



SOUTHERN CALIFORNIA
EDISON

An EDISON INTERNATIONAL Company

Michael D. Montoya
Senior Attorney
Mike.Montoya@SCE.com

November 8, 2004

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: R.04-03-017

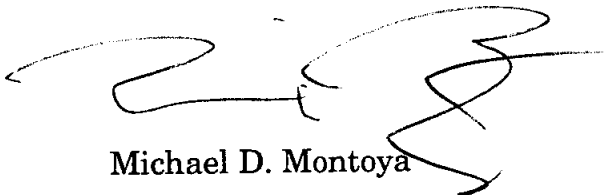
Dear Docket Clerk:

Enclosed for filing with the Commission are the original and five copies of the **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT ORDER TO MODIFY THE SELF GENERATION INCENTIVE PROGRAM AND IMPLEMENT ASSEMBLY BILL 1685** in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,



Michael D. Montoya

MDM:cr:LW043020025.doc

Enclosures

cc: All Parties of Record
President Michael R. Peevey
ALJ Kim Malcolm
(U 338-E)

04-DIST-GEN-1

DOCKET

03-IEP-1

DATE NOV 08 2004

RECD. NOV 09 2004

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

Order Instituting Rulemaking Regarding	)	
Policies, Procedures and Incentives for	)	RULEMAKING 04-03-017
Distributed Generation and Distributed	)	(Filed March 16, 2004)
Energy Resources.	)	
	)	CEC Docket No. 04-DIST-GEN-1
	)	and 03-IEP-1
	)	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON DRAFT ORDER TO MODIFY THE SELF GENERATION INCENTIVE
PROGRAM AND IMPLEMENT ASSEMBLY BILL 1685**

MICHAEL D. MONTOYA
AMBER E. DEAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6057
Facsimile: (626) 302-7740
E-mail: Mike.Montoya@SCE.com

Dated: November 8, 2004

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ON DRAFT ORDER TO MODIFY THE SELF GENERATION INCENTIVE
PROGRAM AND IMPLEMENT ASSEMBLY BILL 1685**

I.

INTRODUCTION

Pursuant to Article 19 of the Commission's Rules of Practice and Procedure, Southern California Edison Company (SCE) submits the following comments to the Draft Order to Modify the Self Generation Incentive Program and Implement Assembly Bill 1685 (the Draft).

As one of the administrators of the Self Generation Incentive Program (SGIP), SCE has been actively engaged in the day to day administration of this program and has experienced first hand the issues that form the underpinnings for the proposed modifications. Based on this experience, SCE certainly appreciates fully the need for program modifications, if those modifications in the end serve to ease administrative burdens and improve program operations. Thus, to ensure success, it is essential that each of the proposed modifications be fully developed

and articulated to allow for a seamless implementation. It is in this spirit that SCE offers the followings comments.

II.

COMMENTS

A. Incentive Level and Size Limits

Although the Draft acknowledges the time-consuming process of reviewing and evaluating project costs to determine whether the costs are eligible under the current incentive cap mechanism, the Draft takes only limited steps to address this problem. In Ordering Paragraph 1, the Draft proposes a reduction in the incentive for Level 1 (wind and solar) technologies to \$3.00 per watt and the elimination of the maximum percentage cap for wind and solar projects. The Draft, however, is silent as to any other incentive levels, except for the notation that the incentive payment of \$4.50 per watt for renewable fuel cells is retained along with the percentage cap. Presumably this means that the incentive structure (with the percentage cap) for Levels 2 and 3 will remain intact.

SCE supports the proposed modification for Level 1 solar technologies. The reduction to \$3.00 per watt and the elimination of the percentage cap is generally consistent with both the SGIP Working Group's and SCE's recommendations. SCE also generally supports the similar treatment afforded to Level 1 wind technologies under the Draft. SCE, however, must point out that the Draft is in error when it states that the Working Group supports a reduction in Level 1 incentives for wind to \$3.00 per watt.¹ In truth, both SCE and the Working Group recommended a

¹ See Draft, p. 5.

reduction in the incentive level for Level 1 wind technologies to \$1.50 per watt based on the average rebate amounts paid statewide for wind projects.²

Although the Commission is certainly free to stop at Level 1 technologies, SCE believes that the Commission should take this opportunity to also address the incentive structures for Levels 2 and 3. SCE, however, cautions that the Commission should not move to remove the percentage cap for Levels 2 and 3 unless and until it is prepared to reset the appropriate incentive amounts.

1. **The Commission Must Establish the Appropriate Dollar-Per-Watt Incentives Before Eliminating the Maximum Project Percentage Cap**

Should the Commission wish to also lift the maximum project percentage cap for Levels 2 and 3 it must also **simultaneously** adjust the dollar-per-watt payments to reflect the weighted average incentive payments for installed eligible equipment at each level. If the incentive levels are not adjusted, then the project incentive caps for Levels 2 and 3 should remain in place to protect against a customer receiving incentives that equal or exceed their full project costs.

Eliminating the percentage of project cost cap without making the necessary adjustments to the incentive levels could result in a significant and unintended windfall for owners and marketers of distributed generation systems. For example, if all previously paid incentives by SCE were recalculated such that the project percentage caps were removed from the incentive levels, the amount paid out would increase by 17% for Level 1, 76% for Level 3N, and 70% for Level 3R. Wind projects which cost an average of

² See the July 23, 2004 Comments of the SGIP Working Group, p. 7.

\$3.63 per watt would have received a windfall of 87 cents per watt (\$4.50 - \$3.63).

As reflected in the original incentive scheme and subsequent Commission decisions, it was never the intent of the Commission or the Legislature to subsidize a customer's entire cost of installing a generator. Rather, the purpose of the incentive program was to subsidize a portion of the total project costs:

“...the incentives were structured to subsidize a certain percentage of total project costs (i.e., 50%, 40%, 30% for Level 1, 2 and 3 respectively) subject to per-watt dollar limits on total subsidy costs. These limits were based on the average capital costs of the technologies within each category. For example, the per-watt limit for Level 1 was designed with projects that have average capital costs of \$9.00/watt in mind (i.e., \$4.50/watt divided by 50%).... Similarly, Level 2 incentives were designed for projects with costs of approximately \$6.25 / watt (i.e., \$2.50 divided by 40%), and level 3 incentives were designed for projects that cost about \$3.33 / watt (i.e., \$1.00 divided by 30%).”³

The basic purpose has not changed and should not be discarded simply because there is consensus to move towards a flat dollar-per-watt incentive scheme. The goal should still be to establish a dollar-per-watt incentive that allows a customer to defer **a reasonable percentage of the eligible project costs** consistent with the levels identified in D.01-03-073. This can be accomplished by reviewing the available eligible project cost data and recalibrating the incentive levels.

³ D.02-09-051, p. 11.

2. The Record Already Provides the Information Needed to Recalibrate Levels 2 and 3 Incentives

Should the Commission wish to lift the percentage cap for Levels 2 and 3, the information needed to recalibrate the incentive payments is already available as part of the record in this proceeding. In response to the ALJ's July 9, 2004 Ruling Soliciting Comments on the Energy Division's Recommendations to Improve the Self Generation Incentive Program, both SCE and the SGIP Working Group provided revised incentive amounts for each technology level, based in part on the average for all completed projects in the SGIP program and data from the SGIP Third Year Impacts Assessment Report. The following table, reflecting both the Working Group's and SCE's incentive recommendations, was provided as part of SCE's July 23, 2004 comments.

Table 1: Historic and Proposed Incentive Levels by Technology Type

Level	Technology	Current SGIP Rebate Amounts	Dollar Per Watt			
			Current CEC Rebate Amounts	Energy Division Recommendation	Working Group Recommendation	SCE's Historic Incentive Levels**
1	Photovoltaic	\$4.50 or 50%	\$3.00	\$4.05	\$3.00 to \$3.70	\$3.45
	Wind Turbines*	\$4.50 or 50%	\$1.90	\$4.05	\$1.50	\$1.50
	Fuel Cells (renewable fuel)	\$4.50 or 50%	\$3.40	\$4.05	\$3.40 to \$4.50	\$4.50
2	Fuel Cells (non-renewable fuel)	\$2.50 or 40%	N/A	\$2.50	\$2.50	
3R	IC Engines, Large Gas Turbines	\$1.50 or 40%	N/A	\$1.50	\$1.00	
	Micro-turbines, Small Gas Turbines	\$1.50 or 40%	N/A	\$1.50	\$1.00 to \$1.50	\$0.88
3N	IC Engines, Large Gas Turbines	\$1.00 or 30%	N/A	\$1.00	\$0.60 to \$0.85	\$0.56
	Micro-turbines, Small Gas Turbines	\$1.00 or 30%	N/A	\$1.00	\$0.65 to \$1.00	\$0.64
	Eligible for Other Non-SGIP Rebates?	Yes				

*Projects not completed

**Weighted average of historical incentive is the sum of approved submitted incentive divided by the approved submitted kW

The values shown in Table 1 reflect SCE's historic weighted average incentive payments, by technology.⁴ The target incentive levels were selected

⁴ Initial incentive levels for Level 3-N and 3-R systems would need to be adjusted to reflect the
Continued on the next page

for two primary reasons. The first is to bring more consistency between the CEC and SGIP programs. The second is to reflect an incentive level that is more representative of observed eligible installed costs and the Commission's original intent of funding a reasonable percentage of those costs. Using the historic weighted average payments (adjusted for large capacity systems), would maintain the Commission's original incentive structure with respect to the percentage of project costs funded, while ensuring future incentive payments would not differ significantly from historic incentive payments. Additionally, data from the Third Year Impact Report⁵ reflects that the \$/Watt incentive for completed 3/3N projects was \$0.58.

SCE recommends that if the Commission elects to lift the project percentage cap, for Levels 2 and 3 the Commission should also adopt revised incentives for Levels 2 and 3 consistent with either the SGIP Working Group's or SCE's recommendations.⁶ As noted above, these revised amounts would ensure that future incentives are in line with historic incentive payments.

B. Program Funding

In proposing that the Commission explore expanding the annual program budget from \$125 million to \$300 million, the Draft simply notes: "We are now interested in expanding the annual state-wide budget, as ORA recommended, and we will consider this change in this successor docket." No other justification for this

Continued from the previous page

eligible project costs associated with systems between 1.5 MW and 5.0 MW of capacity. Based on SCE's analysis of cogeneration projects less than 5 MW of capacity, SCE has observed eligible installed cost for Internal Combustion systems ranging from \$1.30/W to \$1.50/W. The range for gas turbine systems is \$1.60/W to \$1.90/W.

⁵ See Table 10-1 page 10-2 of the Third Year Impact Report.

⁶ SCE presumes that these revised levels would decline through the program termination date (pursuant to an exist strategy) as contemplated in Ordering Paragraph 6 of the Draft.

proposal is provided. The Draft invites comments through December 10, 2004 on this initial proposal and SCE plans to file detailed comments at that time. Nevertheless, SCE has some preliminary observations.

First, while the State Legislature under AB 1685 expressed a clear desire to extend the SGIP through 2007, the Legislature gave no indication that it had any interest in magnifying the impact on other ratepayers through an expansion of the SGIP budget. In fact, the legislation simply directs the Commission to administer a self-generation incentive program for distributed generation in the same form as exists on January 1, 2004.⁷

Second, any move to increase the program budget is premature until the study on the costs and benefits of the SGIP program is completed. At a time when there is increasing pressure to reduce electricity rates to stimulate growth in California, we should be exploring ways to reduce, not increase, costs to California ratepayers. Expanding the SGIP budget to \$300 million (a 140% increase) would saddle ratepayers with an additional \$175 million annually, without any showing yet of offsetting benefits. In fairness to all ratepayers, SCE recommends that the Commission wait for the results of the pending cost benefit analyses before moving to so significantly expand the SGIP budget.

Third, there is no evidence that \$300 million is an appropriate funding level. While the Draft notes anecdotally at page 5 that some program administrators have exceeded their allocated Level 1 budgets for 2004, the Draft fails to distinguish between the reservation of SGIP funds (at the Reservation Request stage) and the actual allocation of SGIP funds. Historically approximately 54% of projects in SCE's service territory drop out before completion and before being allocated any SGIP funds. Further, no evaluation has been conducted to determine what effect

⁷ AB 1685 does, however, expressly provide the Commission with flexibility with regard to the amount of rebates, inclusion of other technologies, and evaluation of other public policy interests.

the reduction of incentives for photovoltaic installations (from \$4.50/watt to \$3.00/watt) will have on program participation. Thus, in considering whether to reset the SGIP budget, the Commission should at a minimum consider forecasted allocations, distinguishing between the reservation and allocation of funds.

The Commission should also not assume that a significant increase in the annual budget is required in every IOU service territory. SCE currently has an overcollection in the amount of \$92 million in its SGIP memorandum account as of the end of September 2004. SCE believes that in the near future, the annual expenditures will continue to remain below the current authorization of \$32.5 million for SCE. At this time of high electric rates, SCE can find no justification to continue to collect and retain ratepayer funds in the hope that they will eventually be paid out. Thus, SCE recently proposed in R.02-06-001 that the Commission authorize SCE to use this overcollection to fund certain demand response programs. At this point in time, there is no need for expanding the SGIP budget in SCE's service territory. Funding within SCE's service territory could be revisited in the future should the current budget prove insufficient.

C. The Commission Should Reject the Proposal For Interval Disbursement of Program Funding for SDREO

The Draft adopts the Energy Division's recommendation to accept the San Diego Regional Energy Office's (SDREO) request as a third-party program administrator of the SGIP for interval disbursement of program funds. SCE understands that the proposed disbursement to SDREO would total more than \$46 million of ratepayer funds, under the current funding levels, regardless of whether such funds are actually needed or used towards SGIP projects. This amount would increase significantly if the proposed \$300 million budget is ultimately adopted. It is unclear from the Draft whether the proposed funding mechanism would require

SDREO to return any unused funds to ratepayers after the program's completion. Unlike regulated utilities that administer the program and are required to establish memorandum or balancing accounts which can later be reconciled with actual program expenses and are subject to Commission oversight, third party administrators may not be subject to this same level of oversight and scrutiny. This may put ratepayer funds at risk.

SCE understands that using a third-party administrator for this program may have resulted in additional administrative and program costs funded by ratepayers. SCE is concerned about setting a precedent in which ratepayers are further required to provide upfront funding to such administrators that may never be used and without any guarantee that unused funds would be returned to the ratepayers. If, despite these important concerns, the Commission approves interval funding for SDREO, the Commission must include language to address these concerns. SCE recommends that the utility should have oversight over SDREO which allows the Commission to retain its jurisdiction over the funds, therefore protecting the ratepayers' interest.

D. Raising the Annual Limit on Funding to 4 MW Per Year May Allow Only a Few Entities to Deplete a Program Administrator's Entire Annual Budget.

The Draft proposes to lift the restrictions that limit funding for the university system, other state agencies, and corporations to 4 MW per year. Presumably, this means that a single corporation could be eligible for upwards of 12 MW of incentives through the duration of the program. SCE continues to have concerns that such a move could have the effect of reducing opportunities for smaller customers. The original incentive scheme adopted in D.01-03-073 was designed in part to avoid the pooling of incentives into large projects and large customers. At that time, there

were legitimate concerns expressed by some parties that large customers would monopolize available incentives without reasonable size and corporate parent caps. SCE remains concerned about the impacts of extending the corporate parent limit to 4 MW and urges the Commission's reconsideration of this proposal.

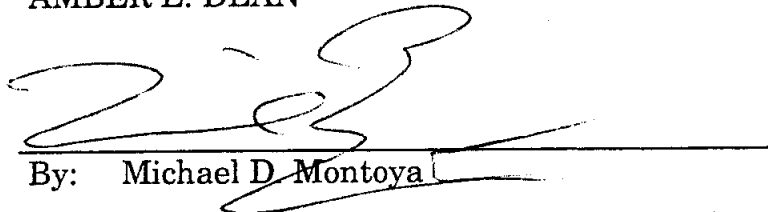
III.

CONCLUSION

SCE respectfully requests that the Commission (1) reset the incentive amounts for Levels 2 and 3 consistent with either the SGIP Working Group's or SCE's recommendations, if the Commission elects to lift the project percentage cap, (2) reconsider any increase in the annual program budget in SCE's service territory, (3) reject interval funding for the SDREO, and (4) reconsider the proposed expansion of the corporate parent limit to 4 MW per year.

Respectfully submitted,

MICHAEL D. MONTOYA
AMBER E. DEAN



By: Michael D. Montoya

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6057
Facsimile: (626) 302-7740
E-mail: Mike.Montoya@SCE.com

November 8, 2004

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of Comments of Southern California Edison Company (U 338-E) on Draft Order to Modify the Self Generation Incentive Program and Implement Assembly Bill 1685 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- ☒ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail):
 - ☐ To all parties, or
 - ☒ To those parties without e-mail addresses or whose e-mails are returned as undeliverable;
- ☒ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or the other addressee(s);
- ☒ Transmitting the copies via e-mail to all parties who have provided an address.

Executed this **8th day of November, 2004**, at Rosemead, California.



Vicki Carr-Donerson

Case Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

JOE J. ANDERS
DIRECTOR OF POLICY AND PLANNING
SAN DIEGO REGIONAL ENERGY OFFICE
20 TECH WAY - SUITE 110
SAN DIEGO, CA 92123
R.04-03-017

DEVRA BACHRACH
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.04-03-017

BARBARA R. BARKOVICH
BARKOVICH AND YAP, INC.
31 EUCALYPTUS LANE
SAN RAFAEL, CA 94901
R.04-03-017

Alerie Beck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-03-017

Werner M. Blumer
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-03-017

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-03-017

ETRINA BURNHAM
DG&E/SOCAL GAS
330 CENTURY PARK CT., CP32D
SAN DIEGO, CA 92123
R.04-03-017

SEAN CASEY
SAN FRANCISCO PUBLIC UTILITIES
COMMISSION
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
R.04-03-017

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1530-1530
R.04-03-017

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
30 WEST UNION STREET
PASADENA, CA 91103
R.04-03-017

ALEXANDER G. CHEN
THERMAL MANAGEMENT GROUP
UNITED TECHNOLOGIES RESEARCH CENTER
411 SILVER LANE, MS129-16
E. HARTFORD, CT 6108
R.04-03-017

JILL K. CLIBURN
45 CRAZY RABBIT DRIVE
SANTA FE, NM 87508
R.04-03-017

JOE COMO
CITY AND COUNTY OF SAN FRANCISCO
DR. CARLTON B. GOODLETT PLACE, RM.
134
SAN FRANCISCO, CA 94102
R.04-03-017

STEVE COONEN
CONNECT ENERGY
14790 MOSSWOOD LANE
GRASS VALLEY, CA 95945
R.04-03-017

REGINA M. DEANGELIS
ATTORNEY AT LAW
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 4107
ROOM 4107
SAN FRANCISCO, CA 94102
R.04-03-017

CHRISTOPHER T. ELLISON
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814
R.04-03-017

ROB ERLICHMAN
SUNLIGHT ELECTRIC, LLC
57 ASHBURY STREET, 6
SAN FRANCISCO, CA 94117
R.04-03-017

DIANE I. FELLMAN
ATTORNEY AT LAW
LAW OFFICES OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.04-03-017

1.04-03-017

Monday, November 8, 2004

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
3520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123
R.04-03-017

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.04-03-017

SYLVIA D. GARDNER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177-0001
R.04-03-017

BRENDA GETTIG
REGIONAL ECONOMIC RESEARCH, INC.
11236 EL CAMINO REAL
SAN DIEGO, CA 92130-2650
R.04-03-017

STEVEN A. GREENBERG
DISTRIBUTED ENERGY STRATEGIES
4100 ORCHARD CANYON LANE
VACAVILLE, CA 95688
R.04-03-017

Maxine Harrison
EXECUTIVE DIVISION
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
R.04-03-017

Mohammad Hassanpour
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-03-017

MICHAEL HALL
BORREGO SOLAR SYSTEMS
2512 9TH ST, SUITE 6
BERKELEY, CA 94710
R.04-03-017

GLENN HAMER
DIRECTOR, GOVERNMENT AFFAIRS
FIRST SOLAR ELECTRIC COMPANY
4050 E. COTTON CENTER BLVD., STE. 68
PHOENIX, AZ 85040-8864
R.04-03-017

ARNO HARRIS
PREVALENT POWER, INC.
20 GALLI DR., SUITE 8
NOVATO, CA 94949
R.04-03-017

Martin Homec
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4205
SAN FRANCISCO, CA 94102-3214
R.04-03-017

DARCIE L. HOUCK
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 34
SACRAMENTO, CA 95814
R.04-03-017

HEATHER HUNT
W.H. ROBERT & H.F. HUNT, LLC
242 WHIPPOORWILL LANE
STRATFORD, CT 06614
R.04-03-017

MICHAEL HYAMS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4/F
SAN FRANCISCO, CA 94103
R.04-03-017

RONALD K. ISHII
AESC, INC.
1945 CAMINO VIDA ROBLE, SUITE A
CARLSBAD, CA 92008
R.04-03-017

ROB JOHANSEN
DIRECTOR OF MARKETING
FIRST SOLAR ELECTRIC COMPANY, LLC
4050 E. COTTON CENTER BLVD., STE. 68
PHOENIX, AZ 85040-8864
R.04-03-017

MARTIN KAY
PROGRAM SUPERVISOR
SOUTH COAST AIR QUALITY MANAGEMENT
DISTR
21865 COPLEY DR.
DIAMOND BAR, CA 91765-3252
R.04-03-017

GREG KENNEDY
OCCIDENTAL POWER SOLAR AND
COGENERATION
3629 TARAVAL ST.
SAN FRANCISCO, CA 94116
R.04-03-017

Monday, November 8, 2004

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
1928 2ND AVENUE
SAN DIEGO, CA 92103
R.04-03-017

RONALD LIEBERT
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
R.04-03-017

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843
R.04-03-017

RANDY LITTENEKER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.04-03-017

JODY S. LONDON
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104
R.04-03-017

Kim Malcolm
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5005
SAN FRANCISCO, CA 94102-3214
R.04-03-017

RACHEL MACDONALD
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 43
SACRAMENTO, CA 95814
R.04-03-017

KEITH MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
R.04-03-017

KARLY MCCRORY
CONTRACTS ADMINISTRATOR
RWE SCHOTT SOLAR INC.
4051 ALVIS COURT, SUITE 1
ROCKLIN, CA 95677
R.04-03-017

JACK P. MCGOWAN
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104
R.04-03-017

DAVID MCMANUS
SENIOR PROGRAMS MANAGER
GREEN ONSITE DIVISION
1004 OREILLY STREET SUITE 300A
SAN FRANCISCO, CA 94129
R.04-03-017

MICHAEL D. MONTOYA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-03-017

JERRY MOORE
CONNECT ENERGY
3625 CINCINNATI AVENUE
ROCKLIN, CA 95765
R.04-03-017

CLYDE S. MURLEY
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104
R.04-03-017

MEGAN MACNEIL MYERS
LAW OFFICES OF SARA STECK MYERS
122 28TH AVE
SAN FRANCISCO, CA 94121
R.04-03-017

SARA STECK MYERS
ATTORNEY AT LAW
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.04-03-017

FREDERICK M. ORTLIEB
ATTORNEY AT LAW
CITY OF SAN DIEGO - OFFICE OF CITY ATTOR
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101
R.04-03-017

STEVEN D. PATRICK
ATTORNEY AT LAW
SEMPRA ENERGY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013
R.04-03-017

R.04-03-017

Monday, November 8, 2004

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
144 SOUTH FLOWER STREET, SUITE 1500
LOS ANGELES, CA 90071-2916
R.04-03-017

MARK RAWSON
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 43
SACRAMENTO, CA 95814
R.04-03-017

Steven C Ross
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-03-017

KEITH ROBERTS
CITY ENERGY MANAGER
CITY OF SACRAMENTO
327 10TH STREET, 300, GENERAL SERVICES
SACRAMENTO, CA 95814
R.04-03-017

JAMES ROSS
REGULATORY & COGENERATION SERVICES,
INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.04-03-017

JP ROSS
182 SECOND STREET, SUITE 400
SAN FRANCISCO, CA 94105
R.04-03-017

Funda Emine Saygin
CALIF PUBLIC UTILITIES COMMISSION
1350 FRONT ST., STATE BLDG. ROOM 4006
SAN DIEGO, CA 92101
R.04-03-017

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
R.04-03-017

LORI SMITH SCHELL PH.D.
EMPOWERED ENERGY
N. ELK RUN
DURANGO, CO 81303
R.04-03-017

NORA SHERIFF
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-03-017

MARK SHIRILAU
ALOHA SYSTEMS, INC.
14801 COMET STREET
IRVINE, CA 92604-2464
R.04-03-017

Donald R Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-03-017

KARI SMITH
POWERLIGHT CORPORATION
2954 SAN PABLO AVENUE
BERKELEY, CA 94706
R.04-03-017

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.04-03-017

DAN THOMPSON
SUN POWER & GEOTHERMAL ENERGY CO.
INC.
863 E. FRANCISCO BLVD.
SAN RAFAEL, CA 94901
R.04-03-017

SCOTT TOMASHEFSKY
CALIFORNIA ENERGY COMMISSION
1516 - 9TH STREET
SACRAMENTO, CA 95814
R.04-03-017

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
R.04-03-017

DANIEL TUNNICLIFF
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE
ROSEMEAD, CA 91770
R.04-03-017

.04-03-017

Monday, November 8, 2004

ANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF CA
11 LOS ALTOS SQUARE
LOS ALTOS, CA 94022
R.04-03-017

Bradford Wetstone
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-03-017

LISA WEINZIMER
CALIFORNIA ENERGY CIRCUIT
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.04-03-017

YAN WISER
BERKELEY LAB
LINE CYCLOTRON ROAD
BERKELEY, CA 94720
R.04-03-017

VIKKI WOOD
PRINCIPAL DEMAND-SIDE SPECIALIST
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A103
SACRAMENTO, CA 95618-1899
R.04-03-017

CATHERINE E. YAP
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND, CA 94611
R.04-03-017

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
51 BLUE RAVINE ROAD
COLSON, CA 95630
R.04-03-017

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431
R.04-03-017

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM.370
ROSEMEAD, CA 91770
R.04-03-017

MRW & ASSOCIATES, INC
999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612-3517
R.04-03-017