

**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

**BEFORE THE CALIFORNIA ENERGY COMMISSION**

Order Instituting Informational Proceeding AB-32  
Implementation: Greenhouse Gases

Docket 07-OIIP-01

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**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY  
(U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY  
(U 904 G) ON PROPOSED DECISION**

ALLEN K. TRIAL  
KIM HASSAN  
101 Ash Street, HQ-12B  
San Diego, California 92101  
Telephone (Trial): (619) 699-5162  
Telephone (Hassan): (619) 699-5006  
Facsimile: (619) 699-5027  
[atrial@sempra.com](mailto:atrial@sempra.com)  
[khassan@sempra.com](mailto:khassan@sempra.com)

Attorneys for  
SAN DIEGO GAS & ELECTRIC COMPANY and  
SOUTHERN CALIFORNIA GAS COMPANY

February 28, 2008

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**I.  
INTRODUCTION AND BACKGROUND**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission"), San Diego Gas & Electric ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit these comments concerning the Phase 2 Proposed Decision of President Peevey (the "Proposed Decision" or "PD"), mailed on February 8, 2008.

The PD proposes nine recommendations to the Air Resources Board ("ARB") regarding the structure of a greenhouse gas ("GHG") emissions reductions regulatory framework for the electricity and natural gas sectors of the California economy. The PD is the product of an extensive effort by the Commission staff and parties to develop a framework for implementing AB 32 mandated GHG emissions reductions. The Commission is to be commended for taking the first steps in addressing the large number

of policy issues associated with implementing AB 32 to the benefit of Californians in supporting a cap-and-trade structure and defining the scope of the cap-and-trade framework.

SDG&E and SoCalGas fully support the PD's findings that adopt a deliverer approach and a cap-and-trade system, especially one that can be integrated with other states in the west, and be further integrated with a national system. This represents the best option for the state to pursue and show its leadership in this area. SDG&E and SoCalGas agree with the PD's assessment that a cap-and-trade system can produce benefits beyond mandatory programs and will provide the price signals needed to encourage investment and achieve the reduction at the lowest possible costs. SDG&E and SoCalGas are also in agreement that the natural gas sector as defined in the PD initially be addressed in a programmatic manner. SDG&E and SoCalGas look forward to working with the Commission, the Energy Commission, the ARB and others parties in the near future to define and clarify many of the details needed to implement the direction put forward by this decision.

As is explained in greater detail below, SDG&E and SoCalGas propose limited revisions to the PD in order to address factual and legal errors, in accordance with Rule 14.3. Specifically, SDG&E and SoCalGas propose that the PD be revised to better reflect the intent of the PD to rely on a cap-and-trade structure for GHG reductions in California. In addition, SDG&E and SoCalGas recommend that the PD be revised to clarify the allowance allocation/auction issue and clearly state that any revenues from the auction of allowances in the electric sector should go to the benefit of California electric consumers.

## II.

### **THE PD SHOULD BE REVISED TO ELIMINATE REFERENCE TO AN EXPANDED RENEWABLES PORTFOLIO STANDARD**

The Findings of Fact (“FOF”) in the PD lay out strong reasons for supporting a cap-and-trade program including the following:

- Would lower costs relative to mandatory reductions (FOF 7)
- Provides flexibility in meeting targets (FOF 8)
- Provides strong incentives for investment in research and innovation in technologies (FOF 9)
- Allows market participants to manage risk (FOF 10)
- Efficiently distributes the cost of GHG reductions (FOF 11)
- Provides experience with trading programs (FOF 12)

While strongly supporting a cap-and-trade system, the PD overlays the cap-and-trade structure on top of an expanding set of direct regulations. There is a significant risk that increased statutory mandates on the mix of supply resources such as those contemplated in Interim Order 3 of the PD could constrain compliance options to such a degree as to render a cap-and-trade framework ineffective in enhancing cost effectiveness of GHG reduction.

In order for a cap-and-trade system to function effectively, a full range of choices need to be available to participants. Contrary to statements in the PD at page 33, “that the cap-and-trade system need only produce a relatively small portion of the overall emissions reductions in the short term”, cap-and-trade markets should be as wide and deep as possible. GHG reductions associated with new mandatory measures should be focused on actions where there is a disconnect between prices and actions (e.g., building and appliance standards among small electric customers). The GHG reductions associated with mandatory measures cannot consist of the majority of the reductions to

meet the aggregate GHG cap where a cap-and-trade regime is to function and improve cost effectiveness.

While Commission policy on expanding energy efficiency and renewables would be a critical component of SDG&E GHG emissions reduction actions, statutory mandates limit flexibility and negate the benefits of a cap-and-trade system. FOF 7 as written is likely to create confusion:

For the electricity sector, a cap-and-trade system, in conjunction with the continuation and strengthening of existing policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard as recommended in this decision, is likely to be a less expensive means of complying with AB 32 GHG emission reduction requirements than sole reliance on existing and increased mandatory programmatic requirements.

It states that a cap-and-trade system should be able to produce the GHG emissions reductions required by AB 32 at a lower cost than reliance on “increased mandatory programmatic requirements.” SDG&E and SoCalGas cannot see how the latter part of FOF 7 is compatible with proposing additional statutorily mandated reductions in the first clauses of the statement. There is no distinction between “strengthening existing policies” and “reliance on existing and increased mandatory programmatic requirements.” While the emissions price mechanism would provide incentive to regulated entities to select the most efficient options to reduce emissions, the in-place incremental command-and-control regulations on supply choices, such as an expanded renewables portfolio standard (“RPS”), would prevent such actions. While existing legislated mandates cannot be ignored, and the PD appropriately recommends equal treatment of all market participants with regard to existing mandates, new supply-side

mandates should not be simultaneously adopted with a cap-and-trade program.<sup>1</sup>

Further, adoption of additional statutorily mandated GHG reductions from an expanded RPS may seriously complicate GHG emissions trading since any action taken pursuant to a mandate may not be eligible to be traded under AB 32 or any Federal GHG market that might be developed in the future, creating an additional tracking burden and an unnecessary economic burden for our customers. For example, if a load serving entity (“LSE”) must use the purchase of renewable power to meet a mandated RPS, under AB 32 as well as typical provisions of most environmental legislation, it cannot then trade the GHG reduction associated with such a purchase.<sup>2</sup> This would deprive California utilities of the ability to sell allowances to higher emitters when they are below an applicable cap, thereby imposing unnecessary costs on electricity consumers.

Therefore, FOF 7 and Interim Order 3 of the PD should be modified as shown in Appendix “A” to encourage LSEs to go beyond the 20 percent mandate where cost effective, but it should not recommend to ARB that it is necessary to adopt new state-mandated RPS levels.

### **III.**

#### **THE PD SHOULD BE REVISED TO INCORPORATE CLARIFICATIONS REGARDING ALLOWANCE ALLOCATION AND AUCTION**

SDG&E and SoCalGas also recommend several revisions regarding the allowance allocation and auction portion of the PD to avoid any potential ambiguity on the range of options the Commission is still considering in this proceeding.

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<sup>1</sup> There should be a distinction between regulations on demand-side regulations for small electric customers such as are reflected in building and appliance standards and regulations on the supply-side such as an expanded RPS. Expanded direct regulations are part of the way to reduce the demand for energy that is beyond utility control. Supply-side regulations, on the other hand, affect LSE decision-making and limit cost effective choices.

<sup>2</sup> This statement assumes a bundled REC and GHG credit or that the RPS is implemented for GHG reductions.

First, the first half of Interim Order 8 should be modified to recognize that under the first deliverer approach, allowances can both be allocated and auctioned. As written, Interim Order 8 implies that allowances can either be auctioned or allocated and that these options are mutually exclusive. In its comments, SDG&E and SoCalGas supported an allocation of allowances to LSEs with a subsequent auction of those allowances to the points of regulation. This auction serves the purpose of ensuring that points of regulation with compliance responsibility have non-discriminatory access to allowances while also ensuring that the value associated with allowances is assigned to customers. The SDG&E/SoCalGas proposed method ensures that all revenues from the auction flow to the parties ultimately paying the allowance cost in the form of higher electricity prices.<sup>3</sup> This method also avoids the problems of double payment (paying for the allowances and having to pay the costs of implementing GHG reductions) since the flow of funds provides a revenue source for LSE GHG reducing activities. Interim Order 8 should be modified as suggested in Appendix A to clarify that the referenced choice between allocation and auction is a choice between auction and allocation to LSEs, with a subsequent non-discriminatory auction on behalf of LSE's of all allowances to first deliverers.

Second, the second half of Interim Order 8 should be modified to avoid committing legal error regarding the use of proceeds from fees. Currently, the PD reads, "We recommend that at least some portion of the GHG emission allowances available to the electricity sector be auctioned, with at least some portion of the proceeds from the

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<sup>3</sup> It is true that a single auction of allowances to first deliverers with the proceeds going to LSEs can accomplish the same goal. However, it is more assured that LSE will have the necessary funds to undertake GHG reductions if there is a two step process – allocation first with a subsequent non-discriminatory auction.

auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California.” [Emphasis added] It should be modified as shown in Appendix A to state that “with all of the proceeds from the auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California.”

Any auction revenues are legally a fee and thus must meet the legal standard established by the Sinclair Paint court decision.<sup>4</sup> A “Sinclair Test” requirement means that the fee must be reasonable and there must be a nexus between the purpose of the fee and the use of its revenues. The fee is intended to further the goals of AB 32 by reducing GHG emissions in California, so the revenues from the auction must be directed to GHG emission reduction activities on behalf of California’s electric consumers. This proposed change in the language in Interim Order 8 would also be consistent with FOF 27 that states “As part of this approach, all proceeds from the auctioning of allowances for the electric sector would be used in ways that benefit electric consumers in California.” [Emphasis added].

#### **IV. THE PD SHOULD BE REVISED TO INCORPORATE LIMITED ADDITIONAL CLARIFICATIONS**

In addition to the modification described above, SDG&E and SoCalGas recommend several other limited revisions to the PD. First, the first clause of the statement on page 13 is factually incorrect and should be modified or eliminated. It reads, “No concerns related to 1990 emissions in the electricity and natural gas sectors have been identified to warrant development of recommendations by the two

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<sup>4</sup> Taken from Economic and Technology Advancement and Advisory Committee (ETAAC) discussion of this issue; *see* ETAAC Final Report, pp. 9-4.



Commissions to ARB,...” In fact, the GHG emissions inventory was litigated exclusively in the ARB proceeding and was not an issue upon which comment was solicited in this proceeding. SDG&E and SoCalGas, through their parent Sempra Energy, have identified and raised concerns regarding the inconsistent methods used by ARB to calculate GHG emissions in the electric sector in the ARB GHG reporting requirements and the ARB GHG inventory, but this issue was raised only in the ARB proceeding.<sup>5</sup>

Second, Conclusions of Law (“COL”) 2 should be modified to eliminate reference to Publicly Owned Utilities (“POUs”) since the statements regarding POUs in COL 2 and COL 3 are contradictory and cannot both be factually correct.

Third, the following statement on page 98 regarding CHP should be clarified, “For gas-fired CHP plants that utilize electricity and thermal heat on site, the portion of the natural gas used in these processes should be considered part of the natural gas sector.” If large enough, the CHP unit should be directly regulated by ARB as a point source. Further, if the CHP unit is large enough to be directly regulated in the electric sector, it would provide more uniform incentives for the whole facility to be part of the cap-and-trade structure so that it is not regulated twice, once under the cap-and-trade and once under direct programmatic regulations.<sup>6</sup> Alternatively, the statement could be modified to state the natural gas used in the CHP process should be considered part of the natural gas sector only if the annual emissions associated with the non-electric portion of natural gas use are below the ARB thresholds for being a large point source. The PD should affirm that entities are only covered once by AB 32 regulations.

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<sup>5</sup> See Sempra Energy comments filed with the ARB on November 19, 2007.

<sup>6</sup> While the emissions can be split, it should be recognized that CHP is often a single piece of equipment.

## V. CONCLUSION

The Commission is to be commended for taking the first major policy steps in implementing AB 32. Firmly making the significant policy choice in this PD to support a multi-sector cap-and-trade framework and providing definition of the scope of the cap-and-trade structure is a major and positive step forward. SDG&E and SoCalGas believe it is critical that the Commission now move forward expeditiously to address the remaining policy issues associated with the cap-and-trade framework necessary to support ARB in meeting its AB 32 imposed deadlines. We note that the ARB is scheduled to publish its full draft Scoping Plan in June, 2008. Therefore, the Commission should adopt the PD and move forward quickly on the policy issues that remain. SDG&E and SoCalGas look forward to continuing to work with the Commission to resolve the remaining policy issues in a manner that will create a viable, cost-effective, and equitable cap-and-trade structure.

For the reasons set forth herein, the PD should be revised to incorporate the modifications detailed above and set forth in Appendix "A" hereto.

Respectfully submitted this 28th day of February, 2008,

By:                     /s/ Kim Hassan                      
Kim Hassan

ALLEN K. TRIAL  
KIM HASSAN  
101 Ash Street, HQ-12B  
San Diego, California 92101  
Telephone (Trial): (619) 699-5162  
Telephone (Hassan): (619) 699-5006  
Facsimile: (619) 699-5027  
[atrial@sempra.com](mailto:atrial@sempra.com)  
[khassan@sempra.com](mailto:khassan@sempra.com)  
Attorneys for  
SAN DIEGO GAS & ELECTRIC COMPANY and  
SOUTHERN CALIFORNIA GAS COMPANY

## **APPENDIX A**

### **Proposed Findings of Fact**

1. The state Energy Action Plan lays out a “loading order” for investment in electricity resources in California that puts energy efficiency as the top priority, with renewable resources second, and clean fossil-fired generation to the extent other options are not available.
2. Energy efficiency building codes and appliance efficiency standards promulgated by the Energy Commission provide a base for energy and GHG emissions reductions.
3. Consistent with AB 2021, the Energy Commission has set statewide energy efficiency goals at the level of cost-effective investment in energy efficiency.
4. The Public Utilities Commission sets requirements and energy savings goals for energy efficiency programs for the IOUs, and has set up a risk/reward mechanism for the IOUs that allows them to earn financial incentives if they exceed the adopted energy savings goals and assesses penalties if they fail to meet the goals.
5. It is reasonable for the State of California to apply the same minimum requirements in the areas of energy efficiency and renewables to all retail providers of electricity.
6. It is reasonable that existing California policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard be maintained and strengthened as recommended in this decision.
7. For the electricity sector, a cap-and-trade system, in conjunction with the continuation ~~and strengthening~~ of existing policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard as recommended in this decision, is likely to be a less expensive means of complying with AB 32 GHG emission reduction requirements than sole reliance on existing and increased mandatory programmatic requirements.
8. For the electricity sector, GHG emissions trading would maximize flexibility in achieving emissions targets by allowing obligated entities to rely on least-cost options across the entire economy.

9. For the electricity sector, a GHG emissions cap-and-trade program would encourage investment in research and innovation in technologies that lower GHG emissions.
10. For the electricity sector, a GHG emissions cap-and-trade program would allow market participants to manage risk associated with compliance obligations.
11. For the electricity sector, a GHG emissions cap-and-trade program would distribute the cost of GHG reductions most efficiently across all capped entities.
12. Implementing a GHG emissions cap-and-trade system in 2012 for the electricity sector would allow entities to gain experience with finding real leastcost GHG emission reduction opportunities.
13. It is reasonable for ARB to proceed to design a multi-sector GHG emissions cap-and-trade system for California that includes the electricity sector, for implementation in 2012, as described in this decision.
14. For the electricity sector, placing the compliance obligation in a GHG emissions cap-and-trade system on the entities that deliver power to the electricity grid in California, which we call “deliverers,” is reasonable because this point of regulation best meets, on balance, the most important criteria, as described in this decision.
15. By choosing a deliverer *point of regulation* we are simply choosing a trigger that determines which entities have to comply, but what is being regulated is the amount of GHGs being produced in California or to supply electricity to customers located in California.
16. The deliverer point of regulation does not single out wholesale sales of electricity, but rather applies uniformly to electricity consumed in California and electricity generated in California.
17. An entity with compliance obligations under a deliverer form of regulation, if it does not already possess enough allowances, would have an opportunity after delivery of the energy to acquire allowances on the market or to show compliance using offsets or other flexible compliance mechanisms.
18. The GHG regulatory program we are proposing would not prevent even high-GHG sources from providing reliability services when needed.
19. A deliverer point of regulation would treat all electricity delivered to the California grid the same, whether that electricity is generated in California or elsewhere. In either

case, the deliverer would later have to surrender GHG allowances (or secure adequate offsets) based on the amount of GHG emissions associated with that electricity.

20. “Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.” (Health & Safety Code § 38501(a).)

21. “Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry. It will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the state.” (Health & Safety Code § 38501(b).)

22. The local benefits to California of reducing GHG emissions are further elaborated in the Final Climate Action Team Report to the Governor and the Legislature (presented to the Legislature in March 2006) and other sources.

23. Any burdens on interstate commerce that may result from the implementation of AB 32 under the regulations that we recommend to ARB (including a deliverer point of regulation) would be purely incidental, while the local benefits to California of reducing GHG emissions, and therefore the impact of global warming, would be most significant.

24. The proposed GHG regulations are intended to change the way that electricity is generated and consumed and are expected to increase the use of (i) renewable resources to generate electricity, (ii) low-emitting sources of generation, and (iii) more efficient methods of using electricity. To the extent such actions are unable to sufficiently reduce GHG emissions associated with the use of electricity, these regulations are expected to result in investments outside of the electricity sector that will cost-effectively reduce GHG emissions from other activities.

25. It is reasonable to regulate the GHG emissions associated with the multi-jurisdictional utilities' deliveries of electricity to the California grid on a retail provider basis, with

GHG emissions attributed based on a proportional share of their electricity sales in California.

26. The auctioning of 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 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. The 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.

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.

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 natural gas to end-users in California.

31. Key differences between the electricity and natural gas sectors make it reasonable to recommend that ARB to proceed to design a multi-sector GHG emissions cap-and-trade system for California but to not include the natural gas sector at this time.

32. Entities in the natural gas sector have fewer options to reduce GHG emissions than entities in the electricity sector.

33. There are limited commercially available lower carbon alternative sources of natural gas.

34. The only reliable near-term options for reducing GHG emissions in the natural gas sector are energy efficiency programs.

35. The incremental benefits from including the natural gas sector in a multi-sector GHG emissions cap-and-trade system are likely to be less than those from including the electricity sector.
36. Reporting protocols for GHG emission arising from the storage, transportation and distribution of natural gas to end-users are under development and do not yet include provisions for reporting end-user combustion related GHG emissions.
37. Implementing a multi-sector GHG emissions cap-and-trade system that includes small end-users of natural gas now may expose those customers to greater price risk than small end-users in the electricity sector.
38. Including all fuels in a multi-sector cap-and-trade system could maximize the benefits of a market-based system.
39. Taking a programmatic approach to the natural gas sector now does not preclude future inclusion in a multi-sector GHG emissions cap-and-trade system.
40. It is reasonable for ARB to not include the natural gas sector when designing a multi-sector GHG emissions cap-and-trade system for California, for implementation in 2012, as described in this decision.

### **Proposed Conclusions of Law**

1. AB 2021 requires the Energy Commission, in consultation with POUs and the Public Utilities Commission, to set statewide energy efficiency goals.  
However, the statute does not require that POUs comply with the energy efficiency goals set by the Energy Commission.
2. SB 1068 as amended by SB 107 requires that IOUs, CCAs, and ESPs, ~~and~~ POUs obtain at least 20% of delivered electricity from renewable sources by 2010.
3. SB 107 requires POUs to set RPS targets, but does not specify minimum delivery requirements or the types of renewables that should qualify.
4. The FPA does not address GHG emissions, nor is there any suggestion in the FPA or in its administration that Congress intended to forbid states from enacting GHG regulations on their own.
5. 16 U.S.C. § 824(a) states: "Federal regulation . . . [under the FPA extends] only to those matters which are not subject to regulation by the States." This broad savings clause supports the conclusion that because air pollution is subject to regulation by the

States, and not by the FPA or the FERC, state regulation of GHG emissions caused by the generation and consumption of electricity is not preempted by the FPA, but may be regulated by the States.

6. Because the FPA expressly leaves room for state regulations dealing with electricity and because there is nothing in the FPA that deals with the regulation of emissions (either generally, or GHG emissions specifically) the deliverer approach is not preempted by the FPA.

7. A GHG regulation that incorporates a deliverer point of regulation is an environmental regulation whose purpose is to decrease the impact of global warming on California insofar as that impact is caused by electricity used or generated in California. Such a GHG regulation is not a regulation of wholesale rates or other terms and conditions of wholesale power sales or electric transmission that the FPA and FERC exclusively regulate.

8. There is no field preemption here because, in enacting the FPA, Congress did not intend, either explicitly or implicitly, to occupy the field of environmental regulation of the power sector.

9. There is no FPA field preemption here because, under AB 32, California will not be regulating the same subject matter as the FPA, nor will its regulations be for the same intended purpose. California will be regulating GHG emissions for the purpose of reducing them and lessening the impacts of global warming on California.

10. While GHG regulation may have some impact on the wholesale prices paid for electricity, such regulation is no more preempted by the FPA than state regulations limiting the amount of other pollutants that may be emitted by electric power plants -- that may affect the cost of generating electricity and therefore indirectly affect the price of wholesale electricity.

11. The inclusion, in FERC-jurisdictional rates, of any costs of compliance with California's GHG regulations would be subject to FERC review under § 205 of the FPA (16 U.S.C. § 824d). All wholesale sales subject to FERC jurisdiction would occur at the FERC-authorized rate.

12. The proposed structure for regulating GHG emissions would not prevent anyone from selling wholesale electricity into the California market, nor is a license required to do so.



13. The proposed deliverer point of regulation would not conflict with the FPA's electric reliability provisions.
14. A deliverer point of regulation is not preempted by the FPA.
15. The regulations we are proposing are facially neutral, as between interstate and intrastate commerce, and do not have a discriminatory purpose or effect.
16. Under *Pike v. Bruce Church, Inc.* (1970) 397 U.S. 137, 142, a state enactment "will be upheld unless the burden imposed on [interstate] commerce is clearly excessive in relation to the putative local benefits."
17. The use of a deliverer point of regulation would not violate the dormant Commerce Clause.
18. The deliverer point of regulation would only regulate electricity that is generated in, or delivered for consumption in, California. Thus, it would not regulate any commerce that occurs totally outside of California, and therefore would not regulate extraterritorially in violation of the Commerce Clause.
19. The fact that the Legislature required reporting by retail providers does not mean that retail providers must be the point of regulation for achieving the required reductions in GHG emissions.
20. Our recommended deliverer point of regulation would not cover power that is merely wheeled through California.

## **INTERIM ORDER**

### **IT IS ORDERED** that:

1. 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. We recommend that ARB require POUs to deliver at least 20 percent renewable electricity to their customers by a date certain, perhaps 2015 or 2017.
3. We recommend that ARB work with the Public Utilities Commission and the Energy Commission to encourage ~~set requirements that all~~ retail providers of electricity to ~~must~~

deliver more than 20 percent of their power from renewable sources in the future, when cost effective, at levels and dates to be determined.

4. We recommend that, if ARB concludes that it does not have authority to adopt regulations consistent with Ordering Paragraphs 1 and 2, ARB seek such authority from the Legislature.

5. We recommend that ARB design a multi-sector cap-and-trade system for greenhouse gas (GHG) emissions in California, to be implemented in 2012. This GHG emissions cap-and-trade system should include the electricity sector.

6. We recommend that, for the electricity sector, ARB establish the compliance obligation in the GHG emissions cap-and-trade system on the entities that deliver power to the California electricity grid, as described in this decision.

7. We recommend that ARB regulate the emissions associated with multijurisdictional utilities' deliveries of electricity to the California grid on a retail provider basis, with GHG emissions attributed based on the proportional share of their electricity sales that are made in California.

8. We recommend that at least some portion of the GHG emission allowances available to the electricity sector be auctioned, with all ~~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.

9. We recommend that, for the natural gas sector, ARB rely on programmatic measures to achieve emission reductions and not include the natural gas sector in a multi-sector GHG emissions cap-and-trade system at this time. It may be appropriate to include the natural gas sector in a cap-and-trade program at a later date.

This order is effective today.

Dated: \_\_\_\_\_, at San Francisco, California.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day re-served a true copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY and SOUTHERN CALIFORNIA GAS COMPANY ON PROPOSED DECISION** on each party named in the official service list for proceeding **R.06-04-009** by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey, and Administrative Law Judges Amy C. Yip-Kikugawa, Charlotte TerKeurst, and Jonathan Lakritz.

Executed this 29th day of February 2008 at San Diego, California.

/s/ Susan A. Long

Susan A. Long



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### Parties

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

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

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

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

KEITH R. MCCREA  
ATTORNEY AT LAW  
SUTHERLAND, ASBILL & BRENNAN, LLP  
1275 PENNSYLVANIA AVE., N.W.  
WASHINGTON, DC 20004-2415  
FOR: CALIFORNIA MANUFACTURERS &  
TECHNOLOGY ASSN.

ADAM J. KATZ  
MCDERMOTT WILL & EMERY LLP  
600 13TH STREET, NW.  
WASHINGTON, DC 20005  
FOR: MORGAN STANLEY CAPITAL GROUP, INC.

CATHERINE M. KRUPKA  
MCDERMOTT WILL AND EMERY LLP  
600 THIRTEEN STREET, NW  
WASHINGTON, DC 20005  
FOR: MORGAN STANLEY CAPITAL GROUP, INC.

KYLE D. BOUDREAUX  
FPL GROUP  
700 UNIVERSE BLVD., JES/JB  
JUNO BEACH, FL 33408  
FOR: FPL ENERGY PROJECT MANAGEMENT

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

CYNTHIA A. FONNER  
SENIOR COUNSEL  
CONSTELLATION ENERGY GROUP INC  
550 W. WASHINGTON ST, STE 300

FOR: KERN RIVER GAS TRANSMISSION

CHICAGO, IL 60661  
FOR: CONSTELLATION ENERGY GROUP INC

KEVIN BOUDREAUX  
CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002  
FOR: CALPINE POWER AMERICA

THOMAS DILL  
PRESIDENT  
LODI GAS STORAGE, L.L.C.  
1021 MAIN ST STE 1500  
HOUSTON, TX 77002-6509

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

TIMOTHY R. ODIL  
MCKENNA LONG & ALDRIDGE LLP  
1875 LAWRENCE STREET, SUITE 200  
DENVER, CO 80202  
FOR: CENTER FOR ENERGY AND ECONOMIC  
DEVELOPMENT

STEPHEN G. KOERNER, ESQ.  
EL PASO CORPORATION  
WESTERN PIPELINES  
2 NORTH NEVADA AVENUE  
COLORADO SPRINGS, CO 80903  
FOR: EL PASO NATURAL GAS COMPANY/MOJAVE  
PIPELINE COMPANY

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

JOHN B. WELDON, JR.  
SALMON, LEWIS & WELDON, P.L.C.  
2850 EAST CAMELBACK ROAD, SUITE 200  
PHOENIX, AZ 85016  
FOR: SALT RIVER PROJECT AGRICULTURAL  
IMPROVEMENT AND POWER DISTRICT

KELLY BARR  
MANAGER, REGULATORY AFFAIRS & CONTRACTS  
SALT RIVER PROJECT  
PO BOX 52025, PAB 221  
PHOENIX, AZ 85072-2025  
FOR: SALT RIVER PROJECT AGRICULTURAL  
IMPROVEMENT AND POWER DISTRICT

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

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

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

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  
FOR: LOS ANGELES DEPT OF WATER AND POWER

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

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

DAVID L. HUARD  
ATTORNEY AT LAW  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064  
FOR: LOS ANGELES COUNTY/TRANS CANADA  
PIPELINES

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

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

GREGORY KOISER  
CONSTELLATION NEW ENERGY, INC.  
350 SOUTH GRAND AVENUE, SUITE 3800  
LOS ANGELES, CA 90071  
FOR: CONSTELLATION NEW ENERGY

FOR: CITY OF VERNON

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, NO. 1500  
LOS ANGELES, CA 90071  
FOR: SOUTHERN CALIFORNIA GENERATION  
COALITION/SOUTHERN CALIFORNIA PUBLIC  
POWER AUTHORITY

MICHAEL MAZUR  
CHIEF TECHNICAL OFFICER  
3 PHASES RENEWABLES, LLC  
8333 ZITOLA TER  
PLAYA DEL REY, CA 90293-7835  
FOR: 3 PHASES ENERGY SERVICES

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

TIFFANY RAU  
POLICY AND COMMUNICATIONS MANAGER  
CARSON HYDROGEN POWER PROJECT LLC  
ONE WORLD TRADE CENTER, SUITE 1600  
LONG BEACH, CA 90831-1600  
FOR: CARSON HYDROGEN POWER PROJECT LLC

GREGORY KLATT  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
411 E. HUNTINGTON DRIVE, STE. 107-356  
ARCADIA, CA 91006  
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS

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

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367  
FOR: WESTERN POWER TRADING FORUM

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

BARRY R. WALLERSTEIN  
EXECUTIVE OFFICER  
SOUTH COAST AQMD  
21865 COPLEY DRIVE  
DIAMOND BAR, CA 91765-4182  
FOR: SOUTH COAST AIR QUALITY MANAGEMENT  
DISTRICT

AKBAR JAZAYEIRI  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800  
2241 WALNUT GROVE AVE. ROOM 390  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

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

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

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

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

ALLEN K. TRIAL  
SAN DIEGO GAS & ELECTRIC COMPANY  
HQ-12  
101 ASH STREET  
SAN DIEGO, CA 92101

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

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

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

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

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

DONALD C. LIDDELL  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
FOR: CALIFORNIA NATURAL GAS VEHICLE  
ASSOCIATION/ CLEAN ENERGY FUELS  
CORPORATION

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

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

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

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

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

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

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

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

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

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

MARCEL HAWIGER  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

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

DIANA L. LEE  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4300  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

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

AUDREY CHANG  
STAFF SCIENTIST  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

DONALD BROOKHYSER  
ATTORNEY AT LAW  
ALCANTAR & KAHL  
120 MONTGOMERY STREET  
SAN FRANCISCO, CA 94104  
FOR: COGENERATION ASSOCIATION OF  
CALIFORNIA/ENERGY PRODUCERS AND USERS  
COALITION

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  
FOR: ENERGY PRODUCERS & USERS COALITION

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

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION

JEANNE B. ARMSTRONG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: WILD GOOSE STORAGE LLC

LISA A. COTTLE  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET, 39TH FLOOR  
SAN FRANCISCO, CA 94111  
FOR: MIRANT CALIFORNIA, LLC, MIRANT  
DELTA, LLC, AND MIRANT POTRERO, LLC

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

EVELYN KAHL  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
FOR: ENERGY PRODUCERS & USERS COALITION

MICHAEL P. ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
FOR: COGENERATION ASSOCIATION OF  
CALIFORNIA/ENERGY PRODUCERS AND USERS  
COALITION

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

ANN G. GRIMALDI  
MCKENNA LONG & ALDRIDGE LLP  
101 CALIFORNIA STREET, 41ST FLOOR  
SAN FRANCISCO, CA 94111  
FOR: CENTER FOR ENERGY AND ECONOMIC  
DEVELOPMENT

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

KAREN BOWEN  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111  
FOR: MIRANT CALIFORNIA, LLC, MIRANT  
DELTA, LLC, AND MIRANT POTRERO, LLC

MICHAEL B. DAY  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: SOLAR ALLIANCE

VIDHYA PRABHAKARAN  
GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION

EDWARD W. O'NEILL  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE LLP



101 CALIFORNIA STREET  
SAN FRANCISCO, CA 94111-5802  
FOR: CALIFORNIA COGENERATION COUNCIL

505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
FOR: CALIFORNIA LARGE ENERGY CONSUMERS  
ASSOCIATION

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

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

SARA STECK MYERS  
ATTORNEY AT LAW  
122 28TH AVENUE  
SAN FRANCISCO, CA 94121  
FOR: CENTER FOR ENERGY EFFICIENCY AND  
RENEWABLE TECHNOLOGIES

LARS KVALE  
CENTER FOR RESOURCE SOLUTIONS  
PRESIDIO BUILDING 97  
PO BOX 39512  
SAN FRANCISCO, CA 94129  
FOR: CENTER FOR RESOURCE SOLUTION

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

BRIAN K. CHERRY  
VICE PRESIDENT, REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE: B10C  
SAN FRANCISCO, CA 94177  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

ANDREA WELLER  
STRATEGIC ENERGY  
3130 D BALFOUR RD., SUITE 290  
BRENTWOOD, CA 94513  
FOR: STRATEGIC ENERGY

JENNIFER CHAMBERLIN  
MGR. OF REG. AND GOV. AFFAIRS  
STRATEGIC ENERGY, LLC  
2633 WELLINGTON CT.  
CLYDE, CA 94520  
FOR: STRATEGIC ENERGY, LLC

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

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

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

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

JANILL RICHARDS  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
1515 CLAY STREET, 20TH FLOOR  
OAKLAND, CA 94702  
FOR: PEOPLE OF THE STATE OF CALIFORNIA

CLIFF CHEN  
UNION OF CONCERNED SCIENTIST  
2397 SHATTUCK AVENUE, STE 203  
BERKELEY, CA 94704  
FOR: UNION OF CONCERNED SCIENTISTS

GREGG MORRIS  
DIRECTOR  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVENUE, STE 402  
BERKELEY, CA 94704  
FOR: GREEN POWER INSTITUTE

R. THOMAS BEACH  
CROSSBORDER ENERGY  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710-2557  
FOR: THE CALIFORNIA COGENERATION COUNCIL

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

BARRY F. MCCARTHY  
ATTORNEY AT LAW  
MCCARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113  
FOR: NORTHERN CALIFORNIA GENERATION  
COALITION

C. SUSIE BERLIN  
ATTORNEY AT LAW  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113  
FOR: NORTHERN CALIFORNIA POWER AGENCY

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

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

BALDASSARO DI CAPO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
FOR: CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR

UDI HELMAN  
CALIFORNIA INDEPENDENT SYS. OPER. CORP  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
FOR: CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION

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

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

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

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95811  
FOR: CONSTELLATION NEW ENERGY,  
INC., CONSTELLATION ENERGY COMMODITIES  
GROUP, INC. CONSTELLATION GENERATION

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814  
FOR: CALIFORNIA MUNICIPAL UTILITIES  
ASSOCIATION

GREGGORY L. WHEATLAND  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
FOR: LS POWER, INC.

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

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

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

WILLIAM W. WESTERFIELD, 111  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2015 H STREET  
SACRAMENTO, CA 95814  
FOR: SIERRA PACIFIC POWER COMPANY

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

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

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

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER & MURPHY, LLP  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864  
FOR: CALIFORNIA CLEAN DG  
COALITION/NORTHWEST NATURAL GAS

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

JESSICA NELSON  
PLUMAS-SIERRA RURAL ELECTRIC CO-OP  
73233 STATE ROUTE 70, STE A  
PORTOLA, CA 96122-7064  
FOR: PLUMAS-SIERRA RURAL ELECTRIC COOP

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

KYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH ST., 20TH FLOOR  
PORTLAND, OR 97232  
FOR: PACIFICORP

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

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

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

## Information Only

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

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

KENNETH A. COLBURN  
SYMBIOTIC STRATEGIES, LLC  
26 WINTON ROAD  
MEREDITH, NH 03253

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

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

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

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

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

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

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

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

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

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

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

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

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

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

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

ANNE HENDRICKSON  
DIRECTOR, REGULATORY AFFAIRS  
COMMERCE ENERGY INC  
222 W. LAS COLINAS BLVD., STE. 950-E  
IRVING, TX 75039  
FOR: COMMERCE ENERGY INC

COURTNEY WEDDINGTON  
COMPLIANCE ANALYST  
COMMERCE ENERGY INC  
222 W. LAS COLINAS BLVD., STE. 950-E  
IRVING, TX 75039

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

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

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

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

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

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

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

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

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

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

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

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

JAMES A. HOLTKAMP  
HOLLAND & HART, LLP

SANDRA ELY  
NEW MEXICO ENVIRONMENT DEPARTMENT

60 EAST SOUTH TEMPLE, STE. 2000  
SALT LAKE CITY, UT 84111

1190 ST FRANCIS DRIVE  
SANTA FE, NM 87501

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

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

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

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

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

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

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

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

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

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

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

TREVOR DILLARD  
SIERRA PACIFIC POWER COMPANY  
PO BOX 10100  
6100 NEIL ROAD, MS S4A50  
RENO, NV 89520-0024

JOSEPH GRECO  
TERRA-GEN POWER 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  
FOR: LOS ANGELES DEPT. OF WATER AND  
POWER

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

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

ROBERT L. PETTINATO  
LOS ANGELES DEPARTMENT OF WATER & POWER  
111 NORTH HOPE STREET, SUITE 1151  
LOS ANGELES, CA 90012

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

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

RANDALL W. KEEN  
ATTORNEY AT LAW  
MANATT PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064  
FOR: LOS ANGELES COUNTY

S. NANCY WHANG  
ATTORNEY AT LAW

PETER JAZAYERI  
STROOCK & STROOCK & LAVAN LLP

MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064

2029 CENTURY PARK EAST, SUITE 1800  
LOS ANGELES, CA 90067

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

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

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

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

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

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

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

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

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

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

JAIRAM GOPAL  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE, GO1-C  
ROSEMEAD, CA 91770

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

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

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

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

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

KIM KIENER  
504 CATALINA BLVD.  
SAN DIEGO, CA 92106

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE DIRECTOR  
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110

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

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

JENNIFER PORTER  
POLICY ANALYST

SEPHRA A. NINOW  
POLICY ANALYST

CALIFORNIA CENTER FOR SUSTAINABLE ENERGY  
8690 BALBOA AVENUE, SUITE 100  
SAN DIEGO, CA 92123

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  
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

JOHN W. LESLIE  
ATTORNEY AT LAW  
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130

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

ELSTON K. GRUBAUGH  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BLVD.  
IMPERIAL, CA 92251

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

MONA TIERNEY-LLOYD  
LANDSITE, INC  
PO BOX 378  
CAYUCOS, CA 93430  
FOR: LANDSITE, INC

JAN PEPPER  
CLEAN POWER MARKETS, INC.  
PO BOX 3206  
418 BENVENUE AVENUE  
LOS ALTOS, CA 94024

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

MARC D. JOSEPH  
ADAMS BRADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO, CA 94080  
FOR: CALIFORNIA UNIONS FOR RELIABLE  
ENERGY&COALITION OF CALIFORNIA UTILITY  
EMPLOYEES

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

HAYLEY GOODSON  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

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

DAN ADLER  
DIRECTOR, TECH AND POLICY DEVELOPMENT  
CALIFORNIA CLEAN ENERGY FUND  
5 THIRD STREET, SUITE 1125  
SAN FRANCISCO, CA 94103

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

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

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

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

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

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

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

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

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

SETH HILTON  
ATTORNEY AT LAW  
STOEL RIVES  
111 SUTTER ST., SUITE 700  
SAN FRANCISCO, CA 94104  
FOR: EL PASO NATURAL GAS

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

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

BIANCA BOWMAN  
RATE CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

CARMEN E. BASKETTE  
SENIOR MGR MARKET DEVELOPMENT  
ENERNOC  
594 HOWARD ST., SUITE 400  
SAN FRANCISCO, CA 94105  
FOR: ENERNOC, INC.

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

JAMES W. TARNAGHAN  
DUANE MORRIS LLP  
SUITE 2000  
ONE MARKET, SPEAR TOWER  
SAN FRANCISCO, CA 94105  
FOR: LODI GAS STORAGE

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

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

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

RAY WELCH  
ASSOCIATE DIRECTOR  
NAVIGANT CONSULTING, INC.  
ONE MARKET PLAZA, SUITE 1200  
SAN FRANCISCO, CA 94105

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

JAMES W. MCTARNAGHAN  
ATTORNEY AT LAW  
DUANE MORRIS LLP  
ONE MARKET, SPEAR TOWER 2000  
SAN FRANCISCO, CA 94105-1104

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

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

ARNO HARRIS  
RECURRENT ENERGY, INC.  
1700 MONTGOMERY ST., SUITE 251  
SAN FRANCISCO, CA 94111

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

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

JOSEPH F. WIEDMAN

MARTIN A. MATTES



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

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

BRAD WETSTONE  
236 HARTFORD STREET  
SAN FRANCISCO, CA 94114

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

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

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

SHAUN ELLIS  
2183 UNION STREET  
SAN FRANCISCO, CA 94123

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

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

JONATHAN FORRESTER  
PG&E  
MAIL CODE N13C  
PO BOX 770000  
SAN FRANCISCO, CA 94177

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

SEBASTIEN CSAPO  
PG&E PROJECT MGR.  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

SHAUN HALVERSON  
PACIFIC GAS AND ELECTRIC COMPANY  
PG&E MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
67 CARR DRIVE  
MORAGA, CA 94596  
FOR: CALIFORNIA LARGE ENERGY CONSUMERS  
ASSOCIATION

JOSEPH HENRI  
31 MIRAMONTE ROAD  
WALNUT CREEK, CA 94597

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

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

ALEX KANG  
ITRON, INC.  
1111 BROADWAY, STE. 1800  
OAKLAND, CA 94607

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

GERALD L. LAHR  
ABAG POWER  
101 EIGHTH STREET  
OAKLAND, CA 94607  
FOR: ASSOCIATION OF BAY AREA GOVERNMENTS

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

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

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

REED V. SCHMIDT  
VICE PRESIDENT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703  
FOR: CALIFORNIA CITY-COUNTY STREET  
LIGHT ASSOCIATION

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

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

CLYDE MURLEY  
CONSULTANT TO NRDC  
1031 ORDWAY STREET  
ALBANY, CA 94706

BRENDA LEMAY  
DIRECTOR OF PROJECT DEVELOPMENT

CARLA PETERMAN  
UCEI

HORIZON WIND ENERGY  
1600 SHATTUCK, SUITE 222  
BERKELEY, CA 94709

2547 CHANNING WAY  
BERKELEY, CA 94720

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

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

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

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

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

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

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

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

ROGER VAN HOY  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

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

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

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

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

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

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

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

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

MELANIE GILLETTE  
SR MGR WESTERN REG. AFFAIRS  
ENERNOC, INC.  
115 HAZELMERE DRIVE  
FOLSOM, CA 95630

ROBIN SMUTNY-JONES  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630

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

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

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

KENNY SWAIN

KIRBY DUSEL

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

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

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

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

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

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

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

AUDRA HARTMANN  
DYNEGY INC.  
980 NINTH STREET, SUITE 2130  
SACRAMENTO, CA 95814

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

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

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

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

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

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

JUSTIN C. WYNNE  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

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

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

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

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

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

PATRICK STONER  
PROGRAM DIRECTOR  
LOCAL GOVERNMENT COMMISSION  
1303 J STREET, SUITE 250  
SACRAMENTO, CA 95814

RACHEL MCMAHON  
DIR. OF REG. AFFAIRS  
CEERT  
1100 11TH STREET, SUITE 311  
SACRAMENTO, CA 95814

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

STEVEN A. LIPMAN  
STEVEN LIPMAN CONSULTING  
500 N. STREET 1108

SACRAMENTO, CA 95814

SACRAMENTO, CA 95814  
FOR: LIPMAN CONSULTING

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

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

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814-3109

EDWARD J. TIEDEMANN  
ATTORNEY AT LAW  
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
400 CAPITOL MALL, 27TH FLOOR  
SACRAMENTO, CA 95814-4416  
FOR: PLACER COUNTY WATER AGENCY & KINGS  
RIVER CONSERVATION DISTRICT

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

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

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

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

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

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

KAREN LINDH  
CALIFORNIA ONSITE GENERATION  
7909 WALERGA ROAD, NO. 112, PMB 119  
ANTELOPE, CA 95843

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

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

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

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

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

CATHIE ALLEN  
CA STATE MGR.  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232

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

SAM SADLER  
OREGON DEPARTMENT OF ENERGY

LISA SCHWARTZ  
SENIOR ANALYST

625 NE MARION STREET  
SALEM, OR 97301-3737

ORGEON PUBLIC UTILITY COMMISSION  
PO BOX 2148  
SALEM, OR 97308-2148

CLARE BREIDENICH  
WESTERN POWER TRADING FORUM  
224 1/2 24TH AVENUE EAST  
SEATTLE, WA 98112  
FOR: WESTERN POWER TRADING FORUM

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

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

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

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

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

AMY C. YIP-KIKUGAWA  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ANDREW CAMPBELL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5203  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

BETH MOORE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

BISHU CHATTERJEE  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING BRANCH  
AREA 3-E  
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

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

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

DONALD R. SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4209

ED MOLDAVSKY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5037

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ELIZABETH STOLTZFUS  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
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

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

JASON R. SALMI KLOTZ  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOEL T. PERLSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5133  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JUDITH IKLE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
ROOM 4012  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: ENERGY RESOURCES BRANCH

KRISTIN RALFF DOUGLAS  
CALIF PUBLIC UTILITIES COMMISSION  
POLICY & PLANNING DIVISION  
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

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

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  
POLICY & PLANNING DIVISION  
AREA 5-B  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

JONATHAN LAKRITZ  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5020  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH  
CALIF PUBLIC UTILITIES COMMISSION  
POLICY & PLANNING DIVISION  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LAINIE MOTAMEDI  
CALIF PUBLIC UTILITIES COMMISSION  
POLICY & PLANNING DIVISION  
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

PAUL S. PHILLIPS  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4101  
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

RAHMON MOMOH  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4205  
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

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

SCOTT MURTISHAW  
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

STEVE ROSCOW  
CALIF PUBLIC UTILITIES COMMISSION  
RATEMAKING 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

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

KEN ALEX  
PO BOX 944255  
1300 I STREET, SUITE 125  
SACRAMENTO, CA 94244-2550  
FOR: PEOPLE OF THE STATE OF CALIFORNIA

JUDITH B. SANDERS  
ATTORNEY AT LAW  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
FOR: CAISO

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

MARY MCDONALD  
DIRECTOR OF STATE AFFAIRS  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
FOR: CAISO

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

MICHAEL SCHEIBLE  
DEPUTY EXECUTIVE OFFICER  
CALIFORNIA AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95677  
FOR: CALIFORNIA AIR RESOURCES BOARD

GARY COLLORD  
STATIONARY SOURCE DIVISION  
AIR RESOURCES BOARD  
1001 I STREET, PO BOX 2815  
SACRAMENTO, CA 95812

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

PAM BURMICH  
AIR RESOURCES BOARD

B. B. BLEVINS  
EXECUTIVE DIRECTOR



1001 I STREET, BOX 2815  
SACRAMENTO, CA 95812

CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-39  
SACRAMENTO, CA 95814  
FOR: CALIFORNIA ENERGY COMMISSION

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

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

DON SCHULTZ  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

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

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814

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

MICHELLE GARCIA  
AIR RESOURCES BOARD  
1001 10TH STREET  
SACRAMENTO, CA 95814

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

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

NANCY TRONAAS  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST. MS-20  
SACRAMENTO, CA 95814-5512

CAROL J. HURLOCK  
CALIFORNIA DEPT. OF WATER RESOURCES  
JOINT OPERATIONS CENTER  
3310 EL CAMINO AVE. RM 300  
SACRAMENTO, CA 95821

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

ROSS A. MILLER  
ELECTRICITY ANALYSIS OFFICE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS 20  
SACRAMENTO, CA 96814-5512  
FOR: CALIFORNIA ENERGY COMMISSION

---

**TOP OF PAGE**  
**BACK TO INDEX OF SERVICE LISTS**