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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

Rulemaking 16-02-007

**AMENDED SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER
AND ADMINISTRATIVE LAW JUDGE**

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AMENDED SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE

Summary

This Scoping Memo sets forth the category, issues, need for hearing, schedule, and other matters necessary to scope this proceeding pursuant to Public Utilities Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure.¹ This proceeding is re-categorized to ratesetting, as discussed in Section 5 below. This ruling is appealable only as to categorization, pursuant to Rule 7.6.

1. Background

On February 11, 2016, the Commission issued this Rulemaking, designed to address the new integrated resources planning (IRP) requirements associated with Senate Bill (SB) 350 (DeLeón, 2015), as well as continue the Commission's work on long-term procurement planning (LTPP) policies previously addressed in Rulemaking (R.) 13-12-010.

The original Scoping Memo in this proceeding was issued May 26, 2016. Since then, there has been a great deal of activity in this proceeding, both informal and formal, including approximately 13 webinars, 8 workshops, 11 staff proposals, and thousands of pages of party comment. The scope thus far has been focused on implementation of Sections 454.51 and 454.52 of the Public Utilities Code.

The proceeding activities to date culminated in Decision (D.) 18-02-018, issued in February 2018, setting requirements for load-serving entities (LSEs) to file individual IRPs in 2018. The decision set a framework in which the IRP

¹ California Code of Regulations, Title 20, Division 1, Chapter 1; hereinafter, Rule or Rules.

process will be conducted in a two-year cycle, with the first year focused on high-level planning activities and the second year focused on individual LSE procurement proposals and authorizations. The first year in each cycle is expected to result in the adoption of a Reference System Plan based on Commission analysis and designed as a guide to meeting the greenhouse gas (GHG) target at the electricity system level. The second year of each cycle is designed to result in adoption of a Preferred System Plan, which is developed by taking into account the individual LSE IRPs and planned procurement, aggregated to ensure the GHG target for the electric sector is met with a reliable electric system at reasonable cost.

D.18-02-018 also adopted a recommendation for the California Air Resources Board (CARB) to establish an electricity sector GHG emissions target in 2030 of 42 million metric tons (MMT), established individual LSE GHG benchmarks, set a GHG Planning Price and a GHG Adder, adopted the first Reference System Portfolio associated with the GHG target, and required individual LSEs to file IRPs that adhered to the policy framework included in the decision.

Under the two-year planning framework for the 2017-2018 IRP cycle, D.18-02-018 represents the conclusion of the first planning year, which took approximately two years in this first cycle, because the overall framework also needed to be developed and then adopted. We expect to open a new rulemaking in early 2019 to begin the 2019-2020 IRP cycle.

2. Scope

Although this is an amended scoping memo, our intention is to continue to include in the scope of this proceeding any items that were included in the

original scope for the proceeding.² Though some topics, such as disadvantaged communities or customer cost and rate impacts, for example, are not specifically singled out in the amended scope below, we will continue to address these topics as issues arise in the proceeding.

At this time, we expect the portion of the scope we will focus on for the remainder of this proceeding to be divided into three categories of work:

1. Items required in preparation for the filing of individual LSE IRPs.
2. Consideration of individual IRPs, leading to adoption of the Preferred System Plan.
3. Groundwork and preparation on policy issues for consideration in the 2019-2020 IRP Cycle.

We discuss each of these categories in more detail in the sections below.

2.1 Items Required for Filing of Individual IRPs

This category of work involves finalizing any guidance or items needed prior to reviewing individual LSE IRPs, the filing of which is currently scheduled for August 1, 2018. Remaining tasks associated with items necessary to be finalized prior to the filing of the individual LSE IRPs includes:

- Assigning or updating individual LSE GHG Benchmarks, as well as associated load assignments, especially for new community choice aggregators (CCAs) which were not yet established or included in the 2017 Integrated Energy Policy Report (IEPR) load forecasts adopted by the California Energy Commission (CEC).
- Finalizing a GHG accounting method to assist in preparation of, and allow comparison across, individual LSE filings.

² See original Scoping Memo issued May 26, 2016 in R.16-02-007.

- Calibrating and vetting production cost modeling (PCM) based on the Reference System Portfolio adopted in D.18-02-018, but updated to be synchronized with the adopted 2017 IEPR and its assumptions.
- Revising PCM guidance based on the outcome of the PCM calibration and vetting exercise and feedback from parties, in preparation for PCM studies of the aggregated LSE IRPs to determine a Preferred System Plan (PSP).

For the first two items listed above, an Administrative Law Judge (ALJ) Ruling was issued April 3, 2018. We expect to issue a subsequent ruling finalizing those issues shortly.

For the third and fourth items in the list above, Commission staff expects to utilize the Modeling Advisory Group (MAG) and conduct workshops and webinars. Materials are being posted to the Commission's web site informally. We also expect to take formal comment on the PCM calibration and potentially give further direction in the form of a subsequent ruling.

In addition, a petition for modification of D.18-02-018 was filed in February 28, 2018 related to the direction for the procurement of replacement power for the Diablo Canyon Power Plant, the closure of which was ordered in D.18-01-022. Several parties have filed responses to the petition for modification. We expect to address the issues raised by the petition for modification, with respect to Diablo Canyon replacement power, in this portion of the proceeding.

2.2 Consideration of Individual LSE IRPs

Now that the overall IRP framework implementing Public Utilities Code Sections 454.51 and 454.52 has been adopted in this proceeding in D.18-02-018, the primary focus of this proceeding will shift to consideration of individual IRPs and the development of the PSP.

Once the individual LSE IRPs are filed, we expect to consider the following issues:

- Whether the individual LSE IRPs meet the requirements of SB 350 and D.18-02-018.
- Whether to approve or require modifications to the individual LSE IRP filings.
- Whether to select conforming portfolios or alternate / preferred portfolios filed by individual LSEs, to make up the PSP for the electric system.
- Whether the Commission needs to order specific procurement activities to implement and effectuate the individual IRPs.
- Whether the individual IRPs, when aggregated, result in an electricity system that is reliable and achievable at a reasonable cost.
- Whether there is a need to address longer-term local reliability needs of individual LSEs beyond those addressed in resource adequacy requirements.
- Whether the aggregated LSE IRPs result in any reliability or GHG shortfalls and, if so, how to attribute responsibility for closing the gaps.
- Approval of a Preferred System Plan that meets reliability requirements and the 2030 GHG target recommended by D.18-02-018 and/or established by CARB.
- Development of a Common Resource Valuation Methodology to assist in comparison between resource options or actual projects, to be compared during the procurement phase of activities, after individual IRPs and a PSP are approved.
- How any procurement proposed and approved as part of an individual IRP should be coordinated with any existing rules or guidelines specific to an individual electric resource area (e.g., energy efficiency, renewables, storage, etc.). This also encompasses any needed coordination across Commission proceedings associated with individual resource types.

To support answering the above questions, Commission staff plan to conduct PCM using the SERVIM model, as indicated in D.18-02-018. In addition, answering the above questions may require a formal evidentiary process with the LSEs and interested parties, or informal comments on various topics may suffice. In order to determine how to proceed with these issues, we expect to take an initial round of responses to the individual IRP filings from interested parties, and then determine how to proceed further thereafter. Section 4 below further delineates the anticipated approach and options for handling this portion of the proceeding.

2.3 Preparation for 2019-2020 IRP Cycle

In this portion of the proceeding, we intend to continue policy inquiry and development in support of the next cycle of IRP, beginning in 2019, and potentially beyond. Work in this portion of the proceeding can be categorized in the following manner:

- Modeling refinements to RESOLVE to support improved analysis for the 2019 Reference System Plan. These may include:
 - New functionality for optimizing certain distributed energy resources and capturing their locational value
 - Refreshed/improved assumptions on cost and potential, cost perspective, land-use constraints, etc., for all resource types
 - Modified assumptions about potential for retention and/or retirement of existing resources of all types, beyond planned retirements.
- Enhanced cross-sectoral analysis. This includes developing better estimation techniques for the cost of GHG reductions in other sectors relative to the electric sector options we are addressing in detail in this proceeding. This analysis may also include quantification of risks, including cost, technology, consumer acceptance, and resource

availability risks. Included in this cross-sectoral category are the following issues:

- Integrating into this proceeding combined heat and power (CHP) procurement activities currently underway and as last addressed in D.15-06-028, and improving the modeling treatment of CHP impacts in the electric and industrial sectors.
- Improved assumptions or scenarios for vehicle electrification, including estimates of GHG benefits and costs of achieving them.
- Development of assumptions or scenarios for building electrification, including beginning to evaluate feasibility of further policy formulation and implementation.
- Comparison to other strategies outside of the electric sector, such as biofuels options, to evaluate costs and risks.
- Evaluation criteria for selecting modeling platforms. This work is intended to inform IRP Cycles beginning in 2021 and not before, but part of this work in preparation for future cycles may involve beginning discussions at the MAG meetings to discuss model options, benchmarking against current assumptions, etc.

3. Respondents

The original Order Instituting Rulemaking in this proceeding included a list of respondents, including all LSEs registered with the Commission at that time. In the meantime, numerous new LSEs, including new CCAs, have been registered with the Commission. Attachment A includes an updated list of respondent LSEs as of the date of this Amended Scoping Memo and Ruling. Any new LSEs registered with the Commission during the pendency of this proceeding will automatically become respondents to this rulemaking by virtue of their being certified or approved to serve electric load in California. Any LSE

serving load in California is required to file an IRP, as further specified in D.18-02-018.

4. Schedule

The scope outlined in Section 2 above has three sets of activities, which are detailed in the schedule table below. While we will not divide this proceeding into tracks or phases, it is the case that the first two sets of activities will proceed roughly in sequence, while the third set related to laying the groundwork for policy examination in the 2019-2020 IRP cycle will be handled concurrently with the other two sets of activities and may be continued into a new rulemaking in 2019.

The table below gives the currently-known schedule of events. Other activities will likely occur that are not listed below; when those issues arise, we will schedule additional workshops, issue rulings, or take other appropriate actions to address those topics.

The assigned Commissioner or ALJ may modify this schedule as necessary to promote the efficient management and fair resolution of this proceeding.

Below is the calendar and sequencing (items in italics have already occurred):

Item	Date
Items Required for Individual IRP Filings	
<i>ALJ Ruling on GHG Accounting and finalizing individual GHG Benchmarks for some CCAs</i>	<i>April 3, 2018</i>
<i>Comments on GHG Accounting and Benchmarks</i>	<i>April 20, 2018</i>
<i>Reply comments on GHG Accounting and Benchmarks</i>	<i>April 30, 2018</i>
ALJ ruling finalizing GHG Accounting and GHG Benchmarks	May 18, 2018
Staff releases results of PCM calibration exercise with Reference System Plan and 2017 IEPR	July 2018
Comments on PCM calibration	August 2018
Proposed decision addressing petition for	August 2018

Item	Date
modification of D.18-02-018 related to Diablo Canyon closure	
Final PCM guidance, for evaluating sum of LSE plans and developing PSP, released by ALJ ruling	September 2018
Consideration of Individual LSE IRPs	
Individual LSE IRPs filed, per D.18-02-018	August 1, 2018
Commission staff host workshop where LSEs present key elements of their IRPs to other stakeholders	Early August 2018
Stakeholder comments filed and served, including requests for evidentiary hearings with contested factual issues identified	September 12, 2018
LSE responses to stakeholder comments filed and served	September 26, 2018
Commission staff conduct PCM to develop PSP	August - November 2018
Ruling issued addressing further proceeding process	Early October 2018
<i>Additional schedule if <u>no</u> hearings held</i>	
Ruling and staff proposal issued with proposed PSP and addressing key issues identified in individual IRP filings	November 2018
Comments on proposed PSP and key individual IRP issues	December 2018
Reply comments on proposed PSP and key individual IRP issues	December 2018
Proposed Decision addressing individual IRPs and PSP	January 2019
Final Commission decision on individual IRPs and PSP	February 2019
<i>Additional schedule if <u>hearings are</u> held</i>	
Prehearing Conference	October 17, 2018
Concurrent opening testimony served	November 7, 2018
Reply testimony served	November 21, 2018
Evidentiary Hearings	December 3- 14, 2018
Concurrent opening briefs	January 17, 2019
Reply briefs	February 1, 2019
Ruling and staff proposal issued with proposed PSP	December 2018

Item	Date
Comments on proposed PSP	January 2019
Reply comments on proposed PSP	February 2019
Proposed Decision addressing individual IRPs and PSP	March 2019
Final Commission decision on individual IRPs and PSP	April 2019
Preparation for 2019-2020 IRP Cycle	
Possible Modeling Advisory Group (MAG) meetings and/or workshops on electrification scenarios and cross-sectoral issues	Summer 2018
ALJ rulings with questions and/or staff proposals with recommendations TBD	Fall and Winter 2018
<i>Planned MAG meetings/webinars in support of all the above topics³</i>	
<i>In-person meeting</i>	<i>April 27, 2018</i>
In-person meeting	May 30, 2018
Webinar	June 29, 2018
Webinar	July 13, 2018
In-person meeting	August 10, 2018
Webinar	August 30, 2018
Webinar	September 28, 2018
In-person meeting	October 29, 2018
Webinar	November 29, 2018
In-person meeting	January 31, 2019
Webinar	February 22, 2019

It is the Commission's intent to complete this proceeding within 18 months of the date this Scoping Memo is issued. This deadline may be extended by order of the Commission. (Public Utilities Code § 1701.5(a).)

³ The dates for the Modeling Advisory Group meetings are included here for reference, but are subject to change. Commission staff will notify the service list with dates, times, and agendas in advance, and the meetings will be posted on the Daily Calendar. In-person MAG meetings will generally be held in San Francisco and scheduled to run 10 a.m. to 4 p.m. Webinars are generally scheduled 10 a.m. to noon.

5. Need for Evidentiary Hearing

The Commission in the Order Instituting Rulemaking preliminarily determined that hearings may be required, a designation that was maintained in the original Scoping Memo. While no hearings have yet been conducted in this proceeding, we expect that it is still possible that hearings may be needed. The Schedule in Section 4 above includes provisions for the scheduling of hearings. Further rulings from the assigned Commissioner and/or ALJ will be issued should hearings be determined to be necessary.

6. Categorization

The original Scoping Memo in this proceeding, issued May 26, 2016, categorized it as a quasi-legislative proceeding. However, since this proceeding will shortly become the venue for consideration of individual LSE IRPs, which may involve authorization for procurement of electricity resources leading to ratepayer expenditures, at least for some LSEs, this amended Scoping Memo re-categorizes the proceeding as ratesetting.

Anyone who decides to appeal the categorization of this rulemaking as ratesetting must file the appeal no later than ten days after the date of this scoping ruling. (*See* Rule 7.6.)

7. Ex Parte Communications

In a ratesetting proceeding such as this one, *ex parte* communications with the assigned Commissioner, other Commissioners, their advisors and the ALJ are only permitted as described at Public Utilities Code § 1701.3(h) and Article 8 of the Rules.

If there are workshops in this proceeding as anticipated, notices of such workshops will be posted on the Commission's Daily Calendar to inform the

public that a decision-maker or an advisor may be present at those meetings or workshops. Parties shall check the Daily Calendar regularly for such notices.

8. Assignment of Proceeding

Liane M. Randolph is the assigned Commissioner and Julie A. Fitch is the assigned ALJ. Pursuant to Public Utilities Code § 1701.3 and Rule 13.2, ALJ Julie A. Fitch is now designated as the Presiding Officer.

9. Service

Rule 1.10 requires service on the ALJ of both an electronic and a paper copy of filed or served documents. However, in this proceeding, unless otherwise directed, parties are requested to serve documents to the assigned ALJ and any Commissioner in electronic format only.

10. Electronic Submission and Format of Supporting Documents

Rule 13.7(f) requires exhibits be submitted as Supporting Documents using the Electronic Filing System on the Commission's website at <http://www.cpuc.ca.gov/PUC/efiling>.

11. Discovery

Discovery may be conducted by the parties consistent with Article 10 of the Commission's Rules. Any party issuing or responding to a discovery request shall serve a copy of the request or response simultaneously on all parties.

Electronic service under Rule 1.10 is sufficient, except Rule 1.10(e) does not apply to the service of discovery and discovery shall not be served on the AL.

Deadlines for responses may be determined by the parties. Motions to compel or limit discovery shall comply with Rule 11.3.

12. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or who has questions about the

electronic filing procedures is encouraged to obtain more information at <http://consumers.cpuc.ca.gov/pao> or contact the commission's Public Advisor at 866-849-8390 or 415-703-2074 or 866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

13. Settlement and Alternative Dispute Resolution

While the schedule does not include specific dates for settlement conferences it does not preclude parties from meeting at other times provided notice is given consistent with our Rules.

The Commission offers Alternative Dispute Resolution (ADR) services consisting of mediation, facilitation, or early neutral evaluation. Use of ADR services is voluntary, confidential, and at no cost to the parties. Trained ALJs serve as neutrals. The parties are encouraged to visit the Commission's ADR webpage at <http://www.cpuc.ca.gov/adr/>, for more information.

If requested, the assigned ALJ will refer this proceeding, or a portion of it, to the Commission's ADR Coordinator. Alternatively, the parties may contact the ADR Coordinator directly at adr_program@cpuc.ca.gov. The parties will be notified as soon as a neutral has been assigned; thereafter, the neutral will contact the parties to make pertinent scheduling and process arrangements. Alternatively, and at their own expense, the parties may agree to use outside ADR services.

IT IS RULED that:

1. The category of this proceeding is modified to be ratesetting. Appeals as to category, if any, must be filed and served within ten days from the date of this scoping memo.

2. The scope of the issues for the remainder of this proceeding is as stated in “Section 2. Scope” of this ruling, while incorporating any issues included in the original Scoping Memo for this proceeding issued May 26, 2016.

3. Hearings may be necessary.

4. The duration of this proceeding shall be 18 months from the date of this ruling.

5. The schedule for the proceeding is set in “Section 4. Schedule” of this ruling. The assigned Commissioner or Administrative Law Judge may adjust this schedule as necessary for efficient management and fair resolution of this proceeding.

6. Administrative Law Judge Julie A. Fitch is now designated as the Presiding Officer in this proceeding.

7. With limited exceptions that are subject to reporting requirements, *ex parte* communications are prohibited. (*See* Public Utilities Code § 1701.3(h); Article 8 of the Commission’s Rules of Practice and Procedure.)

Dated May 14, 2018, at San Francisco, California.

/s/ LIANE M. RANDOLPH

Liane M. Randolph
Assigned Commissioner

/s/ JULIE A. FITCH

Julie A. Fitch
Administrative Law Judge

ATTACHMENT A: LIST OF RESPONDENT LOAD SERVING ENTITIES

	LOAD SERVING ENTITY	Type	ADDRESS LINE 1	ADDR LINE 2	CITY	ST	ZIP	CONTACT EMAIL
1	Apple Valley Choice Energy	CCA						JMoon@applevalley.org
2	CleanPowerSF	CCA	525 Golden Gate Avenue		San Francisco	CA	94102	bhale@sfgwater.org
3	Desert Community Energy	CCA						kbarrows@cvag.org
4	East Bay Community Energy	CCA						SCabrera@ebce.org
5	King City CCA	CCA						kfoley@pilotpowergroup.com
6	Lancaster Choice Energy	CCA	44933 Fern Avenue		Lancaster	CA	93534	bboswell@cityoflancasterca.org
7	Los Angeles Community Choice	CCA						tbardacke@cleanpoweralliance.org
8	Marin Clean Energy	CCA	1125 Tamalpais Avenue		San Rafael	CA	94901	sswaroop@mcecleanenergy.org
9	Monterey Bay Community Power	CCA						tom.habashi@mbcommunitypower.org
10	Peninsula Clean Energy	CCA						jpepper@peninsulacleanenergy.com
11	Pico Rivera Innovative Municipal Energy	CCA						khernandez@pico-rivera.org
12	Pioneer Community Energy	CCA						iwindesh@placer.ca.gov
13	Rancho Mirage Energy Authority	CCA	69-825 Highway 111		Rancho Mirage	CA	92270	isaiah@ranchomirageca.gov
14	Redwood Coast Energy	CCA						rengel@redwoodenergy.org
15	San Jacinto Power	CCA	595 S. San Jacinto Ave.	Bldg. A	San Jacinto	CA	92583	citymanager@sanjacintoca.us
16	San Jose City	CCA						Julie.benabente@sanjoseca.gov
17	Silicon Valley Clean Energy	CCA						Don.eckert@svcleanenergy.org
18	Solana Energy Alliance	CCA						gwade@cosb.org
19	Sonoma Clean Power	CCA	50 Santa Rosa Ave	5th Floor	Santa Rosa	CA	95404	demerson@sonomacleanpower.org

	LOAD SERVING ENTITY	Type	ADDRESS LINE 1	ADDR LINE 2	CITY	ST	ZIP	CONTACT EMAIL
20	Valley Clean Energy Alliance	CCA						msears@cityofdavis.org
21	Anza Electric Cooperative Inc.	Co-op	58470 US Highway 371		Anza	CA	92539	kevins@anzaelectric.org
22	Plumas-Sierra Electrical Cooperative	Co-op	73233 State Route 70		Portola	CA	96122	bmarshall@psrec.coop
23	Surprise Valley Electrical Corp.	Co-op	516 US HWY 395 E		Alturas	CA	96101	janesvec@frontier.com
24	Valley Electric Association, Inc.	Co-op	800 E. Hwy 372		Pahrump	NV	89048	eschneider@vea.coop
25	3 Phases Renewables, LLC	ESP	1228 E. Grand Avenue		El Segundo	CA	90245	info@3phasesrenewables.com
26	Agera Energy, LLC	ESP	555 Pleasantville Road	S-107	Briarcliff Manor	NY	10510	customercare@ageraenergy.com
27	American Powernet Management	ESP	45 Commerce Drive		Wyomissing	PA	19610	lindaj@americanpowernet.com
28	Calpine Energy Solutions	ESP	401 West A Street	Suite 500	San Diego	CA	92101	Drake.welch@calpinesolutions.com
29	Calpine PowerAmerica-CA, LLC	ESP	717 Texas Street	Suite 1000	Houston	TX	77002	jarmenta@calpine.com
30	Commercial Energy of California	ESP	7677 Oakport Street	Suite 525	Oakland	CA	94621	patrick.vanbeek@commercialenergy.net
31	Constellation NewEnergy, Inc.	ESP	50 Oak Court	Suite 120	Danville	CA	94526	Jay.cattermole@constellation.com
32	Direct Energy Business	ESP	1001 Liberty Avenue		Pittsburgh	PA	15222	customerrelations@directenergy.com
33	EDF Industrial Power Services (CA), LLC	ESP	4700 W. Sam Houston Parkway N	Suite 250	Houston	TX	77041	byron.pollard@edftrading.com
34	Just Energy Solutions	ESP	5251 Westheimer Road	Suite 1000	Houston	TX	77056	ca_customerfeedback@justenergy.com
35	Pilot Power Group, Inc.	ESP	8910 University Center Lane	Suite 520	San Diego	CA	92122	regulatory@pilotpowergroup.com
36	Shell Energy	ESP	4445 Eastgate Mall	Suite 100	San Diego	CA	92121	marcie.milner@shell.com
37	The Regents of the	ESP	1111 Franklin Street	6th floor	Oakland	CA	94607	Mark.Byron@ucop.edu

	LOAD SERVING ENTITY	Type	ADDRESS LINE 1	ADDR LINE 2	CITY	ST	ZIP	CONTACT EMAIL
	University of California							
38	Tiger Natural Gas, Inc.	ESP	1422 E. 71 ST	Suite J	Tulsa	OK	74136	tphillips@tigernaturalgas.com
39	Pacific Gas & Electric Company	IOU	77 Beale Street	Room 3120, B30A	San Francisco	CA	94105	A1VB@pge.com
40	San Diego Gas & Electric Company	IOU	101 Ash Street	HQ-12	San Diego	CA	92101	amsmith@semprautilities.com
41	Southern California Edison Company	IOU	601 Van Ness Ave.	Suite 2030	San Francisco	CA	94102	dawn.anaiscourt@sce.com
42	Bear Valley Electric Service	SMJU	630 E. Foothill Blvd		San Dimas	CA	91773	Nguyen.Quan@gswater.com
43	Liberty Utilities	SMJU	701 National Ave.		Tahoe Vista	CA	96148	ken.wittman@libertyutilities.com
44	PacifiCorp	SMJU	825 NE Multnomah	Suite 2000	Portland	OR	97232	Cathie.Allen@Pacifcorp.com

(END OF ATTACHMENT A)