

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

Order Instituting Rulemaking to Implement the	)	
Commission's Procurement Incentive Framework	)	Rulemaking 06-04-009
and to Examine the Integration of Greenhouse Gas	)	(Filed April 13, 2006)
Emissions Standards into Procurement Policies	)	

**COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.  
ON JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND  
CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN  
ELECTRIC RETAIL PROVIDER GHG REPORTING PROTOCOL**

<b>DOCKET</b>	
07-011P-1	
DATE	JUL 02 2007
RECD.	JUL 02 2007

Catherine M. Krupka  
Adam J. Katz  
McDermott Will & Emery LLP  
600 Thirteenth Street, NW  
Washington, DC 20005  
Tel: (202) 756-8000  
Fax: (202) 756-8087  
Email: ckrupka@mwe.com  
ajkatz@mwe.com

Attorneys for Morgan Stanley Capital Group Inc.

July 2, 2007

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

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	) ) ) )	Rulemaking 06-04-009 (Filed April 13, 2006)
--	------------------	--

**COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.  
ON JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND  
CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN  
ELECTRIC RETAIL PROVIDER GHG REPORTING PROTOCOL**

**I. INTRODUCTION**

Pursuant to the June 12, 2007 ruling of Administrative Law Judges Charlotte F. TerKeust and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("MSCG") respectfully submits its comments on the Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol ("Joint Proposal").<sup>1</sup>

As noted by MSCG at Commission-sponsored symposia and in comments filed with the California Air Resources Board ("CARB"), MSCG believes that a source-based greenhouse gas ("GHG") cap-and-trade system is far superior to a load-based system.<sup>2</sup> A source-based system will deliver to California the statutorily mandated reduction in GHG emissions at the least overall cost to end users, and is better equipped to ensure emissions monitoring and compliance. However, the Joint Proposal recommends reporting rules only for a load-based system and

---

<sup>1</sup> See Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal, Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies (R.06-04-009) (issued June 12, 2007).

<sup>2</sup> See Load-Based v. Source-Based Systems, presented by MSCG at the Commission's *Greenhouse Gas Cap and Trade Systems: Symposium on Linking* (Apr. 19, 2007), available at <http://www.cpuc.ca.gov/static/Energy/Electric/climate+change/oliviahartridge.ppt>; Comments of Morgan Stanley Capital Group in Response to Recommendations of the Market Advisory Board to the California Air Resources Board (filed June 1, 2007) ("CARB Comments").

suggests that California will adopt a load-based market because it is more effective for California than a source-based approach.<sup>3</sup> MSCG respectfully disagrees that a load-based approach is best for California.

Thus, MSCG reiterates its support for a source-based market construct and reserves its right to further comment in this proceeding on market design issues in support thereof. MSCG also urges the Commission to avoid the premature adoption of any GHG market design. With those caveats in place, we will focus the remainder of these comments on the details of the Joint Proposal and will focus on the strengths and weaknesses of this proposal within the context of a load-based approach.

Broadly, MSCG believes that the fundamental concept behind the Joint Proposal is a good effort within the context of a load-based system. We applaud Staff for recognizing the importance of avoiding restrictions on the right to free contract and the potential to add unneeded costs to consumers by removing optionality in dispatch. The key decision in this regard was to develop assigned, default emissions profiles for unspecified resource contracts based on marginal dispatch principles. Given the realities of power system physics, this approach is probably the best that could be done. Even things like E-Tags and the PJM GATS system are, in reality, useful administrative fictions. For a load-based system to have practical (if sub-optimal) functionality, this concept probably has to be at the core. Whichever reporting protocol the Commission adopts will have substantial implications for the final emission burden ascribed to a given retail provider. MSCG commends the Joint Proposal for recognizing this and agrees with

---

<sup>3</sup> See Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol (“Joint Proposal”) at 1 n.1, *Order Instituting Rulemaking to Implement the Commission’s Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies* (R.06-04-009) (filed June 12, 2007) (acknowledging that the Joint Proposal “addresses reporting rules [only] for a load-based approach,” and stating “whether a load-based cap is the appropriate approach will be addressed elsewhere in this proceeding”).

its assessment that “[t]he reporting method should not distort the electricity markets by causing retail providers to make non-optimal resource choices.”<sup>4</sup>

## **II. COMMENTS ON JOINT PROPOSAL**

### **A. Reporting Greenhouse Gas Emissions Associated with Electricity Consumption (Joint Proposal, section 1)**

#### **1. *Lack of a Comprehensive “Source to Sink” Reporting System (Joint Proposal, section 1.4)***

MSCG agrees with the Joint Proposal that the lack of a comprehensive “source to sink” reporting system in the western United States makes it difficult to assign emissions to load.<sup>5</sup> Moreover, MSCG agrees that generation information systems are currently operational in the NEPOOL and PJM transmission areas which record generation and emissions data from all plants.<sup>6</sup> However, MSCG questions the claim that the NEPOOL and PJM systems are able to “provide information on where most of the electricity generated in these regions sinks, meaning which entity ultimately takes title of the MWh generated and associated emissions.”<sup>7</sup> Our research indicates that GATS and NEPOOL-GIS capture the amount of MWh’s generated by renewable resources, and then track financial ownership of the various attributes. Ultimately, the rights are assigned to a “sink” and are then used to demonstrate compliance with an obligation and removed from the system. Using an approach like this is certainly a way to administer compliance with a load-based GHG requirement. However, no one should be under the illusion

---

<sup>4</sup> Joint Proposal at 6.

<sup>5</sup> *Id.* at 2-3.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 3.

that it is anything other than a contractual/financial ownership rights tracking system, not a physical tracking system.<sup>8</sup>

**B. Review of Existing Methods for Estimating Resources or Emissions Associated with Electricity Serving California Load (Joint Proposal, section 3)**

**1. *Regional Marginal (Joint Proposal, section 3.3)***

The Joint Proposal provides a discussion of studies conducted over the past decade that have focused on assessing the fuel types of the resources dispatched to meet California load.<sup>9</sup> The most recent study—conducted in 2007 by California Energy Commission (“CEC”) staff—sought to determine fuel dispatch by accounting for all imports from specified sources and conducting a marginal dispatch analysis of the Northwest and Southwest regions for unspecified net imports.<sup>10</sup> The study recognizes the increasing role of natural gas as the marginal resource throughout the West and the role of hydroelectric power as a key resource in the Northwest.<sup>11</sup> The marginal methodology in the staff report would reduce the amount of coal assigned to California load (from 20% to 14%) and increase the amount of natural gas (from 38% to 44%).<sup>12</sup>

MSCG believes this analysis to be fundamentally accurate, and notes that this methodology serves the goal of minimizing interference with industry contracting practices and preserves optionality in dispatch. Both of these actions, in turn, serve to minimize compliance costs for consumers, and optimize the use of society’s resources.

---

<sup>8</sup> Furthermore, tracking GHG emissions (or the lack thereof) may not be an identical problem. It has some challenges that are loosely analogous to “proving the negative,” and is not the same thing as proving that a certain number of MWhs were injected into the system from a qualified renewable resource.

<sup>9</sup> Joint Proposal at 8-10.

<sup>10</sup> *Id.* at 9.

<sup>11</sup> *Id.* at 9, 18.

<sup>12</sup> *Id.* at 9.

## C. Categories of Sources (Joint Proposal, section 4)

### 1. *Specified Sources: Facility-Specific Contracts (Joint Proposal, section 4.1.4)*

The Joint Proposal recommends that conditions be imposed on facility-specific purchases in order for a retail provider to claim the electricity and associated emissions from a specific facility. Such an approach is intended to ensure that power purchased is truly inducing generation from a specified plant.<sup>13</sup> The primary context seems to be a concern over contracting for low-GHG-emitting resources. The Joint Proposal accurately reasons that, “[i]n the absence of any eligibility criteria, contract shuffling is a possible outcome.”<sup>14</sup> It recommends “that new claims to existing low- or zero-GHG plants should be treated with some skepticism since there is little reason to believe that an agreement between a retail provider and an existing plant will induce generation that would not have occurred anyway,” and provides two suggestions to limit the pool of available clean resources.<sup>15</sup> The Joint Proposal suggests that the situation is analogous to the “additionality” condition that is often used to define offset projects.<sup>16</sup>

One suggestion is to allow claims to facilities within California, provided the retail provider and the independent power producer (“IPP”) that operates the facilities contractually agree to these claims.<sup>17</sup> The emission rate assigned to remaining sales of an IPP would be adjusted to remove claimed facilities from its resource mix.<sup>18</sup> A second suggestion is to allow claims to generation from market participants who provide financial backing to new facilities.<sup>19</sup>

---

<sup>13</sup> *Id.* at 11.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.* at 12.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

While MSCG acknowledges the issue, we ask the rhetorical question, what, aside from contracting with low-emissions resources, can an LSE do to lower its responsible emissions?<sup>20</sup> In a load-based system, all an LSE has control over is its own contracting activities. At best, it can responsibly contract with low emission resources, but it cannot control what resource owners do with capacity or output not contracted to that LSE. This is due to the innately insoluble dilemma of trying to impose a closed system regulatory regime on an open system. As a practical matter, MSCG believes that trying to superimpose an additionality-style vetting requirement for resources physically connected to the system, on top of an aggregate emissions responsibility requirement, is unworkable and that the attempt to do so should be abandoned.

**D. Options for Assigning Emissions to Unspecified Sources (Joint Proposal, section 5)**

**1. When Emission Factors are Calculated (Joint Proposal, section 5.1)**

The Joint Proposal discusses whether a retail provider's total emissions responsibility should be tabulated *ex post* (i.e., after-the-fact based on actual generation data) or *ex ante* (i.e., in advance based on an estimate fixed at the start of a reporting period), and recommends the State use an *ex ante* calculation.<sup>21</sup>

While adoption of an *ex ante* approach comes with a risk that the presumed emissions rate will differ from the actual emissions rate, MSCG views this to be a commercial necessity. It is difficult to see how market participants could enter into contracts or plan "carbon budgets" if

---

<sup>20</sup> MSCG is aware that LSEs also may be able to build new resources or implement demand response solutions. However, these solutions are not germane to the discussion of how, and whether to attempt, to require an additionality standard on contracting.

<sup>21</sup> Joint Proposal at 13-14. It posits that "emission factors would need to be calculated from generation, fuel consumption, and emissions data from Year 1 to calculate an emission factor during Year 2 for use in Year 3[.]" and recognizes "the greater certainty afforded by an *ex ante* approach comes at the expense of some accuracy in the factor[.]" *Id.* at 14.

they are to be subject to *ex post* calculations of assigned emissions rates. The market needs the predictability associated with an *ex ante* approach.

**2. *Regions for Defining Emission Factors: Asset Owning Entities (Joint Proposal, section 5.2.3)***

The Joint Proposal evaluated several options for assigning emissions to unspecified sources and recommends requiring asset owning suppliers outside of California to either document their sources of power or accept a default rate.<sup>22</sup> MSCG believes this to be reasonable, in context, but notes that there is no discussion about why non-asset owning suppliers should not be given the same option of documenting their actual emissions rates. Furthermore, even with regard to the “asset owning” class, the proposal should be clarified to add “*or controlling*” so that parties to tolling contracts and asset management arrangements have the same option to indicate a power source when, by virtue of a specific agreement, they are, *de facto*, in the same position as actual asset owners.

**3. *Calculation of Assigned, Regional Emissions Rates***

The Joint Proposal discusses at length the proper way to calculate regional emissions factors. Issues include average versus marginal emissions, subtraction of “baseload,” “claimed” and “specified” resources before calculation, and whether the calculations should be annual or should be broken up into seasonal and/or peak/off-peak calculations. It recommends annual calculations assuming that marginal resources serve California load, and that “baseload,” “claimed” and “specified” resources be subtracted from the calculation, while offering parties the option to demonstrate that their actual purchasing patterns differentiate them from the assigned

---

<sup>22</sup> Joint Proposal at 16.



regional average. MSCG supports this analysis in context and observes that this serves the goal of minimizing disruption of the ability to contract in the most efficient manner.

**4. *Determining the Subset of Facilities From a Pooled Purchase that Serves California Load: Marginal Emission Factors for Residual Unspecified Power (Joint Proposal, section 5.3.3)***

The Joint Proposal finds the marginal method to be the most accurate one for calculating regional emission factors.<sup>23</sup> It goes on to assert that “[m]onitoring will be needed to verify whether contract shuffling is occurring at the Northwest hubs.” However, the Joint Proposal fails to elaborate on how monitoring would occur or what actions would be taken if such activity is discovered.<sup>24</sup> MSCG reiterates its view that contract shuffling could permeate a load-based system. Thus, as discussed in greater detail below in Section II.E., the Commission should address the issue head-on and in detail and should do so using procedures that allow the market to review the proposed approach and submit comments. However, it also should recognize that its practical options to actually do anything about “contract shuffling” are likely to be limited.

**5. *Differentiation by Time of Use: Reporting Options to Capture Seasonal or Time of Day Differences in Emission Rates (Joint Proposal, section 5.4.1)***

The Joint Proposal recommends that retail providers have the option of documenting, prior to a reporting period, that their purchases are significantly different from the regional averages.<sup>25</sup> If so demonstrated, the remaining default rate would need to be recalculated so that the claimed resources no longer appear in the overall factor.<sup>26</sup> MSCG finds this option to be reasonable in principle, but believes it to be problematic from the perspective of the commitment

---

<sup>23</sup> *Id.* at 19.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* at 21, 23.

<sup>26</sup> *Id.* at 21.

to *ex ante* calculations. It remains unclear from the Joint Proposal when a retail provider would have to make this “demonstration” and for what time frames the “adjustments” would be made. Accordingly, if the Commission chooses to adopt this recommendation, it should clarify that adjustments to the individual retail provider’s compliance obligation are to be allowed for whatever periods are demonstrated, but make associated adjustments to the regional default emissions rate effective only for the next reporting period. While this is admittedly misaligned and creates a risk of some inaccurate tracking of total emissions, MSCG expects that the practical impact will be minimal and believes the importance of allowing parties to contract based on *ex ante* emissions certainty more than outweighs any downside from misalignment.

**6. *Recommendation on Unspecified Sources (Joint Proposal, section 5.7)***

Assuming that a load-based system is implemented and based on the data available, MSCG believes that the Joint Proposal’s recommendations for unspecified power are reasonable and supportable.

**E. *Techniques for Addressing the Potential for Contract Shuffling and Leakage (Joint Proposal, section 9)***

The Joint Proposal properly observes the potential for “contract shuffling” to undermine the intent of GHG regulation, and correctly identifies the risk that LSEs may be able to demonstrate full compliance, while having little or no real impact on actual generation dispatch or GHG emissions. MSCG would note that this fact undermines one of the purported advantages of a load-based versus a source-based system. We view the “contract shuffling” dilemma as one of the innate problems of trying to impose a “closed system” regulatory regime on an open system. While we commend the Joint Proposal’s efforts, the problem is probably insoluble.

With regard to the specific measures proposed in the Joint Proposal to address the problem, MSCG believes most reflect a disconnect with actual market activity. In a load-based

system the compliance obligation is on load, but the parties apt to engage in “contract shuffling” will be the suppliers. Market participants over which the regulatory agencies have jurisdiction will not be engaging in the undesired activity, while those who may are not jurisdictional. Some of the items in the action plan seem to recognize this, but others seem to be disconnected from this reality. Others items still make vague promises of “action,” but do not explain what actions might actually be taken to minimize shuffling. Listed below are some specific observations on each of the individual proposals.

First, although the Joint Proposal recommends that the final rule provide that contract shuffling “is not an acceptable practice and that retail providers will be held accountable,” it is unclear how likely it is that a retail provider will know or be able to do anything about most types of contract shuffling. Furthermore, there is no elaboration in the Joint Proposal on what specifically might be done to “hold the retail providers accountable.”

Second, even though the Joint Proposal suggests that a state agency would work to ensure stakeholders know that “contract shuffling will lessen the credibility of allowances,” this seems to be a pointless exercise. “Credibility” will not exist on a sliding scale. The value of allowances will be completely bimodal. Either allowances will be accepted for compliance and will hold full value, or they will be rejected and thus have zero value.

Third, it is unclear what will be done once regulators learn of contract shuffling, or what regulators will do if they “notice changes in daily and seasonal patterns reflecting greater use of out-of-state baseload resources or increased use of aggregated contracts sold from regional hubs.”<sup>27</sup> While this may help in terms of providing inferential evidence regarding the degree of contract shuffling, it is much less clear what might be done about it. Even assuming some

---

<sup>27</sup> *Id.* at 36.

remedy can be devised, a detailed advance explanation is warranted to make the program work and to give market participants regulatory certainty.

## **F. Other Issues**

### **1. *Exports***

The Joint Proposal does not explicitly address emissions associated with exports, although there appears to be an assumption that in-state generation resources will be required to report to CARB under some source-based reporting program and it may be that the Joint Proposal assumes exports get addressed in this manner by CARB. Assuming this is true, it remains unclear how emissions associated with exports get separated from emissions associated with in-state consumption for compliance reporting purposes if the emissions originate from the same physical source or resource cluster.<sup>28</sup>

### **2. *Emissions Cost in the Dispatch***

There is no discussion in the Joint Proposal on how to inject the cost of emissions into the economic dispatch decision. If California is serious about reducing emissions, MSCG believes that the cost of GHG abatement has to be factored into the real-time dispatch decision. The Joint Proposal does not appear to do this.

## **III. ISSUES RAISED IN THE JOINT PROPOSAL SUPPORT THE CONCLUSION THAT LOAD-BASED REGULATION IS FUNDAMENTALLY FLAWED**

The Joint Proposal adds hard substance to MSCG's view that a load-based market design, at best, will be an administratively complex "Rube Goldberg" system. As a side matter, it is axiomatic that the more complex the "rules" the greater the risk of "gaming." Therefore, rather

---

<sup>28</sup> Although not strictly the subject of this straw proposal, there is another issue raised by this broad question: If allowances are allocated, not auctioned, as some propose, especially if the allocations will be to LSEs, then in the interest of fairness, California must consider whether exporters also should get a share of the allowances and must address how it will determine the number of allowances it will allocate to a generator that is exporting instead of selling in-state.

than rushing to adopt the Joint Proposal's suggested load-based approach, the Commission should consider the benefits of a source-based market design—a design that would be compatible with the RGGI proposal to be implemented in 2009, the existing European Union program, and pending federal GHG legislation.

#### **IV. CONCLUSION**

MSCG respectfully requests that the Commission consider the foregoing comments in its consideration of the Joint Proposal.

Respectfully submitted,

/s/

Catherine M. Krupka

Adam J. Katz

McDermott Will & Emery LLP

600 Thirteenth Street, NW

Washington, DC 20005

July 2, 2007

Attorneys for Morgan Stanley Capital Group Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing Comments On Joint California Public Utilities Commission And California Energy Commission Staff Proposal For An Electric Retail Provider GHG Reporting Protocol Of Morgan Stanley Capital Group Inc. on all of parties of record in R. 06-04-009 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission. I also have sent hard copies by overnight mail to the assigned Commissioner, Michael R. Peevy, and the assigned Administrative Law Judges, Charlotte F. TerKeurst and Jonathan Lakritz.

Moreover, pursuant to the June 12, 2007 Administrative Law Judges' Ruling Regarding Comments On Staff Reporting Proposal issued in R. 06-04-009, I have sent one hard copy of these comments by overnight mail to the California Energy Commission and also have sent electronic copies of these comments to [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us) and [kgriffin@energy.state.ca.us](mailto:kgriffin@energy.state.ca.us).

Dated at Washington, DC, this 2nd day of July, 2007.

/s/  
Adam J. Katz

**Service List: R. 06-04-009**

## Appearance

STEVEN S. SCHLEIMER  
DIRECTOR, COMPLIANCE & REGULATORY AFFAIRS  
BARCLAYS BANK, PLC  
200 PARK AVENUE, FIFTH FLOOR  
NEW YORK, NY 10166

STEVEN HUHMANN  
MORGAN STANLEY CAPITAL GROUP INC.  
2000 WESTCHESTER AVENUE  
PURCHASE, NY 10577

RICK C. NOGER  
PRAXAIR PLAINFIELD, INC.  
2711 CENTERVILLE ROAD, SUITE 400  
WILMINGTON, DE 19808

KEITH R. MCCREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN, LLP  
1275 PENNSYLVANIA AVE., N.W.  
WASHINGTON, DC 20004-2415

ERIN M. MURPHY  
MCDERMOTT WILL & EMERY LLP  
600 THIRTEENTH STREET, N.W.  
WASHINGTON, DC 20005

MICHAEL A. YUFFEE  
MCDERMOTT WILL & EMERY LLP  
600 THIRTEENTH STREET, N.W.  
WASHINGTON, DC 20005-3096

LISA M. DECKER  
CONSTELLATION ENERGY GROUP, INC.  
111 MARKET PLACE, SUITE 500  
BALTIMORE, MD 21202

KEVIN BOUDREAUX  
CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002

THOMAS DILL  
PRESIDENT  
LODI GAS STORAGE, L.L.C.  
1021 MAIN ST STE 1500  
HOUSTON, TX 77002-6509

E.J. WRIGHT  
OCCIDENTAL POWER SERVICES, INC.  
5 GREENWAY PLAZA, SUITE 110  
HOUSTON, TX 77046

PAUL M. SEBY  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202

TIMOTHY R. ODIL  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202

JENINE SCHENK  
APS ENERGY SERVICES  
400 E. VAN BUREN STREET, SUITE 750  
PHOENIX, AZ 85004

JOHN B. WELDON, JR.  
SALMON, LEWIS & WELDON, P.L.C.  
2850 EAST CAMELBACK ROAD, SUITE 200  
PHOENIX, AZ 85016

KELLY BARR  
MANAGER, REGULATORY AFFAIRS & CONTRACTS  
SALT RIVER PROJECT  
PO BOX 52025, PAB 221  
PHOENIX, AZ 85072-2025

STEVEN S. MICHEL  
WESTERN RESOURCE ADVOCATES  
2025 SENDA DE ANDRES  
SANTA FE, NM 87501

ROGER C. MONTGOMERY  
VICE PRESIDENT, PRICING  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

SID NEWSOME  
TARIFF MANAGER  
SOUTHERN CALIFORNIA GAS COMPANY  
GT 14 D6  
555 WEST 5TH STREET  
LOS ANGELES, CA 90051

DAVID L. HUARD  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064

CURTIS L. KEBLER  
J. ARON & COMPANY  
SUITE 2600  
2121 AVENUE OF THE STARS  
LOS ANGELES, CA 90067

DENNIS M.P. EHLING  
ATTORNEY AT LAW  
KIRKPATRICK & LOCKHART NICHOLSON GRAHAM  
10100 SANTA MONICA BLVD., 7TH FLOOR  
LOS ANGELES, CA 90067

GREGORY KOISER  
CONSTELLATION NEW ENERGY, INC.  
350 SOUTH GRAND AVENUE, SUITE 3800  
LOS ANGELES, CA 90071

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, NO. 1500  
LOS ANGELES, CA 90071

MICHAEL MAZUR  
CHIEF TECHNICAL OFFICER  
3 PHASES ENERGY SERVICES, LLC  
2100 SEPULVEDA BLVD., SUITE 38  
MANHATTAN BEACH, CA 90266

TIFFANY RAU  
POLICY AND COMMUNICATIONS MANAGER  
CARSON HYDROGEN POWER PROJECT LLC  
ONE WORLD TRADE CENTER, SUITE 1600  
LONG BEACH, CA 90831-1600

GREGORY KLATT  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
411 E. HUNTINGTON DR., STE. 107-356  
ARCADIA, CA 91006

MAUREEN LENNON  
CALIFORNIA COGENERATION COUNCIL  
595 EAST COLORADO BLVD., SUITE 623  
PASADENA, CA 91101

RICHARD HELGESON  
SOUTHERN CAL. PUB. POWER AUTHORITY  
225 S. LAKE AVE., SUITE 1250  
PASADENA, CA 91101

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367

PAUL DELANEY  
AMERICAN UTILITY NETWORK (A.U.N.)  
10705 DEER CANYON DRIVE  
ALTA LOMA, CA 91737

AKBAR JAZAYEIRI  
DIRECTOR OF REVENUE & TARRIFFS  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. ROOM 390  
ROSEMEAD, CA 91770

ANNETTE GILLIAM  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770



LAURA I. GENAO  
ATTORNEY  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

RONALD MOORE  
GOLDEN ST. WATER/BEAR VALLEY ELEC.  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773

DON WOOD  
PACIFIC ENERGY POLICY CENTER  
4539 LEE AVENUE  
LA MESA, CA 91941

ALLEN K. TRIAL  
SDGE&SCG  
HQ-13  
101 ASH STREET  
SAN DIEGO, CA 92101

DAN HECHT  
SEMPRA ENERGY  
101 ASH STREET  
SAN DIEGO, CA 92101

DANIEL A. KING  
SEMPRA ENERGY  
101 ASH STREET, HQ 12  
SAN DIEGO, CA 92101

SYMONE VONGDEUANE  
SEMPRA ENERGY SOLUTIONS  
101 ASH STREET, HQ09  
SAN DIEGO, CA 92101-3017

THEODORE ROBERTS  
ATTORNEY AT LAW  
SEMPRA GLOBAL  
101 ASH STREET, HQ 13D  
SAN DIEGO, CA 92101-3017

JOSEPH R. KLOBERDANZ  
SAN DIEGO GAS & ELECTRIC  
PO BOX 1831  
SAN DIEGO, CA 92112

BILL LYONS  
CORAL POWER, LLC  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121

THOMAS DARTON  
PILOT POWER GROUP, INC.  
ACCOUNTS  
9320 CHESAPEAKE DRIVE, SUITE 112  
SAN DIEGO, CA 92123

STEVE RAHON  
DIRECTOR, TARIFF & REGULATORY  
  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548

GLORIA BRITTON  
ANZA ELECTRIC COOPERATIVE, INC.  
58470 HWY 371  
PO BOX 391909  
ANZA, CA 92539

LYNELLE LUND  
COMMERCE ENERGY, INC.  
600 ANTON BLVD., SUITE 2000  
COSTA MESA, CA 92626

TAMLYN M. HUNT  
ENERGY PROGRAM DIRECTOR  
COMMUNITY ENVIRONMENTAL COUNCIL  
26 W. ANAPAMU ST., 2/F  
SANTA BARBARA, CA 93101

JEANNE M. SOLE  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PL., R.234  
SAN FRANCISCO, CA 94102

JOHN P. HUGHES  
MANAGER, REGULATORY AFFAIRS  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, STE. 2040  
SAN FRANCISCO, CA 94102

LAD LORENZ  
V.P. REGULATORY AFFAIRS  
SOUTHERN CALIFORNIA GAS COMPANY  
601 VAN NESS AVENUE, SUITE 2060  
SAN FRANCISCO, CA 94102

MARCEL HAWIGER  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

NINA SUETAKE  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVE., STE 350  
SAN FRANCISCO, CA 94102

DIANA L. LEE  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4300  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

F. JACKSON STODDARD  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5125  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

AUDREY CHANG  
STAFF SCIENTIST  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

EVELYN KAHL  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

MICHAEL P. ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

SEEMA SRINIVASAN  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

WILLIAM H. CHEN  
CONSTELLATION NEW ENERGY, INC.  
SPEAR TOWER, 36TH FLOOR  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105

BRIAN K. CHERRY  
DIRECTOR REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B10C  
SAN FRANCISCO, CA 94106

EDWARD G POOLE  
ANDERSON DONOVAN & POOLE  
601 CALIFORNIA STREET SUITE 1300  
SAN FRANCISCO, CA 94108

ANN G. GRIMALDI  
MCKENNA LONG & ALDRIDGE LLP  
101 CALIFORNIA STREET, 41ST FLOOR  
SAN FRANCISCO, CA 94111

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JAMES D. SQUERI  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE &  
DAY LLP  
505 SANSOME STREET, STE 900  
SAN FRANCISCO, CA 94111

JEANNE B. ARMSTRONG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

KAREN BOWEN  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111

LISA A. COTTLE  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET, 39TH FLOOR  
SAN FRANCISCO, CA 94111

SEAN P. BEATTY  
ATTORNEY AT LAW  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA ST., 17TH FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH M. KARP  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111-5802

JEFFREY P. GRAY  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

CHRISTOPHER J. WARNER  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, PO BOX 7442  
SAN FRANCISCO, CA 94120-7442

SARA STECK MYERS  
ATTORNEY AT LAW  
122 28TH AVENUE  
SAN FRANCISCO, CA 94121

LARS KVALE  
CENTER FOR RESOURCE SOLUTIONS  
PRESIDIO BUILDING 97  
PO BOX 39512  
SAN FRANCISCO, CA 94129

ANDREA WELLER  
STRATEGIC ENERGY  
3130 D BALFOUR RD., SUITE 290  
BRENTWOOD, CA 94513

JENNIFER CHAMBERLIN  
STRATEGIC ENERGY, LLC  
2633 WELLINGTON CT.  
CLYDE, CA 94520

KERRY HATTEVIK  
MIRANT CORPORATION  
696 WEST 10TH STREET  
PITTSBURG, CA 94565

AVIS KOWALEWSKI  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5TH FLOOR  
WALNUT CREEK, CA 94596

J. ANDREW HOERNER  
REDEFINING PROGRESS  
1904 FRANKLIN STREET  
OAKLAND, CA 94612

JANILL RICHARDS  
DEPUTY ATTORNEY GENERAL  
CAL. ATTORNEY GENERAL'S OFFICE  
1515 CLAY STREET, 20TH FLOOR  
OAKLAND, CA 94702

CLIFF CHEN  
UNION OF CONCERNED SCIENTIST  
2397 SHATTUCK AVENUE, STE 203  
BERKELEY, CA 94704

GREGG MORRIS  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVENUE, STE 402  
BERKELEY, CA 94704

R. THOMAS BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557

BARRY F. MCCARTHY  
ATTORNEY AT LAW  
MCCARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

C. SUSIE BERLIN  
ATTORNEY AT LAW  
LLC  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

MIKE LAMOND  
ALPINE NATURAL GAS OPERATING CO. #1  
  
PO BOX 550  
VALLEY SPRINGS, CA 95252

JOY A. WARREN  
ATTORNEY AT LAW  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

BALDASSARO DI CAPO, ESQ.  
CALIFORNIA ISO  
LEGAL AND REGULATORY DEPARTMENT  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

JOHN JENSEN  
PRESIDENT  
MOUNTAIN UTILITIES  
PO BOX 205  
KIRKWOOD, CA 95646

MARY LYNCH  
CONSTELLATION ENERGY COMMODITIES  
GROUP  
2377 GOLD MEDAL WAY  
GOLD RIVER, CA 95670

LEONARD DEVANNA  
EXECUTIVE VICE PRESIDENT  
CLEAN ENERGY SYSTEMS, INC.  
11330 SUNCO DRIVE, SUITE A  
RANCHO CORDOVA, CA 95742

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

BRUCE MCCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1420  
SACRAMENTO, CA 95814

GREGGORY L. WHEATLAND  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

JANE E. LUCKHARDT  
ATTORNEY AT LAW  
DOWNEY BRAND LLP  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814

JEFFERY D. HARRIS  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95814

VIRGIL WELCH  
CLIMATE CAMPAIGN COORDINATOR  
ENVIRONMENTAL DEFENSE  
1107 9TH STREET, SUITE 540  
SACRAMENTO, CA 95814

WILLIAM W. WESTERFIELD, 111  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814

DOWNEY BRAND  
JANE E. LUCKHARDT  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814-4686

RAYMOND J. CZAHAH, C.P.A.  
CHIEF FINANCIAL OFFICER  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
SACRAMENTO, CA 95826

STEVEN M. COHN  
ASSISTANT GENERAL COUNSEL  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
PO BOX 15830  
SACRAMENTO, CA 95852-1830

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER & MURPHY, LLP  
3620 AMERICAN RIVER DRIVE, STE. 205  
SACRAMENTO, CA 95864

DAN SILVERIA  
SURPRISE VALLEY ELECTRIC COOPERATIVE  
PO BOX 691  
ALTURAS, CA 96101

JESSICA NELSON  
PLUMAS-SIERRA RURAL ELECTRIC CO-OP  
73233 STATE ROUTE 70, STE A  
PORTOLA, CA 96122-7064

DONALD BROOKHYSER  
ALCANTAR & KAHL  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97210

CYNTHIA SCHULTZ  
REGULATORY FILING COORDINATOR  
PACIFIC POWER AND LIGHT COMPANY  
825 N.E. MULTNOMAH  
PORTLAND, OR 97232

KYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH,  
PORTLAND, OR 97232

RYAN FLYNN  
PACIFICORP  
825 NE MULTNOMAH STREET  
PORTLAND, OR 97232

TARA KNOX  
AVISTA CORPORATION  
PO BOX 3727  
SPOKANE, WA 99220

IAN CARTER  
POLICY COORDINATOR-NORTH AMERICA  
INTL. EMISSIONS TRADING ASSN.  
350 SPARKS STREET, STE. 809  
OTTAWA, ON K1R 7S8  
CANADA

JASON DUBCHAK  
ASSOCIATE GENERAL COUNSEL  
NISKA GAS STORAGE  
1200 855 2ND STREET, S.W.  
CALGARY, AB T2P 4Z5  
CANADA

# Information Only

BRIAN M. JONES  
M. J. BRADLEY & ASSOCIATES, INC.  
47 JUNCTION SQUARE DRIVE  
CONCORD, MA 01742

KENNETH A. COLBURN  
SYMBILTIC STRATEGIES, LLC  
26 WINTON ROAD  
MEREDITH, NH 03253

RICHARD COWART  
REGULATORY ASSISTANCE PROJECT  
50 STATE STREET, SUITE 3  
MONTPELIER, VT 05602

KATHRYN WIG  
PARALEGAL  
NRG ENERGY, INC.  
211 CARNEGIE CENTER  
PRINCETON, NY 08540

SAKIS ASTERIADIS  
APX INC  
1270 FIFTH AVE., SUITE 15R  
NEW YORK, NY 10029

GEORGE HOPLEY  
BARCLAYS CAPITAL  
200 PARK AVENUE  
NEW YORK, NY 10166

ADAM J. KATZ  
MCDERMOTT WILL & EMERY LLP  
600 13TH STREET, NW.  
WASHINGTON, DC 20005

ELIZABETH ZELLJADT  
1725 I STREET, N.W. SUITE 300  
WASHINGTON, DC 20006

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

VERONIQUE BUGNION  
POINT CARBON  
205 SEVERN RIVER RD  
SEVERNA PARK, MD 21146

KYLE D. BOUDREAUX  
FPL GROUP  
700 UNIVERSE BLVD., JES/JB  
JUNO BEACH, FL 33408

ANDREW BRADFORD  
SENIOR MARKET RESEARCH ASSOCIATE  
FELLON-MCCORD & ASSOCIATES  
SUITE 2000  
9960 CORPORATE CAMPUS DRIVE  
LOUISVILLE, KY 40223

GARY BARCH  
FELLON-MCCORD & ASSOCIATES, INC.  
SUITE 2000  
9960 CORPORATE CAMPUS DRIVE  
LOUISVILLE, KY 40223

RALPH E. DENNIS  
DIRECTOR, REGULATORY AFFAIRS  
FELLON-MCCORD & ASSOCIATES  
CONSTELLATION NEWENERGY-GAS DIV.  
9960 CORPORATE CAMPUS DR., STE 2000  
LOUISVILLE, KY 40223

SAMARA MINDEL  
REGULATORY AFFAIRS ANALYST  
FELLON-MCCORD & ASSOCIATES  
9960 CORPORATE CAMPUS DRIVE, SUITE 2000  
LOUISVILLE, KY 40223

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

CATHY S. WOOLLUMS  
MIDAMERICAN ENERGY HOLDINGS COMPANY  
106 EAST SECOND STREET  
DAVENPORT, IA 52801

BRIAN POTTS  
SUITE 700  
ONE SOUTH PINCKNEY STREET  
MADISON, WI 53703

JAMES W. KEATING  
BP AMERICA, INC.  
MAIL CODE 603-1E  
150 W. WARRENVILLE RD.  
NAPERVILLE, IL 60563

JAMES ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017

TRENT A. CARLSON  
RELIANT ENERGY  
1000 MAIN STREET  
HOUSTON, TX 77001

GARY HINNERS  
RELIANT ENERGY, INC.  
PO BOX 148  
HOUSTON, TX 77001-0148

JULIE L. MARTIN  
WEST ISO COORDINATOR  
NORTH AMERICA GAS AND POWER  
BP ENERGY COMPANY  
501 WESTLAKE PARK BLVD.  
HOUSTON, TX 77079

ED CHIANG  
ELEMENT MARKETS, LLC  
ONE SUGAR CREEK CTR. BLVD., STE 250  
SUGAR LAND, TX 77478

NADAV ENBAR  
ENERGY INSIGHTS  
1750 14TH STREET, SUITE 200  
BOULDER, CO 80302

NICHOLAS LENSSEN  
ENERGY INSIGHTS  
1750 14TH STREET, SUITE 200  
BOULDER, CO 80302

ELIZABETH BAKER  
SUMMIT BLUE CONSULTING  
1722 14TH STREET, SUITE 230  
BOULDER, CO 80304

KEVIN J. SIMONSEN  
ENERGY MANAGEMENT SERVICES  
646 EAST THIRD AVENUE  
DURANGO, CO 81301

PHILIP D. LUSK  
WESTERN ELECTRICITY COORDINATING COUNCIL  
615 ARAPEEN DRIVE, SUITE 210  
SALT LAKE CITY, UT 84108-1262

SANDRA ELY  
NEW MEXICO ENVIRONMENT DEPARTMENT  
1190 ST FRANCIS DRIVE  
SANTA FE, NM 87501

BRIAN MCQUOWN  
RELIANT ENERGY  
7251 AMIGO ST., SUITE 120  
LAS VEGAS, NV 89119

DOUGLAS BROOKS  
NEVADA POWER COMPANY  
SIERRA PACIFIC POWER COMPANY  
6226 WEST SAHARA AVENUE  
LAS VEGAS, NV 89151

BILL SCHRAND  
SOUTHWEST GAS CORPORATON  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

JJ PRUCNAL  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

MERIDITH J. STRAND  
SENIOR COUNSEL  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

CYNTHIA MITCHELL  
ENERGY ECONOMICS, INC.  
530 COLGATE COURT  
RENO, NV 89503

CHRISTOPHER A. HILEN  
ASSISTANT GENERAL COUNSEL  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89511

ELENA MELLO  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89520

TREVOR DILLARD  
SIERRA PACIFIC POWER COMPANY  
PERMITTING&STRATEGIC  
PO BOX 10100  
6100 NEIL ROAD, MS S4A50  
RENO, NV 89520

DARRELL SOYARS  
MANAGER-RESOURCE

SIERRA PACIFIC RESOURCES  
6100 NEIL ROAD  
RENO, NV 89520-0024

FRANK LUCHETTI  
NEVADA DIV. OF ENVIRONMENTAL PROTECTION  
POWER  
901 S. STEWART ST., SUITE 4001  
CARSON CITY, NV 89701

LEILANI JOHNSON KOWAL  
LOS ANGELES DEPT. OF WATER AND  
POWER  
111 N. HOPE STREET, ROOM 1050  
LOS ANGELES, CA 90012

RANDY S. HOWARD  
LOS ANGELES DEPT. OF WATER AND POWER  
111 NORTH HOPE STREET, ROOM 921  
LOS ANGELES, CA 90012

ROBERT L. PETTINATO  
LOS ANGELES DEPT OF WATER & POWER  
111 NORTH HOPE STREET, SUITE 1150  
LOS ANGELES, CA 90012

HUGH YAO  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. 5TH ST, GT22G2  
LOS ANGELES, CA 90013

RASHA PRINCE  
SAN DIEGO GAS & ELECTRIC  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

RANDALL W. KEEN  
ATTORNEY AT LAW  
MANATT PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064

S. NANCY WHANG  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064

MICHAEL MCCORMICK  
CALIFORNIA CLIMATE ACTION REGISTRY  
515 S. FLOWER ST. SUITE 1640  
LOS ANGELES, CA 90071

HARVEY EDER  
PUBLIC SOLAR POWER COALITION  
1218 12TH ST., 25  
SANTA MONICA, CA 90401



STEVE ENDO  
DEPARTMENT OF WATER & POWER  
150 S LOS ROBLES AVE., STE. 200  
PASADENA, CA 91101

STEVEN G. LINS  
CITY OF GLENDALE  
OFFICE OF THE CITY ATTORNEY  
613 EAST BROADWAY, SUITE 220  
GLENDALE, CA 91206-4394

TOM HAMILTON  
MANAGING PARTNER  
ENERGY CONCIERGE SERVICES  
321 MESA LILA RD  
GLENDALE, CA 91208

BRUNO JEIDER  
BURBANK WATER & POWER  
164 WEST MAGNOLIA BLVD.  
BURBANK, CA 91502

ROGER PELOTE  
WILLIAMS POWER COMPANY  
12736 CALIFA STREET  
VALLEY VILLAGE, CA 91607

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE., RM. 370  
ROSEMEAD, CA 91770

CATHY KARLSTAD  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770

TIM HEMIG  
NRG ENERGY, INC.  
1819 ASTON AVENUE, SUITE 105  
CARLSBAD, CA 92008

BARRY LOVELL  
15708 POMERADO RD., SUITE 203  
POWAY, CA 92064

AIMEE M. SMITH  
ATTORNEY AT LAW  
SEMPRA ENERGY  
101 ASH STREET HQ13  
SAN DIEGO, CA 92101

ALDYN HOEKSTRA  
PACE GLOBAL ENERGY SERVICES  
420 WEST BROADWAY, 4TH FLOOR  
SAN DIEGO, CA 92101

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103

YVONNE GROSS  
REGULATORY POLICY MANAGER  
SEMPRA ENERGY  
HQ08C  
101 ASH STREET  
SAN DIEGO, CA 92103

JOHN LAUN  
APOGEE INTERACTIVE, INC.  
1220 ROSECRANS ST., SUITE 308  
SAN DIEGO, CA 92106

KIM KIENER  
504 CATALINA BLVD.  
SAN DIEGO, CA 92106

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE DIRECTOR  
UNIV. OF SAN DIEGO SCHOOL OF LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110

ANDREW MCALLISTER  
DIRECTOR OF OPERATIONS  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVE., SUITE 100  
SAN DIEGO, CA 92123

JACK BURKE  
LEGISLATIVE AFFAIRS MANAGER  
CAL. CNTR FOR SUSTAINABLE ENERGY  
8690 BALBOA AVE., SUITE 100  
SAN DIEGO, CA 92123

JENNIFER PORTER  
POLICY ANALYST  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVENUE, SUITE 100  
SAN DIEGO, CA 92123

SEPHRA A. NINOW  
POLICY ANALYST  
CAL. CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVENUE, SUITE 100  
SAN DIEGO, CA 92123

JOHN W. LESLIE  
ATTORNEY AT LAW  
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130

ORLANDO B. FOOTE, III  
ATTORNEY AT LAW  
HORTON, KNOX, CARTER & FOOTE  
895 BROADWAY, SUITE 101  
EL CENTRO, CA 92243

ELSTON K. GRUBAUGH  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BLVD.  
IMPERIAL, CA 92251

MWIRIGI IMUNGI  
15615 ALTON PARKWAY  
IRVINE, CA 92618

JAN PEPPER  
CLEAN POWER MARKETS, INC.  
PO BOX 3206  
418 BENVENUE AVENUE  
LOS ALTOS, CA 94024

GLORIA D. SMITH  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
601 GATEWAY BLVD., SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080

MARC D. JOSEPH  
ADAMS BRADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO, CA 94080

DIANE I. FELLMAN  
ATTORNEY AT LAW  
LAW OFFICES OF DIANE I. FELLMAN  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102

HAYLEY GOODSON  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

MICHEL FLORIO  
ATTORNEYS AT LAW  
711 VAN NESS AVE., STE. 350  
SAN FRANCISCO, CA 94102

DAN ADLER  
DIR., TECH AND POLICY DEVELOPMENT  
CALIFORNIA CLEAN ENERGY FUND  
5 THIRD STREET, SUITE 1125  
SAN FRANCISCO, CA 94103

MICHAEL A. HYAMS  
POWER ENTERPRISE-REGULATORY AFFAIRS  
SAN FRANCISCO PUBLIC UTILITIES COMM  
1155 MARKET ST., 4TH FLOOR  
SAN FRANCISCO, CA 94103

NORMAN J. FURUTA  
ATTORNEY AT LAW  
FEDERAL EXECUTIVE AGENCIES  
1455 MARKET ST., SUITE 1744  
SAN FRANCISCO, CA 94103-1399

ANNABELLE MALINS  
CONSUL-SCIENCE AND TECHNOLOGY  
BRITISH CONSULATE-GENERAL  
ONE SANSOME STREET, SUITE 850  
SAN FRANCISCO, CA 94104

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

ERIC WANLESS  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

OLOF BYSTROM  
DIRECTOR, WESTERN ENERGY  
CAMBRIDGE ENERGY RESEARCH ASSOC.  
555 CALIFORNIA STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94104

SHERYL CARTER  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

ASHLEE M. BONDS  
THELEN REID BROWN RAYSMAN&STEINER  
LLP SUITE 1800  
101 SECOND STREET  
SAN FRANCISCO, CA 94105

CARMEN E. BASKETTE  
CORPORATE DEVELOPMENT PRINCIPAL  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105

COLIN PETHERAM  
DIRECTOR-REGULATORY  
SBC CALIFORNIA  
140 NEW MONTGOMERY ST., SUITE 1325  
SAN FRANCISCO, CA 94105

DAVID R MILLER  
ENERGY AND CLIMATE CONSULTANT  
TETRA TECH EM INC.  
135 MAIN STREET, SUITE 1800  
SAN FRANCISCO, CA 94105

DEBORAH BROCKETT  
CONSULTANT  
NAVIGANT CONSULTING, INC.  
SPEAR STREE TOWER, SUITE 1200  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105

KEVIN FOX  
WILSON SONSINI GOODRICH & ROSATI  
ONE MARKET STREET, SPEAR TOWER, 3300  
SAN FRANCISCO, CA 94105

KHURSHID KHOJA  
ASSOCIATE  
THELEN REID BROWN RAYSMAN & STEINER  
101 SECOND STREET, SUITE 1800  
SAN FRANCISCO, CA 94105

STEPHANIE LA SHAWN  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
77 BEALE STREET, RM. 996B  
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVENUE  
SAN FRANCISCO, CA 94110

HOWARD V. GOLUB  
NIXON PEABODY LLP  
2 EMBARCADERO CENTER, STE. 2700  
SAN FRANCISCO, CA 94111

JANINE L. SCANCARELLI  
ATTORNEY AT LAW  
FOLGER, LEVIN & KAHN, LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

MARTIN A. MATTES  
NOSSAMAN, GUTHNER, KNOX & ELLIOTT,  
50 CALIFORNIA STREET, 34TH FLOOR  
SAN FRANCISCO, CA 94111

JEN MCGRAW  
CENTER FOR NEIGHBORHOOD TECHNOLOGY  
PO BOX 14322  
SAN FRANCISCO, CA 94114

LISA WEINZIMER  
CALIFORNIA ENERGY REPORTER  
PLATTS  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118

STEVEN MOSS  
SAN FRANCISCO COMMUNITY POWER COOP  
2325 3RD STREET, SUITE 344  
SAN FRANCISCO, CA 94120

SHAUN ELLIS  
2183 UNION STREET  
SAN FRANCISCO, CA 94123

ARNO HARRIS  
RECURRENT ENERGY, INC.  
220 HALLECK ST., SUITE 220  
SAN FRANCISCO, CA 94129

ED LUCHA  
PROJECT COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE: B9A  
SAN FRANCISCO, CA 94177

GRACE LIVINGSTON-NUNLEY  
ASSISTANT PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

JASMIN ANSAR  
PG&E  
MAIL CODE B24A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

JONATHAN FORRESTER  
PG&E  
MAIL CODE N13C  
PO BOX 770000  
SAN FRANCISCO, CA 94177

SEBASTIEN CSAPO  
PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

SOUMYA SASTRY  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

VALERIE J. WINN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, B9A  
SAN FRANCISCO, CA 94177-0001

FARROKH ALBUYEH  
VICE PRESIDENT  
OPEN ACCESS TECHNOLOGY INTERNATIONAL INC  
SUITE 910  
1875 SOUTH GRANT STREET  
SAN MATEO, CA 94402

GREG BLUE  
140 MOUNTAIN PKWY.  
CLAYTON, CA 94517

DEAN R. TIBBS  
PRESIDENT  
ADVANCED ENERGY STRATEGIES, INC.  
1390 WILLOW PASS ROAD, SUITE 610  
CONCORD, CA 94520

JEFFREY L. HAHN  
COVANTA ENERGY CORPORATION  
876 MT. VIEW DRIVE  
LAFAYETTE, CA 94549

ANDREW J. VAN HORN  
VAN HORN CONSULTING  
12 LIND COURT  
ORINDA, CA 94563

SUE KATELEY  
EXECUTIVE DIRECTOR  
CAL. SOLAR ENERGY INDUSTRIES ASSN  
PO BOX 782  
RIO VISTA, CA 94571

JOSEPH M. PAUL  
SENIOR CORPORATE COUNSEL  
DYNEGY, INC.  
2420 CAMINO RAMON, SUITE 215  
SAN RAMON, CA 94583

MONICA A. SCHWEBS, ESQ.  
BINGHAM MCCUTCHEN LLP  
SUITE 210  
1333 N. CALIFORNIA BLVD.  
WALNUT CREEK, CA 94596

PETER W. HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER, LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596

JOSEPH HENRI  
31 MIRAMONTE ROAD  
WALNUT CREEK, CA 94597

PATRICIA THOMPSON  
SUMMIT BLUE CONSULTING  
2920 CAMINO DIABLO, SUITE 210  
WALNUT CREEK, CA 94597

WILLIAM F. DIETRICH  
ATTORNEY AT LAW  
DIETRICH LAW  
2977 YGNACIO VALLEY ROAD, 613  
WALNUT CREEK, CA 94598-3535

BETTY SETO  
POLICY ANALYST  
KEMA, INC.  
492 NINTH STREET, SUITE 220  
OAKLAND, CA 94607

GERALD L. LAHR  
ABAG POWER  
101 EIGHTH STREET  
OAKLAND, CA 94607

JODY S. LONDON  
JODY LONDON CONSULTING  
PO BOX 3629  
OAKLAND, CA 94609

STEVEN SCHILLER  
SCHILLER CONSULTING, INC.  
111 HILLSIDE AVENUE  
PIEDMONT, CA 94611

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612

REED V. SCHMIDT  
VICE PRESIDENT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703

ADAM BRIONES  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706

BRENDA LEMAY  
DIRECTOR OF PROJECT DEVELOPMENT  
HORIZON WIND ENERGY  
1600 SHATTUCK, SUITE 222  
BERKELEY, CA 94709

CARLA PETERMAN  
UCEI  
2547 CHANNING WAY  
BERKELEY, CA 94720

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL LABORATORY  
BUILDING 90-4000  
BERKELEY, CA 94720

RYAN WISER  
BERKELEY LAB  
MS-90-4000  
ONE CYCLOTRON ROAD  
BERKELEY, CA 94720

CHRIS MARNAY  
BERKELEY LAB  
1 CYCLOTRON RD MS 90R4000  
BERKELEY, CA 94720-8136

PHILLIP J. MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

RITA NORTON  
RITA NORTON AND ASSOCIATES, LLC  
18700 BLYTHSWOOD DRIVE,  
LOS GATOS, CA 95030

CARL PECHMAN  
POWER ECONOMICS  
901 CENTER STREET  
SANTA CRUZ, CA 95060

KENNY SWAIN  
POWER ECONOMICS  
901 CENTER STREET  
SANTA CRUZ, CA 95060

MAHLON ALDRIDGE  
ECOLOGY ACTION  
PO BOX 1188  
SANTA CRUZ, CA 95060

RICHARD SMITH  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95352-4060

CHRISTOPHER J. MAYER  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

ROGER VAN HOY  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460

JOHN R. REDDING  
ARCTURUS ENERGY CONSULTING  
44810 ROSEWOOD TERRACE  
MENDOCINO, CA 95460

CLARK BERNIER  
RLW ANALYTICS  
1055 BROADWAY, SUITE G  
SONOMA, CA 95476

RICHARD MCCANN, PH.D  
M. CUBED  
2655 PORTAGE BAY, SUITE 3  
DAVIS, CA 95616

CAROLYN M. KEHREIN  
ENERGY MANAGEMENT SERVICES  
1505 DUNLAP COURT  
DIXON, CA 95620-4208

CALIFORNIA ISO  
LEGAL AND REGULATORY DEPARTMENT  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

GRANT ROSENBLUM, ESQ.  
CALIFORNIA ISO  
LEGAL AND REGULATORY DEPARTMENT  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

KAREN EDSON  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

ROBIN SMUTNY-JONES  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

SAEED FARROKHPAY  
FEDERAL ENERGY REGULATORY COMMISSION  
110 BLUE RAVINE RD., SUITE 107  
FOLSOM, CA 95630

DAVID BRANCHCOMB  
BRANCHCOMB ASSOCIATES, LLC  
9360 OAKTREE LANE  
ORANGEVILLE, CA 95662

KIRBY DUSEL  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670

LAURIE PARK  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078

SCOTT TOMASHEFSKY  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420

ELLEN WOLFE  
RESERO CONSULTING  
9289 SHADOW BROOK PL.  
GRANITE BAY, CA 95746

AUDRA HARTMANN  
980 NINTH STREET, SUITE 2130  
SACRAMENTO, CA 95814

CURT BARRY  
717 K STREET, SUITE 503  
SACRAMENTO, CA 95814

DAVID L. MODISETTE  
EXECUTIVE DIRECTOR  
CALIFORNIA ELECTRIC TRANSP. COALITION  
1015 K STREET, SUITE 200  
SACRAMENTO, CA 95814

LARRY HUNSAKER  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

RACHEL MCMAHON  
CEERT  
1100 11TH STREET, SUITE 311  
SACRAMENTO, CA 95814

WEBSTER TASAT  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

WEBSTER TASAT  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS ASSN  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814-3947

EDWARD J. TIEDEMANN  
ATTORNEY AT LAW  
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
400 CAPITOL MALL, 27TH FLOOR  
SACRAMENTO, CA 95814-4416

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95816

OBADIAH BARTHOLOMY  
MECHANICAL ENGINEER  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
M.S. B257  
6201 S. STREET  
SACRAMENTO, CA 95817

BUD BEEBE  
SACRAMENTO MUNICIPAL UTIL DIST  
MS B257  
6201 S STREET  
SACRAMENTO, CA 95817-1899

BALWANT S. PUREWAL  
DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., LL-90  
SACRAMENTO, CA 95821

DOUGLAS MACMULLLEN  
CHIEF, POWER PLANNING SECTION  
CA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., ROOM 356  
SACRAMENTO, CA 95821

KAREN NORENE MILLS  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA RD, NO. 112, PMB 119  
ANTELOPE, CA 95843

DENISE HILL  
DIRECTOR  
4004 KRUSE WAY PLACE, SUITE 150  
LAKE OSWEGO, OR 97035

ANNIE STANGE  
ALCANTAR & KAHL  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97201



ELIZABETH WESTBY  
ALCANTAR & KAHL, LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201

ALEXIA C. KELLY  
THE CLIMATE TRUST  
65 SW YAMHILL STREET, SUITE 400  
PORTLAND, OR 97204

ALAN COMNES  
WEST COAST POWER  
3934 SE ASH STREET  
PORTLAND, OR 97214

KYLE SILON  
ECOSECURITIES CONSULTING LIMITED  
529 SE GRAND AVENUE  
PORTLAND, OR 97214

CATHIE ALLEN  
CA STATE MGR.  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232

PHIL CARVER  
OREGON DEPARTMENT OF ENERGY  
625 MARION ST., NE  
SALEM, OR 97301-3737

SAM SADLER  
OREGON DEPARTMENT OF ENERGY  
625 NE MARION STREET  
SALEM, OR 97301-3737

LISA SCHWARTZ  
SENIOR ANALYST  
ORGEON PUBLIC UTILITY COMMISSION  
PO BOX 2148  
SALEM, OR 97308-2148

CLARE BREIDENICH  
224 1/2 24TH AVENUE EAST  
SEATTLE, WA 98112

JESUS ARREDONDO  
NRG ENERGY INC.  
4600 CARLSBAD BLVD.  
CARLSBAD, CA 92008

KAREN MCDONALD  
POWEREX CORPORATION  
1400,  
666 BURRAND STREET  
VANCOUVER, BC V6C 2X8  
CANADA

## State Service

JAMES LOEWEN  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
320 WEST 4TH STREET SUITE 500  
LOS ANGELES, CA 90013

ANDREW CAMPBELL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5203  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ANNE GILLETTE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHARLOTTE TERKEURST  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMIN. LAW JUDGES  
ROOM 5117  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHRISTINE S. TAM  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ED MOLDAVSKY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5130  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5036  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JACLYN MARKS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5306  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

GEORGE S. TAGNIPES  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOEL T. PERLSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5133  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JONATHAN LAKRITZ  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5020  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JUDITH IKLE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
ROOM 4012  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KRISTIN RALFF DOUGLAS  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LAINIE MOTAMEDI  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MEG GOTTSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MERIDETH STERKEL  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NANCY RYAN  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5217  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAMELA WELLNER  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARA M. KAMINS  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SCOTT MURTISHAW  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

STEVE ROSCOW  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SUZY HONG  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5037  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

THERESA CHO  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5207  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TIM G. DREW  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
JUSTICE  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BILL LOCKYER  
STATE ATTORNEY GENERAL  
STATE OF CALIFORNIA, DEPT OF  
  
PO BOX 944255  
SACRAMENTO, CA 94244-2550

KEN ALEX  
PO BOX 944255  
1300 I STREET, SUITE 125  
SACRAMENTO, CA 94244-2550

JUDITH B. SANDERS  
ATTORNEY AT LAW  
CAL. INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

JULIE GILL  
EXTERNAL AFFAIRS MANAGER  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MARY MCDONALD  
DIRECTOR OF STATE AFFAIRS  
CAL. INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

PHILIP D. PETTINGILL  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MICHAEL SCHEIBLE  
DEPUTY EXECUTIVE OFFICER  
CALIFORNIA AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95677

MEG GOTTSTEIN  
ADMINISTRATIVE LAW JUDGE  
PO BOX 210/21496 NATIONAL STREET  
VOLCANO, CA 95689

PAM BURMICH  
AIR RESOURCES BOARD  
1001 I STREET, BOX 2815  
SACRAMENTO, CA 95812

B. B. BLEVINS  
EXECUTIVE DIRECTOR  
ENVIRONMENT  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-39  
SACRAMENTO, CA 95814

DEBORAH SLON  
DEPUTY ATTORNEY GENERAL,  
OFFICE OF THE ATTORNEY GENERAL  
1300 I STREET, 15TH FLOOR  
SACRAMENTO, CA 95814

DON SCHULTZ  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

KAREN GRIFFIN  
EXECUTIVE OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 39  
SACRAMENTO, CA 95814

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814

MICHELLE GARCIA  
AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

PIERRE H. DUVAIR  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-41  
SACRAMENTO, CA 95814

WADE MCCARTNEY  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

ANDREW ULMER  
STAFF COUNSEL  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVENUE, SUITE 120  
SACRAMENTO, CA 95821

CAROL J. HURLOCK  
CALIFORNIA DEPT. OF WATER RESOURCES  
JOINT OPERATIONS CENTER  
3310 EL CAMINO AVE. RM 300  
SACRAMENTO, CA 95821

HOLLY B. CRONIN  
STATE WATER PROJECT OPERATIONS DIV  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVE., LL-90  
SACRAMENTO, CA 95821

WDC99 1415030-8.043920.0236