

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

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07-OIIP-1	
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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.

Rulemaking 06-04-009  
(Filed April 13, 2006)

**ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION  
OF THE STATE OF CALIFORNIA**

In the Matter of:

Order Instituting Informational Proceeding on a  
Greenhouse Gas Emissions Cap

Docket 07-OIIP-01

**REPLY 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**

John B. Weldon, Jr.  
Rebecca C. Goldberg  
Salmon, Lewis & Weldon, P.L.C.  
2850 East Camelback Road, Suite 200  
Phoenix, Arizona 85016  
Telephone: 602-801-9060  
Facsimile: 602-801-9070  
Email: [jbw@slwplc.com](mailto:jbw@slwplc.com)  
*Attorneys for Salt River Project  
Agricultural Improvement and Power District*

Robert R. Taylor  
Salt River Project Agricultural  
Improvement and Power District  
1600 North Priest Drive, PAB221  
Tempe, Arizona 85281  
Telephone: 602-236-3487  
Facsimile: 602-236-3458  
Email: [rrtaylor@srpnet.com](mailto:rrtaylor@srpnet.com)

August 15, 2007

**REPLYCOMMENTS 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**

In accordance with Rules 1.9 and 1.10 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC") of the State of California, and in accordance with the "Administrative Law Judges' Ruling Requesting Comments and Legal Briefs on the 'Market Advisory Committee Report and Notice of En Banc Hearing' (the "ALJ Ruling") filed July 19, 2007 in Rulemaking 06-04-009, the Salt River Project Agricultural Improvement and Power District ("SRP") hereby files these Reply Comments ("Comments"). SRP also files these Comments with the California Energy Commission ("CEC") in Docket 07-OIIP-01. In these Comments, the CPUC and CEC will be referred to collectively as the Joint Commissions.

SRP reiterates its view that any mandatory program to reduce green house gas ("GHG") emissions should be national in scope and should include all sectors of the economy that contribute GHG to the atmosphere. SRP also believes that the Joint Commissions should give sufficient consideration to reliability impacts and the impact to market liquidity throughout the rule making process.

SRP's Comments focus on the point of regulation and concerns about the use of E-Tags to identify the source of generation.

## **POINT OF REGULATION**

SRP supports a hybrid system where the point of regulation is (1) any generation located in California and (2) the first entity to buy electricity at a point of delivery within California for use in California ("First Buyer").

Numerous parties commented on the definition of First Seller. Several parties argued that, as it relates to imports, the first seller should be the entity delivering electricity into the state of California. Other parties have suggested that it should be the parties receiving electricity into California. The arguments of both groups have focused on whether either system (1) could accurately identify GHG emissions associated with a specific transaction, (2) would encourage the use of lower GHG emitting generation resources, and (3) may violate the Commerce Clause. SRP believes the First Buyer approach would work best in light of the issues discussed to date.

### **Identification of Emissions**

One of the benefits touted by advocates of the First Seller approach is its alleged superiority for identifying generation sources. SRP believes that a carefully crafted First Buyer approach can provide similar information on the generation resources in most transactions. The parties have generally focused on transactions occurring in the bi-lateral or Independent System Operator ("ISO") market.

Under a First Buyer approach, in a bi-lateral transaction the purchasing entity would have access to same amount of information about the source of the generation that an importing entity would. The ALJ Ruling discusses using E-tags as the source for

information to determine the GHG emissions for a transaction.<sup>1</sup> In a bi-lateral transaction, the buying entity has the same access to the E-tag as would the selling entity.<sup>2</sup>

To the extent there is a problem identifying a generation resource with the First Buyer approach, it would occur in transactions involving the California Independent System Operator (“Cal ISO”). Emissions information can be lost when a transaction occurs through the ISO market. This concern could be resolved by requiring the ISO to develop a refined emissions profile for its transactions.

The ISO has access to the E-tag for transactions occurring in its market. The ISO could use the generator information identified on the E-tags to create a refined emissions profile for its transactions. The emissions profile could then be applied to purchases made through the ISO Market requiring parties to acquire allowances to cover those purchases. This is not dissimilar to the approach used for systems sales from regions when the generator is not identified on the E-tag. It will be more accurate because the ISO would have access to E-tags with the specific generation resources.

#### **Encourage the Use of Low GHG Emitting Resources by California Entities**

Under a First Buyer approach, as defined above, California entities are encouraged to select low GHG emitting resources when making purchasing or investment decisions. If the First Buyer is also the point of regulation, the entity would be required to purchase allowances associated with the electricity it purchases. The higher GHG

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<sup>1</sup> See ALJ Ruling at 4 and 8.

<sup>2</sup> SRP does not endorse using E-Tags as the only source of information to identify generation. SRP has concerns about such an approach as discussed later in these Comments. SRP merely uses this as a point of illustration since E-Tags appear to represent the Joint Commission’s approach at this time.

emitting resources would require more allowances, thereby encouraging entities to purchase from lower emitting resources.

The First Buyer approach accomplishes this without the unintended price impacts to consumers that a First Seller approach would entail. Under the First Seller approach low emitting GHG generation sold through the ISO market would be paid the market clearing price set by higher emitting resources such as coal fired facilities. While the coal plant is penalized with a higher price because of the requirement for the plant to internalize the costs, California consumers will also pay more for the lower emitting resource because of the market clearing price. Under a First Buyer approach the cost of the allowances for coal would still have to be paid by the buying entity raising the price for coal to consumers but the low GHG emitting generation would be cheaper for consumers.

### **COMMERCE CLAUSE CONSIDERATIONS**

The First Seller approach raises significant Commerce Clause issues. The Commerce Clause provides that “Congress shall have Power . . . to regulate Commerce with foreign nations, and among the several States, and with Indian tribes.”<sup>3</sup> The “dormant” Commerce Clause refers to the negative implications of the Commerce Clause that prohibits economic protectionism, a restriction prohibiting a state from passing legislation that is designed to benefit in-state economic interests by burdening out-of-state competitors.<sup>4</sup>

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<sup>3</sup> U.S. Const., art. I, § 8, cl. 3.

<sup>4</sup> Wyoming v. Oklahoma, 502 U.S. 437, 454 (1992); New Energy Co. of Indiana v. Limbach, 486 U.S. 269, 273-74 (1988).

The U.S. Supreme Court has adopted “what amounts to a two-tiered approach” to determine the validity of a statute that invokes the Dormant Commerce Clause.<sup>5</sup> The first tier is referred to as the “virtual *per se*” rule, which is applied when a statute directly regulates or discriminates against interstate commerce, or when the effect of a statute is to favor in-state economic interests over out-of-state interests.<sup>6</sup> A facially discriminatory statute is subject to “the strictest scrutiny of any purported legitimate local purpose and of the absence of nondiscriminatory measures.”<sup>7</sup>

The second tier is reserved for statutes that regulate evenhandedly, but have an indirect effect on interstate commerce.<sup>8</sup> In those instances, the statute will be upheld “unless the burden imposed on such commerce is clearly excessive in relation to the putative local benefits.”<sup>9</sup> Thus, the court examines “whether the State’s interest is legitimate and whether the burden on interstate commerce clearly exceeds the local benefits.”<sup>10</sup>

The United States Supreme Court has also recognized that statutes that have the effect of controlling conduct beyond state boundaries are unconstitutional.<sup>11</sup> Thus, the Supreme Court has stated that “a statute that directly controls commerce occurring wholly outside the boundaries of a State exceeds the inherent limits of the enacting State’s authority and is invalid regardless of whether the statute’s extraterritorial reach was intended by the legislature.”<sup>12</sup> The “critical inquiry is whether the practical effect of

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<sup>5</sup> Brown-Forman Distillers Corp. v. New York State Liquor Auth., 476 U.S. 573, 578 (1986).

<sup>6</sup> Id.; Alliant Energy Corp. v. Bie, 330 F.3d 904, 911 (7th Cir. 2003); Philadelphia v. New Jersey, 437 U.S. 617, 623-24 (1978).

<sup>7</sup> Wyoming v. Oklahoma, 502 U.S. 437, 456 (1992).

<sup>8</sup> Brown-Forman Distillers Corp., 476 U.S. at 579; Pike v. Bruce Church, Inc., 397 U.S. 137, 142 (1970).

<sup>9</sup> Pike, 397 U.S. at 142.

<sup>10</sup> Brown-Forman Distillers Corp., 476 U.S. at 579.

<sup>11</sup> Edgar v. MITE Corp., 457 U.S. 624, 642-43 (1982) (plurality).

<sup>12</sup> Healy v. Beer Institute, Inc., 491 U.S. 324, 336 (1989); see Edgar, 457 U.S. at 642-43.

the regulation is to control conduct beyond the State.”<sup>13</sup> Finally, the “practical effect of the statute must be evaluated not only by considering the consequences of the statute itself, but also by considering how the challenged statute may interact with the legitimate regulatory regimes of other States.”<sup>14</sup> Applying this theory, courts have struck down laws that burden interstate commerce by imposing environmental conditions on citizens of the state when those same regulations have extraterritorial effects.<sup>15</sup>

SRP is concerned that the First Seller approach could be challenged as discriminatory even though it may be facially neutral. A broad definition of First Seller, sweeping in out-of-state power generators, may have unconstitutional consequences by controlling the conduct of those engaged in commerce occurring wholly outside the state. Similarly, an expansive definition of “point of regulation” that includes out-of-state generators would directly regulate interstate commerce in violation of the Commerce Clause. Therefore, the First Seller approach may have the “practical effect” of regulating out-of-state commerce because of requiring compliance and imposing increased costs on out-of-state generators.

Furthermore, SRP believes that a national program may solve any Commerce Clause concerns. The Ninth Circuit Court of Appeals has held that state-based regulations may disrupt interstate commerce to the extent that state-based rules regulate extraterritorially and produce different standards.<sup>16</sup> For example, in Union Pacific Railroad, the court addressed the issue of railroad safety measures. Under the challenged regulatory system at issue in the case, a train leaving from one state and arriving in

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<sup>13</sup> Healy, 491 U.S. at 336.

<sup>14</sup> Id.

<sup>15</sup> See Nat'l Solid Wastes Management Ass'n v. Meyer, 63 F.3d 652, 657-58 (7th Cir. 1995); Hardage v. Atkins, 619 F.2d 871, 872 (10th Cir. 1980).

<sup>16</sup> See Union Pacific Railroad Co. v. CPUC, 346 F.3d 851 (9th Cir. 2003).

California would have to be configured to meet the most stringent standards on its trip because trains often travel across multiple state lines.<sup>17</sup> The court noted that under such a system, “any rule regarding the make-up of a train will have extra-territorial effects in a number of different states.”<sup>18</sup> The court expressed concern that this could direct other states to adopt differing standards, possibly leading to an extensive amount of inconsistent state regulation, which “would undermine the need for substantial uniformity in this area.”<sup>19</sup> Ultimately, the court found that the justification of easing the administrative burden of applying the railroads’ more technical standards was not enough to validate the burden on interstate commerce, which the court held to be unconstitutional.<sup>20</sup> SRP believes the same justification — the need for uniformity or coordination at a regional, national and international level — exists with respect to the MAC Report’s recommendation.

The First Buyer approach avoids many of the Commerce Clause issues by limiting the purview of the regulations to those entities in California. The more expansive the definitions are such as regulating entities located outside of California, the more vulnerable the regulations are to a constitutional challenge. Because the Supreme Court and other federal cases make clear that the Commerce Clause’s prohibits against directly regulating out-of-state commerce, SRP believes that such a challenge may be avoided by using a First Buyer based definition and point of regulation for the cap-and-trade program.

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<sup>17</sup> Id. at 871.

<sup>18</sup> Id.

<sup>19</sup> Id.

<sup>20</sup> Id.



## **E-TAGS WILL NOT ALWAYS ACCURATELY IDENTIFY THE SOURCE OF GENERATION**

SRP is concerned about the potential reliance some parties seem to be placing on the use of E-tags as the sole source of information to identify the generator. E-tags will not always accurately identify a generator. In certain instances, the source listed in an E-tag may be substituted with another source. For accounting purposes, this is resolved after the transaction occurs but the E-Tag is not updated to reflect the actual generator.

## **SYSTEM SALES**

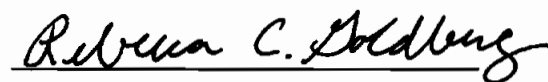
SRP like other entities offer system sales as an energy product to the market. These sales are not backed by a specific generator. Instead such sales are backed by a generation portfolio. System sales are a superior product because they allow for flexibility and improve reliability. If a specific generator is not available or if a transmission line from a specific generator is not available, the selling entity can still complete the transaction. SRP urges the Joint Commissions to ensure that such sales are not penalized by a high emission factor that is not representative of that generation.

## **CONCLUSION**

SRP appreciates the opportunity to provide these Comments to the CPUC and CEC for your consideration.

Dated: August 15, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rebecca C. Goldberg", is written over a horizontal line.

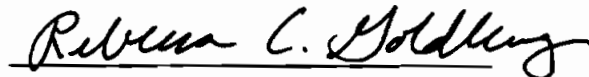
John B. Weldon, Jr.

Rebecca C. Goldberg  
Salmon, Lewis & Weldon, P.L.C.  
2850 East Camelback Road, Suite 200  
Phoenix, Arizona 85016  
Telephone: 602-801-9060  
Facsimile: 602-801-9070  
Email: jbw@slwplc.com  
*Attorneys for Salt River Project Agricultural  
Improvement and Power District*

### **Certificate of Service**

I hereby certify that I have on this day served a copy of these **Reply 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** on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named with an e-mail address in the official service list dated August 13, 2007. Parties without e-mail addresses, Commissioner Michael R. Peevey, Administrative Law Judge Charlotte TerKeurst, Administrative Law Judge Jonathan Lakritz, and Administrative Law Judge Meg Gottstein, were mailed a properly addressed copy by first-class mail with postage prepaid. A copy of the **Reply 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** was also filed with the CEC by transmitting an e-mail message with the document attached to the CEC Docket Office.

Executed on August 15, 2007.

A handwritten signature in black ink, reading "Rebecca C. Goldberg", written over a horizontal line.

Rebecca C. Goldberg

**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**Service Lists**

Proceeding: R0604009 - CPUC - PG&E, SDG&E,  
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List Name: LIST  
Last changed: August 13, 2007

**Appearance**

CINDY ADAMS  
COVANTA ENERGY CORPORATION  
AFFAIRS  
40 LANE ROAD  
FAIRFIELD, NJ 07004

STEVEN S. SCHLEIMER  
DIRECTOR, COMPLIANCE & REGULATORY

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

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

CATHERINE M. KRUPKA  
MCDERMOTT WILL AND EMERY LLP  
600 THIRTEEN STREET, NW  
WASHINGTON, DC 20005

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

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

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

STEPHEN G. KOERNER, ESQ.  
EL PASO CORPORATION  
WESTERN PIPELINES  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903

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.  
CONTRACTS  
2850 EAST CAMELBACK ROAD, SUITE 200  
PHOENIX, AZ 85016

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

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

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

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

RONALD F. DEATON  
LOS ANGELES DEPARTMENT OF WATER &  
111 NORTH HOPE STREET, ROOM 1550  
LOS ANGELES, CA 90012

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  
GRAHAM  
2121 AVENUE OF THE STARS  
LOS ANGELES, CA 90067

DENNIS M.P. EHLING  
ATTORNEY AT LAW  
KIRKPATRICK & LOCKHART NICHOLSON  
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 RENEWABLES, LLC  
2100 SEPULVEDA BLVD., SUITE 37  
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 DRIVE, STE. 107-356  
ARCADIA, CA 91006

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

RICHARD HELGESON  
SOUTHERN CALIFORNIA PUBLIC 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

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

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

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

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

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

ALLEN K. TRIAL  
SAN DIEGO GAS & ELECTRIC COMPANY  
HQ-13  
101 ASH STREET  
SAN DIEGO, CA 92101

ALVIN PAK  
SEMPRA GLOBAL ENTERPRISES  
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

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

MARCIE MILNER  
DIRECTOR - REGULATORY AFFAIRS  
SHELL TRADING GAS & POWER COMPANY  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121

REID A. WINTHROP  
PILOT POWER GROUP, INC.  
8910 UNIVERSITY CENTER LANE, SUITE 520  
SAN DIEGO, CA 92122

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

STEVE RAHON  
DIRECTOR, TARIFF & REGULATORY ACCOUNTS  
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 PLACE, RM. 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  
EXECUTIVE 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  
DAY  
SAN FRANCISCO, CA 94111

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

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

JEANNE B. ARMSTRONG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE & DAY  
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

VIDHYA PRABHAKARAN  
GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY  
505 SANSOME STREET, SUITE 900  
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

BETH VAUGHAN  
CALIFORNIA COGENERATION COUNCIL  
4391 N. MARSH ELDER COURT  
CONCORD, CA 94521



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  
CALIFORNIA 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  
DIRECTOR  
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  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

MIKE LAMOND  
ALPINE NATURAL GAS OPERATING CO. #1 LLC  
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  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

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

MARY LYNCH  
VP - REGULATORY AND LEGISLATIVE AFFAIRS  
CONSTELLATION ENERGY COMMODITIES GROUP  
2377 GOLD MEDAL WAY, SUITE 100  
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 95811

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
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. CZAHAR, 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, SUITE 205  
SACRAMENTO, CA 95864

DAN SILVERIA  
SURPRISE VALLEY ELECTRIC CORPORATION  
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, 18TH FLOOR  
PORTLAND, OR 97232

TARA KNOX  
AVISTA CORPORATION  
PO BOX 3727  
SPOKANE, WA 99220

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

JASON DUBCHAK  
ASSOCIATE GENERAL COUNSEL  
WILD GOOSE STORAGE, LLC  
C/O NISKA GAS STORAGE, SUITE 400  
607 8TH AVENUE S.W.  
CALGARY, AB T2P 0A7  
CANADA

**Information Only**

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

KENNETH A. COLBURN  
SYMBILITIC 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

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 DIVISION  
2000  
9960 CORPORATE CAMPUS DRIVE, STE 2000  
LOUISVILLE, KY 40223

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

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

BRIAN POTTS  
FOLEY & LARDNER  
PO BOX 1497  
150 EAST GILMAN STREET  
MADISON, WI 53701-1497

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

FIJI GEORGE  
EL PASO CORPORATION  
EL PASO BUILDING  
PO BOX 2511  
HOUSTON, TX 77252

ED CHIANG  
ELEMENT MARKETS, LLC  
ONE SUGAR CREEK CENTER BLVD., SUITE 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

WAYNE TOMLINSON  
EL PASO CORPORATION  
WESTERN PIPELINES  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903

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

ANITA HART  
SENIOR SPECIALIST/STATE REGULATORY AFFAIR  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89193

RANDY SABLE  
SOUTHWEST GAS CORPORATION  
MAILSTOP: LVB-105  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89193

BILL SCHRAND  
SOUTHWEST GAS CORPORATION  
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  
PO BOX 10100  
6100 NEIL ROAD, MS S4A50  
RENO, NV 89520

DARRELL SOYARS  
MANAGER-RESOURCE PERMITTING&STRATEGIC  
SIERRA PACIFIC RESOURCES  
6100 NEIL ROAD  
RENO, NV 89520-0024

FRANK LUCHETTI  
NEVADA DIV. OF ENVIRONMENTAL PROTECTION  
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

LORRAINE PASKETT  
DIRECTOR, LEGISLATIVE AND REG. AFFAIRS  
LA DEPT. OF WATER & POWER  
PO BOX 51111  
111 N. HOWARD ST., ROOM 1536  
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 DEPARTMENT 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  
SOUTHERN CALIFORNIA GAS COMPANY  
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

PETER JAZAYERI  
STROOCK & STROOCK & LAVAN LLP  
2029 CENTURY PARK EAST, SUITE 1800  
LOS ANGELES, CA 90067

DEREK MARKOLF  
CALIFORNIA CLIMATE ACTION REGISTRY  
515 S. FLOWER STREET, SUITE 1640  
LOS ANGELES, CA 90071

DAVID NEMTZOW  
1254 9TH STREET, NO. 6  
SANTA MONICA, CA 90401

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

VITALY LEE  
AES ALAMITOS, LLC  
690 N. STUDEBAKER ROAD  
LONG BEACH, CA 90803

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

RICHARD J. MORILLO  
ASSISTANT CITY ATTORNEY  
CITY OF BURBANK  
215 E. OLIVE AVENUE  
BURBANK, CA 91502

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

AIMEE BARNES  
MANAGER REGULATORY AFFAIRS  
ECOSECURITIES  
HARVARD SQUARE  
206 W. BONITA AVENUE  
CLAREMONT, CA 91711

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

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

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  
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110

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

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

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

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

SEPHRA A. NINOW  
POLICY ANALYST  
CALIFORNIA 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

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  
DIRECTOR, 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

THERESA BURKE  
SAN FRANCISCO PUC  
1155 MARKET STREET, 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

AMBER MAHONE  
ENERGY & ENVIRONMENTAL ECONOMICS, INC.  
101 MONTGOMERY STREET, SUITE 1600  
SAN FRANCISCO, CA 94104

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

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

KRISTIN GRENFELL  
PROJECT ATTORNEY, CALIF. ENERGY PROGRAM  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
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 ASSOCIATES  
555 CALIFORNIA STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94104

SETH HILTON  
ATTORNEY AT LAW  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
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

JAMES W. TARNAGHAN  
DUANE MORRIS LLP  
SUITE 2000  
ONE MARKET, SPEAR TOWER  
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

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  
LLP  
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  
ASSOCIATE EDITOR  
PLATTS MCGRAW-HILL  
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

STEPHANIE LA SHAWN  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

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

KARLA DAILEY  
CITY OF PALO ALTO  
UTILITIES DEPARTMENT  
BOX 10250  
PALO ALTO, CA 94303

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  
ASSN  
ORINDA, CA 94563

SUE KATELEY  
EXECUTIVE DIRECTOR  
CALIFORNIA SOLAR ENERGY INDUSTRIES

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

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

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

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

KENNY SWAIN  
NAVIGANT CONSULTING  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670

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

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

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

DAVID REYNOLDS  
MEMBER SERVICES MANAGER  
NORTHERN CALIFORNIA POWER AGENCY  
180 CIRBY WAY  
ROSEVILLE, CA 95678-6420

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

KELLIE SMITH  
SENATE ENERGY/UTILITIES & COMMUNICATION  
STATE CAPITOL, ROOM 4038  
SACRAMENTO, CA 95814

MICHAEL WAUGH  
AIR RESOURCES BOARD  
1001 10TH STREET  
SACRAMENTO, CA 95814

PATRICK STONER  
PROGRAM DIRECTOR  
LOCAL GOVERNMENT COMMISSION  
1303 J STREET, SUITE 250  
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

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

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

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 MACMULLEN  
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 ROAD, NO. 112, PMB 119  
ANTELOPE, CA 95843

ELIZABETH W. HADLEY  
CITY OF REDDING  
777 CYPRESS AVENUE  
REDDING, CA 96001

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 1700  
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

DONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660

JESUS ARREDONDO  
NRG ENERGY INC.  
4600 CARLSBAD BLVD.  
CARLSBAD, CA 99208

CHARLIE BLAIR  
DELTA ENERGY & ENVIRONMENT  
15 GREAT STUART STREET  
EDINBURGH, UK EH2 7TP  
UNITED KINGDOM

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

CLARENCE BINNINGER  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102

DAVID ZONANA  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102

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  
BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BETH MOORE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING  
ROOM 4103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

DONALD R. SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4209  
505 VAN NESS AVENUE

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

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

JACQUELINE GREIG  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JASON R. SALMI KLOTZ  
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

JUDITH IKLE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
ROOM 4012  
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

MATTHEW DEAL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5215

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

JAMIE FORDYCE  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF STRATEGIC PLANNING  
AREA 5-B  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JEORGE S. TAGNIPES  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
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

JULIE A. FITCH  
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

MEG GOTTSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106

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

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

RAHMON MOMOH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY RESOURCES & PRICING BRANCH  
ROOM 4205  
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

SEAN A. SIMON  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
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

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

JUDITH B. SANDERS  
ATTORNEY AT LAW

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

PEARLIE SABINO  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RICHARD A. MYERS  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING 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

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

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

JULIE GILL  
EXTERNAL AFFAIRS MANAGER



CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MARY MCDONALD  
DIRECTOR OF STATE AFFAIRS  
OPERATOR  
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

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

DARYL METZ  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST., MS-20  
SACRAMENTO, CA 95814

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

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

CALIFORNIA INDEPENDENT SYSTEM  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

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

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

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

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

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

MARC PRYOR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST., MS-20  
SACRAMENTO, CA 95814

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

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