroff@rhoads-sinon.com	SCOTT H.	DEBROFF
keith.mccrea@sablaw.com	KEITH R.	MCCREA
	KEN	SKINNER
spatrick@sempra.com	STEVEN D.	PATRICK
klatt@energyattorney.com	GREGORY	KLATT
douglass@energyattorney.com	DANIEL W.	DOUGLASS
janet.combs@sce.com	JANET	COMBS
liddell@energyattorney.com	DONALD C.	LIDDELL
ames_doug@yahoo.com	DOUGLAS A.	AMES
jellis@resero.com	JACK	ELLIS
pmaltbaek@consumerpowerline.com	PETER	MALTBAEK
marcel@turn.org	MARCEL	HAWIGER
	MICHEL	
mflorio@turn.org	PETER	FLORIO
lms@cpuc.ca.gov	Lisa-Marie	Salvacion
nes@a-klaw.com	NORA	SHERIFF
cbaskette@enernoc.com	CARMEN	BASKETTE
saw0@pge.com	SHIRLEY	WOO
vprabhakaran@goodinmacbride.com	VIDHYA	PRABHAKARAN
jeffgray@dwt.com	JEFFREY P.	GRAY
irene@igc.org	IRENE K.	MOOSEN
ssmyers@att.net	SARA STECK	MYERS
l_brown369@yahoo.com	LYNNE	BROWN
wbooth@booth-law.com	WILLIAM H.	BOOTH
linda.sherif@calpine.com	LINDA Y.	SHERIF
eric@strategyi.com	ERIC C.	WOYCHIK
ja_boothe@yahoo.com	JAMES	BOOTHE
rquattrini@energyconnectinc.com	RICH	QUATTRINI
bhines@svlg.net	BOB	HINES
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH
bdicapo@caiso.com	BALDASSARO	DI CAPO, ESQ.
bdicapo@caiso.com	DI CAPO	BALDASSARO
rmettling@bluepointenergy.com	JAMES R.	METTLING
kmills@cfbf.com	KAREN N.	MILLS
clark.pierce@us.landisgyr.com	CLARK E.	PIERCE
nplanson@consumerpowerline.com	NICHOLAS J.	PLANSON
gesmith@ecsny.com	GLEN E.	SMITH
apetersen@rhoads-sinon.com	ALICIA R.	PETERSEN
miimo@rhoads-sinon.com	MONICA S.	IINO
CCole@currentgroup.com	CLINTON	COLE

stephen.baker@constellation.com	GRAYSON	HEFFNER
tcarlson@reliant.com	STEPHEN D.	BAKER
dviolette@summitblue.com	TRENT A.	CARLSON
kcooney@summitblue.com	DANIEL M.	VIOLETTE
sschare@summitblue.com	KEVIN	COONEY
barrettlarry@comcast.net	STUART	SCHARE
william.ross@constellation.com	LARRY B.	BARRETT
david@nemtzwow.com	WILLIAM D.	ROSS
david.reed@sce.com	DAVID	NEMTZOW
joyce.leung@sce.com	DAVID	REED
marian.brown@sce.com	JOYCE	LEUNG
mark.s.martinez@sce.com	MARIAN	BROWN
andrea.horwatt@sce.com	MARK S.	MARTINEZ
carl.silsbee@sce.com	ANDREA	HORWATT
Case.Admin@sce.com	CARL	SILSBEE
Jennifer.Shigekawa@sce.com	CASE	ADMINISTRATION
	JENNIFER	SHIGEKAWA
	KA-WING	
ka-wing.poon@sce.com	MAGGIE	POON
larry.cope@sce.com	LARRY R.	COPE
garwacrd@sce.com	RUSS	GARWACRD
Stacie.Schaffer@sce.com	STACIE	SCHAFFER
dwood8@cox.net	DON	WOOD
cfpena@sempra.com	CARLOS F.	PENA
jlaun@apogee.net	JOHN	LAUN
dbarker@semprautilities.com	DAVID	BARKER
jyamagata@semprautilities.com	JOY	YAMAGATA
ksmith2@semprautilities.com	KATHRYN	SMITH
LWrazen@semprautilities.com	LINDA	WRAZEN
CentralFiles@semprautilities.com		CENTRAL FILES
Dave.Hanna@itron.com	DAVE	HANNA
gayres@energycoalition.org	GEOFF	AYRES
	WARREN	MITCHELL
dwylie@aswengineering.com	DAVID M.	WYLIE, PE
hvidstenj@kindermorgan.com	JOEL M.	HVIDSTEN
shawn_cox@kindermorgan.com	SHAWN	COX
mtierney-lloyd@enernoc.com	MONA	TIERNEY-LLOYD
pk@utilitycostmanagement.com	PAUL	KERKORIAN
sue.mara@rtoadvisors.com	SUE	MARA
chris@emeter.com	CHRIS	KING
Paul.karr@trilliantnetworks.com	PAUL	KARR
sharon@emeter.com	SHARON	TALBOTT

theresa.mueller@sfgov.org	THERESA	MUELLER
mgm@cpuc.ca.gov	Massis	Galestan
tcr@cpuc.ca.gov	Thomas	Roberts
crmd@pge.com	CHARLES	MIDDLEKAUFF
srovetti@sfgwater.org	SANDRA	ROVETTI
tburke@sfgwater.org	THERESA	BURKE
dcengel@fscgroup.com	DANIEL C.	ENGEL
elaine.s.kwei@pjc.com	ELAINE S.	KWEI
filings@a-klaw.com	KAREN	TERRANOVA
snuller@ethree.com	SNULLER	PRICE
	STEVE	GEORGE
abonds@thelen.com	ASHLEE M.	BONDS
	BRUCE	PERLSTEIN
evk1@pge.com	EDWARD V.	KURZ
kea3@pge.com	KEN	ABREN
SRH1@pge.com	STEVEN R.	HAERTLE
4010@pacbell.net	STEVEN	MOSS
epoole@adplaw.com	EDWARD G.	POOLE
ahmad.faruqui@brattle.com	AHMAD	FARUQUI
	BRAD	MANUILOW
bcragg@goodinmacbride.com	BRIAN T.	CRAGG
joshdavidson@dwt.com	J. JOSHUA	DAVIDSON
bobgex@dwt.com	ROBERT	GEX
thuebner@icfi.com	TYLER	HUEBNER
salleyoo@dwt.com	SALLE E.	YOO
MAGq@pge.com	MARY A.	GANDESBERY
	LAW	
cpuccases@pge.com	DEPARTMENT	FILE ROOM
jwwd@pge.com	JOSEPHINE	WU
mrh2@pge.com	MARK	HUFFMAN
hxag@pge.com	HELEN	ARRICK
sem4@pge.com	SUSAN	MCNEILL
rwalther@pacbell.net	ROBIN J.	WALTHER, PH.D.
jchamberlin@strategicenergy.com	JENNIFER	CHAMBERLIN
Service@spurr.org	MICHAEL	ROCHMAN
cpjoe@gepllc.com	JOE	PRIJYANONDA
sean.beatty@mirant.com	SEAN P.	BEATTY
Patricia.R.Thompson@gmail.com	PATRICIA R.	THOMPSON
pthompson@summitblue.com	PATRICIA	THOMPSON
philha@astound.net	PHILIPPE	AUCLAIR
alex.kang@itron.com	ALEX	KANG
jody_london_consulting@earthlink.net	JODY S.	LONDON

ted@energy-solution.com	TED	POPE
mrw@mrwassoc.com		
cpucdockets@keyesandfox.com	DOCKET	COORDINATOR
rschmidt@bartlewells.com	REED V.	SCHMIDT
stevek@kromer.com	STEVE	KROMER
elvine@lbl.gov	EDWARD	VINE
glbarbose@lbl.gov	GALEN	BARBOSE
jcluboff@lmi.net	JAY	LUBOFF
agartner@energyconnectinc.com	ALAN	GARTNER
janreid@coastecon.com	L. JAN	REID
arg@enertechnologies.com	ALAN	GARTNER
jshields@ssjid.com	JEFF	SHIELDS
joyw@mid.org	JOY A.	WARREN
rogerv@mid.org	ROGER	VAN HOY
tomk@mid.org	THOMAS S.	KIMBALL
jweil@aglet.org	JAMES	WEIL
clark.bernier@rlw.com	CLARK	BERNIER
gayatri@jbsenergy.com	GAYATRI	SCHILBERG
jeff@jbsenergy.com	JEFF	NAHIGIAN
rmccann@umich.edu	RICHARD	MCCANN
demorse@omsoft.com	DAVID	MORSE
jgoodin@caiso.com	JOHN	GOODIN
mgillette@enernoc.com	MELANIE	GILLETTE
e-recipient@caiso.com		
mary.lynch@constellation.com	MARY	LYNCH
abb@eslawfirm.com	ANDREW B.	BROWN
dhungerf@energy.state.ca.us	DAVID	HUNGERFORD
msherida@energy.state.ca.us	MARGARET	SHERIDAN
bernardo@braunlegal.com	RYAN	BERNARDO
vwood@smud.org	VIKKI	WOOD
bboice02@yahoo.com	BARB	BOICE
karen@klindh.com	KAREN	LINDH
rogerl47@aol.com	ROGER	LEVY
sas@a-klaw.com	ANNIE	STANGE
bschuman@pacific-crest.com	BENJAMIN	SCHUMAN
laura.rooke@pgn.com	LAURA	ROOKE
jholmes@emi1.com	JENNIFER	HOLMES
tylerb@poweritsolutions.com	TYLER	BERGAN
dserio@ecsgrid.com	DENISE	SERIO
ag2@cpuc.ca.gov	Aloke	Gupta
agc@cpuc.ca.gov	Andrew	Campbell
bsk@cpuc.ca.gov	Bruce	Kaneshiro

cec@cpuc.ca.gov	Christopher	Clay
crv@cpuc.ca.gov	Christopher R	Villarreal
dnl@cpuc.ca.gov	Dorris	Lam
edd@cpuc.ca.gov	Elizabeth	Dorman
hcf@cpuc.ca.gov	Hazlyn	Fortune
jk1@cpuc.ca.gov	Jason R.	Salmi Klotz
jc8@cpuc.ca.gov	Jennifer	Caron
jhe@cpuc.ca.gov	Jessica T.	Hecht
joc@cpuc.ca.gov	Joe	Como
jym@cpuc.ca.gov	Joy	Morgenstern
mjd@cpuc.ca.gov	Matthew	Deal
wtr@cpuc.ca.gov	Rebecca	Tsai-Wei Lee
skg@cpuc.ca.gov	Sudheer	Gokhale
tjs@cpuc.ca.gov	Timothy J.	Sullivan
ys2@cpuc.ca.gov	Yuliya	Shmidt
claufenb@energy.state.ca.us	CLARE	LAUFENBERG