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**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 MODESTO IRRIGATION DISTRICT
ON INTERIM OPINION ON GREENHOUSE GAS
REGULATORY STRATEGIES**

Joy A. Warren
Modesto Irrigation District
1231 11th Street
Modesto, CA 95354
Tel: (209) 526-7389
Fax: (209) 526-7383
Email: joyw@mid.org

February 28, 2008

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In accordance with Rules of Practice and Procedure of the Public Utilities Commission ("CPUC") of the State of California, the Modesto Irrigation District ("Modesto ID") hereby files these Comments ("Comments") on the proposed "Interim Opinion on Greenhouse Gas Regulatory Strategies" issued February 8, 2008 (the "Proposed Decision" or "PD"). Modesto ID 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."

Modesto ID has several concerns with the point of regulation proposals outlined in the PD, and believes significant clarifications must be provided before a final recommendation is adopted by the CPUC. Modesto ID also disagrees with the PD's approach regarding energy efficiency and renewable resources which exceeds the objectives of AB 32 and is founded on blatant fallacies. The PD's recommendations must be carefully structured to ensure that

compliance with AB 32 is achieved without devastating California's electric providers or the customers they serve.

I. BACKGROUND.

Modesto ID is an irrigation district, organized and operated under the laws of the State of California, which undertakes both electric and water operations. It is a vertically integrated publicly owned utility providing electric services to over 114,000 customers in California's Central Valley. With regard to its electric operations, Modesto ID owns and operates facilities for the generation, transmission, distribution, purchase and sale of electric power and energy at wholesale and retail. Modesto ID is a fully integrated, fully resourced, credit worthy utility. In 2007 Modesto ID served a peak summer load of almost 675 MW and had retail sales of over 2,572 GW-hours.

Modesto ID serves this load through a mixture of owned and purchased resources, including wind, large and small hydro, natural gas and coal generation. In addition to ownership interests in significant hydroelectric generation at Don Pedro Reservoir, Modesto ID owns several natural gas generation facilities. Modesto ID purchases power from a variety of resources and suppliers, including renewable resources firmed by the supplier. These purchases are delivered within MID's service territory, and outside of its service territory at various points both within and out of state. Modesto ID is also a member of a joint powers authority, the M-S-R Public Power Agency ("M-S-R"), which purchases power from wind energy projects in the Pacific Northwest and owns a share of the thermal San Juan Project in New Mexico. M-S-R annually produces about 1,750 GW-hours of energy of which about 35% (605 GW-hours) would be classified as eligible renewable.

Modesto ID currently projects its annual average load growth over the next ten (10) years to be 2.79 percent. Modesto ID is located in the central San Joaquin Valley where population

growth has been consistently higher than the State average. The forecast growth is consistent with Modesto ID's historical load growth which has averaged 3% over the last 25 years.

II. THE POINT OF REGULATION APPROACH SUBMITTED TO CARB MUST PROVIDE MECHANISMS TO ACHIEVE COMPLIANCE WITH AB 32 WITH THE LEAST IMPACT TO RATEPAYERS.

Pursuant to AB 32 the California Air Resources Board (CARB) is responsible for implementing the greenhouse gas (GHG) emission reduction goals set forth in that legislation. CARB has thus undertaken a scoping plan process to determine what mechanisms will be most effective in achieving these goals with the least cost and impact to ratepayers. The Joint Agencies have been tasked with developing and providing CARB with recommendations on how best to meet this objective within the electric and gas sectors. The PD presents the CPUC's recommendations regarding "point of regulation" to CARB.

A. CLARIFICATION IS REQUIRED BEFORE THE FIRST DELIVERER POINT OF REGULATION CAN BE IMPLEMENTED.

The PD determines that the point of regulation for the electric sector, which is the entity that will be required to surrender allowances associated with GHG emissions attributed to it, should be the party responsible for the power at the point where it is first delivered to the California grid, and concludes:

"the most useful formulation of the deliverer point of regulation approach is that the point of regulation would be the entity that is responsible for the electricity either (1) on the portion of the physical scheduling path where it is first delivered to a point of delivery on the transmission grid within California or (2) where the generator's facilities are interconnected to the distribution system in California."

(PD, pp.65-66.)

The PD does not explore the plethora of intricate arrangements by which power may be brought onto the California grid. Several fundamental questions have yet to be addressed. For

example, how will “the entity that is responsible for the electricity” at any point in time be determined? What impact will this approach have on pre-existing contractual terms? Will the proposed approach be consistent with E-tag procedures as they are currently operated? Will the necessary information to appropriately determine the “first deliverer” be available from E-tag data? What form of “alternative documentation” will be required where E-tag data is not available? How will these situations be identified? What process will be undertaken to develop and provide oversight of such “alternative documentation”?

The CPUC will need to fine tune its proposal and answer these and other questions before adopting the PD. In doing so, the CPUC must ensure that the mechanism it proposes for identifying the entities responsible for GHG reductions identifies those entities best able to minimize cost of compliance and impact on California ratepayers.

B. CALIFORNIA REGULATIONS CANNOT REGULATE ELECTRICITY THAT IS NEITHER GENERATED NOR CONSUMED IN CALIFORNIA.

The PD properly notes that AB 32 governs GHG emissions from electricity generated or consumed in California. It recognizes that California GHG emission reduction regulations cannot reach beyond California to emissions generated and consumed outside of California, even where a California electricity provider may have an ownership share in the generating resource. “AB 32 would not regulate emissions associated with power wheeled through California.” (PD, p. 66, n 17.) Thus, the point of regulation incorporated into any scoping plan developed by CARB must allow for the distinction between emissions associated with power generated or consumed within California from those associated with power that is neither generated nor consumed in California. The reporting regulations ultimately by CARB for approval must also recognize such distinction and be consistent with the point of regulation approach adopted.

III. POUS CANNOT BE MADE SUBJECT TO MANDATES DESIGNED AND IMPOSED BY THE CPUC.

The PD expends much effort justifying its recommendation that CARB impose energy efficiency and renewable portfolio mandates on publicly owned utilities (POUs) “the same as those required of investor owned utilities (IOUs) by the [CPUC].” (PD, OP 1-3.) Putting aside the lack of any legal foundation for such regulation, special mandates for POUs are not necessary. Nor do they make good policy.

A. POUS ARE SUBJECT TO AND COMPLY WITH OR EXCEED THE MANDATES OF EXISTING ENERGY EFFICIENCY AND RENEWABLE PORTFOLIO LEGISLATION.

New, additional, special mandates on POUs are not needed to accomplish the goals of AB 32. First, POUs are already subject to the energy efficiency and renewable resource requirements set forth by the Legislature, including those in AB 2021, SB 1068 and SB 107 cited by the PD. (PD, Conclusion of Law 1-3.) For example, the popularly elected Board of Directors of the Modesto ID has adopted both energy efficiency goals that are designed to achieve feasible and realizable reductions in energy consumption, and a renewable procurement standard that meets the requirements set forth by the Legislature. In both cases, Modesto ID’s programs are targeted to achieve results on par with those energy efficiency and renewable procurement results achieved by IOUs regulated by the CPUC. For example, recent testimony before the legislature confirmed that POUs as a whole maintain over 20% renewables in their resource portfolios, exceeding current IOU performance.

Nor is it good policy to impose regulatory decisions adopted by the CPUC on POUs that are not CPUC jurisdictional. The PD’s recommendations are only a thinly veiled effort to overcome the CPUC’s well-recognized jurisdictional constraints, more focused on creating what the IOUs perceive to be a “level playing field” than on achieving real additional GHG

reductions. As noted below, such recommendations also exceed the purpose and authority set forth in AB 32. AB 32 is not about creating competitive equality between IOUs and POUs; it is about achieving real reductions in GHG emissions.

The PD is factually incorrect and misleading when it presumes that applying the CPUC rules to POUs will create “a level playing field.” Even without seeking the necessary clarification of what constitutes a “level playing field” the fallacies on which the PD bases its assumptions are clearly identifiable. POUs were created by the legislature under specific, well thought out, statutory constructs. The various governing structures of POUs and IOUs have been the subject of thorough exploration in other CPUC proceedings – it is well documented that POUs do not operate under the same circumstances as IOUs. (See, eg., Decision (D.) 07-12-005)

By Constitution and statute, POUs are not CPUC jurisdictional, and are not subject to or regulated by the decisions of the CPUC. As such, the POUs did not actively participate in or otherwise have any influential role in the proceedings that produced the regulatory mandates the CPUC would now have applied to the POUs. History has shown that even in proceedings the POUs do actively participate in before the CPUC, their perspective is given very little weight or recognition.

Moreover, as specifically related to the energy efficiency and renewable resources, applying the mandates adopted in CPUC decisions for IOUs to all POUs would not put all utilities on equal footing but rather would give IOUs which receive monetary “incentives” for partially meeting established goals, advantages not available to POUs who have no mechanism for similar incentives. In addition, POUs do not generally enjoy the market power, economies of scale and breadth of customer base experienced by the IOUs and program measures that may be effective for the larger IOUs could likely be detrimental to POU ratepayers.

Moreover, before recommending that its regulatory mandates should be universally adopted, the CPUC must overcome evidence that such mandates cannot be achieved in today's economy. For example, the PD recommends that POUs be required to adopt energy efficiency goals that "achieve all cost-effective energy efficiency." Yet, there is no evidence that even the IOUs are approaching compliance with such goals.

The level of GHG emission reductions to be achieved by 2020 are dictated by the goals set forth in AB 32. In order to achieve such reductions utilities need the flexibility to determine the balance of available tools most effective for their own particular circumstances. For some, more energy efficiency reductions are available; for others a heavier investment in renewable resources may be required. As noted above, every utility is situated differently and the most cost effective mix of compliance mechanisms must be judged by each utility in accordance with its own circumstances. The 2007 California Integrated Energy Policy Report noted that the state's inland areas such as the Sacramento and San Joaquin Valleys are growing at a rate that is disproportionally higher than the rest of the state. These areas are also hotter than the milder heavily populated coastal areas and as a result require more air conditioning, which in turn causes higher peak loads with lower load factors. The ability to factor in these and other variables such as changing load type makeup, fluxuating industrial requirements, peak patterns, proximity to resources, and transmission capabilities are even more critical for POUs which are smaller and have significantly smaller customer base that will be required to absorb the costs and impacts of emission reduction activities.

B. CARB DOES NOT HAVE AUTHORITY TO IMPOSE CPUC MANDATES ON POUS IN THE GUISE OF GHG REDUCTION REGULATIONS.

AB 32 does not contain legislative direction or authority for CARB to regulate the specifics of POU energy efficiency programs or renewable resource procurements. Energy

efficiency and renewable resource procurement are individual elements that without question will be the primary tools used by entities with reduction responsibilities to meet the AB 32 goals. However, energy efficiency and renewable resource standards are already established by separate laws, laws presumed to have been carefully crafted and considered by the Legislature that adopted them. Those laws already determine the POU's obligations in the establishment of energy efficiency programs and renewable resource portfolios. As noted above Modesto ID, like other POUs, are meeting or exceeding those obligations.

If the CPUC does adopt recommendation for CARB regulation of POUs, such recommendation must incorporate an approach that treats all electric providers equally. Thus, if CARB were to accept oversight of energy efficiency and renewable resource mandates it must do so for *all* utilities – IOUs as well as POUs - and must develop its own regulations for such oversight independently from existing CPUC decisions and mandates. Regardless, any new mandates must be designed to provide sufficient planning time for compliance.

IV. ANY CAP/TRADE SYSTEM MUST BE IMPLEMENTED IN A MANNER TO ENSURE MARKET STABILITY.

Implementation of AB 32 must avoid any repeat of the electric industry restructuring debacle. The market must be designed to develop gradually and ensure that the appropriate safety valves and fraud prevention elements are in place. Market manipulation must be precluded. A neutral source of oversight must also be clearly identified and empowered. Modesto ID believes that flexible compliance options are critical to the success of any market system and that the “toolbox” approach is the most important aspect of such flexibility. Energy efficiency and renewable resources are two of the most important tools available to entities responsible for GHG emission reductions. However, once ultimate reduction goals are established each entity must have flexibility to apply these and other available tools at its

discretion so long as the reduction mandates are met. Modesto ID also appreciates the PD's recognition that offsets, banking, borrowing, and other tools should also be options to be included in program "toolbox."

V. ALLOWANCE ALLOCATION ISSUES ARE PROPERLY SEGREGATED TO SEPARATE DECISION.

The PD appropriately postpones all aspects of emission allowance allocation. Until critical aspects of CARB's scoping plan are developed the effect and impact of various allocation recommendations cannot be fully identified. This point of regulation decision cannot predetermine any of the important allowance allocation issues raised by the numerous parties in previous filings in this proceeding. Additional workshops and/or hearings will be required to gather evidence necessary to address these issues, including the recognition of early reduction activities and "early actions" as they may eventually be defined, electrification of emission from other sectors, disproportionate reduction burdens, high load growth, etc.

Modesto ID generally recommends that if a market based system is implemented to meet emission reduction goals, emission allowances should be allocated administratively based at least initially on point of regulations' historic emissions and accounting for forecasted as well as mandated load growth. Auction of allowances should be minimized and delayed until a robust market has matured. Proceeds from any allowance allocation should be applied for the benefit of the ratepayers and used to reduce emissions, including investments in research and development of new non-emitting generation, renewable energy resources, and programs to encourage energy efficiency. Any market system put in place must be closely monitored by an identifiable regulatory body to avoid manipulation, fraud and other abuses.


VI. ALL GAS USED BY INTEGRATED ELECTRIC UTILITIES SHOULD BE REGULATED THROUGH THE ELECTRIC SECTOR REQUIREMENTS.

The PD rightly excludes from regulation under the natural gas sector any emissions that would be regulated through other sectors. Thus, the PD appropriately exempts from regulation as part of the natural gas sector, with a few specific exceptions, all natural gas that is used to generate electricity that is delivered to the California grid. (PD, p. 97.) In order to avoid double-counting concerns and the excessive burden of multiple reporting and compliance requirements, it must be clear that entities responsible for emissions regulated through the electric sector mandates are not also responsible for emissions regulated through the gas sector.

VII. CONCLUSION.

Modesto ID appreciates the opportunity to review its concerns regarding the PD and urges the CPUC to clarify its intent regarding the first deliverer point of regulation and to remove its recommendations to impose the CPUC energy efficiency and renewable requirements on POUs. The point of regulation approach adopted by the CPUC must provide mechanisms to achieve compliance with AB 32 in the most cost effective manner and avoid unnecessary impact to ratepayers. In formulating its recommendations the CPUC must ensure that new GHG requirements are consistent with and coalesce seamlessly into the existing body of related laws and regulations. Further, the CPUC should not overreach its boundaries to force superfluous regulation on to POUs.

Respectfully Submitted,

A handwritten signature in black ink that reads "Joy A. Warren". The signature is fluid and cursive, with the first name "Joy" being the most prominent.

Joy A. Warren
Regulatory Administrator
Modesto Irrigation District
joyw@mid.org

CERTIFICATE OF SERVICE

I, Linda Fischer, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On February 28, 2008, I served the attached:

COMMENTS OF THE MODESTO IRRIGATION DISTRICT ON INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES

on the service list for R.06-04-009 by serving a copy of each party by electronic mail, or by mailing a properly addressed copy by first-class mail with postage prepaid to each party unable to accept service by electronic mail.

Copies were also sent by first-class mail with postage prepaid to Commissioner Peevey and Administrative Law Judges Charlotte F. TerKeurst and Jonathan Lakritz.

A copy was also sent by first-class mail with postage prepaid to the California Energy Commission, Docket Office, MS-4, Re: Docket No. 07-OIIP-01, 1516 Ninth Street, Sacramento, CA 95814-5512.

Copies were also served by email to the CEC docket office and to Nancy Ryan, Commissioner Peevey's advisor.

A copy of the service list is attached hereto.

Executed on February 28, 2008, at Modesto, California.


Linda Fischer

SERVICE LIST R.06-04-009

cadams@covantaenergy.com
 steven.schleimer@barclayscapital.com
 steven.huhman@morganstanley.com
 rick_noger@praxair.com
 keith.mccrea@sablax.com
 ajkatz@mwe.com
 ckrupka@mwe.com
 kyle_boudreaux@fpl.com
 cswoollums@midamerican.com
 Cynthia.A.Fonner@constellation.com
 kevin.boudreaux@calpine.com
 trdill@westernhubs.com
 ej_wright@oxy.com
 todil@mckennalong.com
 steve.koerner@elpaso.com
 jenine.schenk@apses.com
 jbw@slwplc.com
 kelly.barr@srpnet.com
 rrtaylor@srpnet.com
 smichel@westernresources.org
 roger.montgomery@swgas.com
 Lorraine.Paskett@ladwp.com
 ron.deaton@ladwp.com
 snewsom@semprautilities.com
 dhuard@manatt.com
 curtis.kebler@gs.com
 dehling@klng.com
 gregory.koiser@constellation.com
 npedersen@hanmor.com
 mmazur@3phasesRenewables.com
 vitality.lee@aes.com
 tiffany.rau@bp.com
 klatt@energyattorney.com
 rhelgeson@scppa.org
 douglass@energyattorney.com
 pssed@adelphia.net
 bwallerstein@aqmd.gov
 akbar.jazayeri@sce.com
 cathy.karlstad@sce.com
 Laura.Genao@sce.com
 rkmoore@gswater.com
 dwood8@cox.net
 atrial@sempra.com
 apak@sempraglobal.com
 dhecht@sempratradng.com
 daking@sempra.com
 svongdeuane@semprasolutions.com
 troberts@sempra.com
 liddell@energyattorney.com
 marcie.milner@shell.com
 rwinthrop@pilotpowergroup.com

tdarton@pilotpowergroup.com
 lschavrien@semprautilities.com
 GloriaB@anzaelectric.org
 llund@commerceenergy.com
 thunt@cecmil.org
 jeanne.sole@sfgov.org
 john.hughes@sce.com
 llorenz@semprautilities.com
 marcel@turn.org
 nsuetake@turn.org
 dil@cpuc.ca.gov
 fjs@cpuc.ca.gov
 ahang@nrdc.org
 rsa@a-klaw.com
 ek@a-klaw.com
 kgrenfell@nrdc.org
 mpa@a-klaw.com
 sls@a-klaw.com
 bill.chen@constellation.com
 epoole@adplaw.com
 agrimaldi@mckennalong.com
 bcragg@goodinmacbride.com
 jsqueri@gmssr.com
 jarmstrong@goodinmacbride.com
 kbowen@winston.com
 lcottle@winston.com
 mday@goodinmacbride.com
 sbeatty@cwclaw.com
 vprabhakaran@goodinmacbride.com
 jkarp@winston.com
 edwardoneill@dwt.com
 jeffgray@dwt.com
 cjlw5@pge.com
 ssmyers@att.net
 lars@resource-solutions.org
 alho@pge.com
 bkc7@pge.com
 aweller@sel.com
 jchamberlin@strategicenergy.com
 beth@beth411.com
 kerry.hattevik@mirant.com
 kowalewsia@calpine.com
 hoerner@redefiningprogress.org
 janill.richards@doj.ca.gov
 cchen@ucsusa.org
 gmmorris@emf.net
 tomb@crossborderenergy.com
 kinnovation@earthlink.net
 bmcc@mccarthyllaw.com
 sberlin@mccarthyllaw.com
 Mike@alpinenaturalgas.com

joyw@mid.org
 bdicapo@caiso.com
 UHelman@caiso.com
 jjensen@kirkwood.com
 mary.lynch@constellation.com
 lrdevanna-rf@cleanenergysystems.com
 abb@eslawfirm.com
 mclaughlin@braunlegal.com
 glw@eslawfirm.com
 jluckhardt@downeybrand.com
 jdh@eslawfirm.com
 vwelch@environmentaldefense.org
 www@eslawfirm.com
 westgas@aol.com
 scohn@smud.org
 atrowbridge@daycartermurphy.com
 dansvec@hdo.net
 notice@psrec.coop
 cynthia.schultz@pacificorp.com
 kyle.l.davis@pacificorp.com
 ryan.flynn@pacificorp.com
 carter@ieta.org
 jason.dubchak@niskags.com
 bjones@mjbardley.com
 kcolburn@symbioticstrategies.com
 rapcowart@aol.com
 Kathryn.Wig@nrgenergy.com
 sasteriadis@apx.com
 george.hopley@barcap.com
 ez@pointcarbon.com
 burtraw@rff.org
 vb@pointcarbon.com
 andrew.bradford@constellation.com
 gbarch@knowledgeinenergy.com
 ralph.dennis@constellation.com
 smindel@knowledgeinenergy.com
 brabe@umich.edu
 bpotts@foley.com
 james.keating@bp.com
 jimross@r-c-s-inc.com
 ahendrickson@commerceenergy.com
 cweddington@commerceenergy.com
 tcarlson@reliant.com
 ghinners@reliant.com
 zaiontj@bp.com
 julie.martin@bp.com
 fiji.george@elpaso.com
 echiang@elementmarkets.com
 fstern@summitblue.com
 nenbar@energy-insights.com
 nlenssen@energy-insights.com

bbaker@summitblue.com
william.tomlinson@elpaso.com
kjsimonsen@ems-ca.com
jholtkamp@hollandhart.com
Sandra.ely@state.nm.us
bmcquown@reliant.com
dbrooks@nevpc.com
anita.hart@swgas.com
randy.sable@swgas.com
bill.schrand@swgas.com
jj.prucnal@swgas.com
sandra.carolina@swgas.com
ckmitchell1@sbcglobal.net
chilen@sppc.com
emello@sppc.com
dsoyars@sppc.com
tdillard@sppc.com
jgreco@terra-genpower.com
leilani.johnson@ladwp.com
randy.howard@ladwp.com
Robert.Rozanski@ladwp.com
robert.pettinato@ladwp.com
HYao@SempraUtilities.com
rprince@semprautilities.com
rkeen@manatt.com
nwhang@manatt.com
pjazayeri@stroock.com
derek@climaterestry.org
david@nemtzw.com
harveyederpspc.org@hotmail.com
sendo@ci.pasadena.ca.us
slins@ci.glendale.ca.us
THAMILTON5@CHARTER.NET
bjeider@ci.burbank.ca.us
rmorillo@ci.burbank.ca.us
aimee.barnes@ecosecurities.com
case.admin@sce.com
Jairam.gopal@sce.com
tim.hemig@nrgenergy.com
bjl@bry.com
aldyn.hoekstra@paceglobal.com
ygross@sempraglobal.com
jlaun@apogee.net
kmkiener@fox.net
scottanders@sandiego.edu
jkloberdanz@semprautilities.com
andrew.mcallister@energycenter.org
jennifer.porter@energycenter.org
sephra.ninow@energycenter.org
dniehaus@semprautilities.com
jleslie@luce.com

ofoote@hkcf-law.com
ekgrubaugh@iid.com
mona@landsiteinc.net
pepper@cleanpowermarkets.com
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com
Diane_Fellman@fpl.com
hayley@turn.org
mflorio@turn.org
Dan.adler@calcef.org
mhyams@sfwater.org
tburke@sfwater.org
norman.furuta@navy.mil
amber@ethree.com
annabelle.malins@fco.gov.uk
dwang@nrdc.org
filings@a-klaw.com
nes@a-klaw.com
obystrom@cera.com
sdhilton@stoel.com
scarter@nrdc.org
abonds@thelen.com
brbc@pge.com
cbasket@enernoc.com
colin.petheram@att.com
jwmctarnaghan@duanemorris.com
kfox@wsgr.com
kkhoja@thelenreid.com
pvallen@thelen.com
ray.welch@navigantconsulting.com
spauker@wsgr.com
jwmctarnaghan@duanemorris.com
rreinhard@mofo.com
cem@newsdata.com
arno@recurrentenergy.com
hgolub@nixonpeabody.com
jscancarelli@flk.com
jwiedman@goodinmacbride.com
mmattes@nossaman.com
bwetstone@hotmail.com
jen@cmt.org
lisa_weinzimer@platts.com
steven@moss.net
sellis@fypower.org
ELL5@pge.com
GXL2@pge.com
jxa2@pge.com
JDF1@PGE.COM
RHHJ@pge.com
sscb@pge.com
SEHC@pge.com

svs6@pge.com
S1L7@pge.com
vjw3@pge.com
karla.dailey@cityofpaloalto.org
farrokh.albuyeh@oati.net
dtibbs@aes4u.com
jhahn@covantaenergy.com
andy.vanhorn@vhcenergy.com
Joe.paul@dynegy.com
info@calseia.org
gblue@enxco.com
sbeserra@sbcglobal.net
monica.schwebs@bingham.com
phanschen@mofo.com
wbooth@booth-law.com
josephhenri@hotmail.com
pthompson@summitblue.com
dietrichlaw2@earthlink.net
alex.kang@itron.com
Betty.Seto@kema.com
JerryL@abag.ca.gov
jody_london_consulting@earthlink.net
steve@schiller.com
mrw@mrwassoc.com
rschmidt@bartlells.com
adamb@greenlining.org
stevek@kromer.com
clyde.murley@comcast.net
brenda.lemay@horizonwind.com
carla.peterman@gmail.com
elvine@lbl.gov
rhwisner@lbl.gov
C_Marnay@lbl.gov
phil@mcdenergy.com
rita@ritanortonconsulting.com
cpechman@powereconomics.com
emahlon@ecoact.org
richards@mid.org
rogerv@mid.org
tomk@mid.org
fwmonier@tid.org
brbarkovich@earthlink.net
johnredding@earthlink.net
clark.bernier@rlw.com
rmccann@umich.edu
cmkehrrein@ems-ca.com
grosenblum@caiso.com
mgillette@enernoc.com
rsmutny-jones@caiso.com
saeed.farrokhpay@ferc.gov
e-recipient@caiso.com

david@branchcomb.com
kenneth.swain@navigantconsulting.com
kdusel@navigantconsulting.com
gpickering@navigantconsulting.com
lpark@navigantconsulting.com
davidreynolds@ncpa.com
scott.tomashefsky@ncpa.com
ewolfe@resero.com
Audra.Hartmann@Dynergy.com
Bob.lucas@calobby.com
curt.barry@iwpnews.com
danskopec@gmail.com
dseperas@calpine.com
dave@ppallc.com
dkk@eslawfirm.com
wynne@braunlegal.com
kgough@calpine.com
kellie.smith@sen.ca.gov
kdw@woodruff-expert-services.com
mwaugh@arb.ca.gov
pbarthol@energy.state.ca.us
pstoner@lgc.org
rachel@ceert.org
bernardo@braunlegal.com
steven@lipmanconsulting.com
steven@iepa.com
wtasat@arb.ca.gov
lmh@eslawfirm.com
etiedemann@kmtg.com
ltenhope@energy.state.ca.us
bushinskyj@pewclimate.org
obartho@smud.org
bbeebe@smud.org
bpurewal@water.ca.gov
dmacmull@water.ca.gov
kmills@cbbf.com
karen@klindh.com
ehadley@reupower.com
sas@a-klaw.com
egw@a-klaw.com
akelly@climatetrust.org
alan.comnes@nrgenergy.com
kyle.silon@ecosecurities.com
californiadockets@pacificorp.com
Philip.H.Carver@state.or.us
samuel.r.sadler@state.or.us
lisa.c.schwartz@state.or.us
cbreidenich@yahoo.com
dws@r-c-s-inc.com
jesus.arredondo@nrgenergy.com
charlie.blair@delta-ee.com

Tom.Elgie@powerex.com
clarence.binninger@doj.ca.gov
david.zonana@doj.ca.gov
ayk@cpuc.ca.gov
agc@cpuc.ca.gov
aeg@cpuc.ca.gov
blm@cpuc.ca.gov
bbc@cpuc.ca.gov
cf1@cpuc.ca.gov
cft@cpuc.ca.gov
tam@cpuc.ca.gov
dsh@cpuc.ca.gov
edm@cpuc.ca.gov
eks@cpuc.ca.gov
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jci@cpuc.ca.gov
jf2@cpuc.ca.gov
krd@cpuc.ca.gov
lrm@cpuc.ca.gov
ltt@cpuc.ca.gov
mjd@cpuc.ca.gov
ner@cpuc.ca.gov
pw1@cpuc.ca.gov
psp@cpuc.ca.gov
pzs@cpuc.ca.gov
rmm@cpuc.ca.gov
ram@cpuc.ca.gov
smk@cpuc.ca.gov
sgm@cpuc.ca.gov
svn@cpuc.ca.gov
scr@cpuc.ca.gov
tcx@cpuc.ca.gov
ken.alex@doj.ca.gov
ken.alex@doj.ca.gov
jsanders@caiso.com
jgill@caiso.com
ppetillingill@caiso.com
mscheibl@arb.ca.gov
gcollord@arb.ca.gov
jdoll@arb.ca.gov
pburmich@arb.ca.gov
bblevins@energy.state.ca.us
dmetz@energy.state.ca.us

deborah.slone@doj.ca.gov
dks@cpuc.ca.gov
kgriffin@energy.state.ca.us
ldecarlo@energy.state.ca.us
mprior@energy.state.ca.us
mgarcia@arb.ca.gov
pduvair@energy.state.ca.us
wsm@cpuc.ca.gov
ntronaas@energy.state.ca.us
hurlock@water.ca.gov
hronin@water.ca.gov
rmiller@energy.state.ca.us