BEFORE THE CALIFORNIA ENERGY
CONSERVATION AND DEVELOPMENT COMMISSION

AB 32 Implementation | Docket No. 07-OIIP-1

COMMENTS OF CONSTELLATION NEWENERGY, INC., AND CONSTELLATION ENERGY COMMODITIES GROUP, INC. ON THE PROPOSED DECISION OF PRESIDENT PEEVEY CONCERNING GREENHOUSE GAS REGULATORY STRATEGIES

Pursuant to the February 15, 2008 *Notice of Availability*,[1] Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. (collectively, "Constellation") hereby submit, as Attachment A, the comments Constellation filed with the California Public Utilities Commission on the Proposed Decision of Commission President Michael R. Peevey, ***Interim Opinion On Greenhouse Gas Regulatory Strategies,*** issued February 8, 2008 ("Proposed Decision" or "PD").

Respectfully submitted,

February 28, 2008

Andrew B. Brown

Ellison Schneider & Harris L.L.P.
2015 H Street
Sacramento, CA 95814
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: abb@eslawfirm.com

Attorneys for Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

Cynthia A. Fonner
Senior Counsel
Constellation Energy Resources, LLC
550 West Washington Blvd., Suite 300
Chicago, Illinois 60661
Telephone: (312) 704-8518
Facsimile: (312) 795-9286
Cynthia.A.Fonner@constellation.com

On behalf of Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

[1] Posted at http://www.energy.ca.gov/ghg_emissions/meetings/2008-02-15_notice_of_availablity.html.

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

COMMENTS OF CONSTELLATION NEWENERGY, INC., AND CONSTELLATION ENERGY COMMODITIES GROUP, INC. ON THE PROPOSED DECISION OF PRESIDENT PEEVEY CONCERNING GREENHOUSE GAS REGULATORY STRATEGIES

Dated: February 28, 2008

Cynthia A. Fonner
Senior Counsel
Constellation Energy Resources, LLC
550 West Washington Blvd., Suite 300
Chicago, Illinois 60661
Telephone: (312) 704-8518
Facsimile: (312) 795-9286
Cynthia.A.Fonner@constellation.com
On behalf of Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

Andrew B. Brown

Ellison Schneider & Harris L.L.P.
2015 H Street
Sacramento, CA 95814
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: abb@eslawfirm.com
Attorneys for Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

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

COMMENTS OF CONSTELLATION NEWENERGY, INC., AND CONSTELLATION ENERGY COMMODITIES GROUP, INC. ON THE PROPOSED DECISION OF PRESIDENT PEEVEY CONCERNING GREENHOUSE GAS REGULATORY STRATEGIES

I. Introduction and Summary

Pursuant to Rule 14.3 of the California Public Utilities Commission ("CPUC" or "Commission") Rules of Practice and Procedure, Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. (collectively, "Constellation") submit these comments on the Proposed Decision of Commission President Michael R. Peevey, ***Interim Opinion On Greenhouse Gas Regulatory Strategies,*** issued February 8, 2008 ("Proposed Decision" or "PD").

In most respects, Constellation supports the key conclusions reached in the Proposed Decision with respect to recommendations to the California Air Resources Board on greenhouse gas strategies applicable to the electricity sector, particularly:

- California should move forward with the development of a cap-and-trade program so as to ensure a viable platform for compliance with AB 32 requirements, while at the same time remaining mindful that such a system must eventually (and hopefully sooner rather than later) integrate with regional, federal, and potentially international programs.

- The adoption of the “deliverer” as the point of regulation will be the best approach for managing compliance with the AB 32 requirements, and will most efficiently integrate with regional and national programs as they come into fruition.
- The system for the distribution of allowances should include an auction component for a portion of the allowance distribution, and that the overall program for allowance distribution requires further study and stakeholder input.
- Steps should be taken, through regulation or legislation as appropriate, to ensure that the all deliverers in California are subject to GHG compliance regulations.

There are three areas of the Proposed Decision, however, that Constellation believes require clarification or modification:

- Constellation believes that auctioning of allowances will emerge over time as the most efficient and transparent way to distribute allowances. However, Constellation believes that there should be a transition to 100% auctions, and urges the Commission to clarify the Proposed Decision so that the ongoing stakeholder discussions on allowance distribution include a determination of the appropriate transition period.
- Constellation urges the Commission to modify the Proposed Decision to clarify that Energy Service Providers (“ESPs”) should not be subject to Energy Efficiency (“EE”) program mandates.

II. Constellation Comments

A. There Should Be a Transition Period to 100% Auctioning of Allowances.

Constellation has commented previously on the issue of allowance allocations versus auctions, and includes by reference its submission on October 31, 2006 in this regard. In summary:

> For the initial stages of California's cap-and-trade program, Constellation believes that a 50-50 split between a free allocation of allowances and an auctioning of the balance of allowances best strikes the appropriate balance between the need to accomplish GHG emission reductions while simultaneously mitigating some of the impacts on developing markets, investment in new technologies, consumers' costs, and compliance costs for existing emission sources and new entrants. Over time, Constellation believes that the initial 50-50 split should transition to a 100% auction system for the distribution of allowances which will serve as a valuable market development tool offering price transparency and market efficiencies.[1]

Therefore, Constellation urges the following modifications to the Proposed Decision's Findings of Fact and Ordering Paragraphs to provide for a transitional phase-in to 100% allocation auctions:

> 26. The auctioning of a ~~at least some~~ portion of ~~the~~ emission allowances available to the electricity sector would promote liquidity in the emission allowance market, improve the accuracy of emission allowance prices as a reflection of marginal emission reduction costs, and allow new market entrants access to allowances on an equal basis with other parties.
>
> 27. It is reasonable to require that a ~~at least some~~ portion of ~~the~~ GHG emissions allowances for the electricity sector be auctioned in a GHG emissions cap-and-trade system in which deliverers are the point of regulation for the electricity sector. As part of this approach, all proceeds from the auctioning of allowances for the electricity sector would be used in ways that benefit electricity consumers in California.
>
> 28. Although t~~T~~he record in R.06-04-009 is not sufficient, at this time, to determine a reasonable mixture of auctioning and the administrative allocation of GHG emissions allowances for the electricity sector, a gradual increase in the percentage of allowances to be subject to auction over a reasonable transition period is appropriate such that at the end of the transition and going forward 100% of the allowances would be subject to auction.
>
> 29. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable approach for the administrative allocations of GHG emissions allowances~~, if such free distributions are undertaken~~.

[1] See *Comments Of Constellation NewEnergy, Inc., And Constellation Energy Commodities Group, Inc. On ALJ Ruling Requesting Comments And Noticing Workshop On Allowance Allocation Issues*, October 31, 2007, pages 5-6.

29a. The purpose of an orderly and phased transition to 100% allocation auctions is to provide for an orderly development of the cap-and-trade market and an opportunity for existing entities to transition their existing market positions and manage their risks as the new regulatory program evolves.

B. Constellation Urges The Commission To Modify The Proposed Decision To Clarify That Energy Service Providers ("ESPs") Should Not Be Subject To Energy Efficiency Requirements.

Constellation concurs that both CPUC jurisdictional LSEs and the publicly owned utilities ("POUs") should be subject to equivalent Renewable Portfolio Standard ("RPS ") requirements. Constellation also concurs with Ordering Paragraph No. 1, which states

> We recommend that the California Air Resources Board (ARB) adopt mandatory levels of energy efficiency savings for publicly owned utilities (POUs), the same as those required of investor owned utilities (IOUs) by the California Public Utilities Commission (Public Utilities Commission), and consistent with energy savings requirements as recommended by the California Energy Commission (Energy Commission).[2]

However, contrary to the clear intent of Ordering Paragraph No. 1, the following statement from the PD seems to imply that all CPUC jurisdictional LSEs should also be subject to EE program mandates:

> For the electricity sector, we recommend that all retail providers in California be required to provide a minimum level of energy efficiency programs and renewable energy delivery to their customers.[3]

Imposing an EE program mandate on ESPs would be inappropriate for several reasons. First and foremost, the IOUs (as the distribution companies), receive public goods charge and public purpose program funding as well as other Commission-directed rate relief to support their EE programs (including the associated administrative costs) and to decouple utility revenue from its energy sales. More importantly, all customers—including direct access customers served by

[2] See Proposed Decision, page 118.
[3] See Proposed Decision, page 4.

ESPs—are utility distribution customers that pay for and may participate in those public utility programs. Therefore, to impose a mandated EE program requirement on ESPs would place them at a distinct competitive disadvantage to the IOUs.

Second, ESPs often provide energy management and assessment services to their customers that will typically lead those customers to participate in the most cost-effective utility EE programs. Accordingly, any notion that customers who secure their energy commodity requirements from ESPs somehow miss out or fail to participate in EE programs and thus should be captured through a new mandate on ESPs is misplaced.

Lastly, significant efforts have occurred in the EE dockets to maximize the efficiency of the programs through a re-consolidation of program administration by the public utilities. The suggestion that a new EE mandate be imposed on ESPs runs contrary to those considerable efforts.

Constellation therefore requests that the Proposed Decision—specifically the language cited above as well as Finding of Fact No. 30—more precisely state that the Commission's EE program recommendation should be imposed on other retailing entities that also distribute power, i.e., the POUs, as reflected in Appendix A. Constellation believes that the Commission's intent in the cited passage was to create more parity in requirements between jurisdictional and non-jurisdictional distribution companies, and not to suggest imposition of a new EE program requirement on ESPs contrary to the EE program structure that has been already developed at the CPUC. This intent is best reflected in the language found in existing Ordering Paragraph No. 1.

III. Conclusion

Constellation applauds the Commission's efforts in developing these comprehensive recommendations regarding GHG emission program for the electricity sector and believes they provide a strong platform to initiate implementation and compliance with AB 32 by the CARB. For the reasons set forth above, Constellation suggests specific changes to the Proposed Decision to allow for a transitional program to phase in 100% allocation auctions and to clarify that language recommending imposition of energy efficiency program mandates is addressed to non-CPUC jurisdictional distribution utilities such as the POUs as clearly stated in Ordering Paragraph No. 1. Appendix A provides specific language changes to the PD's Findings of Fact.

Respectfully submitted,

Dated: February 28, 2008

Andrew B. Brown

Ellison Schneider & Harris L.L.P.
2015 H Street
Sacramento, CA 95814
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: abb@eslawfirm.com

Attorneys for Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

Cynthia A. Fonner
Senior Counsel
Constellation Energy Resources, LLC
550 West Washington Blvd., Suite 300
Chicago, Illinois 60661
Telephone: (312) 704-8518
Facsimile: (312) 795-9286
Cynthia.A.Fonner@constellation.com

On behalf of Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

Appendix A
Recommended Modifications to Findings of Fact

Findings of Fact

26. The auctioning of a ~~at least some~~ portion of ~~the~~ emission allowances available to the electricity sector would promote liquidity in the emission allowance market, improve the accuracy of emission allowance prices as a reflection of marginal emission reduction costs, and allow new market entrants access to allowances on an equal basis with other parties.

27. It is reasonable to require that a ~~at least some~~ portion of ~~the~~ GHG emissions allowances for the electricity sector be auctioned in a GHG emissions cap-and-trade system in which deliverers are the point of regulation for the electricity sector. As part of this approach, all proceeds from the auctioning of allowances for the electricity sector would be used in ways that benefit electricity consumers in California.

28. Although t~~T~~he record in R.06-04-009 is not sufficient, at this time, to determine a reasonable mixture of auctioning and the administrative allocation of GHG emissions allowances for the electricity sector, a gradual increase in the percentage of allowances to be subject to auction over a reasonable transition period is appropriate such that at the end of the transition and going forward 100% of the allowances would be subject to auction.

29. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable approach for the administrative allocations of GHG emissions allowances~~, if such free distributions are undertaken~~.

29a. The purpose of an orderly and phased transition to 100% allocation auctions is to provide for an orderly development of the cap-and-trade market and an opportunity for existing entities to transition their existing market positions and manage their risks as the new regulatory program evolves.

30. It is reasonable for the State of California to apply the same minimum requirements in the areas of energy efficiency and energy conservation to all entities that provide ~~retail sales,~~ transportation, and/or distribution of electricity or natural gas to end-users in California.

Ordering Paragraph

8. We recommend that ~~at least some~~ a portion of the GHG emission allowances available to the electricity sector be auctioned at the completion of a transition period during which there will be a phasing in of the percentage of allocations subject to auction, with at least some portion of the proceeds from the auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California.

End of Appendix A

Certificate of Service

I hereby certify that I have this day served a copy of *Comments Of Constellation NewEnergy, Inc., And Constellation Energy Commodities Group, Inc. On The Proposed Decision Of President Peevey Concerning Greenhouse Gas Regulatory Strategies* 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. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on February 28, 2008 at Sacramento, California.

/s/

Eric Janssen

R.06-04-009
Service List
February 28, 2008

cadams@covantaenergy.com
steven.schleimer@barclayscapital.com
steven.huhman@morganstanley.com
rick_noger@praxair.com
keith.mccrea@sablaw.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
vitaly.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@sempratrading.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@cecmail.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
achang@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
cjw5@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
kowalewskia@calpine.com
hoerner@redefiningprogress.org
janill.richards@doj.ca.gov
cchen@ucsusa.org
gmorris@emf.net
tomb@crossborderenergy.com
kjinnovation@earthlink.net
bmcc@mccarthylaw.com
sberlin@mccarthylaw.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@mjbradley.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@nevp.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@climateregistry.org
david@nemtzow.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
cbaskette@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@cnt.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@bartlewells.com
adamb@greenlining.org
stevek@kromer.com
clyde.murley@comcast.net
brenda.lemay@horizonwind.com
carla.peterman@gmail.com
elvine@lbl.gov
rhwiser@lbl.gov
C_Marnay@lbl.gov
philm@scdenergy.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
johnrredding@earthlink.net
clark.bernier@rlw.com
rmccann@umich.edu
cmkehrein@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@Dynegy.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@cfbf.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
cpe@cpuc.ca.gov
hym@cpuc.ca.gov
jm3@cpuc.ca.gov
jnm@cpuc.ca.gov
jbf@cpuc.ca.gov
jk1@cpuc.ca.gov
jst@cpuc.ca.gov
jtp@cpuc.ca.gov
jol@cpuc.ca.gov
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
ppettingill@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.slon@doj.ca.gov
dks@cpuc.ca.gov
kgriffin@energy.state.ca.us
ldecarlo@energy.state.ca.us
mpryor@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
hcronin@water.ca.gov
rmiller@energy.state.ca.us

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

MARY MCDONALD
CAISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630