BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	**Rulemaking 06-04-009 (Filed April 13, 2006)**
AB 32 Implementation	**CEC Docket 07-OIIP-01**

COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC. ON GENERAL ISSUES, FLEXIBLE COMPLIANCE POLICIES AND NON-MARKET-BASED EMISSION REDUCTION MEASURES (OTHER THAN CHP) AND EMISSION CAPS

Michael A. Yuffee
Melissa R. Dorn
McDermott Will & Emery LLP
600 Thirteenth Street, NW
Washington, DC 20005
Tel: (202) 756-8000
Fax: (202) 756-8087
Email: myuffee@mwe.com
mdorn@mwe.com

Attorneys for Morgan Stanley Capital Group Inc.

Dated: June 2, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)
AB 32 Implementation	CEC Docket 07-OIIP-01

COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC. ON GENERAL ISSUES, FLEXIBLE COMPLIANCE POLICIES AND NON-MARKET-BASED EMISSION REDUCTION MEASURES (OTHER THAN CHP) AND EMISSION CAPS

I. SUMMARY

Pursuant to the May 6, 2008 Ruling of Administrative Law Judges Charlotte F. TerKeurst and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("Morgan Stanley") respectfully submits its comments on the possible policies for flexible compliance in a cap-and-trade program as it pertains to the electricity sector[1] and general issues and non-market-based greenhouse gas ("GHG") emissions reduction measures and emissions caps.[2]

Morgan Stanley submits these comments with the sincere belief that the use of market mechanisms is the most efficient and cost-effective method of achieving California's goal of

---

[1] Administrative Law Judges' Ruling Requesting Comments on Flexible Compliance Policies (Docket No. R.06-04-009) (issued May 6, 2008).

[2] Administrative Law Judges' Ruling Requesting Comments on Emission Reduction Measures, Modeling Results, and Other Issues (Docket No. R.06-04-009) (issued May 13, 2008).

reducing GHG emissions to address global climate change. This belief informs Morgan Stanley's responses below to the California Public Utilities Commission's ("CPUC") and the California Energy Commission's ("CEC") (collectively, the "Commissions") questions regarding general issues, flexible compliance mechanisms and other non-market-based emission reduction measures (other than CHP) and emission caps. Morgan Stanley also reserves its right to comment further in this proceeding.

II. GENERAL ISSUES

Q10. What evaluation criteria should be used in assessing each issue area in these comments (allowance allocation, flexible compliance, CHP, and emission reduction measures and policies)? Explain how your recommendations satisfy any evaluation criteria you propose.

Morgan Stanley encourages California to evaluate the issues related to the development of California's cap-and-trade on the basis of the legal implications of any given proposal. In addition to the legal criterion, Morgan Stanley recommends that the overarching evaluation criterion should be whether the proposals will result in the achievement of California's environmental goals at the least cost to society.

Q12. In establishing policies regarding allowance allocation, flexible compliance, CHP, and emission reduction policies, what should California keep in mind regarding the potential transition to regional and/or national cap-and-trade programs in the future? Are there policies or methods that California should avoid or embrace in order to maximize potential compatibility with other cap-and-trade systems?

While keeping in mind the possibility of a future transition of California's cap-and-trade system into a national or regional system is a useful exercise in the development of California's system, it will not lead to definitive conclusions. The parameters of any such regional and/or national cap-and-trade system cannot be known with certainty at this time. In the event that a national system is adopted, the requirements for transition may be mandated and thus out of

California's hands. With respect to other regional systems, California should monitor their development and consider the policies and methods used by such regional systems in the development of its own system.

To facilitate any potential transition into a national or regional system, California should avoid implementing cap-and-trade approaches that are at odds with the those taken in other jurisdictions. Morgan Stanley recognizes that this cannot be an absolute standard, because other jurisdictions may implement approaches that are fundamentally flawed or unsuited to California's regulatory environment. Thus, while California should keep in mind the approaches that other U.S. cap-and-trade systems have employed, they should merely be points of reference rather than absolute criteria for the creation of California's own cap-and-trade system.

III. FLEXIBLE COMPLIANCE

A. Detailed Proposal

Q1. Please explain in detail your comprehensive proposal for flexible compliance rules for a cap-and-trade program for California as it pertains to the electricity sector. Address each of the cost containment mechanisms you find relevant including those mentioned in this ruling and any other you would propose.

a. Discuss how your proposal would affect the environmental integrity of the cap, California's ability to link with other trading systems, and administrative complexity.

b. Address how your various recommendations interact with one another and with the overall market and describe what kind of market you envision being crated.

c. Describe and specify how unique circumstances in the electricity market may warrant any special consideration in crafting flexible compliance policies for a multi-sector cap-and-trade program.

d. If your recommendations are based on assumptions about the type and scope of a cap-and-trade market that ARB will adopt, provide a description of the anticipated market including sectors included, expected or required emission reductions from the

electricity sector, and the role that flexible compliance mechanisms serve in the market, e.g., purely cost containment, catalyst for long-term investment, and/or protection against market failures.

Morgan Stanley does not have a set of proposed rules that it would explicitly label as a "flexible compliance mechanism," but rather believes that a well-designed cap-and-trade program would necessarily incorporate many features that inherently provide a great deal of flexibility. If properly designed, the California cap-and-trade program would not need any additional, explicit flexible compliance mechanisms, either pertaining to the electricity sector in particular or to the cap-and-trade program as a whole.

The aspects of a well designed system that provide such compliance flexibility include:

1) A multi-sector program that would allow anomalous, low-probability events within one sector to be buffered and absorbed across the entire program.
2) A limitation on the use of offsets by quality, but not by quantity or geography.
3) Linkage with other cap and trade systems. Ideally, the designs of such systems will be coordinated so as to be mutually interoperable. However, when considering flexible compliance options, it should be kept in mind that California may always unilaterally accept another system's allowances or offsets for compliance purposes in California, even if the practice is not reciprocal.
4) Creation of undated, or non-expiring, allowances.

Ultimately, an integral facet of a well-designed cap-and-trade program would be the imposition of the obligation for emitters to manage their allowance requirements and adequately develop contingency plans in case of anomalous results during a given compliance period. Relaxation of this requirement would only be justified at the onset of the program, when emitters will not have had any significant opportunity for contingency planning and thus an anomalous first compliance period could be unduly problematic. For that reason, the CPUC should consider implementing a "loose" early compliance timeframe that "tightens" over time. For example,

perhaps the first compliance true-up period should be three years, the second two years, and then annual thereafter. This would allow for a smoother transition and enable any problems to be identified and addressed without penalizing entities for early kinks in the system.

B. Scope of Market and Related Issues

Q5. Should the market for GHG emission allowances and/or offsets be limited to entities with compliance obligations, or should other entities such as financial institutions, hedge funds, or private citizens be allowed to participate in the buying and selling of allowances and/or offsets? If non-obligated entities are allowed to participate in the market, should the trading rules differ for them? If so, how?

Morgan Stanley strongly opposes the limitation of participation in allowance and/or offset markets to those entities with compliance obligations. Exclusion of entities such as financial institutions, hedge funds, or private citizens would be difficult, if not impossible, to enforce and would have negative consequences for the allowance and/or offset market. It should be recognized that any attempts to prevent entities without compliance obligations from participating are unlikely to succeed. Such excluded entities could simply contract with an eligible participant to undertake trades at the direction of that excluded entity. On the other hand, there are significant benefits to allowing such entities to participate. For instance, maximizing the number and type of market participants also maximizes the liquidity and price stability of the market. Thus, any party that needs to buy or sell allowances and/or offsets at any given point in time can find a counterparty and transact at market price. Illiquid markets exacerbate price volatility and also can force a party urgently needing to transact to buy or sell at an out-of-market price. In addition, many market manipulation schemes are easier to implement in illiquid markets. Large, liquid markets with many diverse participants prevent or more quickly correct price excursions caused by activities or "schemes" designed to defeat or subvert the underlying market fundamentals. Another benefit to an open market is that intermediaries

will be available to provide many useful services such as warehousing allowances and/or offsets, providing explicit and de facto financing, creating derivative instruments such as swaps and futures that provide flexibility and hedging opportunities, and making markets in the underlying instruments.

C. Price Triggers and Other Safety Valves

Q6. Should California incorporate price triggers or other safety valves in a cap-and-trade system? Why or why not? Would price triggers or other safety valves affect environmental integrity and/or the ability to link with other systems? Address options including State market intervention to sell or purchase GHG emission allowances to drive allowance prices down or up; a circuit breaker or accelerator which either slows down or speeds up reductions in the emission cap until allowance prices respond; and increasing or decreasing offset limits to increase or decrease liquidity to affect prices. Address how these various strategies would be utilized in conjunction with other flexible compliance mechanisms.

Morgan Stanley does not believe that creation of explicit "safety valve" mechanisms, including price triggers, is the best course of action for California. These mechanisms undermine the environmental integrity of the program by allowing emitters to avoid their compliance obligations. Instead, a properly designed program will provide many de facto price mitigation tools, as described more fully in our answer to Question 1. Safety valves also create uncertainty in the market that discourages and undermines investment incentives for the development and deployment of new or existing technologies that can reduce emissions. In addition, such artificial manipulations of price signals will mute incentives for individuals to make changes in their behavior. The inclusion of safety valves in the cap-and-trade program could result in a "worst of all possible worlds" situation, in which the cost of allowances and/or offsets essentially becomes a tax that burdens the economy without attaining the desired environmental goal.

Of course, practical evaluation of the impact of "safety valves" will depend on the details of how such mechanisms are implemented, primarily the intervention price and the specific action to be taken if that intervention price is met or exceeded. Set suitably high, the safety valve becomes symbolic and has no practical impact, while if set too low, the compliance obligations are practically meaningless. In the alternative, if political pressures make inclusion of some sort of safety valve unavoidable, then the focus should be to minimize the damage of such mechanism on the market. The best way to achieve this is by explicitly specifying at the start of the program the circumstances that will trigger intervention and the resulting actions to be taken. Morgan Stanley encourages California to avoid allowing any discretion in the decision of when to intervene and what action to take. Clear, detailed rules, while still having the potential to undermine achievement of the cap-and-trade program's environmental goals, will, at minimum, lessen the uncertainty that a discretionary approach would add to any and all decision making.

Q7. Should California create an independent oversight board for the GHG market? If so, what should its role be? Should it intervene in the market to manage the price of carbon? If such an oversight board were created, how would that affect your recommendations, *e.g.*, would the oversight board obviate the need to include additional cost containment mechanisms and price-triggered safety valves in the market design?

Morgan Stanley strongly opposes the creation of an independent oversight board that has discretionary intervention powers. As discussed in further detail in the response to Question 6 above, if "additional cost containment mechanisms" are unavoidable, they should be activated only according to explicit, pre-set rules. Under such circumstances, the primary administrative agency responsible for the program should be able to manage and oversee such mechanisms without difficulty, and an independent oversight board would thus be redundant and provide no useful function.

D. Linkage

Q8. Should California accept all tradable units, *i.e.*, GHG emission allowances and offsets, from other carbon trading programs? Such tradable units could include, e.g., Certified Emission Reductions, Clean Development Mechanism (CDM) credits, and/or Joint Implementation credits?

Morgan Stanley strongly supports California's acceptance of all types of tradable units for compliance with its cap-and-trade program. It is in California's best interests to do this, because it enables the achievement of the program's environmental objectives at the lowest cost to society and leverages the expertise of others to minimize administrative costs. Restrictions should only be based on an evaluation of the environmental integrity of the tradable unit, not the type or geographic location.

Q10. If linkage is allowed, should it be unilateral (where California accepts allowances and other credits from other carbon trading programs, but does not allow its own allowances and offsets to be used by other carbon trading programs) or bilateral (where California accepts allowances and other credits from other carbon trading programs and allows its allowances and offsets to be used by other carbon trading programs)?

Morgan Stanley encourages California to develop bilateral linkages to maximize flexibility and liquidity and minimize administrative costs. However, if bilateral linkages are not possible, it is in California's interest to allow unilateral use of another jurisdiction's allowances and/or offsets so long as they meet California's environmental integrity criteria. By the same token, Morgan Stanley notes that it is unlikely that California can do anything to prevent another jurisdiction from making a similar unilateral decision with regard to California's allowances and/or offsets. Therefore, there is little point in trying to restrict the use of California's allowances and/or offsets in another carbon trading program. Instead, the focus should be on

designing administrative protocols that prevent double usage of the same instrument in multiple jurisdictions for compliance purposes.

Q11. If linkage is allowed, should allowances and other credits from other carbon trading programs be treated as offsets, such that any limitations applied to offsets would apply to such credits? If not, how should they be treated?

Consistent with our comments in response to other questions herein, Morgan Stanley does not see any reason to treat allowances as anything else other than allowances, and offsets as anything other than offsets, regardless of the jurisdiction of origin.

E. Compliance Periods

Q12. What length of compliance periods should be used? Should compliance periods remain the same throughout the 2012 to 2020 period? Should compliance periods be the same for all entities and sectors? Should dates be staggered so that not all obligated entities have the same compliance dates?

Morgan Stanley does not consider the exact timeframe of the compliance period to be an important factor to the success of the program. The many different compliance timeframes that have been discussed, generally ranging from one to three years, are probably all feasible. However, Morgan Stanley would offer two observations. Relatively more frequent compliance true-up periods provide better market information as to the ongoing supply and demand balance, and thus lead to more "accurate" market pricing. Alternatively, essentially the same result can be achieved by frequent collection and publication of actual emissions data, including the number of allowances and/or offsets issued and retired, so that the market has ongoing knowledge of the allowance and/or offset inventory and compliance liabilities. As mentioned above under Question 1, it may also make sense for the initial compliance time period to be relatively long, with subsequent time periods of lesser length. This would prevent an early

anomalous event from causing a major disruption before emitters have had time to develop and implement contingency strategies to manage such outliers. For example, an unusually hot summer in the first year of the cap-and-trade program could cause severe disruptions if the compliance true-up period is annual, because emitters will not have had any opportunity to purchase and warehouse extra allowances or employ other backup measures. Over time, however, emitters should expect that anomalous events will occasionally occur, and it is reasonable to expect the emitters to have a contingency plan in place to manage such events. Allowing the program to have a longer initial compliance period will aid in a smoother transition, as all program participants will have an opportunity to gauge the market and plan for eventual contingencies.

Q13. Should compliance extensions be granted? If so, under what circumstances?

A compliance extension is merely another name for "borrowing," a practice that Morgan Stanley does not support. To prevent emitters from receiving a "fielder's choice," and to achieve the cap-and-trade program's environmental goals, the enforcement mechanism should: (1) require any shortfall in surrendered allowances and/or offsets to be made up in a subsequent compliance period, and (2) require all non-compliant emitters to pay a penalty. Thus, failure to comply only puts off the obligation to procure and surrender the allowances and/or offsets, rather than excuses it. In addition, an entity's failure to meet its compliance obligations results in an additional cost for that entity, thus encouraging compliance. Therefore, Morgan Stanley encourages California not to allow compliance extensions in the cap-and-trade program design.

F. Banking and Borrowing

Q14. Should entities with California compliance obligations be allowed to bank any or all tradable units, including allowances, offsets, or credits from other carbon trading programs? Should entities that do not have compliance obligations be able to bank tradable units? If so, for how long and with what other conditions? Should allowances, offsets, or credits from other carbon trading programs banked during the program between 2012 and 2020 be recognized after 2020? If the California system joins a regional, national, or international carbon trading program, how should unused banked allowances, offsets, or credits from other carbon trading programs be treated?

While Morgan Stanley does not oppose "banking," we believe that it is a needless complication requiring additional tracking and monitoring and thus extra administrative cost. Instead, Morgan Stanley suggests a cap-and-trade program in which allowances and/or offsets are issued without expiration dates. This would serve the same practical purpose as "banking," but entail a lower administrative burden.

In the event that a national carbon program is established, it is likely that the decision about how to treat remaining or leftover unused allowances and/or offsets will be largely out of the hands of California officials. Given the number of regional carbon programs that are under development across the U.S., any national program will likely specify conversion parameters to limit confusion. Similarly, if California chooses to join a regional program, it should negotiate to allow conversion of state allowances to equivalent instruments in the superseding program.

Q15. Should limitations be placed on banking aimed at preventing or limiting market participants' ability to "hoard" allowances and offsets or distort market prices?

Morgan Stanley does not believe any explicit rules are needed to prohibit or limit "hoarding" for two reasons. First, it will almost always be impossible to distinguish between a party holding allowances and/or offsets for "legitimate" purposes and one engaged in "hoarding." The only difference between the two practices is intent. Second, inventorying large

numbers of allowances for "hoarding" purposes is likely to be prohibitively expensive. This is especially true if allowances are auctioned, and is perhaps another argument in favor of auctioning allowances rather than allocating them. In discussions over the details of the national Lieberman-Warner bill, some analysts have suggested that the capital requirements for auctioning all allowances will exceed the capacity of the entire U.S. financial system. Morgan Stanley does not endorse this viewpoint, but does note it in support of the prediction that hoarding will be so financially prohibitive that there will be no need for preventive measures. In addition, to prevent "hoarding" of both allowances and offsets, the cap-and-trade program should place no limits on the number of offsets available. Allowing unlimited offsets that meet the environmental integrity standards has the indirect benefit of discouraging hoarding, because the supply can grow to meet the demand as prices rise.

Q16. Should entities with compliance obligations be allowed to borrow allowances to meet a portion of their obligation? If so, during what compliance periods and for what portion of their obligation? How long should they be given to repay borrowed allowances? Should there be penalties or interest payments? Should there be other conditions on borrowing, such as limitations on the ability to borrow from affiliated entities? Also address the extent to which borrowing might affect environmental integrity and emission reductions.

As discussed above in the response to Question 13, Morgan Stanley does not support borrowing from the Program Administrator. We would note that if repayment is not required, it is not "borrowing," but rather, an "advance," and presumes an entitlement. Morgan Stanley does not support this concept either. Conversely, there does not appear to be any rationale for restricting "borrowing" from affiliates or other entities other than the Program Administrator. Such transactions are commercial arrangements,

and it should be left to the discretion of the contracting parties to include all appropriate protections in the contract.

G. Penalties and Alternative Compliance Payments

Q17. Should there be penalties for entities that fail to meet their compliance obligations? If so, how should the penalties be set? If not, what should be the recourse for non-compliance?

As discussed in further detail in the comments to Question 13, Morgan Stanley supports a strong enforcement mechanism to ensure that the program's goals are met. Non-compliant entities should be required to make up the allowance shortfall in the next compliance period and also be assessed a financial penalty or fine to discourage noncompliance. A financial penalty alone is unlikely to be sufficient because an emitter could discharge its obligations by merely paying a fine rather than making the effort to obtain the necessary allowances and/or offsets. Without the obligation to make up missing allowances and/or offsets, the penalty alone would simply function as a de facto price cap, thereby disrupting normal market functioning.

Q18. Instead of penalties, should there be alternative compliance payments? What would be the distinguishing attributes of alternative compliance payments versus penalties? How would the availability of alternative compliance payments affect the environmental integrity of the cap?

Morgan Stanley does not support the use of alternative compliance payments. While it may be possible to devise alternative compliance methodologies that would meet the environmental integrity criteria and not act as an incentive to avoid compliance, doing so will add enormous administrative complexity to the system and there are no obvious offsetting commensurate benefits. Instead, Morgan Stanley supports the implementation of its suggested enforcement mechanism, discussed above in response to Question 13. With regard to alternative compliance payments specifically, the obvious result of such a payment alternative will be to

establish a de facto price ceiling. No party will pay more for an allowance or offset than it would have to pay via the alternative compliance payment mechanism. On the other hand, a "penalty" is distinguished by the presumption that the obligation to supply the required allowances remains, even after the penalty is paid. The penalty, in practical terms, is just a "late charge", not an excuse of performance under the obligation.

Q20. How should California use the money that would be generated by penalties and/or alternative compliance payments?

Morgan Stanley does not have a definitive proposal for such payments, but suggests that they be included in the same pool as auction revenues. Morgan Stanley further recommends that such pool be used to provide cost relief to consumers in a manner that does not counteract the incentive for investment or behavioral change received by the price signal. An example might be a per meter (but not a per KWH) utility bill credit for all electric customers.

H. Offsets

Q21. Should California allow offsets for AB 32 compliance purposes?

Morgan Stanley strongly supports the unlimited use of any and all offsets that meet California's quality criteria, without restriction by quantity or geography. The utilization of offsets in this manner serves a cost controlling "safety valve" function without impairing the environmental integrity of the program. Furthermore, as described in comments to Question 15 above, use of offsets provides the secondary benefit of acting as an "anti-hoarding" and "anti-manipulation" mechanism.

Q22. If offsets are permitted, what types of offsets should be allowed? Should California establish geographic limits or preferences on the location of offsets? If so, what should be the nature of those limits or preferences?

Morgan Stanley strongly believes that there should be no restrictions on or preferences for offsets on any basis other than quality. Other restrictions can only cause California consumers to pay higher costs without providing any incremental reductions in GHG emissions.

Q23. Should voluntary GHG emission reduction projects, i.e., projects that are not developed to comply with governmental mandates, be permitted as offsets if they are within sectors in California that are not within the cap-and-trade program? In particular, should voluntary GHG emission reduction projects within the natural gas sector in California be permitted as offsets, if the natural gas sector is not yet in the cap-and-trade program?

Any offset that meets the quality criteria should be permitted and incorporated into the cap-and-trade program.

Q24. Should there be limits to the quantity of offsets? If so, how should the limits be determined?

There should be no limits placed on the quantity of offsets that meet California's quality criteria.

Q25. How should an offsets program be administered? What should be the project approval and quantification process? What protocols should be used to determine eligibility of proposed offsets? Are existing protocols that have been developed elsewhere acceptable for use in California, or is additional protocol development needed? Should offsets that have been certified by other trading programs be accepted? Should use of CDM or Joint Implementation credits be allowed?

We recommend starting with the United Nations Clean Development Mechanism ("CDM") protocols as the default standard for the verification and quantification of offsets. While the CDM mechanism may not be "perfect," it is the most widely vetted system available and will allow California to leverage the extensive work of some of the world's foremost experts

in the field. Furthermore, the CDM protocols are not static, but are constantly refined as an exercise in "continuous improvement." Thus, as legitimate criticisms are brought to light, the CDM protocols will constantly be refined and improved to address those criticisms. Conversely, a decision to qualify offsets for use in California via an alternative, unique mechanism will require the assemblage of a large degree of expertise from scratch, will take a great deal of time, effort and money, and will have no guarantee of improving upon any weaknesses of the CDM.

Q26. Should California discount credits (*i.e.*, make the credits worth less than a ton of CO2e) from some offset projects or other trading programs to account for uncertainty in emission reductions achieved? If so, what types of credits would be discounted? How would the appropriate discount be quantified and accounted for?

Morgan Stanley does not believe discounting of questionable tradable credits is a sound approach. It introduces additional uncertainty and risk into the market and compromises the environmental integrity of the cap-and-trade program. If the integrity or environmental value of an offset project or trading program is in doubt, then it should neither be issued credits nor should any credits that are issued be eligible to be used to meet an emitter's compliance obligation. A credit should either be judged "valid" or "invalid."

I. Legal Issues

Q27. Under AB 32, is it permissible for GHG emission allowances from non-California carbon trading programs or offsets from GHG emission sources outside of California to be used instead of GHG emission allowances issued in California? Please consider especially the provisions of Health and Safety Code Sections 3805, 38550, and 38562(a) added by AB 32.

It is clearly permissible under AB32 for GHG allowances and/or offsets from outside the geographic boundaries of California to be used for compliance in California's cap-and-trade program. AB32 explicitly recognizes that "[n]ational and international actions are necessary to

fully address the issue of global warming"[3] and stresses California's role as a national and international leader in environmental stewardship.[4] The California legislature further expressed its intent that California's emissions reductions measures should "minimize[] costs and maximize[] benefits for California's economy."[5] All GHG regulations adopted by the state board must "achieve the maximum technologically feasible and cost-effective [GHG emissions] reductions."[6] As discussed in further detail below, to fulfill its legislature's orders, California should accept allowances and offsets from sources outside California for compliance in California's cap-and-trade program.

As mentioned above, the California legislature mandates in AB32 that the California Air Resources Board design the carbon regulations to minimize the costs and maximize the benefits to California, while achieving "the maximum technologically feasible and cost-effective [GHG emissions] reductions."[7] The California legislature also envisions that by exercising a leadership role in addressing GHG emissions, "California will [] position its economy, technology centers, financial institutions, and businesses to benefit from national and international efforts to reduce emissions of greenhouse gases."[8] This language anticipates that California will observe and incorporate other states' and regions' efforts to reduce GHG emissions into its own program. Accepting outside allowances and/or offsets for the purposes of compliance will help California to achieve its legislature's order, by utilizing the economic comparative advantage that some types of emitters may have with regard to emissions reductions and that certain regions may have

---

3 California Health and Safety Code §§ 38501(d)-(e) (2006).

4 *Id.* at §§ 38501(b)-(e).

5 *Id.* at § 38501(h).

6 *Id.* at §§ 38560.5(c), 38562(a).

7 *Id.* at §§ 38562(b)(1), 38560.5(c), and 38562(a).

8 *Id.* at § 38501(e).

with regard to offset projects. California cannot, by remaining isolated and establishing a closed allowance and offset market, achieve the maximum GHG emissions reductions at the least cost, as mandated by AB32.

By allowing out-of-state allowances and offsets to be used for compliance, California will apply in practice the hope expressed in §38501 of AB32 that "actions taken by California to reduce emissions of greenhouse gases [] have far-reaching effects by encouraging other states, the federal government and other countries to act."[9] While other states may be motivated to act based on California's example, bureaucracies are slow-moving. An open California allowance and offset market will preemptively involve outside industry in the effort to reduce GHG emissions. For instance, an open California allowance and offset market will encourage the development of such offset projects in other states or regions where otherwise there may be no incentive for such development. Similarly, a California emitter could purchase allowances from another entity, subject to another state's or regional carbon cap-and-trade program, for whom emissions reductions are easier or more cost-effective. Thus, acceptance of outside allowances and offsets will bolster California's role as an environmental leader and accomplish the legislature's goals set forth in AB32.

In sum, AB32 not only permits, but encourages California's acceptance of outside allowances and offsets. Through AB32, the California legislature seeks to establish a GHG emissions reduction program that not only "minimizes costs and maximizes benefits for California's economy,"[10] but also "continues [California's] traditions of environmental leadership by placing California at the forefront of national and international efforts to reduce

---

[9] *Id.* at § 38501(d).

[10] *Id.* at § 38501(h).

emissions of greenhouse gases."[11] These overarching goals will be most comprehensively, efficiently and effectively met if allowances and offsets from outside of California may be used for compliance purposes in California's cap-and-trade system.

IV. NON-MARKET-BASED EMISSION REDUCTION MEASURES (OTHER THAN CHP) AND EMISSION CAPS

A. Electricity Emission Reduction Measures

Q1. What direct programmatic or regulatory emission reduction measures, in addition to current mandates in the areas of energy efficiency and renewables, should be included for the electricity and natural gas sectors in ARB's Assembly Bill (AB) 32 scoping plan?

Morgan Stanley strongly believes that programmatic measures should only be implemented when needed to remedy market failures. Otherwise, such measures can only harm the market by causing increased costs without commensurate incremental emissions reductions. Generally, market failures should not be presumed, but rather should be addressed only after being observed in the market. However, preemptive actions to facilitate markets may be useful when they are employed to create the attributes of an efficient market. For example, actions facilitating efficient markets may include the elimination of information asymmetry, the restriction of a participant's market power, removing and minimizing barriers to entry, and ensuring a level playing field for all market participants and technologies, among others. More specifically, a practical example of a constructive programmatic measure might be the utilization of IOU websites to list qualified contractors who have been vetted for technical expertise and financial responsibility, and who can conduct home energy audits and make recommendations for cost-effective energy efficiency projects.

---

[11] *Id.* at § 38501(c).

On the other hand, measures such as mandates, subsidies and set-asides will almost certainly harm the market, market participants, investors and consumers, frustrating the attainment of the underlying objective, increasing consumer costs, or both. Even where market failure is demonstrated, such approaches are unlikely to be effective remedies and may actually worsen the situation instead. The Renewable Portfolio Standards ("RPS") requirements provide an excellent example of the detrimental effects of additional regulatory measures on a GHG emissions market. While RPS programs arguably are reasonable half-measures toward GHG reduction in the absence of an emissions cap, once such a cap is in place they become counterproductive mandates that increase costs without providing needed incremental emissions reductions. Morgan Stanley recognizes that state laws do not grant the Commissions or the Air Resources Board ("ARB") the unilateral authority to abolish such counterproductive mandates. We point out their negative impact on costs and technology development so that any similar proposals over which the Commissions and/or ARB do have discretion will be recognized and rejected.

Q5. What percentage of emission reductions in the electricity sector should come from programmatic or regulatory measures, and what percentage should be derived from market-based measures or mechanisms? What criteria should be used to determine the portion from each approach? By what approach and in what timeframe should this question be resolved?

As explained in more detail in our answer to Question 1 of this section, Morgan Stanley believes that one hundred percent (100%) of the emission reductions in the electricity sector should be derived from market-based mechanisms. This is the most efficient and cost-effective method of achieving California's environmental goals. Any other approach will add cost without providing corresponding incremental GHG reductions.

V. CONCLUSION

Morgan Stanley respectfully requests that the Commissions and ARB consider the foregoing comments when developing the cap-and-trade system for California.

Respectfully submitted,

/s/

Michael A. Yuffee
Melissa R. Dorn
MCDERMOTT WILL & EMERY LLP
600 Thirteenth Street, NW
Washington, DC 20005

Attorneys for Morgan Stanley Capital Group Inc.

Dated: June 2, 2008

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have on this date served a copy of the foregoing "Comments of Morgan Stanley Capital Group Inc. on General Issues, Flexible Compliance Policies And Non-Market-Based Emission Reduction Measures (Other Than CHP) And Emission Caps the Administrative Law Judges' Ruling Requesting Comments on the Flexible Compliance Policies" on all of parties of record in R. 06-04-009 by either electronic mail or U.S. mail to those parties that have not provided an electronic address to the Commission.

Copies were also sent by U.S. mail to Commissioner Michael R. Peevy, Administrative Law Judges, Charlotte F. TerKeurst and Jonathan Lakritz, the California Energy Commission, Docket Office, MS-4, Re: Docket No. 07-OIIP-01, 1516 Ninth Street, Sacramento, CA 95814-5512, and, as directed, by electronic mail to docket@energy.state.ca.us and to kgriffin@energy.state.ca.us.

Dated at Washington, DC, this 2nd day of June, 2008.

/s/
Melissa R. Dorn

SERVICE LIST — R.06-04-009

DAN HECHT
SEMPRA ENERGY
58 COMMERCE ROAD
STANFORD, CT 06902

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

STEVEN S. SCHLEIMER
DIRECTOR,COMPLIANCE & REGULATORY AFFAIRS
2000 WESTCHESTER AVENUE
NEW YORK, NY 10166

STEVEN HUHMAN
MORGAN STANLEY CAPITAL GROUP INC.
BARCLAYS BANK, PLC
200 PARK AVENUE, FIFTH FLOOR
PURCHASE, NY 10577

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

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

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

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

CYNTHIA A. FONNER
SENIOR COUNSEL
CONSTELLATION ENERGY GROUP INC
500 WEST WASHINGTON ST, STE 300
CHICAGO, IL 60661

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

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

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

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

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

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

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

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

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

LORRAINE PASKETT
DIRECTOR, LEGISLATIVE AND REG. AFFAIRS
LA DEPT. OF WATER & POWER
111 N. HOWARD ST., ROOM 1536
LOS ANGELES, CA 90012

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

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

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

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

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

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

BARRY R. WALLERSTEIN
EXECUTIVE OFFICER
SOUTH COAST AQMD
21865 COPLEY DRIVE PO BOX 800,
DIAMOND BAR, CA 91765-4182

JOSEPH GRECO
TERRA-GEN POWER LLC
9590 PROTOTYPE COURT, SUITE 200
RENO, NV 89521

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

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

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

MICHAEL MAZUR
3 PHASES RENEWABLES, LLC
2100 SEPULVEDA BLVD. STE 37
MANHATTAN BEACH, CA 90266

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

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

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

AKBAR JAZAYEIRI
DIR. REVENUE & TARIFFS, RM 390
SOUTHERN CALIFORNIA EDISON CO
2241WALNUT GROVE AVE
ROSEMEAD, CA 91770

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

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

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

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

THEODORE ROBERTS
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

JOHN P. HUGHES
MANAGER, REGULATORY AFFAIRS
SOUTHERN CALIFORNIA EDISON CO
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

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

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

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

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

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

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

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

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

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

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

MICHAEL P. ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

WILLIAM H. CHEN
DIR. ENERGY POLICY WEST REGION
CONSTELLATION NEW ENERGY, INC.
ONE MARKET ST., SPEAR TOWER, 36TH FL.
SAN FRANCISCO, CA 94105

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

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

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

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

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

JOSEPH M. KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO, CA 94111-5894

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

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

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

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

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

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
4160 DUBLIN BLVD.
DUBLIN, CA 94568

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

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

EDWARD W. O'NEILL
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

CHRISTOPHER J. WARNER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, RM 3145; PO BOX 7442
SAN FRANCISCO, CA 94120-7442

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

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

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

KERRY HATTEVIK
DIRECTOR OF REG. AND MARKET AFFAIRS
NRG ENERGY
829 ARLINGTON BLVD.
EL CERRITO, CA 94530

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

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

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

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557

BARRY F. MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

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

BALDASSARO DI CAPO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

WAYNE AMER
PRESIDENT
MOUNTAIN UTILITIES
PO BOX 2052377
KIRKWOOD, CA 95646

STEPHEN E. DOYLE
EXECUTIVE VICE PRESIDENT
CLEAN ENERGY SYSTEMS, INC.
3035 PROSPECT PARK DRIVE, STE 150
RANCHO CORDOVA, CA 95670-6071

GREGGORY L. WHEATLAND
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95811-3109

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

CLIFF CHEN
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94708

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

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

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

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

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

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

JEFFERY D. HARRIS
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95811-3109

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

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

DOWNEY BRAND
DOWNEY BRAND
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-46869

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

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

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

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

JASON 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 OA7
CANADA

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

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

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

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

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

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

IAN CARTER
INTERNATIONAL EMISSIONS TRADING AS
350 SPARKS STREET, STE. 809
OTTAWA, ON K1R 7S8
CANADA

INFORMATION ONLY:

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

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

KENNETH A. COLBURN
SYMBILTIC 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

MELISSA DORN
MCDERMOTT, WILL & EMERY LLP
600 13TH ST. NW
WASHINGTON, DC 20005

MICHAEL A. YUFFEE
MCDERMOTT WILL & EMERY LLP
600 THIRTEENTH STREET, N.W.
WASHINGTON, DC 20005-3096

DALLAS BURTRAW
1616 P STREET, NW
WASHINGTON, DC 20036

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

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH, FL 33408

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

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

BARRY RABE
1427 ROSS STREET
PLYMOUTH, MI
150 EAST GILMAN STREET
MADISON, WI 53701-1497

BRIAN POTTS
FOLEY & LARDNER
48170PO BOX 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

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

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

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

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

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

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

JAMES A. HOLTKAMP
HOLLAND & HART, LLP
60 EAST SOUTH TEMPLE, STE. 2000
SALT LAKE CITY, UT 84111

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

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

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

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

JULIE L. MARTIN
NORTH AMERICA GAS AND POWER
BP ENERGY COMPANY
501 WESTLAKE PARK BLVD.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LEE WALLACH
SOLEL, INC
3424 MOTOR AVE., STE. 100
LOS ANGELES, CA 90034

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KIM KIENER
504 CATALINA BLVD.
SAN DIEGO, CA 92106

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

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

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

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

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

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

TIM HEMIG
NRG ENERGY, INC.
1817 ASTON AVENUE, SUITE 104
CARLSBAD, CA 92008

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

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

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

SEPHRA A. NINOW
POLICY ANALYST
CA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVENUE, SUITE 100
SAN DIEGO, CA 92123

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

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

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

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

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

MICHEL FLORIO
ATTORNEYS AT LAW
711 VAN NESS AVE., STE. 350
SAN FRANCISCO, CA 941025

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

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

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

LEAH FLETCHER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET 20TH FLR
SAN FRANCISCO, CA 94104

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

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

LOULENA A. MILES
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080

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

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

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

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

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

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

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

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

FRED WELLINGTON
NAVIGANT CONSULTING, INC.
1 MARKET ST., SPEAR ST. TOWER, STE 1200
SAN FRANCISCO, CA 94105

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

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

KHURSHID KHOJA
ASSOCIATE
THELEN REID BROWN RAYSMAN
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

PETER V. ALLEN
THELEN REID BROWN RAYSMAN & STEINER
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105-3606

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
673 KANSAS STREET
SAN FRANCISCO, CA 94107

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

JAMES B. WOODRUFF
VICE PRESIDENT REGULATORY AND GOVT AFFAIRS
NEXTLIGHT RENEWABLE POWER, LLC
101 CALIFORNIA STREET, STE 2450
SAN FRANCISCO, CA 94111

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

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

KARLEEN O'CONNOR
WINSTON & STRAWN LLP
101 CALIFORNIA STREET 39TH FLR
SAN FRANCISCO, CA 94111

MARTIN A. MATTES
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

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST.
SAN FRANCISCO, CA 94117

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

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123

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

KATE BEARDSLEY
PG&E
MAIL CODE B9A
PO BOX 770000
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

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

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

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

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

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

JOSEPH HENRI
31 MIRAMONTE ROAD
WALNUT CREEK, CA 94597 2920

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH CONSULTING
2977 YGNACIO VALLEY ROAD, NO. 613
WALNUT CREEK, CA 94598-3535

BETTY SETO
POLICY ANALYST
KEMA, INC.

BRAD WETSTONE\
ALAMEDA POWER AND TELECOM
2000 GRANT STREET, PO BOX H
ALAMEDA, CA 94501-0263

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

TOM DELFINO
GEOMATRIX CONSULTANTS, INC.
359 BIRCHWOOD DRIVE
MORAGA, CA 94556-2304

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

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

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

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94596

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

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

GERALD L. LAHR
ABAG POWER
101 EIGHTH STREET

492 NINTH STREET, SUITE 220
OAKLAND, CA 94607

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

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703

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

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

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

CARLA PETERMAN
UCEI
2547 CHANNING WAY
BERKELEY, CA 94720

RYAN WISER
BERKELEY LAB
1 CYCLOTRON ROAD, MS-90-40001
BERKELEY, CA 94720

EMMA POELSTERL
SUNPOWER
1414 HARBOUR WAY SOUTH
RICHMOND, CA 94804

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

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

OAKLAND, CA 94607

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

REED V. SCHMIDT
VICE PRESIDENT
BARTLE WELLS ASSOCIATES

TANDY MCMANNES
ABENGOA SOLAR, INC.
2030 ADDISON STREET, STE 420
BERKELEY, CA 94704

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

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710

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

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

KARI SMITH
SUNPOWER
1414 HARBOUR WAY SOUTH
RICHMOND, CA 94804

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

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

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

THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
TURLOCK, CA 95381-0949

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

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

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

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

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

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

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

PAUL D. MAXWELL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

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

WES MONIER
STRATEGIC ISSUES AND PLANNING MGR
TURLOCK IRRIGATION DISTRICT
333 EAST CANAL DRIVE, PO BOX 949

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

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

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

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

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

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

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

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

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND, CA 95776

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

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

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

DIANA SCHWYZER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 31
SACRAMENTO, CA 95814

JOSE CARMONA
DIRECTOR OF ADVOCACY
CEERT
1100 11TH STREET, STE 311
SACRAMENTO, CA 95814

JUSTIN C. WYNNE
ATTORNEY AT LAW
BRAU & BLAISING, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

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

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

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 MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

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

STEVEN KELLY
POLICY DIR., IND ENERGY PRODUCERS
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

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

EDWARD J. TIEDEMANN
ATTORNEY AT LAW
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4416

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

WILLIAM W. WESTERFIELD III
SR. ATTORNEY
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET
SACRAMENTO, CA 95817

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

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

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

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

ALAN COMNES
NRG ENERGY
3934 SE ASH STREET
PORTLAND, OR 97214

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

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

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

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

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

DOUGLAS MACMULLLEN
CHIEF, POWER PLANNING SECTION
DEPARTMENT OF WATER RESOURCES
EL CAMINO AVE., ROOM 356 SACRAMENTO,

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

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

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

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

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

SAM SADLER
OREGON DEPARTMENT OF ENERGY
625 NE MARION STREET
SALEM, OR 97301-3737

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

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

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

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

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

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 OF
455 GOLDEN GATE AVENUE, SUITE 11000
SAN FRANCISCO, CA 94102

ADAM LANGTON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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 DIVISION
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

BISHU CHATTERJEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CATHLEEN A. FOGEL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
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 BR
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

ELIZABETH STOLTZFUS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
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

JACLYN MARKS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JACQUELINE GREIG
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL
ROOM 4102
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

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

JEORGE S. TAGNIPES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
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

JONATHAN J. REIGER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5035
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

MICHAEL COLVIN
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAMELA WELLNER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

RICHARD A. MYERS
CALIF PUBLIC UTILITIES COMMISSION
DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SCOTT MURTISHAW
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

NANCY RYAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BR
ROOM 4101
05 VAN NESS AVENUE
AN FRANCISCO, CA 94102-3214

AHMON MOMOH
ALIF PUBLIC UTILITIES COMMISSION
LECTRICITY PLANNING & POLICY BRANCH
OOM 4205
05 VAN NESS AVENUE
AN FRANCISCO, CA 94102-3214

ARA M. KAMINS
ALIF PUBLIC UTILITIES COMMISSION ENERGY
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN A. SIMON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEVE ROSCOW
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ZACH CHURCH
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 2252
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

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

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

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

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

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

JUDITH B. SANDERS
ATTORNEY AT LAW
CALIFORNIA INDEPENDENT SYSTEM OPER
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

PHILIP D. PETTINGILL
LEGAL & REG. DEPT.
CALIFORNIA INDEPENDENT SYSTEM OPER
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

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

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

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

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

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

MELISSA JONES
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

PAT PEREZ
ASST. DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 39
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

HEATHER LOUIE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95818

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 RES
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