BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

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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

BEFORE THE CALIFORNIA ENERGY COMMISSION

In The Matter Of,

AB 32 Implementation – Greenhouse Gas Emissions.

Docket 07-OIIP-01

<u>REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO</u> <u>COMMENTS AND LEGAL BRIEFS ON MARKET ADVISORY COMMITTEE</u>

REPORT

MICHAEL D. MONTOYA LAURA I. GENAO



Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

> 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-6842 Facsimile: (626) 302-1935 E-mail: Laura.Genao@sce.com

Dated: August 15, 2007

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

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Pursuant to the Administrative Law Judge's Ruling Regarding Comments and Legal Briefing on Market Advisory Committee Report, issued July 19, 2007, and the Administrative Law Judge's Ruling Requesting That Parties Address an Additional Legal Issue, issued August 8, 2007 ("Ruling on Additional Legal Issue"), Southern California Edison Company ("SCE") submits these reply comments addressing various general issues raised by parties to this proceeding. SCE notes that because of the volume of comments received, it is impossible to address them all here. However, SCE looks forward to responding to any additional questions the California Public Utilities Commission ("CPUC"), California Energy Commission ("CEC"), and other parties may have at the upcoming *en banc* hearing on the deliverer/first seller ("First Seller") proposal set forth in the Recommendations for Designing a Greenhouse Gas Cap-and*Trade System for California* ("Report") prepared by the California Market Advisory Committee ("CMAC") or in any other forum the CPUC or CEC may choose.

Although SCE addresses issues such as market liquidity, data requirements, and certain legal questions in this reply brief, it also wishes to reiterate the reasons why a load-based approach is not the most effective and efficient way for California to implement its greenhouse gas ("GHG") emissions reduction legislation. Among these are the following:

- A load-based approach will not produce accurate reporting of GHG emissions;
- A load-based approach will likely distort electricity markets;
- A load-based approach will likely interfere with the California Independent System Operators Market Redesign Technology Update ("MRTU"); and
- A load-based approach does not adequately address leakage and contract shuffling.

I.

SCE'S REPLY TO PARTIES' SPECIFIC CONCERNS

A. <u>Allegations Regarding the Effect of a First Seller Construct on the Market and</u> <u>Liquidity are Speculative and Baseless</u>

Various parties argue that a First Seller approach will result in firms abandoning sales into California.¹ They predict that the regulatory burden will be such that firms will elect to do business elsewhere resulting in higher prices in, and reliability concerns for, California. This

PacifiCorp's Response to Administrative Law Judge's Ruling Requesting Comments and Legal Briefs on Market Advisory Committee Report, dated August 6, 2007 ("PacifiCorp Comments"), at 8; Opening Comments of the Salt River Project Agricultural Improvement and Power District on the Administrative Law Judges' Ruling Requesting Comments and Legal Briefs on Market Advisory Committee Report, dated August 6, 2007 ("Salt River Comments"), at 4-5; Southern California Public Power Authority Comment on Market Advisory Committee Report, dated August 6, 2007 ("SCPPA Comments"), at 13.

same argument is made with regard to renewables.² These assertions are highly speculative and should therefore not be accorded much weight.

There are many regulatory and operational issues that sellers wishing to export to any state or Balancing Authority face. The market currently addresses such issues through appropriate contracting. Such contracts may address which party must comply with the regulation or may simply include a pricing premium for risks associated with the market and/or regulatory activity. As western markets evolve, SCE expects that the prices, terms, and conditions of contracts will likewise evolve. While the absolute price of electricity in California will likely be higher after GHG emissions regulations are implemented, there is simply no reason to believe that an entity, be it a generator, marketer, banker, or load-serving entity ("LSE"), will abandon a transaction which offers incremental benefit to it, once all costs and risks have been appropriately addressed.³

B. <u>The Data Requirements of the First Seller Approach Are Not Significant Enough to</u> Warrant Rejection of the Approach

Several parties seem to urge the CPUC and CEC to stop discussion, analysis, and development of a First Seller option for GHG emissions reduction compliance by raising the specter of uncontrolled regulation with vast data requirements both for a regulating agency and for regulated entities.⁴ One party, for example, asserts that "seventy California entities . . . could be regulated under a load-based approach versus literally hundreds, perhaps thousands, of electricity generators and power marketers located throughout the Western Electricity

² CalEnergy Operating Corporation's Response to Administrative Law Judges' Ruling Requesting Comments and Legal Briefs on Market Advisory Committee Report, dated August 6, 2007 ("CalEnergy Comments"), at 3; PacifiCorp Comments at 9.

³ Notably, with regard to renewables, at least one renewable generator recognized that "RPS facilities are only going to grow in value due to the increasing reliance that is being placed on the sector due to evolving public policy." Comments of Covanta Energy Corporation on the Market Advisory Committee Report, dated August 6, 2007, at 6. It is difficult to imagine that the requirements placed on a First Seller would be enough to send developers elsewhere when California is placing a premium on "cleaner" resources.

 $[\]pm$ PacifiCorp Comments at 2.

Coordinating Council . . . would need to be overseen by California under 'first seller' approach." 5

This assertion overstates the number of potentially regulated entities under a First Seller approach. In all of North America, there are only 1,099 entities registered as a Purchasing Selling Entity ("PSE") or Control Area. Most of these entities are not within the Western Electricity Coordinating Council ("WECC") interconnection and therefore would not likely transact in California. When paring the list down to just PSEs and Control Areas within WECC, the list currently includes about 100 entities. Notably, this list includes substantially all of the entities which some parties believe will be regulated under a load-based approach.

The comparison of the burden of regulation under a load-based approach versus the scope of regulation under a First Seller approach is also inappropriate because it fails to account for how either a load-based or a First Seller approach will actually be implemented. Under a loadbased approach, the state must track individual transactions conducted by each LSE. This makes the relevant number for benchmarking the complexity of reporting under the load-based approach is the number of LSEs times the number of transactions per LSE. Some parties have completely ignored this part of the calculation.

Under a First-Seller approach, it is not necessary for the specified regulatory agency to track LSE transactions. Rather, that agency need only track the total emissions for each in-state generator (on an aggregate, as opposed to on a transaction-by-transaction, basis) and the emissions associated with import transactions.⁶

The CAISO's data can be used to estimate the complexity of tracking and reporting under a First Seller approach. Multiplying 600 E-tags per day, times 365 days, and adding in a requirement to track total annual emissions from each generator, produces 22,000 data elements

⁵ PacifiCorp Comments at 8.

⁶ According to the recent California Independent System Operator ("CAISO") presentation, there are 1,356 generators in the CAISO and 600 NERC E-tags generated per day for imports into CAISO. *Tagging Under MRTU New Interchange Transaction Schedule System for CAISO*, presentation to WECC Interchange Scheduling and Accounting Subcommittee by Kyle T. Hoffman, Manager Scheduling, CAISO, given in Boise, Idaho, on August 8, 2007.

for First Seller reporting in CAISO. Based on this number of data elements, tracking and reporting under the First Seller approach seems manageable.

By contrast, according to CAISO, for each hour, on average, there are approximately 714 generation schedules, 800 to 1,000 energy custody change schedules, 99 load schedules, and 320 intertie schedules. This represents nearly 18 million schedules per year in the CAISO's system that would have to be tracked, in addition to bilateral transactions that do not involve CAISO schedules, to accurately trace the path of electrical energy from source to LSE sink under a load-based approach. Given the size of this number and for the other reasons discussed in SCE's previous comments, emissions tracking under a load-based approach only becomes administratively feasible when individual transactions and schedules are ignored and default emissions factors are employed. However, this comes at the price of accuracy and also introduces several gaming opportunities as SCE has previously explained. Accordingly, the load-based approach seems far inferior to the First Seller approach in terms of the regulatory burden that will be imposed by a load-based system.

C. Assembly Bill 32 Does Not Require Adoption of a Load-Based System

Certain parties assert that a First Seller approach should not be considered because the text of Assembly Bill ("AB") 32 requires adoption of an approach that regulates consumers, not producers, of electricity.² This argument is meritless.

The text of AB 32 clearly states that the Legislature's intent:

It is the intent of the Legislature that the State Air Resources Board design emissions reduction measures to meet the statewide emissions limits for greenhouse gases established pursuant to this division in a manner that minimizes costs and maximizes benefits for California's economy, improves and modernizes California's infrastructure and maintains electric system reliability, maximizes additional environmental and economic co-benefits for California and complements the state's efforts to improve air quality.⁸

² SCPPA Comments at 5-6.

 $[\]frac{8}{2}$ Cal. Health & Safety Code § 38501(h).

This and other statements of the Legislature's intent make no mention of a legislative desire to enact a load-based system. Instead, they clearly leave open the means by which compliance with the legislation will be achieved.

Additionally, although parties cite to statutory language referring to electricity consumption, they fail to note that the statute specifically requires adoption of regulations that "[r]equire the monitoring and annual reporting of greenhouse gas emissions from greenhouse gas emissions sources beginning with the sources or categories of sources that contribute the most to statewide emissions."⁹ Statements such as this one squarely refute the idea that AB 32 requires adoption of a load-based approach to GHG emissions regulation.

D. <u>California's Renewable Portfolio Standard and Energy Efficiency Programs Will</u> Not be Affected by Adoption of the First Seller Proposal

Certain parties argue that adoption of the First Seller approach will remove the various incentives which have, to date, encouraged the development of renewables in California.¹⁰ There are no grounds for this assertion. The First Seller approach will not affect the Renewables Portfolio Standard ("RPS") or energy efficiency programs as they exist now because, under AB 32, the CPUC's independent authority and responsibilities over RPS and energy efficiency issues are not in any way abrogated.¹¹ Parties asserting the contrary make no effort to explain their reasoning for how AB 32 could affect the CPUC's authority over the RPS or energy efficiency programs.

 $[\]frac{9}{2}$ Id. at §38530(b)(1).

¹⁰ See e.g., CalEnergy Comments at 5-6; PacifiCorp Comments at 9.

See Comment of Morgan Stanley Capital Group Inc. on the Market Advisory Committee To the California Air Resource's Board's Recommendations for Designing a Greenhouse Gas Cap-and-Trade System for California, dated August 6, 2007 ("Morgan Stanley Comments"), at 16 ("Operationally, they are two separate programs, and do not directly interface, depite the fact that their innate purposes are very similar.")

E. <u>Proposals Requesting Limits on Non-Source-Specific Transactions Should be</u> <u>Rejected</u>

Some parties propose to make emission reduction and tracking more effective by adopting measures to discourage the use of non-source specific transactions.¹² It is unclear what target reduction these parties recommend for reducing non-source-specific transactions. It is also unclear what specific measures these parties would support to achieve that target. These reasons alone warrant rejection of such proposals. Additionally, for the reasons set forth below, SCE urges the CPUC to reject any proposals which would discourage of non-source-specific transactions.

First, various forms of legislation have already been implemented to discourage certain types of contracting. For example, the CPUC has already implemented regulations to prevent long-term investment in power plants that do not meet a certain emissions profile pursuant to Senate Bill 1368.¹³ Additionally, AB 32 requires that emissions reductions measures achieving GHG reduction be accomplished in a cost effective manner. Discouraging the use of non-source specific transactions would not comply with that legislative mandate.

Second, suggestions discouraging the use of non-source specific transactions fail to recognize the role of such purchases in the cost effective procurement of energy. To eliminate or significantly reduce such alternatives would unnecessarily increase electricity costs to California's ratepayers. As SCE has previously noted, "Today, SCE conducts approximately 20,000 electric energy transactions per year to meet the CPUC's requirement of least-cost dispatch of SCE's portfolio. Virtually all of these transactions are non source-specific, time-

PacifiCorp Comments at 3 ("[t]he Commission should explore procurement or contracting rules (i.e., standard contracting provisions) that encourage LSEs to develop energy portfolios that consist mainly of owned generation or source-specific contracted generation, and discourage non source-specific transactions.")

¹³ See Decision No. 07-01-039 at 8.

critical transactions conducted in day-ahead and hour-ahead markets to balance SCE's supply and demand on a least-cost basis."^{\square}

If any proposal to eliminate (or significantly restrict) non-source-specific transactions is adopted, SCE will lose (or have limited capability to use) its most important tool in achieving least-cost dispatch of its portfolio. Least-cost dispatch is achieved in the WECC today by bilateral non-source-specific transactions among market participants. Market participants having sales or retail obligations, for example, can choose not to operate their own generation that has a higher operating cost than the market price for power, and instead buy substitute power at the lower market price. Market participants operating all generation in their portfolio, having an operating cost less than the market price for power, can also sell any surplus energy in their portfolio beyond their sales or retail obligations, producing net revenue gains. In effect, all market participants, whether generators, LSEs, marketers, or financial institutions, use nonsource-specific transactions to balance their own portfolios (that is, achieving a portfolio netshort, or net-long, position that is approximately equal to zero) to achieve least-cost on an individual basis, with the result being least-cost on a system-wide basis. If this tool is taken away (or severely restricted) under a load-based cap in order to facilitate accurate tracking of GHG emissions from source to LSE, significant barriers to commerce will be created such that regulators should not expect least-cost dispatch to be achieved. Below are some examples of the impact on commerce and least-cost dispatch if non-source-specific transactions are banned or restricted.

> • For any source-specific transactions, the individual unit(s) sourcing the sale must be identified, and parties must determine and deal with issues such as the unit(s) tripping off line, loss (or de-rating) of transmission from the unit(s), transmission congestion costs, etc. In other words, there would be no standard contract that

¹⁴ See Reply Comments of Southern California Edison Company (U 338-E) Regarding Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Protocol, dated July 10, 2007 ("SCE Reply Comments"), at 7.

could quickly and easily be put in place at a low transaction cost. Finding the best transaction to execute among all possible buyers and sellers would be difficult in the absence of a standard product. The service brokers currently provide to match buyers and sellers of a standard product could not be performed. Since generation units come in different (odd-lot) sizes, there would be no common lot size for an energy transaction. None of these problems arise for non-source-specific products.

- In order for day-ahead least-cost dispatch to occur, many hundreds of transactions among many market participants must take place during a trading window that is approximately an hour or two long. It is unrealistic to expect this volume of transactions if all transactions must be source-specific.
- If the market price changes after the transaction is executed, such that a generator that is the source for the transaction is no longer economic to operate, the source-specific transaction must be renegotiated to achieve least-cost. Given the volatility of the power market, this need will often occur. Again, this issue does not arise for non-source-specific products.
- Market participants such as financial institutions and other entities that do not own "sources," cannot easily conduct "source-specific" transactions and would be significantly impacted. As these market participants create liquidity and typically have very high credit ratings, eliminating them or significantly impeding their operations in the market will also make it more difficult and costly (and perhaps impossible) for LSEs to achieve least-cost dispatch.¹⁵

Lastly, the proposal to eliminate non-source-specific transactions fails to consider how an LSE avoids such transactions under MRTU. MRTU contains market mechanisms to clear all bid-in load against bid-in generation. Such a "pooling" process necessarily breaks the link

¹⁵ SCE Reply Comments at 7-8 (footnotes omitted).

between a load and resources. Said another way, a ban on non-source-specific transactions would be tantamount to California's rejection of MRTU.

As should be apparent from the foregoing, the First Seller approach is superior in that GHG is accounted for at the source for in-state generation and at the point of import for out-of state resources. The transaction trail from source to sink does not need be tracked or regulated under First Seller.

II.

RESPONSE TO CPUC QUESTIONS REGARDING ADDITIONAL QUESTIONS REGARDING PREEMPTION UNDER THE FEDERAL POWER ACT

The CPUC's Ruling on Additional Legal Issue seeks parties' comments on the applicability of a line of federal Natural Gas Act cases to the question of whether the First Seller proposal is preempted by the Federal Power Act.¹⁶ Although the cases raised by the CPUC may be considered if a court is faced with a question of first impression regarding whether a state law intended to reduce the GHG emissions of electricity consumed within a state is preempted by the regulatory scheme embodied in the Federal Power Act, there is no indication that the line of cases identified by the CPUC will be more dispositive of the legal review of a First Seller approach than of a load-based approach. As set forth below, the cases identified by the CPUC support the view that a reviewing court will closely examine the effect and intent of California's statute in order to determine whether it should be preempted by the Federal Power Act.

As various parties have noted, Supreme Court precedent has directly acknowledged that a state regulation is not preempted by the Federal Power Act if compliance with FERC's economic regulation of the terms, conditions, and rates for FERC jurisdictional power sales is not prevented or thwarted by the state regulation.¹⁷ As parties note, in *Pacific Gas & Electric v*.

¹⁶ Ruling on Additional Legal Issue at 1.

¹⁷ See e.g., Comments of Pacific Gas & Electric Company (U 39 E) on Market Advisory Committee Recommendation of "First Seller" Regulation of Greenhouse Gas Emission Under AB 32, dated August 6, Continued on the next page

State Energy Resources Conservation & Dev. Comm'n, 461 U.S. 190, 205 (1983), the Court avoided preemption by narrowly characterizing federal and state goals so as to avoid a conflict between the two.¹⁸ The Supreme Court had previously come to the same conclusion when it found that a local state environmental regulation was not preempted when considered in the context of a federal regulatory scheme.

In *Huron Portland Cement Co.* v. *City of Detroit, et al*, 362 U.S. 440, (1960), the Court found that a city's "Smoke Abatement Code," which criminalized certain levels of smoke emissions from vessels docked in the city, was not preempted by federal laws governing ship inspection and licensing. The Court made this decision by separating out the purpose of the city's ordinance and the federal scheme. It held, "[t]he ordinance was enacted for the manifest purpose of promoting the health and welfare of the city's inhabitants. Legislation designed to free from pollution the very air that people breathe clearly falls within the exercise of even the most traditional concept of what is compendiously known as the police power. ... [T]he purpose of the federal inspection statutes is to insure the seagoing safety of vessels subject to inspection. ... By contrast, the sole aim of the Detroit ordinance is the elimination of air pollution to protect the health and enhance the cleanliness of the local community. ... For this reason we cannot find that the federal inspection legislation has pre-empted local action."¹⁰

FERC has similarly adopted a narrow interpretation of its jurisdiction in order to avoid preemption. In its Order Granting Emergency Clarification dated July 25, 2001, 96 FERC ¶ 61,117, Docket EL00-95-031 (2001), FERC ruled that power generators could be exempt from FERC's "must offer" requirements if they could show that running a unit would result in violation of a permit, including an environmental operating limitation.

The cases upon which the CPUC seeks comment similarly try to examine the true purpose of regulations in order to determine the preemption question and all three reaffirm the

Continued from the previous page

^{2007,} at 2; Legal Brief of the Natural Resources Defense Council (NRDC) and Enviornmental Defense (ED) on the "First Seller" Approach, dated August 6, 2007 ("NRDC/ED Brief") at 5-8.

¹⁸ See NRDC/ED Brief at 6.

¹⁹ Huron Portland Cement Co. v. City of Detroit, et al, 362 U.S. at 442, 445-446 (1960).

principle that an indirect effect on a subject matter also seemingly governed by federal regulation is not alone reason to find preemption. This is consistent with the Supreme Court's more recent pronouncements that "Of course, every state statute that has some indirect effect on rates and facilities . . . is not preempted." $\frac{20}{20}$

If a reviewing court were inclined to follow the Supreme Court's and FERC's lead as set out in the aforementioned cases, a finding that the federal scheme which governs FERC does not conflict with California's GHG regulation may be sustained.

III.

CONCLUSION

For the aforementioned reasons and those set out in SCE's Comments of Southern California Edison Company (U 338-E) Regarding Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol and subsequent reply briefing, SCE urges the CPUC and CEC to adopt a First Seller approach to reducing GHG emissions in California.

²⁰ Schneidewind v. ANR Pipeline Co., 485 U.S. 293, 308 (1989); see also Northwest Central Pipeline Corp. v. Kansas, 489 U.S. 493, 514 (1989) (State regulation was not preempted even though there may be "an incremental effect on the costs of purchasers in some market and contractual situations.")

Respectfully submitted,

MICHAEL D. MONTOYA LAURA I. GENAO

/S/ LAURA I. GENAO

By: Laura I. Genao

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

> 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-6842 Facsimile: (626) 302-1935 E-mail: Laura.Genao@sce.com

August 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I

have this day served a true copy of REPLY OF SOUTHERN CALIFORNIA EDISON

COMPANY (U 338-E) TO COMMENTS AND LEGAL BRIEFS ON MARKET ADVISORY

COMMITTEE REPORT on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.

First class mail will be used if electronic service cannot be effectuated.

Executed this 15th day of August, 2007, at Rosemead, California.

<u>/S/ RAQUEL IPPOLITI</u> Raquel Ippoliti, Project Analyst SOUTHERN CALIFORNIA EDISON COMPANY

> 2244 Walnut Grove Ave. Post Office Box 800 Rosemead, California 91770

CINDY ADAMS COVANTA ENERGY CORPORATION 40 LANE ROAD FAIRFIELD, NJ 7004 R.06-04-009

MICHAEL P. ALCANTAR ATTORNEY AT LAW ALCANTAR & KAHL LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-04-009

CATHIE ALLEN PACIFICORP 825 NE MULTNOMAH STREET, SUITE 2000 PORTLAND, OR 97232 R.06-04-009

JEANNE B. ARMSTRONG ATTORNEY AT LAW **GOODIN MACBRIDE SQUERI DAY &** LAMPREY 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-04-009

ELIZABETH BAKER SUMMIT BLUE CONSULTING 1722 14TH STREET, SUITE 230 BOULDER, CO 80304 R.06-04-009

AIMEE BARNES MANAGER REGULATORY AFFAIRS **ECOSECURITIES** 206 W. BONITA AVENUE CLAREMONT, CA 91711 R.06-04-009

CASE ADMINISTRATION SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE., RM. 370 ROSEMEAD, CA 91770 R.06-04-009

MAHLON ALDRIDGE ECOLOGY ACTION PO BOX 1188 SANTA CRUZ, CA 95060 R.06-04-009

SCOTT J. ANDERS **RESEARCH/ADMINISTRATIVE DIRECTOR** UNIVERSITY OF SAN DIEGO SCHOOL OF LAW 5998 ALCALA PARK SAN DIEGO, CA 92110 R.06-04-009

JESUS ARREDONDO NRG ENERGY, INC. 4600 CARLSBAD BLVD. CARLSBAD, CA 99208 R.06-04-009

GARY BARCH FELLON-MCCORD & ASSOCIATES, INC. 9960 CORPORATE CAMPUS DRIVE LOUISVILLE, KY 40223 R.06-04-009

CURT BARRY 717 K STREET, SUITE 503 SACRAMENTO, CA 95814 R.06-04-009

KELLY BARR MANAGER, REGULATORY AFFAIRS & CONTRACTS SALT RIVER PROJECT PO BOX 52025, PAB 221 PHOENIX, AZ 85072-2025 R.06-04-009

JASMIN ANSAR PG&E PO BOX 770000 SAN FRANCISCO, CA 94177 R.06-04-009

1270 FIFTH AVE., SUITE 15R NEW YORK, NY 10029 R.06-04-009

BARBARA R. BARKOVICH

44810 ROSEWOOD TERRACE

BARKOVICH & YAP, INC.

MENDOCINO, CA 95460

R.06-04-009

SAKIS ASTERIADIS APX INC

R.06-04-009

1300 I STREET, SUITE 125

SACRAMENTO, CA 94244-2550

KEN ALEX

FARROKH ALBUYEH VICE PRESIDENT **OPEN ACCESS TECHNOLOGY** INTERNATIONAL INC 1875 SOUTH GRANT STREET SAN MATEO, CA 94402 R 06-04-009

OBADIAH BARTHOLOMY MECHANICAL ENGINEER SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S. STREET SACRAMENTO, CA 95817 R.06-04-009

SEAN P. BEATTY ATTORNEY AT LAW COOPER, WHITE & COOPER, LLP 201 CALIFORNIA ST., 17TH FLOOR SAN FRANCISCO, CA 94111 R.06-04-009

CLARK BERNIER RLW ANALYTICS 1055 BROADWAY, SUITE G SONOMA, CA 95476 R.06-04-009

B.B. BLEVINS EXECUTIVE DIRECTOR CALIFORNIA ENERGY COMMISSION 1516 9TH STREET, MS-39 SACRAMENTO, CA 95814 R.06-04-009

WILLIAM H. BOOTH ATTORNEY AT LAW LAW OFFICES OF WILLIAM H. BOOTH 1500 NEWELL AVENUE, 5TH FLOOR WALNUT CREEK, CA 94596 R.06-04-009

KAREN BOWEN ATTORNEY AT LAW WINSTON & STRAWN LLP 101 CALIFORNIA STREET SAN FRANCISCO, CA 94111 R.06-04-009 CARMEN E. BASKETTE CORPORATE DEVELOPMENT PRINCIPAL 594 HOWARD ST., SUITE 400 SAN FRANCISCO, CA 94105 R.06-04-009

BUD BEEBE SACRAMENTO MUNICIPAL UTIL DIST 6201 S STREET SACRAMENTO, CA 95817-1899 R.06-04-009

CLARENCE BINNINGER DEPUTY ATTORNEY GENERAL CALIFORNIA ATTORNEY GENERAL'S OFFICE 455 GOLDEN GATE AVENUE, SUITE 11000 SAN FRANICSCO, CA 94102 R.06-04-009

GREG BLUE 140 MOUNTAIN PKWY. CLAYTON, CA 94517 R.06-04-009 R. THOMAS BEACH CROSSBORDER ENERGY 2560 NINTH STREET, SUITE 213A BERKELEY, CA 94710-2557 R.06-04-009

C. SUSIE BERLIN ATTORNEY AT LAW MC CARTHY & BERLIN, LLP 100 PARK CENTER PLAZA, SUITE 501 SAN JOSE, CA 95113 R.06-04-009

CHARLIE BLAIR DELTA ENERGY & ENVIRONMENT 15 GREAT STUART STREET EDINBURGH, UK EH2 7TP UNITED KINGDOM R.06-04-009

ASHLEE M. BONDS THELEN REID BROWN RAYSMAN&STEINER LLP 101 SECOND STREET SAN FRANCISCO, CA 94105 R.06-04-009

KEVIN BOUDREAUX CALPINE POWER AMERICA-CA, LLC 717 TEXAS AVENUE, SUITE 1000 HOUSTON, TX 77002 R.06-04-009 KYLE D. BOUDREAUX FPL GROUP 700 UNIVERSE BLVD., JES/JB JUNO BEACH, FL 33408 R.06-04-009

ANDREW BRADFORD SENIOR MARKET RESEARCH ASSOCIATE FELLON-MCCORD & ASSOCIATES 9960 CORPORATE CAMPUS DRIVE LOUISVILLE, KY 40223 R.06-04-009

DAVID BRANCHCOMB BRANCHCOMB ASSOCIATES, LLC 9360 OAKTREE LANE ORANGEVILLE, CA 95662 R.06-04-009

- -----

DOWNEY BRAND JANE E. LUCKHARDT 555 CAPITOL MALL, 10TH FLOOR SACRAMENTO, CA 95814-4686 R.06-04-009

GLORIA BRITTON ANZA ELECTRIC COOPERATIVE, INC. PO BOX 391909 ANZA, CA 92539 R.06-04-009

ANDREW BROWN ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS, LLP 2015 H STREET SACRAMENTO, CA 95811 R.06-04-009

THERESA BURKE SAN FRANCISCO PUC 1155 MARKET STREET, 4TH FLOOR SAN FRANCISO, CA 94103 R.06-04-009

JOSHUA BUSHINSKY WESTERN POLICY COORDINATOR PEW CENTER ON GLOBAL CLIMATE CHANGE 2101 WILSON BLVD., SUITE 550 ARLINGTON, VA 95816 R.06-04-009

Andrew Campbell CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5304 SAN FRANCISCO, CA 94102-3214 R.06-04-009 CLARE BREIDENICH 224 1/2 24TH AVENUE EAST SEATTLE, WA 98112 R.06-04-009

DONALD BROOKHYSER ALCANTAR & KAHL 1300 SW FIFTH AVE., SUITE 1750 PORTLAND, OR 97210 R.06-04-009

VERONIQUE BUGNION POINT CARBON 205 SEVERN RIVER RD SEVERNA PARK, MD 21146 R.06-04-009

PAM BURMICH AIR RESOURCES BOAD 1001 I STREET, BOX 2815 SACRAMENTO, CA 95812 R.06-04-009

OLOF BYSTROM DIRECTOR, WESTERN ENERGY CAMBRIDGE ENERGY RESEARCH ASSOCIATES 555 CALIFORNIA STREET, 3RD FLOOR SAN FRANCISCO, CA 94104 R.06-04-009

TRENT A CARLSON RELIANT ENERGY 1000 MAIN STREET RPM-3407 HOUSTON, TX 77001 R06-04-009 ADAM BRIONES THE GREENLINING INSTITUTE 1918 UNIVERSITY AVENUE, 2ND FLOOR BERKELEY, CA 94704 R.06-04-009

DOUGLAS BROOKS NEVADA POWER COMPANY SIERRA PACIFIC POWER COMPANY 6226 WEST SAHARA AVENUE LAS VEGAS, NV 89151 R.06-04-009

JACK BURKE LEGISLATIVE AFFAIRS MANAGER CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVE., SUITE 100 SAN DIEGO, CA 92123 R.06-04-009

DALLAS BURTRAW 1616 P STREET, NW WASHINGTON, DC 20036 R.06-04-009

Eugene Cadenasso CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

IAN CARTER INTERNATIONAL EMISSIONS TRADING ASSN. 350 SPARKS STREET, STE. 809 OTTAWA, ON K1R 7S8 CANADA R.06-04-009 SHERYL CARTER NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER STREET, 20TH FLOOR SAN FRANCISCO, CA 94104 R.06-04-009

JENNIFER CHAMBERLIN STRATEGIC ENERGY, LLC 2633 WELLINGTON CT. CLYDE, CA 94520 R.06-04-009

WILLIAM H. CHEN CONSTELLATION NEW ENERGY, INC. ONE MARKET STREET SAN FRANCISCO, CA 94105 R.06-04-009

STEVEN M. COHN ASSISTANT GENERAL COUNSEL SACRAMENTO MUNICIPAL UTILITY DISTRICT PO BOX 15830 SACRAMENTO, CA 95852-1830 R.06-04-009

LISA A. COTTLE ATTORNEY AT LAW WINSTON & STRAWN, LLP 101 CALIFORNIA STREET, 39TH FLOOR SAN FRANCISCO, CA 94111 R.06-04-009

HOLLY B. CRONIN STATE WATER PROJECT OPERATIONS DIV CALIFORNIA DEPARTMENT OF WATER RESOURCES 3310 EL CAMINO AVE., LL-90 SACRAMENTO, CA 95821 R.06-04-009 PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST., NE SALEM, OR 97301-3737 R.06-04-009

AUDREY CHANG NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER STREET, 20TH FLOOR SAN FRANCISCO, CA 94104 R.06-04-009

BRIAN K. CHERRY DIRECTOR REGULATORY RELATIONS PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE STREET, B10C SAN FRANCISCO, CA 94106 R.06-04-009

KENNETH A. COLBURN SYMBILTIC STRATEGIES, LLC 26 WINTON ROAD MEREDITH, NH 3253 R.06-04-009

RICHARD COWART REGULATORY ASSISTANCE PROJECT 50 STATE STREET, SUITE 3 MONTPELIER, VT 5602 R.06-04-009

SEBASTIEN CSAPO PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 SAN FRANCISCO, CA 94177 R.06-04-009 Theresa Cho CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5207 SAN FRANCISCO, CA 94102-3214 R.06-04-009

CLIFF CHEN UNION OF CONCERNED SCIENTIST 2397 SHATTUCK AVENUE, STE 203 BERKELEY, CA 94704 R.06-04-009

ED CHIANG ELEMENT MARKETS, LLC ONE SUGAR CREEK CENTER BLVD., SUITE 250 SUGAR LAND, TX 77478 R.06-04-009

ALAN COMNES WEST COAST POWER 3934 SE ASH STREET PORTLAND, OR 97214 R.06-04-009

BRIAN T. CRAGG ATTORNEY AT LAW GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-04-009

RAYMOND J. CZAHAR, C.P.A. CHIEF FINANCIAL OFFICER WEST COAST GAS COMPANY 9203 BEATTY DRIVE SACRAMENTO, CA 95826 R.06-04-009

KARLA DAILEY CITY OF PALO ALTO BOX 10250 PALO ALTO, CA 94303 R.06-04-009

Matthew Deal CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

LISA M. DECKER CONSTELLATION ENERGY GROUP, INC. 111 MARKET PLACE, SUITE 500 BALTIMORE, MD 21202 R.06-04-009

LEONARD DEVANNA EXECUTIVE VICE PRESIDENT CLEAN ENERGY SYSTEMS, INC. 11330 SUNCO DRIVE, SUITE A RANCHO CORDOVA, CA 95742 R.06-04-009

WILLIAM F. DIETRICH ATTORNEY AT LAW DIETRICH LAW 2977 YGNACIO VALLEY ROAD, 613 WALNUT CREEK, CA 94598-3535 R.06-04-009

DANIEL W. DOUGLASS ATTORNEY AT LAW DOUGLASS & LIDDELL 21700 OXNARD STREET, SUITE 1030 WOODLAND HILLS, CA 91367 R.06-04-009 THOMAS DARTON PILOT POWER GROUP, INC. 9320 CHESAPEAKE DRIVE, SUITE 112 SAN DIEGO, CA 92123 R.06-04-009

RONALD F. DEATON LOS ANGELES DEPARTMENT OF WATER & POWER 111 NORTH HOPE STREET, ROOM 1550 LOS ANGELES, CA 90012 R.06-04-009

PAUL DELANEY AMERICAN UTILITY NETWORK (A.U.N.) 10705 DEER CANYON DRIVE ALTA LOMA, CA 91737 R.06-04-009

BALDASSARO DI CAPO 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

TREVOR DILLARD SIERRA PACIFIC POWER COMPANY 6100 NEIL ROAD, MS S4A50 RENO, NV 89520 R.06-04-009

JASON DUBCHAK ASSOCIATE GENERAL COUNSEL WILD GOOSE STORAGE, LLC 607 8TH AVENUE S.W. CALGARY, AB T2P OA7 CANADA R.06-04-009 KYLE L. DAVIS PACIFICORP 825 NE MULTNOMAH, PORTLAND, OR 97232 R.06-04-009

LISA DECARLO STAFF COUNSEL CALIFORNIA ENERGY COMMISSION 1516 9TH STREET MS-14 SACRAMENTO, CA 95814 R.06-04-009

RALPH E. DENNIS DIRECTOR, REGULATORY AFFAIRS FELLON-MCCORD & ASSOCIATES 9960 CORPORATE CAMPUS DRIVE, STE 2000 LOUISVILLE, KY 40223 R.06-04-009

BALDASSARO DICAPO CALIFORNIA ISO 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

THOMAS DILL PRESIDENT LODI GAS STORAGE, LLC 1021 MAIN ST STE 1500 HOUSTON, TX 77002-6509 R.06-04-009

KIRBY DUSEL NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670 R.06-04-009

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PIERRE H. DUVAIR CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET, MS-41 SACRAMENTO, CA 95814 R 06-04-009

DENNIS M.P. EHLING KIRKPATRICK & LOCKHART NICHOLSON GRAHAM 10100 SANTA MONICA BLVD., 7TH FLOOR LOS ANGELES, CA 90067 R.06-04-009

NADAV ENBAR ENERGY INSIGHTS 1750 14TH STREET, SUITE 200 BOULDER, CO 80302 R 06-04-009

DIANE I. FELLMAN ATTORNEY AT LAW LAW OFFICES OF DIANE I. FELLMAN 234 VAN NESS AVENUE SAN FRANCISCO, CA 94102 R.06-04-009

RYAN FLYNN PACIFICORP 825 NE MULTNOMAH STREET, 18TH FLOOR PORTLAND, OR 97232 R.06-04-009

HARVEY EDER PUBLIC SOLAR POWER COALITION 1218 12TH ST., 25 SANTA MONICA, CA 90401 R 06-04-009

SHAUN ELLIS 2183 UNION STREET SAN FRANCISCO, CA 94123 R.06-04-009

STEVE ENDO **DEPARTMENT OF WATER & POWER** 150 S LOS ROBLES AVE., STE, 200 PASADENA, CA 91101 R.06-04-009

Julie A Fitch CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE **EXECUTIVE DIVISION ROOM 5203** SAN FRANCISCO, CA 94102-3214 R.06-04-009

Jamie Fordyce CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 5-B SAN FRANCISCO, CA 94102-3214 R.06-04-009

ORLANDO B. FOOTE, III ATTORNEY AT LAW HORTON, KNOX, CARTER & FOOTE 895 BROADWAY, SUITE 101 EL CENTRO, CA 92243 R.06-04-009

JONATHAN FORRESTER PG&E PO BOX 770000 SAN FRANCISCO, CA 94177 R.06-04-009

KEVIN FOX WILSON SONSINI GOODRICH & ROSATI ONE MARKET STREET, SPEAR TOWER, 3300 SAN FRANCISCO, CA 94105 R.06-04-009

NORMAN J. FURUTA ATTORNEY AT LAW FEDERAL EXECUTIVE AGENCIES 1455 MARKET ST., SUITE 1744 SAN FRANCISCO, CA 94103-1399 R.06-04-009

FEDERAL ENERGY REGULATORY 110 BLUE RAVINE RD., SUITE 107

NEW MEXICO ENVIRONMENT DEPARTMENT

MICHEL FLORIO ATTORNEYS AT LAW 711 VAN NESS AVE., STE. 350 SAN FRANCISCO, CA 94102 R.06-04-009

SAEED FARROKHPAY COMMISSION FOLSOM, CA 95630 R.06-04-009

SANDRA ELY

R.06-04-009

KAREN EDSON 151 BLUE RAVINE ROAD **FOLSOM, CA 95630** R.06-04-009

1190 ST FRANCIS DRIVE

SANTA FE, NM 87501

MICHELLE GARCIA AIR RESOURCES BOARD 1001 | STREET SACRAMENTO, CA 95814 R.06-04-009

Anne Gillette CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

Meg Gottstein CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 2106 SAN FRANCISCO, CA 94102-3214 R.06-04-009

MEG GOTTSTEIN ADMINISTRATIVE LAW JUDGE PO BOX 210/21496 NATIONAL STREET VOLCANO, CA 95689 R.06-04-009

KRISTIN GRENFELL PROJECT ATTORNEY, CALIF. ENERGY PROGRAM NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER STREET, 20TH FLOOR SAN FRANCISCO, CA 94104 R.06-04-009

YVONNE GROSS REGULATORY POLICY MANAGER SEMPRA ENERGY 101 ASH STREET SAN DIEGO, CA 92103 R.06-04-009 LAURA I. GENAO ATTORNEY SOUTHERN CALIFORNIA EDISON 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-04-009

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ANNETTE GILLIAM SCE LAW DEPARTMENT SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-04-009

HOWARD V. GOLUB NIXON PEABODY LLP 2 EMBARCADERO CENTER, STE. 2700 SAN FRANCISCO, CA 94111 R.06-04-009

Jacqueline Greig CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4102 SAN FRANCISCO, CA 94102-3214 R.06-04-009

KAREN GRIFFIN EXECUTIVE OFFICE CALIFORNIA ENERGY COMMISSION 1516 9TH STREET, MS 39 SACRAMENTO, CA 95814 R.06-04-009

ELSTON K. GRUBAUGH IMPERIAL IRRIGATION DISTRICT 333 EAST BARIONI BLVD. IMPERIAL, CA 92251 R.06-04-009 FIJI GEORGE EL PASO CORPORATION PO BOX 2511 HOUSTON, TX 77252 R.06-04-009

JULIE GILL EXTERNAL AFFAIRS MANAGER CALIFORNIA INDEPENDENT SYSTEM OPERATOR 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

HAYLEY GOODSON ATTORNEY AT LAW THE UTILITY REFORM NETWORK 711 VAN NESS AVENUE, SUITE 350 SAN FRANCISCO, CA 94102 R.06-04-009

JEFFREY P. GRAY ATTORNEY AT LAW DAVIS WRIGHT TREMAINE, LLP 505 MONTGOMERY STREET, SUITE 800 SAN FRANCISCO, CA 94111-6533 R.06-04-009

ANN G. GRIMALDI MCKENNA LONG & ALDRIDGE LLP 101 CALIFORNIA STREET, 41ST FLOOR Center for Energy and Economic Development SAN FRANCISCO, CA 94111 R.06-04-009

ELIZABETH W. HADLEY CITY OF REDDING 777 CYPRESS AVENUE REDDING, CA 96001 R.06-04-009

JEFFREY L. HAHN COVANTA ENERGY CORPORATION 876 MT. VIEW DRIVE LAFAYETTE, CA 94549 R.06-04-009

ARNO HARRIS RECURRENT ENERGY, INC. 220 HALLECK ST., SUITE 220 SAN FRANCISCSO, CA 94129 R.06-04-009

ANITA HART SENIOR SPECIALIST/STATE REGULATORYAFFAIR SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS, NV 89193 R06-04-009

MARCEL HAWIGER ATTORNEY AT LAW THE UTILITY REFORM NETWORK 711 VAN NESS AVENUE, SUITE 350 SAN FRANCISCO, CA 94102 R.06-04-009

TIM HEMIG DIRECTOR NRG ENERGY, INC. 1819 ASTON AVENUE, SUITE 105 CARLSBAD, CA 92008 R.06-04-009

DENISE HILL DIRECTOR 4004 KRUSE WAY PLACE, SUITE 150 LAKE OSWEGO, OR 97035 R.06-04-009 TOM HAMILTON MANAGING PARTNER ENERGY CONCIERGE SERVICES 321 MESA LILA RD GLENDALE, CA 91208 R.06-04-009

JEFFERY D. HARRIS ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS LLP 2015 H STREET SACRAMENTO, CA 95814 R.06-04-009

KERRY HATTEVIK MIRANT CORPORATION 696 WEST 10TH STREET PITTSBURG, CA 94565 R.06-04-009

DAN HECHT SEMPRA ENERGY 101 ASH STREET SAN DIEGO, CA 92101 R.06-04-009

JOSEPH HENRI 31 MIRAMONTE ROAD WALNUT CREEK, CA 94597 R.06-04-009

SETH HILTON ATTORNEY AT LAW STOEL RIVES 111 SUTTER ST., SUITE 700 SAN FRANCISCO, CA 94104 R.06-04-009 PETER W. HANSCHEN ATTORNEY AT LAW MORRISON & FOERSTER, LLP 101 YGNACIO VALLEY ROAD, SUITE 450 WALNUT CREEK, CA 94596 R.06-04-009

AUDRA HARTMANN 980 NINTH STREET, SUITE 2130 SACRAMENTO, CA 95814 R.06-04-009

LYNN HAUG ELLISON, SCHNEIDER & HARRIS, LLP 2015 H STREET SACRAMENTO, CA 95816 R.06-04-009

RICHARD HELGESON SOUTHERN CALIFORNIA PUBLIC POWER AUTHORI 225 S. LAKE AVE., SUITE 1250 PASADENA, CA 91101 R.06-04-009

CHRISTOPHER A. HILEN ASSISTANT GENERAL COUNSEL SIERRA PACIFIC POWER COMPANY 6100 NEIL ROAD RENO, NV 89511 R.06-04-009

GARY HINNERS RELIANT ENERGY, INC. PO BOX 148 HOUSTON, TX 77001-0148 R.06-04-009 ALDYN HOEKSTRA PACE GLOBAL ENERGY SERVICES 420 WEST BROADWAY, 4TH FLOOR SAN DIEGO, CA 92101 R.06-04-009

RANDY S. HOWARD LOS ANGELES DEPT. OF WATER AND POWER 111 NORTH HOPE STREET, ROOM 921 LOS ANGELES, CA 90012 R.06-04-009

STEVEN HUHMAN MORGAN STANLEY CAPITAL GROUP INC. 2000 WESTCHESTER AVENUE PURCHASE, NY 10577 R.06-04-009

MICHAEL A. HYAMS POWER ENTERPRISE-REGULATORY AFFAIRS SAN FRANCISCO PUBLIC UTILITIES COMM 1155 MARKET ST., 4TH FLOOR SAN FRANCISCO, CA 94103 R.06-04-009

PETER JAZAYERI STROOCK & STROOCK & LAVAN LLP 2029 CENTURY PARK EAST, SUITE 1800 LOS ANGELES, CA 90067 R.06-04-009

LEILANI JOHNSON KOWAL LOS ANGELES DEPT. OF WATER AND POWER 111 N. HOPE STREET, ROOM 1050 LOS ANGELES, CA 90012 R.06-04-009 J. ANDREW HOERNER REDEFINING PROGRESS 1904 FRANKLIN STREET OAKLAND, CA 94612 R.06-04-009

DAVID L. HUARD ATTORNEY AT LAW MANATT, PHELPS & PHILLIPS, LLP 11355 WEST OLYMPIC BOULEVARD LOS ANGELES, CA 90064 R.06-04-009

TAMLYN M. HUNT ENERGY PROGRAM DIRECTOR COMMUNITY ENVIRONMENTAL COUNCIL 26 W. ANAPAMU ST., 2/F SANTA BARBARA, CA 93101 R.06-04-009

Judith Ikle CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4012 SAN FRANCISCO, CA 94102-3214 R.06-04-009

BRUNO JEIDER BURBANK WATER & POWER 164 WEST MAGNOLIA BLVD. BURBANK, CA 91502 R.06-04-009

BRIAN M. JONES M.J. BRADLEY & ASSOCIATES, INC. 47 JUNCTION SQUARE DRIVE CONCORD, MA 1742 R.06-04-009 GEORGE HOPLEY BARCLAYS CAPITAL 200 PARK AVENUE NEW YORK, NY 10166 R.06-04-009

JOHN P HUGHES MANAGER, REGULATORY AFFAIRS SOUTHERN CALIFORNIA EDISON COMPANY 601 VAN NESS AVENUE, STE. 2040 SAN FRANCISCO, CA 94102 R.06-04-009

CAROL J. HURLOCK CALIFORNIA DEPT. OF WATER RESOURCES 3310 EL CAMINO AVE. RM 300 SACRAMENTO, CA 95821 R.06-04-009

AKBAR JAZAYEIRI DIRECTOR OF REVENUE & TARRIFFS SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE. ROOM 390 ROSEMEAD, CA 91770 R.06-04-009

JOHN JENSEN PRESIDENT MOUNTAIN UTILITIES PO BOX. 205 PO BOX. 205 KIRKWOOD, CA 95646 R.0604-009

MARC D. JOSEPH ADAMS BRADWELL JOSEPH & CARDOZO 601 GATEWAY BLVD., STE. 1000 SOUTH SAN FRANCISCO, CA 94080 R.06-04-009 Sara M. Kamins CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

JOSEPH M. KARP ATTORNEY AT LAW WINSTON & STRAWN LLP 101 CALIFORNIA STREET SAN FRANCISCO, CA 94111-5802 R.06-04-009

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JAMES W. KEATING BP AMERICA, INC. 150 W. WARRENVILLE RD. NAPERVILLE, IL 60563 R.06-04-09

CAROLYN M. KEHREIN ENERGY MANAGEMENT SERVICES 1505 DUNLAP COURT DIXON, CA 95620-4208 R.06-04-009

KHURSHID KHOJA ASSOCIATE THELEN REID BROWN RAYSMAN & STEINER 101 SECOND STREET, SUITE 1800 SAN FRANCISCO, CA 94105 R.06-04-009

GREGORY KLATT ATTORNEY AT LAW DOUGLASS & LIDDELL 411 E. HUNTINGTON DRIVE, STE. 107-356 ARCADIA, CA 91006 R:06-04-009 EVELYN KAHL ATTORNEY AT LAW ALCANTAR & KAHL, LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-04-009

SUE KATELEY EXECUTIVE DIRECTOR CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN PO BOX 782 RIO VISTA, CA 94571 R.06-04-009

CURTIS L. KEBLER J. ARON & COMPANY 2121 AVENUE OF THE STARS LOS ANGELES, CA 90067 R.06-04-009

ALEXIA C KELLY THE CLIMATE TRUST 65 SW YAMHILL STREET, SUITE 400 PORTLAND, OR 97204 R.06-04-009

KIM KIENER 504 CATALINA BLVD. SAN DIEGO, CA 92106 R.06-04-009

JOSEPH R. KLOBERDANZ SAN DIEGO GAS & ELECTRIC PO BOX 1831 SAN DIEGO, CA 92112 R.06-04-009 CATHY A. KARLSTAD SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE. ROSEMEAD, CA 91770 R.06-04-009

ADAM J KATZ MCDERMOTT WILL & EMERY LLP 600 13TH STREET, NW WASHINGTON, DC 20005 R.06-04-009

RANDALL W. KEEN ATTORNEY AT LAW MANATT PHELPS & PHILLIPS, LLP 11355 WEST OLYMPIC BLVD. LOS ANGELES, CA 90064 R.06-04-009

STEVEN KELLY INDEPENDENT ENERGY PRODUCERS ASSN 1215 K STREET, SUITE 900 SACRAMENTO, CA 95814-3947 R.06-04-009

DANIEL A. KING SEMPRA ENERGY 101 ASH STREET, HQ 12 SAN DIEGO, CA 92101 R.06-04-009

TARA KNOX AVISTA CORPORATION PO BOX 3727 SPOKANE, WA 99220 R.06-04-009 STEPHEN G. KOERNER, ESQ. EL PASO CORPORATION 2 NORTH NEVADA AVENUE COLORADO SPRINGS, CO 80903 R.06-04-009

CATHERINE M KRUPKA MCDERMOTT WILL AND EMERY LLP 600 THIRTEEN STREEET, NW WASHINGTON, DC 20005 R.06-04-009

STEPHANIE LA SHAWN PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000, MAIL CODE B9A SAN FRANCISCO, CA 94177 R.06-04-009

JOHN LAUN APOGEE INTERACTIVE, INC. 1220 ROSECRANS ST., SUITE 308 SAN DIEGO, CA 92106 R.06-04-009

BRENDA LEMAY DIRECTOR HORIZON WIND ENERGY 1600 SHATTUCK, SUITE 222 BERKELEY, CA 94709 R.06-04-009

JOHN W. LESLIE ATTORNEY AT LAW LUCE, FORWARD, HAMILTON & SCRIPPS, LLP 11988 EL CAMINO REAL, SUITE 200 SAN DIEGO, CA 92130 R.06-04-009 GREGORY KOISER CONSTELLATION NEW ENERGY, INC. 350 SOUTH GRAND AVENUE, SUITE 3800 LOS ANGELES, CA 90071 R.06-04-009

LARS KVALE CENTER FOR RESOURCE SOLUTIONS PO BOX 39512 SAN FRANCISCO, CA 94129 R.06-04-009

GERALD L. LAHR ABAG POWER 101 EIGHTH STREET OAKLAND, CA 94607 R.06-04-009

Diana L. Lee CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4300 SAN FRANCISCO, CA 94102-3214 R.06-04-009

MAUREEN LENNON CALIFORNIA COGENERATION COUNCIL 595 EAST COLORADO BLVD., SUITE 623 PASADENA, CA 91101 R.06-04-009

DONALD C. LIDDELL P. C. DOUGLASS & LIDDELL 2928 2ND AVENUE SAN DIEGO, CA 92103 R.06-04-009 AVIS KOWALEWSKI CALPINE CORPORATION 3875 HOPYARD ROAD, SUITE 345 PLEASANTON, CA 94588 R.06-04-009

Jonathan Lakritz CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5020 SAN FRANCISCO, CA 94102-3214 R.06-04-009

MIKE LAMOND ALPINE NATURAL GAS OPERATING CO. #1 LLC PO BOX 550 VALLEY SPRINGS, CA 95252 R.06-04-009

VITALY LEE AES ALAMITOS, LLC 690 N. STUDEBAKER ROAD LONG BEACH, CA 90803 R.06-04-009

NICHOLAS LENSSEN ENERGY INSIGHTS 1750 14TH STREET, SUITE 200 BOULDER, CO 80302 R.06-04-009

KAREN LINDH LINDH & ASSOCIATES 7909 WALERGA ROAD, NO. 112, PMB119 ANTELOPE, CA 95843 R.06-04-009 STEVEN G. LINS CITY OF GLENDALE 613 EAST BROADWAY, SUITE 220 GLENDALE, CA 91206-4394 R.06-04-009

BILL LOCKYER STATE ATTORNEY GENERAL STATE OF CALIFORNIA, DEPT OF JUSTICE PO BOX 944255 SACRAMENTO, CA 94244-2550 R.06-04-009

BARRY LOVELL 15708 POMERADO RD., SUITE 203 POWAY, CA 92064 R.06-04-009

JANE E. LUCKHARDT ATTORNEY AT LAW DOWNEY BRAND LLP 555 CAPITOL MALL, 10TH FLOOR SACRAMENTO, CA 95814 R.06-04-009

MARY LYNCH VP - REGULATORY AND LEGISLATIVE AFFAIRS CONSTELLATION ENERGY COMMODITIES GROUP 2377 GOLD MEDA'L WAY, SUITE 100 GOLD RIVER, CA 95670 R06-04-009

AMBER MAHONE ENERGY & ENVIRONMENTAL ECONOMICS, INC. 101 MONTGOMERY STREET, SUITE 1600 SAN FRANCISCO, CA 94104 R.06-04-009 GRACE LIVINGSTON-NUNLEY ASSISTANT PROJECT MANAGER PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 MAIL CODE B9A SAN FRANCISCO, CA 94177 R.06-04-009

JODY S. LONDON JODY LONDON CONSULTING PO BOX 3629 OAKLAND, CA 94609 R.06-04-009

ED LUCHA PROJECT COORDINATOR PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000, MAIL CODE B9A SAN FRANCISCO, CA 94177 R.06-04-009

LYNELLE LUND COMMERCE ENERGY, INC. 600 ANTON BLVD., SUITE 2000 COSTA MESA, CA 92626 R.06-04-009

Jaclyn Marks CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5306 SAN FRANCISCO, CA 94102-3214 R.06-04-009

ANNABELLE MALINS CONSUL-SCIENCE AND TECHNOLOGY BRITISH CONSULATE-GENERAL ONE SANSOME STREET, SUITE 850 SAN FRANCISCO, CA 94104 R.06-04-009 James Loewen CALIF PUBLIC UTILITIES COMMISSION 320 WEST 4TH STREET SUITE 500 LOS ANGELES, CA 90013 R.06-04-009

LAD LORENZ V.P. REGULATORY AFFAIRS SOUTHERN CALIFORNIA GAS COMPANY 601 VAN NESS AVENUE, SUITE 2060 SAN FRANCISCO, CA 94102 R.06-04-009

FRANK LUCHETTI NEVADA DIV. OF ENVIRONMENTAL PROTECTION 901 S. STEWART ST., SUITE 4001 CARSON CITY, NV 89701 R.06-04-009

PHILIP D. LUSK WESTERN ELECTRICITY COORDINATING COUNCIL 615 ARAPEEN DRIVE,SUITE 210 SALT LAKE CITY, UT 84108-1262 R.06-04-009

DOUGLAS MACMULLLEN CHIEF, POWER PLANNING SECTION CA DEPARTMENT OF WATER RESOURCES 3310 EL CAMINO AVE., ROOM 356 SACRAMENTO, CA 95821 R.06-04-009

DEREK MARKOLF CALIFORNIA CLIMATE ACTION REGISTRY 515 S. FLOWER STREET, SUITE 1640 LOS ANGELES, CA 90071 R.06-04-009

CHRIS MARNAY 1 CYCLOTRON RD MS 90R4000 BERKELEY, CA 94720-8136 R.06-04-009

CHRISTOPHER J. MAYER MODESTO IRRIGATION DISTRICT 1231 11TH STREET MODESTO, CA 95354 R.06-04-009

ANDREW MCALLISTER DIRECTOR OF OPERATIONS CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVE., SUITE 100 SAN DIEGO, CA 92123 R.06-04-009

KEITH R. MCCREA ATTORNEY AT LAW SUTHERLAND ASBILL & BRENNAN LLP 1275 PENNSYLVANIA AVE, NW WASHINGTON, DC 20004-2415 R.06-04-009

JEN MCGRAW CENTER FOR NEIGHBORHOOD TECHNOLOGY PO BOX 14322 SAN FRANCISCO, CA 94114 R.06-04-009

BRIAN MCQUOWN RELIANT ENERGY 7251 AMIGO ST., SUITE 120 LAS VEGAS, NV 89119 R.06-04-009 JULIE L. MARTIN WEST ISO COORDINATOR NORTH AMERICA GAS AND POWER 501 WESTLAKE PARK BLVD. HOUSTON, TX 77079 R.06-04-009

MICHAEL MAZUR CHIEF TECHNICAL OFFICER 3 PHASES RENEWABLES, LLC 2100 SEPULVEDA BLVD., SUITE 37 MANHATTAN BEACH, CA 90266 R.06-04-009

RICHARD MCCANN, PH.D M.CUBED 2655 PORTAGE BAY, SUITE 3 DAVIS, CA 95616 R.06-04-009

KAREN MCDONALD POWEREX CORPORATION 666 BURRAND STREET VANCOUVER, BC V6C 2X8 CANADA 8.06-04-009

BRUCE MCLAUGHLIN BRAUN & BLAISING P.C. 915 L STREET, SUITE 1270 SACRAMENTO, CA 95814 R.06-04-009

ELENA MELLO SIERRA PACIFIC POWER COMPANY 6100 NEIL ROAD RENO, NV 89520 R.06-04-009 MARTIN A. MATTES NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP 50 CALIFORNIA STREET, 34TH FLOOR SAN FRANCISCO, CA 94111 R.06-04-009

Wade McCartney CALIF PUBLIC UTILITIES COMMISSION 770 L STREET, SUITE 1050 SACRAMENTO, CA 95814 R.06-04-009

BARRY F. MCCARTHY ATTORNEY AT LAW MCCARTHY & BERLIN, LLP 100 PARK CENTER PLAZA, SUITE 501 SAN JOSE, CA 95113 R.06-04-009

MARY MCDONALD DIRECTOR OF STATE AFFAIRS CALIFORNIA INDEPENDENT SYSTEM OPERATOR 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.0604.009

RACHEL MCMAHON CEERT 1100 11TH STREET, SUITE 311 SACRAMENTO, CA 95814 R.06-04-009

DARYL METZ CALIFORNIA ENERGY COMMISSION 1516 9TH ST., MS-20 SACRAMENTO, CA 95814 R.06-04-009 STEVEN S. MICHEL WESTERN RESOURCE ADVOCATES 2025 SENDA DE ANDRES SANTA FE, NM 87501 R.06-04-009

SAMARA MINDEL REGULATORY AFFAIRS ANALYST FELLON-MCCORD & ASSOCIATES 9960 CORPORATE CAMPUS DRIVE, SUITE 2000 LOUISVILLE, KY 40223 R.06-04-009

Rahmon Momoh CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4205 SAN FRANCISCO, CA 94102-3214 R.06-04-009

Lainie Motamedi CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5119 SAN FRANCISCO, CA 94102-3214 R.06-04-009

ROGER C. MONTGOMERY VICE PRESIDENT, PRICING SOUTHWEST GAS CORPORATION PO BOX 98510 LAS VEGAS, NV 89193-8510 R.06-04-009

GREGG MORRIS DIRECTOR GREEN POWER INSTITUTE 2039 SHATTUCK AVENUE, STE 402 BERKELEY, CA 94704 R:06-04-009 KAREN NORENE MILLS ATTORNEY AT LAW CALIFORNIA FARM BUREAU FEDERATION 2300 RIVER PLAZA DRIVE SACRAMENTO, CA 95833 R.06-04-009

CYNTHIA MITCHELL ENERGY ECONOMICS, INC. 530 COLGATE COURT RENO, NV 89503 R.06-04-009

Beth Moore CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4103 SAN FRANCISCO, CA 94102-3214 R.06-04-009

DAVID L. MODISETTE CALIFORNIA ELECTRIC TRANSP. COALITION 1015 K STREET, SUITE 200 SACRAMENTO, CA 95814 R.06-04-009

RONALD MOORE GOLDEN STATE WATER/BEAR VALLEY ELECTRIC 630 EAST FOOTHILL BOULEVARD SAN DIMAS, CA 91773 R.06-04-009

STEVEN MOSS SAN FRANCISCO COMMUNITY POWER COOP 2325 3RD STREET, SUITE 344 SAN FRANCISCO, CA 94120 R.06-04-009 MARCIE MILNER DIRECTOR - REGULATORY AFFAIRS SHELL TRADING GAS & POWER COMPANY 4445 EASTGATE MALL, SUITE 100 SAN DIEGO, CA 92121 8 06-04-009

Ed Moldavsky CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5125 SAN FRANCISCO, CA 94102-3214 R.06-04-009

Harvey Y. Morris CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5036 SAN FRANCISCO, CA 94102-3214 R.06-04-009

WES MONIER STRATEGIC ISSUES AND PLANNING MANAGER TURLOCK IRRIGATION DISTRICT 333 EAST CANAL DRIVE, PO BOX 949 TURLOCK, CA 95381-0949 R.06-04-009

RICHARD J. MORILLO ASSISTANT CITY ATTORNEY CITY OF BURBANK 215 E. OLIVE AVENUE BURBANK, CA 91502 R.06-04-009

Scott Murtishaw CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009 PHILLIP J. MULLER SCD ENERGY SOLUTIONS 436 NOVA ALBION WAY SAN RAFAEL, CA 94903 R.06-04-009

SARA STECK MYERS ATTORNEY AT LAW 122 28TH AVENUE SAN FRANCISCO, CA 94121 R.06-04-009

SID NEWSOME TARIFF MANAGER SOUTHERN CALIFORNIA GAS COMPANY 555 WEST 5TH STREET LOS ANGELES, CA 90051 R.06-04-009

RITA NORTON RITA NORTON AND ASSOCIATES, LLC 18700 BLYTHSWOOD DRIVE, LOS GATOS, CA 95030 R.06-04-009

LAURIE PARK NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.06-04-009

Joel T. Perlstein CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5133 SAN FRANCISCO, CA 94102-3214 R.06-04-009 CLYDE MURLEY 1031 ORDWAY STREET ALBANY, CA 94706 R.06-04-009

JESSICA NELSON PLUMAS-SIERRA RURAL ELECTRIC CO-OP 73233 STATE ROUTE 70, STE A PORTOLA, CA 96122-7064 R.06-04-009

SEPHRA A. NINOW POLICY ANALYST CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVENUE, SUITE 100 SAN DIEGO, CA 92123 R06-04-009

TIMOTHY R. ODIL MCKENNA LONG & ALDRIDGE LLP 1875 LAWRENCE STREET, SUITE 200 Center for Energy and Economic Development DENVER, CO 80202 R.06-04-009

ALVIN PAK SEMPRA GLOBAL ENTERPRISES 101 ASH STREET SAN DIEGO, CA 92101 R.06-04-009

Richard A. Myers

DAVID NEMTZOW

RICK C. NOGER

R.06-04-009

1254 9TH STREET, NO. 6

SANTA MONICA, CA 90401

PRAXAIR PLAINFIELD, INC.

WILMINGTON, DE 19808

2711 CENTERVILLE ROAD, SUITE 400

AREA 4-A

R.06-04-009

R.06-04-009

505 VAN NESS AVENUE

CALIF PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3214

LORRAINE PASKETT DIRECTOR, LEGISLATIVE AND REG. AFFAIRS LA DEPT. OF WATER & POWER 111 N. HOWARD ST., ROOM 1536 LOS ANGELES, CA 90012 R.06-04-009

CARL PECHMAN POWER ECONOMICS 901 CENTER STREET SANTA CRUZ, CA 95060 R.06-04-009 SENIOR CORPORATE COUNSEL DYNEGY, INC. 2420 CAMINO RAMON, SUITE 215 SAN RAMON, CA 94583 R.06-04-009

JOSEPH M. PAUL

NORMAN A. PEDERSEN ATTORNEY AT LAW HANNA AND MORTON, LLP 444 SOUTH FLOWER STREET, NO. 1500 LOS ANGELES, CA 90071 R.06-04-009 ROGER PELOTE WILLIAMS POWER COMPANY 12736 CALIFA STREET VALLEY VILLAGE, CA 91607 R.06-04-009

COLIN PETHERAM DIRECTOR-REGULATORY SBC CALIFORNIA 140 NEW MONTGOMERY ST., SUITE 1325 SAN FRANCISCO, CA 94105 R.06-04-009

Paul S Phillips CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4101 SAN FRANCISCO, CA 94102-3214 R.06-04-009

JENNIFER PORTER POLICY ANALYST CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVENUE, SUITE 100 SAN DIEGO, CA 92123 R.06-04-009

RASHA PRINCE SOUTHERN CALIFORNIA GAS COMPANY 555 WEST 5TH STREET, GT14D6 LOS ANGELES, CA 90013 R.06-04-009

BALWANT S. PUREWAL DEPARTMENT OF WATER RESOURCES 3310 EL CAMINO AVE., LL-90 SACRAMENTO, CA 95821 R.06-04-009 JAN PEPPER CLEAN POWER MARKETS, INC. 418 BENVENUE AVENUE LOS ALTOS, CA 94024 R.06-04-009

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GORDON PICKERING PRINCIPAL NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.06-04-009

BRIAN POTTS Foley & Lardner 150 East Gilman Street 1497 MADISON, WI 53701-1497 R.06-04-009

JJ PRUCNAL SOUTHWEST GAS CORPORATION PO BOX 98510 LAS VEGAS, NV 89193-8510 R.06-04-009 MARC PRYOR CALIFORNIA ENERGY COMMISSION 1516 9TH ST., MS-20 SACRAMENTO, CA 95814 R.06-04-009

Kristin Ralff Douglas CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5119 SAN FRANCISCO, CA 94102-3214 R.06-04-009

BARRY RABE 1427 ROSS STREET PLYMOUTH, MI 48170 R.06-04-009

EDWARD G. POOLE ANDERSON DONOVAN & POOLE 601 CALIFORNIA STREET, SUITE 1300 SAN FRANCISCO, CA 94108 R.06-04-009

CALIFORNIA INDEPENDENT SYSTEM

VIDHYA PRABHAKARAN GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-04-009

ANDERSON DONOVAN 601 CALIFORNIA STRE SAN FRANCISCO, CA S R.06-04-009

CARLA PETERMAN UCEI 2547 CHANNING WAY BERKELEY, CA 94720 8.06-04-009

PHILIP D. PETTINGILL

151 BLUE RAVINE ROAD FOLSOM, CA 95630

OPERATOR

R.06-04-009

STEVE RAHON DIRECTOR, TARIFF & REGULATORY ACCOUNTS SAN DIEGO GAS & ELECTRIC COMPANY 8330 CENTURY PARK COURT, CP32C SAN DIEGO, CA 92123-1548 R.06-04-009

DAVID REYNOLDS MEMBER SERVICES MANAGER NORTHERN CALIFORNIA POWER AGENCY 180 CIRBY WAY ROSEVILLE, CA 95678-6420 R.06-04-009

THEODORE ROBERTS ATTORNEY AT LAW SEMPRA GLOBAL 101 ASH STREET, HQ 13D SAN DIEGO, CA 92101-3017 R.06-04-009

Nancy Ryan CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5217 SAN FRANCISCO, CA 94102-3214 R.06-04-009

RANDY SABLE SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS, NV 89193 R.06-04-009

SOUMYA SASTRY PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000 SAN FRANCISCO, CA 94177 R.06-04-009 TIFFANY RAU

POLICY AND COMMUNICATIONS MANAGER CARSON HYDROGEN POWER PROJECT LLC ONE WORLD TRADE CENTER, SUITE 1600 LONG BEACH, CA 90831-1600 R06-04-009

JANILL RICHARDS DEPUTY ATTORNEY GENERAL CALIFORNIA ATTORNEY GENERAL'S OFFICE 1515 CLAY STREET, 20TH FLOOR OAKLAND, CA 94702 R.06-04-009

GRANT ROSENBLUM, ESQ. CALIFORNIA ISO 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

Pearlie Sabino CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.06-04-009

SAM SADLER OREGON DEPARTMENT OF ENERGY 625 NE MARION STREET SALEM, OR 97301-3737 R.06-04-009

Don Schultz CALIF PUBLIC UTILITIES COMMISSION 770 L STREET, SUITE 1050 RM. SCTO SACRAMENTO, CA 95814 R.06-04-009 JOHN R. REDDING ARCTURUS ENERGY CONSULTING 44810 ROSEWOOD TERRACE MENDOCINO, CA 95460 R.06-04-009

Steve Roscow CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

JAMES ROSS RCS, INC. 500 CHESTERFIELD CENTER, SUITE 320 CHESTERFIELD, MO 63017 R.06-04-009

Jason R. Salmi Klotz CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

JUDITH B. SANDERS ATTORNEY AT LAW CALIFORNIA INDEPENDENT SYSTEM OPERATOR 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R06-04-009

JANINE L. SCANCARELLI FOLGER LEVIN & KAHN LLP 275 BATTERY STREET, 23RD FLOOR SAN FRANCISCO, CA 94111 R.06-04-009

MICHAEL SCHEIBLE DEPUTY EXECUTIVE OFFICER CALIFORNIA AIR RESOURCES BOARD 1001 I STREET SACRAMENTO, CA 95677 R.06-04-009

STEVEN S. SCHLEIMER DIRECTOR,COMPLIANCE & REGULATORY AFFAIRS BARCLAYS BANK, PLC 200 PARK AVENUE, FIFTH FLOOR NEW YORK, NY 10166 R.06-04-009

BILL SCHRAND SOUTHWEST GAS CORPORATON PO BOX 98510 LAS VEGAS, NV 89193-8510 R.06-04-009

MONICA A. SCHWEBS, ESQ. BINGHAM MCCUTCHEN LLP 1333 N. CALIFORNIA BLVD. WALNUT CREEK, CA 94596 R.06-04-009

NORA SHERIFF ATTORNEY AT LAW ALCANTAR & KAHL LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-04-009

DAN SILVERIA SURPRISE VALLEY ELECTRIC CORPORATION PO BOX 691 ALTURAS, CA 96101 R.06-04-009 JENINE SCHENK APS ENERGY SERVICES 400 E. VAN BUREN STREET, SUITE 750 PHOENIX, AZ 85004 R.06-04-009

REED V. SCHMIDT VICE PRESIDENT BARTLE WELLS ASSOCIATES 1889 ALCATRAZ AVENUE BERKELEY, CA 94703 R.06-04-009

CYNTHIA SCHULTZ REGULATORY FILING COORDINATOR PACIFIC POWER AND LIGHT COMPANY 825 N.E. MULTNOMAH PORTLAND, OR 97232 R.08-04-009

PAUL M. SEBY MCKENNA LONG & ALDRIDGE LLP 1875 LAWRENCE STREET, SUITE 200 DENVER, CO 80202 R.06-04-009

Sean A. Simon CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

KEVIN J. SIMONSEN ENERGY MANAGEMENT SERVICES 646 EAST THIRD AVENUE DURANGO, CO 81301 R.06-04-009 STEVEN SCHILLER SCHILLER CONSULTING, INC. 111 HILLSIDE AVENUE PIEDMONT, CA 94611 R06-04-009

DONALD SCHOENBECK RCS, INC. 900 WASHINGTON STREET, SUITE 780 VANCOUVER, WA 98660 R.06-04-009

LISA SCHWARTZ SENIOR ANALYST ORGEON PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM, OR 97308-2148 R.06-04-009

BETTY SETO POLICY ANALYST KEMA, INC. 492 NINTH STREET, SUITE 220 OAKLAND, CA 94607 R.06-04-009

KYLE SILON ECOSECURITIES CONSULTING LIMITED 529 SE GRAND AVENUE PORTLAND, OR 97214 R.06-04-009

DEBORAH SLON DEPUTY ATTORNEY GENERAL, ENVIRONMENT OFFICE OF THE ATTORNEY GENERAL 1300 I STREET, 15TH FLOOR SACRAMENTO, CA 95814 R.06-04-009

Donald R Smith CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.06-04-009

KELLIE SMITH SENATE ENERGY/UTILITIES & COMMUNICATION STATE CAPITOL, ROOM 4038 SACRAMENTO, CA 95814 R.06-04-009

JEANNE M. SOLE DEPUTY CITY ATTORNEY CITY AND COUNTY OF SAN FRANCISCO 1 DR. CARLTON B. GOODLETT PLACE, RM. 234 SAN FRANCISCO, CA 94102 R.06-04-009

SEEMA SRINIVASAN ATTORNEY AT LAW ALCANTAR & KAHL, LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-04-009

ANNIE STANGE ALCANTAR & KAHL 1300 SW FIFTH AVE., SUITE 1750 PORTLAND, OR 97201 R.06-04-009

NINA SUETAKE THE UTILITY REFORM NETWORK 711 VAN NESS AVE., STE 350 SAN FRANCISCO, CA 94102 R.06-04-009 AIMEE M. SMITH ATTORNEY AT LAW SEMPRA ENERGY 101 ASH STREET HQ13 SAN DIEGO, CA 92101 R.06-04-009

RICHARD SMITH MODESTO IRRIGATION DISTRICT 1231 11TH STREET MODESTO, CA 95352-4060 R.06-04-009

DARRELL SOYARS MANAGER-RESOURCE PERMITTING&STRATEGIC SIERRA PACIFIC RESOURCES 6100 NEIL ROAD RENO, NV 89520-0024 RENO, NV 89520-0024 R.06-04-009

Henry Stern CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 2106 SAN FRANCISCO, CA 94102-3214 R.06-04-009

PATRICK STONER PROGRAM DIRECTOR LOCAL GOVERNMENT COMMISSION 1303 J STREET, SUITE 250 SACRAMENTO, CA 95814 R.06-04-009

KENNY SWAIN NAVIGANT CONSULTING 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670 R.06-04-009 GLORIA D. SMITH ADAMS, BROADWELL, JOSEPH & CARDOZO 601 GATEWAY BLVD., SUITE 1000 SOUTH SAN FRANCISCO, CA 94080 R.06-04-009

ROBIN SMUTNY-JONES CALIFORNIA ISO 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

JAMES D. SQUERI ATTORNEY AT LAW GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP 505 SANSOME STREET, STE 900 SAN FRANCISCO, CA 94111 R.06-04-009

F. Jackson Stoddard CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5040 SAN FRANCISCO, CA 94102-3214 R.06-04-009

MERIDITH J. STRAND SENIOR COUNSEL SOUTHWEST GAS CORPORATION PO BOX 98510 LAS VEGAS, NV 89193-8510 R:06-04-009

Jeorge S Tagnipes CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ENERGY DIVISION AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009 Christine S Tam CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.06-04-009

ROBERT R. TAYLOR AGRICULTURAL IMPROVEMENT AND POWER DIST. 1600 NORTH PRIEST DRIVE, PAB221 TEMPE, AZ 85281 R.06-04-009

PATRICIA THOMPSON SUMMIT BLUE CONSULTING 2920 CAMINO DIABLO, SUITE 210 WALNUT CREEK, CA 94597 R.06-04-009

SCOTT TOMASHEFSKY NORTHERN CALIFORNIA POWER AGENCY 180 CIRBY WAY ROSEVILLE, CA 95678-6420 R.06-04-009

ANN L. TROWBRIDGE ATTORNEY AT LAW DAY CARTER & MURPHY, LLP 3620 AMERICAN RIVER DRIVE, SUITE 205 SACRAMENTO, CA 95864 R.06-04-009

BETH VAUGHAN CALIFORNIA COGENERATION COUNCIL 4391 N. MARSH ELDER COURT CONCORD, CA 94521 R.06-04-009 JAMES W. TARNAGHAN DUANE MORRIS LLP ONE MARKET, SPEAR TOWER SAN FRANCISCO, CA 94105 R.06-04-009

Charlotte TerKeurst CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5117 SAN FRANCISCO, CA 94102-3214 R.06-04-009

DEAN R. TIBBS PRESIDENT ADVANCED ENERGY STRATEGIES, INC. 1390 WILLOW PASS ROAD, SUITE 610 CONCORD, CA 94520 R.06-04-009

WAYNE TOMLINSON EL PASO CORPORATION 2 NORTH NEVADA AVENUE COLORADO SPRINGS, CO 80903 R.06-04-009 WEBSTER TASAT AIR RESOURCES BOARD 1001 I STREET SACRAMENTO, CA 95814 R.06-04-009

KAREN TERRANOVA ALCANTAR & KAHL, LLP 120 MONTGOMERY STREET, STE 2200 SAN FRANCISCO, CA 94104 R.06-04-009

EDWARD J TIEDEMANN ATTORNEY AT LAW KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD 400 CAPITOL MALL, 27TH FLOOR SACRAMENTO, CA 95814-4416 R.06-04-009

ALLEN K. TRIAL SAN DIEGO GAS & ELECTRIC COMPANY 101 ASH STREET SAN DIEGO, CA 92101 R.06-04-009

ANDREW J. VAN HORN VAN HORN CONSULTING 12 LIND COURT ORINDA, CA 94563 R06:04-009

EDWARD VINE LAWRENCE BERKELEY NATIONAL LABORATORY BUILDING 90-4000 BERKELEY, CA 94720 R.06-04-009 ROGER VAN HOY MODESTO IRRIGATION DISTRICT 1231 11TH STREET MODESTO, CA 95354 R.06-04-009

SYMONE VONGDEUANE SEMPRA ENERGY SOLUTIONS 101 ASH STREET, HQ09 SAN DIEGO, CA 92101-3017 R.06-04-009 DEVRA WANG NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER STREET, 20TH FLOOR SAN FRANCISCO, CA 94104 R.06-04-009

LISA WEINZIMER CALIFORNIA ENERGY REPORTER PLATTS MCGRAW-HILL 695 NINTH AVENUE, NO. 2 SAN FRANCISCO, CA 94118 R.06-04-009

ANDREA WELLER STRATEGIC ENERGY 3130 D BALFOUR RD., SUITE 290 BRENTWOOD, CA 94513 R.06-04-009

WILLIAM W. WESTERFIELD, 111 ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS L.L.P. 2015 H STREET SACRAMENTO, CA 95814 R.06-04-009

JOSEPH F. WIEDMAN ATTORNEY AT LAW GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-04-009

REID A. WINTHROP PILOT POWER GROUP, INC 8910 UNIVERSITY CENTER LANE SUITE 520 SAN DIEGO, CA 92122 R.06-04-009 CHRISTOPHER J. WARNER PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE STREET, PO BOX 7442 SAN FRANCISCO, CA 94120-7442 R.06-04-009

VIRGIL WELCH CLIMATE CAMPAIGN COORDINATOR ENVIRONMENTAL DEFENSE 1107 9TH STREET, SUITE 540 SACRAMENTO, CA 95814 R.06-04-009

PAMELA WELLNER CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ENERGY RESOURCES BRANCH AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-04-009

S. NANCY WHANG ATTORNEY AT LAW MANATT, PHELPS & PHILLIPS, LLP 11355 WEST OLYMPIC BLVD. LOS ANGELES, CA 90064 R.06-04-009

KATHRYN WIG PARALEGAL NRG ENERGY, INC 211 CARNEGIE CENTER PRINCETON, NY 8540 R.06-04-009

RYAN WISER BERKELEY LAB ONE CYCLOTRON ROAD BERKELEY, CA 94720 R.06-04-009 JOY A. WARREN ATTORNEY AT LAW MODESTO IRRIGATION DISTRICT 1231 11TH STREET MODESTO, CA 95354 R.06-04-009

JOHN B. WELDON, JR. SALMON, LEWIS & WELDON, P.L.C. 2850 EAST CAMELBACK ROAD, SUITE 200 PHOENIX, AZ 85016 R.06-04-009

ELIZABETH WESTBY ALCANTAR & KAHL LLP 1300 SW FIFTH AVENUE, SUITE 1700 PORTLAND, OR 97201 R.06-04-009

GREGGORY L. WHEATLAND ATTORNEY AT LAW ELLISON, SCHNEIDER & HARRIS, LLP 2015 H STREET SACRAMENTO, CA 95814 R.06-04-009

VALERIE J. WINN PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000, B9A SAN FRANCISCO, CA 94177-0001 R06-04-009

ELLEN WOLFE RESERO CONSULTING 9289 SHADOW BROOK PL. GRANITE BAY, CA 95746 R.06-04-009

DON WOOD PACIFIC ENERGY POLICY CENTER 4539 LEE AVENUE LA MESA, CA 91941 R.06-04-009 CATHY S. WOOLLUMS MIDAMERICAN ENERGY HOLDINGS COMPANY 106 EAST SECOND STREET DAVENPORT, IA 52801 R.06-04-009

HUGH YAO SOUTHERN CALIFORNIA GAS COMPANY 555 W. 5TH ST, GT22G2 LOS ANGELES, CA 90013 R.06-04-009

ELIZABETH ZELLJADT 1725 I STREET, N.W. SUITE 300 WASHINGTON, DC 20006 R.06-04-009 E.J. WRIGHT OCCIDENTAL POWER SERVICES, INC. 5 GREENWAY PLAZA, SUITE 110 HOUSTON, TX 77046 R.06-04-009

DAVID ZONANA DEPUTY ATTORNEY GENERAL CALIFORNIA ATTORNEY GENERAL'S OFFICE 455 GOLDEN GATE AVENUE, SUITE 11000 SAN FRANCISCO, CA 94102 R.06-04-009

LEGAL AND REGULATORY DEPARTMENT CALIFORNIA ISO 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-04-009

CALIFORNIA ENERGY MARKETS 517-B POTRERO AVENUE SAN FRANCISCO, CA 94110 R.06-04-009 MRW & ASSOCIATES, INC. 1814 FRANKLIN STREET, SUITE 720 OAKLAND, CA 94612 R.06-04-009

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