

<b>DOCKET</b>	
07-OIIP-1	
<b>DATE</b>	DEC 03 2007
<b>RECD.</b>	DEC 03 2007

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

---

Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework  
and to Examine the Integration of Greenhouse Gas  
Emissions Standards into Procurement Policies.

---

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

**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

**COMMENTS OF THE  
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION  
ON THE TYPE AND POINT OF REGULATION ISSUES**

December 3, 2007

Bruce McLaughlin  
Justin Wynne  
Braun & Blaising, P.C.  
915 L Street, Suite 1270  
Sacramento, CA 95814  
Tel: (916) 326-5812  
Fax: (916) 441-4468  
Email: [mclaughlin@braunlegal.com](mailto:mclaughlin@braunlegal.com)

*Attorneys for the  
California Municipal Utilities Association*

**COMMENTS OF THE  
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION  
ON THE TYPE AND POINT OF REGULATION ISSUES**

In accordance with the Rules of Practice and Procedure of the Public Utilities Commission (“CPUC”) of the State of California, the California Municipal Utilities Association (“CMUA”) hereby files these Comments to questions posed in the *Administrative Law Judges’ Ruling Requesting Comments on Type and Point of Regulation Issues* (“ALJ Ruling”) issued November 9, 2007, in the R.06-04-009. CMUA also files these Comments with the California Energy Commission (“CEC”) in Docket 07-OIIP-01. In these Comments, the CPUC and CEC will collectively be called the “Joint Agencies.”

**I. INTRODUCTION**

CMUA represents California’s publicly owned electric utilities (“POUs”) serving approximately one-quarter of the electricity load in the state. All Comments in this filing represent the consensus position of CMUA’s members. These Comments are organized according to the outline used in the ALJ Ruling.

**II. SELECTED COMMENTS**

**A. Section 3.3. [Retail Provider]-Based Cap and Trade**

In the event that California implements a market-based system in furtherance of achieving the Assembly Bill 32 (“AB 32”) statewide greenhouse gas emissions limit,<sup>1</sup> CMUA believes that retail providers<sup>2</sup> should be the point of regulation. In the case of POUs, this means that AB 32 compliance obligations are the responsibility of the local regulatory authority. The retail provider is the proper point of regulation since it is best situated to manage its portfolio to meet the goals of AB 32, including decisions involving energy procurement, renewable portfolio standards, and energy efficiency. CMUA suggests that the term “retail provider-based” is actually more accurate than the term “load-based” as used in the ALJ Ruling. This term also clearly distinguishes the point of regulation concept from any issues related to allowance allocation schemes.<sup>3</sup>

---

<sup>1</sup> CAL. HEALTH & SAFETY CODE § 38570.

<sup>2</sup> In terms of reporting obligations, AB 32 applies to “retail sellers of electricity” which includes POUs, electrical corporations, electric service providers, and community choice aggregators serving end-use customers in California. CAL. HEALTH & SAFETY CODE § 38530(b)(2).

<sup>3</sup> CMUA does not have a position on allowance allocations but does have a position on the point of regulation.

**B. Question 5: How extensive do you view the threat of contract shuffling under a [retail provider]-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?**

As of this date, the California Air Resources Board ("CARB") has not adopted any regulations incorporating the Joint Agencies' interpretations of contract shuffling. However, CMUA responds by stating that there is little threat of *actual* contract shuffling within a California-only retail provider-based program. Robust verification procedures will serve as an adequate deterrent to virtually eliminate *actual* contract shuffling by retail providers.

CMUA believes that the Joint Agencies hold to a clearly erroneous interpretation of AB 32 concerning the scope of authority granted to CARB.<sup>4</sup> Based on their belief that CARB may regulate emissions beyond the definition of "statewide greenhouse gas emissions" as specified in AB 32, the Joint Agencies dispense several arbitrary and capricious recommendations for classifying a large range of wholesale sales within the rubric of "contract shuffling." The Joint Agency recommendations shoulder retail providers with something akin to a presumption of guilt and/or strict liability offense by penalizing retail providers for selling power from owned / partially-owned high-GHG facilities. The Joint Agencies' recommendations do not even include any procedural mechanism for a retail provider to overcome the "presumption" by providing evidence that demonstrates the *actual and verifiable* sources of power procured to serve its load.

**C. Question 12: As the CPUC does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers, which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POU's? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POU's?**

The nature of this question seems to imply that without further regulatory or legislative action, any greenhouse gas emission reduction requirement would be ineffectual as to POU's. A review of existing law confirms that POU's already possess the legal framework to adopt and enforce a variety of important policies, including energy efficiency, demand response, and emission reduction programs.

The source of authority for a POU to own and operate a utility is founded in the California Constitution and statutes, and then flows to the POU's local regulatory authority. There are two predominate forms of POU's in California; (1) cities; and (2) special districts. A city is a municipal corporation formed primarily for the purpose of efficiently administering government and serving the general welfare of those

---

<sup>4</sup> The ALJ Ruling asks that parties not repeat any comments filed previously in this proceeding. Therefore, CMUA incorporates by reference herein, all its comments filed in R.06-04-009 on the subject of "contract shuffling" as that term is used by the Joint Agencies.

inhabitants in the territory. Cities may be either Charter cities<sup>5</sup> or General Law<sup>6</sup> cities, but both have various enumerated powers. Special purpose districts are also common in California. The most prominent of these are Municipal Utility Districts,<sup>7</sup> Public Utility Districts,<sup>8</sup> and Irrigation Districts.<sup>9</sup>

The California Constitution grants the legislature the power to authorize a municipal corporation to own and operate an electric utility.<sup>10</sup> Although, there is no uniform definition of a municipal corporation, the California courts have held that cities and both municipal and public utility districts fall within the definition of "municipal corporation" for the purposes of the California Constitution, Article XI, Section 9.<sup>11</sup> As such, both the Public Utilities Code and the Government Code provide that a municipal corporation may acquire, construct, own, operate, or lease an electric public utility.<sup>12</sup> California law also specifically authorizes irrigation districts to acquire, operate, lease and control electric utilities.

POUs have all the necessary legal authority to undertake their obligations to serve. A chief difference between POU and private corporations providing utility functions is the manner in which that the functions are regulated. While private corporations are regulated by state agencies led by appointed commissioners, POU are regulated by an elected local governing body. POU are not defined as public utilities within Public Utilities Code Section 216 or California Constitution, Article XII, Section 3, and are generally exempt from CPUC regulation.<sup>13</sup> Each type of POU has a statutory designation of the delegated power to own and operate a utility and the decision making power is within the purview of an elected governing body. Within this structure, considerable discretion is given to the governing body on matters of

---

<sup>5</sup> Several examples of charter cities include Anaheim, Burbank, Roseville, and Los Angeles.

<sup>6</sup> The City of Redding is an example of a general law city.

<sup>7</sup> The Municipal Utility District Act (MUD Act) reads as follows: "A district may acquire, construct, own, operate, control, or use, within or without, or partly within or partly without, the district, works or parts of works for supplying the inhabitants of the district and public agencies therein, or some of them, with light, water, power, heat, . . . , and may do all things necessary or convenient to the full exercise of the powers herein." CAL. PUB. UTIL. CODE §§ 11500, *et seq.*

<sup>8</sup> See CAL. PUB. UTIL. CODE §§ 15501, *et seq.* "A district may acquire, construct, own, operate, control, or use, . . . , works for supplying its inhabitants with light, water, power, . . . , and may do all things necessary or convenient to the full exercise of the powers granted in this article. *Id.* at § 16461.

<sup>9</sup> Under the Irrigation District Law, an irrigation district may purchase or lease electric power from any public or private entity and may acquire, operate, lease and control plants for the generation, transmission, distribution, sale and lease of electric power. CAL. WATER CODE § 22115.

<sup>10</sup> CAL. CONST., art. XI, § 9. "A municipal corporation may establish, purchase, and operate public works to furnish its inhabitants with light, water, power, heat, transportation, or means of communication. It may furnish those services outside its boundaries, except within another municipal corporation which furnishes the same service and does not consent." *Id.* § 9(a).

<sup>11</sup> *Glenbrook Development Co. v. City of Brea*, 253 Cal.App.2d 267, 275 (1967).

<sup>12</sup> CAL. PUB. UTIL. CODE § 10003 (stating that the power to acquire and operate a public utility includes the power to complete, reconstruct, extend, change, enlarge, and repair a public utility acquired, constructed, owned, or operated by a municipality).

<sup>13</sup> See *County of Inyo v. PUC*, 26 Cal.3d 154 (1980). "Established doctrine declares that, 'In the absence of legislation otherwise providing, the Commission's jurisdiction to regulate public utilities extends only to the regulation of privately owned utilities.'" *Id.* at 166 quoting *Los Angeles Met. Transit Authority v. Public Utilities Com.*, 52 Cal.2d 655, 661 (1959).

policy. Each POU's governing body has the power to regulate rates and practices relevant thereto. In addition to being regulated by the locally elected officials, POU's are directly regulated by the public through the ability of the electorate to qualify and subject issues to a vote.

It is inaccurate to assume that because POU's are regulated by their local governing boards, rather than some outside authority, that they operate without legal guidelines. In fact, the ordinances and regulations adopted by a municipal utility governing board are enforceable, and have been enforced by the courts. Relevantly, a POU may be compelled to serve when it fails or refuses to exercise its duties or supply services that it is obligated to provide.<sup>14</sup> Actions of a POU's governing board are subject to judicial review and the courts will remedy decisions that are unreasonable.<sup>15</sup>

Given that they are locally regulated, the POU's obligations are established by municipal codes, ordinances, tariffs, and regulations. These obligations, which legally bind the POU, define strategic goals, risk management, rates, resource adequacy, renewable portfolio standards, and a host of other policies relevant to providing reliable electric service. Several examples are set forth here.

- "The objectives of the [City of Anaheim] Electric Utility organization are to plan and carry out the development of the power resources of the City for the greatest benefit to the area and to the citizens of Anaheim. This includes providing dependable service without discrimination for the residents of the City of Anaheim to the fullest extent possible, consistent with overall sound business principles in planning, in financing, in construction of developments and in the operation and maintenance of the City's utility facilities. The accomplishments of these objectives will make the maximum benefits to the public realized. It is recognized that the City Council is the governing body of the City and that it provides the utility services to the citizens of Anaheim. Through the City Council's direction and guidance, the City's management and supervisory personnel are continually anticipating the electrical service and related needs of all the customers in the community and expect to be responsive to their needs and requirements." *City of Anaheim, Resolution No.: 71R-478 (Adopted: 10-26-71)*.
- "The [Los Angeles] Department [of Water & Power] will exercise reasonable diligence and care to furnish and deliver a continuous and sufficient supply of water or electric energy to the customer, and to avoid any shortage or interruption of delivery." *City of Los Angeles, Department of Water and Power Rules and Regulations, Rule 14*.
- "The Board of Water and Power Commissioners shall have the possession, management and control of all the electric energy rights, land, rights-of-way, sites, facilities and property used for generation, transportation, distribution and delivery of power for the benefit of the City, its inhabitants and its customers." *Los Angeles City Charter Section 672*.
- "The board shall have the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of

---

<sup>14</sup> "Like a private corporation, it is the duty of the city to furnish without discrimination to all its inhabitants who apply therefor a supply of water upon such applicants complying with such reasonable rules and regulations as it may lawfully establish for the conduct of the business." *Nourse v. City of Los Angeles*, 25 Cal. App. 384, 385-386 (1914).

<sup>15</sup> Upon review, courts will determine whether or not decisions related to rates and practices of a municipal utility governing body are unreasonable, unfair, or fraudulently or arbitrarily established. *American Microsystems, Inc. v. City of Santa Clara*, 137 Cal. App. 3d 1037, 1042 (1982).

the Water and Power Assets for Departmental Purposes.” *Los Angeles City Charter Section 675.*

In addition to these examples, there are numerous acts of the California Legislature recognizing the local authority by placing specific obligations on POUs to develop, adopt, and implement various policies. These policies are enforceable in law, and provide a mechanism for ensuring POU compliance. Pertinent examples are described below.

- Each POU is responsible for implementing a renewable portfolio standard. Public Utilities Code § 387(a) requires that “[e]ach governing body of a [POU] . . . , shall be responsible for implementing and enforcing a renewables portfolio standard that recognizes the intent of the Legislature to encourage renewable resources, while taking into consideration the effect of the standard on rates, reliability, and financial resources and the goal of environmental improvement.” Each POU is held accountable to its customers through an annual reporting process outlined in Public Utilities Code § 387(b). The report must include the: (1) expenditures of public goods funds collected pursuant to Section 385 for renewable energy resource development; (2) a description of programs, expenditures, and expected or actual results; (3) the POU’s resource mix by fuel type; and (4) the contribution of each type of renewable energy resource with separate categories for those fuels considered eligible renewable energy resources as defined by Public Utilities Code § 399.12.
- Each POU is responsible for planning to ensure resource adequacy. Public Utilities Code § 9620 reads that “[e]ach [POU] serving end-use customers, shall prudently plan for and procure resources that are adequate to meet its planning reserve margin and peak demand and operating reserves, sufficient to provide reliable electric service to its customers.” The objective target set by Section 9620 is that each POU set a minimum standard in its planning process as established by the minimum planning reserve and reliability criteria approved by the Board of Trustees of the Western Systems Coordinating Council or the Western Electricity Coordinating Council. Each POU is responsible to provide any information requested by the CEC to enable it to evaluate the POU’s progress in meeting the requirements of § 9620.
- Each POU is responsible for meeting its load in accordance with a “loading order” that prefers energy efficiency, demand response, and renewable generation before conventional generation. Public Utilities Code § 9615 states that each POU, “in procuring energy, shall first acquire all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.”<sup>16</sup> Each POU must “report annually to its customers and to the [CEC], its investment in energy efficiency and demand reduction programs.”<sup>17</sup> Similar to the annual report discussed above for each POU’s RPS, this report must include a “description of programs, expenditures, and expected and actual energy savings results.”<sup>18</sup> Section 9615 requires that each POU shall identify all potentially achievable cost-effective electricity efficiency savings and establish annual targets for energy efficiency savings and demand reduction for the next 10-year period, and then report those targets to the CEC. The POU shall treat investments made to achieve energy efficiency savings and demand reduction targets as procurement investments.
- Each POU must provide certain load, forecast, and program data to the CEC as

<sup>16</sup> CAL. PUB. UTIL. CODE § 9615(a).

<sup>17</sup> *Id.* at § 9615(b).

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

requested. In April 2007, the CEC adopted comprehensive new data collection regulations. These regulations include reporting requirements for the information discussed above, i.e., resource adequacy, energy efficiency, and load forecasts.

- Each POU must consider the impacts of greenhouse gas emissions in all resource procurement decisions. In October 2007, CEC regulations were approved that implement the requirements of SB 1368 that establishes a greenhouse gas (“GHG”) emission performance standard (“EPS”) for long-term financial commitments in baseload generation. Pursuant to Health & Safety Code §§ 38500 et seq., CARB is charged with monitoring and regulating sources of statewide greenhouse gas emissions. Among other things, CARB shall adopt rules and regulations to achieve the maximum technologically feasible and cost-effective reduction in statewide greenhouse gas emissions.<sup>12</sup> AB 32 specifically requires POUs that are retail providers to incorporate emission reduction plans into their operations going forward.
- Each POU must adopt, implement, and fund a solar initiative program by January 1, 2008. Public Utilities Code § 387.5 requires each POU that sells electricity at retail to adopt, implement, and fund a solar initiative program (“SIP”) for the purpose of investing in, and encouraging the increased installation of, residential and commercial solar energy systems.

**D. Question 22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.**

No. Regardless of which regulatory mechanism is implemented, the ultimate responsibility and obligation for reducing GHG emissions is properly within the purview of the retail providers.

**E. Question 25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?**

California should put its primary efforts into collaborating at the regional / national level in order to develop an effective program that spans both geographical and sector boundaries. CMUA believes that the most technologically feasible and cost-effective program will encompass as many aspects of the nation’s economy as possible. A determination of the “reasonable” waiting period cannot be made at this time. This determination will be an ongoing subject for review. If the CARB scoping plan includes activities for developing a market-based system over the next 4 years, CARB should reevaluate the status of regional / national plans no less than annually. The analysis should evaluate factors such as the type of plan (i.e., retail provider-based, source-based, etc.) and its expected starting date. In this way, California could anticipate the regulatory structure and ensure that if any California-only plan is adopted, it will be designed in a way that transitions smoothly into the regional / national plan. Under no circumstance should California implement its own cap and trade program before 2012.

//

---

<sup>12</sup> CAL. HEALTH & SAFETY CODE § 38560.

//

//

//

//

//

//

//

//

//

//

//



**III. CONCLUSION**

CMUA asks the Joint Agencies to consider CMUA's comments as outlined above.

Dated: December 3, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'BM' or 'B. McLaughlin', written in a cursive style.

Bruce McLaughlin  
Braun & Blaising, P.C.  
915 L Street, Suite 1270  
Sacramento, CA 95814  
(916) 326-5812  
(916) 441-4468 (facsimile)  
mclaughlin@braunlegal.com

Attorneys for the California Municipal Utilities Assn.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the attached:

**COMMENTS OF THE  
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION  
ON THE TYPE AND POINT OF REGULATION ISSUES**

on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 3<sup>rd</sup> day of December 2007, at Sacramento, California.



---

Vicki Ferguson

---

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

**Proceeding: R0604009 - CPUC - PG&E, SDG&E,**  
**Filler: CPUC - PG&E, SDG&E, SOCALGAS, EDISON**  
**List Name: LIST**  
**Last changed: November 30, 2007**

**Parties**

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

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

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

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

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

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

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

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

KELLY BARR  
MANAGER, REGULATORY AFFAIRS & CONTRACTS  
SALT RIVER PROJECT  
PO BOX 52025, PAB 221  
PHOENIX, AZ 85072-2025  
STEVEN S. MICHEL  
WESTERN RESOURCE ADVOCATES  
2025 SENDA DE ANDRES  
SANTA FE, NM 87501

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

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

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

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

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

CYNTHIA A. FONNER  
SENIOR COUNSEL  
CONSTELLATION ENERGY GROUP INC  
550 W. WASHINGTON ST, STE 300  
CHICAGO, IL 60661  
THOMAS DILL  
PRESIDENT  
LODI GAS STORAGE, L.L.C.  
1021 MAIN ST STE 1500  
HOUSTON, TX 77002-6509

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

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

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

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

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

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

GREGORY KOISER  
CONSTELLATION NEW ENERGY, INC.  
350 SOUTH GRAND AVENUE, SUITE 3800  
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

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

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

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

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

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

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

ALVIN PAK  
SEMPRA GLOBAL ENTERPRISES  
101 ASH STREET  
SAN DIEGO, CA 92101

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

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

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

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

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

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

BARRY R. WALLERSTEIN  
EXECUTIVE OFFICER  
SOUTH COAST AQMD  
21865 COPLEY DRIVE  
DIAMOND BAR, CA 91765-4182

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

LAURA I. GENAO  
ATTORNEY  
SOUTHERN CALIFORNIA EDISON  
PO BOX 800  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

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

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

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

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

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

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

THOMAS DARTON  
PILOT POWER GROUP, INC.  
SUITE 520  
8910 UNIVERSITY CENTER LANE  
SAN DIEGO, CA 92122

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

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

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

MARCEL HAWIGER  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 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

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

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

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

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

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

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

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

LAD LORENZ  
V.P. REGULATORY AFFAIRS  
SEMPRA UTILITIES  
601 VAN NESS AVENUE, SUITE 2060  
SAN FRANCISCO, CA 94102

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

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

DONALD BROOKHYSER  
ATTORNEY AT LAW  
ALCANTAR & KAHL  
120 MONTGOMERY STREET  
SAN FRANCISCO, CA 94104

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

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

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

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

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

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

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

VIDHYA PRABHAKARAN  
GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

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

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

ANDREW L. HARRIS  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KENNETH C. JOHNSON  
KENNETH CARLISLE JOHNSON  
2502 ROBERTSON RD  
SANTA CLARA, CA 95051

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

JOY A. WARREN  
REGULATORY ADMINISTRATOR  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

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

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

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

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

VIRGIL WELCH  
STAFF ATTORNEY  
ENVIRONMENTAL DEFENSE  
1107 9TH STREET, SUITE 540  
SACRAMENTO, CA 95814

DOWNEY BRAND  
DOWNEY BRAND  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814-4686

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

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

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

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

UDI HELMAN  
CALIFORNIA INDEPENDENT SYS. OPER. CORP  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

MARY LYNCH  
VP - REGULATORY AND LEGISLATIVE AFFAIRS  
CONSTELLATION ENERGY COMMODITIES GROUP  
2377 GOLD MEDAL WAY, SUITE 100  
GOLD RIVER, CA 95670

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95811

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

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

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

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

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

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

KYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH ST., SUITE 2000  
PORTLAND, OR 97232

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

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

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

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

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

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

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

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

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

RYAN FLYNN  
PACIFICORP  
825 NE MULTNOMAH STREET, 18TH FLOOR  
PORTLAND, OR 97232

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

MATTHEW MOST  
EDISON MISSION MARKETING & TRADING, INC.  
160 FEDERAL STREET  
BOSTON, MA 02110-1776

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

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

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

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

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

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

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

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



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

JEANNE ZAIONTZ  
BP ENERGY COMPANY  
501 WESTLAKE PARK BLVD, RM. 4328  
HOUSTON, TX 77079

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

FRANK STERN  
SUMMIT BLUE CONSULTING  
1722 14TH STREET, SUITE 230  
BOULDER, CO 80302

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

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

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

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

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

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

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

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

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

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

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

ED CHIANG  
ELEMENT MARKETS, LLC  
ONE SUGAR CREEK CENTER BLVD., SUITE 250  
SUGAR LAND, TX 77478

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

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

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

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

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

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

SANDRA CAROLINA  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510

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

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

JOSEPH GRECO  
VICE PRESIDENT - WESTERN REGION  
CAITHNESS ENERGY, LLC.  
9590 PROTOTYPE COURT, SUITE 200  
RENO, NV 89521

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

ROBERT K. ROZANSKI  
LOS ANGELES DEPT OF WATER AND POWER  
111 NORTH HOPE STREET, ROOM 1520  
LOS ANGELES, CA 90012

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

RANDALL W. KEEN  
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

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

STEVE ENDO  
PASADENA DEPARTMENT OF WATER & POWER  
45 EAST GLENARM STREET  
PASADENA, CA 91105

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

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

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

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

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

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

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 1151  
LOS ANGELES, CA 90012

RASHA PRINCE  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

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

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

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

STEVEN G. LINS  
GENERAL COUNSEL  
GLENDALE WATER AND POWER  
613 EAST BROADWAY, SUITE 220  
GLENDALE, CA 91206-4394

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

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

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

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

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

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

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

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

DESPINA NIEHAUS  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32H  
SAN DIEGO, CA 92123-1530

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

THOMAS MCCABE  
EDISON MISSION ENERGY  
18101 VON KARMAN AVE., SUITE 1700  
IRVINE, CA 92612

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

DIANE I. FELLMAN  
DIRECTOR, REGULATORY AFFAIRS  
FPL ENERGY PROJECT MANAGEMENT, INC.  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102

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

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

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

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

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

JACK BURKE  
LEGISLATIVE AFFAIRS MANAGER  
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVE., 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

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

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

HAYLEY GOODSON  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 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

THERESA BURKE  
REGULATORY ANALYST  
SAN FRANCISCO PUC  
1155 MARKET STREET, 4TH FLOOR  
SAN FRANCISCO, CA 94103

AMBER MAHONE  
ENERGY & ENVIRONMENTAL ECONOMICS, INC.  
101 MONTGOMERY STREET, SUITE 1600  
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

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

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

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

JAMES W. TARNAGHAN  
DUANE MORRIS LLP  
SUITE 2000  
ONE MARKET, SPEAR TOWER  
SAN FRANCISCO, CA 94105

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

SHERIDAN J. PAUKER  
WILSON SONSINI GOODRICH & ROSATI  
SPEAR TOWER, SUITE 3300  
ONE MARKET ST  
SAN FRANCISCO, CA 94105

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

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

MARTIN A. MATTES  
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
50 CALIFORNIA STREET, SUITE 3400  
SAN FRANCISCO, CA 94111

LISA WEINZIMER  
ASSOCIATE EDITOR  
PLATTS MCGRAW-HILL  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118

SHAUN ELLIS  
2183 UNION STREET  
SAN FRANCISCO, CA 94123

BIANCA BOWMAN  
RATE CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PG&E MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

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

SETH HILTON  
ATTORNEY AT LAW  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
SAN FRANCISCO, CA 94104

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

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

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

PETER V. ALLEN  
THELEN REID BROWN RAYSMAN & STEINER  
101 SECOND STREET, SUITE 1800  
SAN FRANCISCO, CA 94105

ROBERT J. REINHARD  
MORRISON AND FOERSTER  
425 MARKET STREET  
SAN FRANCISCO, CA 94105-2482

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

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

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

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

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

ED LUCHA  
CASE 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

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

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

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

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

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

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

SARAH BESERRA  
CALIFORNIA REPORTS  
39 CASTLE HILL COURT  
VALLEJO, CA 94591

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

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

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

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

RAYMOND HUNG  
PG&E  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

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

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

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

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

JOSEPH M. PAUL  
SENIOR CORPORATE COUNSEL  
DYNEGY, INC.  
4140 DUBLIN BLVD., STE. 100  
DUBLIN, CA 94568

GREG BLUE  
ENXCO DEVELOPMENT CORP  
5000 EXECUTIVE PARKWAY, STE.140  
SAN RAMON, CA 94583

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

JOSEPH HENRI  
31 MIRAMONTE ROAD  
WALNUT CREEK, CA 94597

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

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

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

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

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

CLYDE MURLEY  
1031 ORDWAY STREET  
ALBANY, CA 94706

CARLA PETERMAN  
UCEI  
2547 CHANNING WAY  
BERKELEY, CA 94720

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

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

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

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

THOMAS S. KIMBALL  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

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

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

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

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

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

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

STEVE KROMER  
3110 COLLEGE AVENUE, APT 12  
BERKELEY, CA 94705

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

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL LABORATORY  
BUILDING 90R4000  
BERKELEY, CA 94720

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

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

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

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

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

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

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

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

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

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

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

AUDRA HARTMANN  
DYNegy INC.  
980 NINTH STREET, SUITE 1420  
SACRAMENTO, CA 95814

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

DANIELLE MATTHEWS SEPERAS  
CALPINE CORPORATION  
1127 11TH STREET, SUITE 242  
SACRAMENTO, CA 95814

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

KASSANDRA GOUGH  
CALPINE CORPORATION  
1127 11TH STREET, SUITE 242  
SACRAMENTO, CA 95814

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814

PANAMA BARTHOLOMY  
ADVISOR TO CHAIR PFANNENSTIEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET  
SACRAMENTO, CA 95814

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

STEVEN A. LIPMAN  
STEVEN LIPMAN CONSULTING  
500 N. STREET 1108  
SACRAMENTO, CA 95814

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

KENNY SWAIN  
NAVIGANT CONSULTING  
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

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

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

BOB LUCAS  
LUCAS ADVOCATES  
1121 L STREET, SUITE 407  
SACRAMENTO, CA 95814

DAN SKOPEC  
CLIMATE & ENERGY CONSULTING  
1201 K STREET SUITE 970  
SACRAMENTO, CA 95814

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

JUSTIN C. WYNNE  
BRAU & BLAISING, P.C.  
915 L STREET, SUITE 1270  
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

RYAN BERNARDO  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

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

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

LAURIE TEN HOPE  
ADVISOR TO COMMISSIONER BYRON  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-32  
SACRAMENTO, CA 95814-5512

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

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

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

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

ANNE-MARIE MADISON  
TRANSALTA ENERGY MARKETING INC.  
222 SW COLUMBIA STREET, STE 1105  
PORTLAND, OR 97201

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

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

CATHIE ALLEN  
CA STATE MGR.  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232  
SAM SADLER  
OREGON DEPARTMENT OF ENERGY  
625 NE MARION STREET  
SALEM, OR 97301-3737

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

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

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

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

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

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

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

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

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

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

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

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

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

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



THOMAS ELGIE  
POWEREX CORPORATION  
1400, 666 BURRAND ST  
VANCOUVER, BC V6C 2X8  
CANADA

**State Service**

CLARENCE BINNINGER  
DEPUTY ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
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

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

CHARLOTTE TERKEURST  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5117  
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  
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

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

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

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

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

ED MOLDAVSKY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5037  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
HARVEY Y. MORRIS  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5036  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

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

LANA TRAN  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRIC GENERATION PERFORMANCE BRANCH  
AREA 2-D  
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  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

MATTHEW DEAL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5215  
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 BRA  
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 DI CAPO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

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

MARY MCDONALD  
DIRECTOR OF STATE AFFAIRS  
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

JEFFREY DOLL  
CALIFORNIA AIR RESOURCES BOARD  
PO BOX 2815 1001 I STREET  
SACRAMENTO, CA 95812

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

ROSS A. MILLER  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS 20  
SACRAMENTO, CA 95814-5512

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

EVAN POWERS  
CALIFORNIA AIR RESOURCES BOARD  
1001 I ST, PO BOX 2815  
SACRAMENTO, CA 95812

PAM BURMICH  
AIR RESOURCES BOAD  
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

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