

**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**

**REPLY COMMENTS OF  
MORGAN STANLEY CAPITAL GROUP INC.**

**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 16, 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

**REPLY COMMENTS OF  
MORGAN STANLEY CAPITAL GROUP INC.**

**I. INTRODUCTION**

Pursuant to the May 6, 2008 and May 13, 2008 Rulings of Administrative Law Judges Charlotte F. TerKeurst and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("Morgan Stanley") respectfully submits its reply comments on the possible policies for flexible compliance in a cap-and-trade program as it pertains to the electricity sector,<sup>1</sup> general issues and non-market-based greenhouse gas ("GHG") emissions reduction measures and emissions caps.<sup>2</sup>

**II. REPLY COMMENTS**

In these reply comments, Morgan Stanley responds to certain comments submitted by other parties addressing the questions presented by the Commission in its May 6 and May 13, 2008 Rulings.

---

<sup>1</sup> Administrative Law Judges' Ruling Requesting Comments on Flexible Compliance Policies (R. 06-04-009) (issued May 6, 2008).

<sup>2</sup> Administrative Law Judges' Ruling Requesting Comments on Emission Reduction Measures, Modeling Results, and Other Issues (R. 06-04-009) (issued May 13, 2008).

**A. Participation of Parties Without Compliance Obligations (Q5, May 13, 2008 Ruling)**

Some parties<sup>3</sup> propose to limit who may participate in the GHG emissions allowance and/or offset markets for a variety of reasons. Most of these parties have taken a similar position in prior comments in this docket. In contrast, Morgan Stanley and others previously have demonstrated why limits on market participation would be detrimental to market development and competition. Morgan Stanley will not repeat the arguments it already has made in this docket but, rather, will make a few additional broad observations on the concerns raised by other parties in their initial comments.

First, the parties that propose limits on who may participate in these markets, cite to only vague general fears of “market manipulation” or repeat the current popular demagoguery that “speculators artificially drive up prices.”<sup>4</sup> None of these parties cite to any court findings, academic research, economic principles or other relevant authoritative source to support their grim predictions.<sup>5</sup> Thus, such proposals to restrict market participation should be regarded as expressions of unsupported, if understandable, fear, rather than well-reasoned suggestions based on empirical evidence that the absence of such limitations will be harmful. In contrast, economic experts have found that speculation is good for markets because it adds needed liquidity and

---

<sup>3</sup> See, e.g., “Comments of The Coalition of California Utility Employees (“CUE”) and California Unions for Reliable Energy (“CURE”) on Greenhouse Gas Emission Allowance Allocation Methodologies and Other Matters,” (R. 06-04-009 and D. 07-OIIP-01) (filed June 2, 2008)(“Comments of CUE/CURE”); “Opening Comments of PacifiCorp (U 901 E) on Administrative Law Judges’ Ruling Requesting Comments on Emission Reduction Measures, Modeling Results, and Other Issues; Incorporating Materials into the Record; and Recommending Outline for Comments,” (R. 06-04-009 and D. 07-OIIP-01) (filed June 2, 2008).

<sup>4</sup> See Comments of CUE/CURE at 5.

<sup>5</sup> In their comments, CUE/CURE quote an opinion from a book author, but do not include a discussion of what, if any, evidence this author uses to support his opinion. *Id.* at 6.

allows the market to operate more efficiently.<sup>6</sup> This is particularly important in commodity markets where planning is driven by forward prices. Contrary to simplistic conventional wisdom, forward prices do not reflect consensus expectations of future spot prices, but rather reflect the clearing price between forward buyers and forward sellers. Without speculators, forward prices can become severely distorted by the different risk tolerances and different motivation to transact forward of fundamental buyers and sellers.

Second, although GHG emissions allowances and/or offsets will be created by a single state's action and subject to state anti-fraud and competition laws, commercial trade in such commodities also will be subject to applicable federal laws. The Commodity Futures Trading Commission ("CFTC") has the authority to monitor and punish market manipulation in both listed and over-the-counter ("OTC") derivatives markets, including with respect to the underlying physical commodity.<sup>7</sup> Thus, California's allowance and/or offset market will be far from the unregulated, "wild west" free-for-all envisioned by the proponents for limitations on market participants.

Third, other emissions markets have operated successfully for some time without limiting the entities that may participate. For instance, the US markets for SO<sub>2</sub> and NO<sub>x</sub> allowances, the Chicago Climate Exchange emissions markets, as well as the European Union market for GHG emissions allowances ("EUAs") all have operated effectively for years. Additionally, after a thorough examination of the issues, the northeastern Regional Greenhouse Gas Initiative ("RGGI") elected to open its market without limiting participation to those entities with

---

<sup>6</sup> See, e.g., CFTC Office of the Chief Economist Report, Market Growth, Trader Participation and Pricing in Energy Futures Markets (February 7, 2007), *available at* <http://www.cftc.gov/stellent/groups/public/@newsroom/documents/file/marketreportenergyfutures.pdf>

<sup>7</sup> In addition, Senator Feinstein also has introduced legislation, which currently is in committee, that would give the Environmental Protection Agency ("EPA") the authority to prosecute manipulation in physical OTC emissions markets.

compliance obligations.<sup>8</sup> In fact, participation by entities without compliance obligations has assisted the development of these markets, by promoting market liquidity, market efficiency, and performing a price discovery function. Therefore, the available empirical evidence suggests that limiting market participation is neither necessary nor desirable.

**B. Kyoto/CDM Process (Q 25, May 6, 2008 Ruling)**

In its response to Question 25 from the Commission’s May 6, 2008 Ruling, Dynegy makes the unsupported statement that “the Kyoto/CDM process is complicated and is currently proving to be too burdensome to allow timely review and approval of projects.” Morgan Stanley interprets Dynegy’s statement to be a negative response to the last part of Question 25, which reads “Should use of CDM credits or Joint Implementation credits be allowed?” Morgan Stanley disagrees with Dynegy’s characterization of the CDM process, but ultimately this type of statement is solely a matter of opinion. Importantly, even if Dynegy’s statement is completely accurate, it is irrelevant to deciding whether to allow CDM credits for compliance purposes. In fact, CDM credits are readily available, but even if they were not, such scarcity should not preclude any available CDM credits from being used for compliance. As Morgan Stanley has articulated repeatedly in prior comments in this docket, restrictions on offsets for reasons other than quality will only result in increased costs to consumers with no corresponding incremental environmental benefit. Morgan Stanley believes that any offset certification process like the UN-administered process should be appropriately rigorous and subject to well-defined and high standards in order to ensure ongoing faith in the market.

---

<sup>8</sup> See, e.g., Overview of RGGI CO<sub>2</sub> Budget Trading Program (Oct. 2007), *available at* [http://www.rggi.org/docs/program\\_summary\\_10\\_07.pdf](http://www.rggi.org/docs/program_summary_10_07.pdf)

**C. Brackets and Collars (Q6, May 6, 2008 Ruling)**

Multiple parties have suggested using a moving “price collar” or similar method to control prices within a range. In addition to the theoretical arguments against price floors and ceilings, such price constraints have at least two other practical challenges to overcome. First, to the extent that a price ceiling triggers a release of incremental allowances, this release either violates the environmental integrity of the program by allowing additional emissions reductions, or becomes an “allowance advance.” Second, to the extent an auction is used to distribute all or part of the allowances, advocates have not explained how allowances would be distributed among bidders when the price hits the ceiling and demand exceeds the amount to be distributed. Therefore, Morgan Stanley believes that such price collars or brackets do not provide any material advantages over outright price-based “safety valves,” the problems of which have been widely discussed by many parties in this docket.

**D. Use of Outside Allowances and/or Offsets for Compliance under AB 32 (Q27, May 6, 2008 Ruling)**

CUE/CURE suggested in their comments that the language of AB 32 explicitly precluded outside allowances and/or offsets from use for compliance in the California GHG cap-and-trade program.<sup>9</sup> CUE/CURE argued that “[t]he language of AB 32 forecloses the possibility of a cap and trade program in California utilizing offsets regionally, nationally or internationally” because AB 32 requires all measures to be enforceable by CARB and CARB cannot oversee and enforce offsets outside of California.<sup>10</sup>

---

<sup>9</sup> See Comments of CUE/CURE.

<sup>10</sup> See *id.*

Morgan Stanley suggests that CUE/CURE’s interpretation of Section 38580(a),<sup>11</sup> which requires CARB to monitor and enforce compliance with California’s GHG emissions regulations, is too narrow. Rather, this section should be analyzed in light of the overall statutory context, namely the legislature’s explicit recognition that “[n]ational and international actions are necessary to fully address the issue of global warming”<sup>12</sup> and 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,”<sup>13</sup> as well as its mandate that California design a GHG emission reduction program that will “achieve the maximum technologically feasible and cost-effective [GHG emissions] reductions”<sup>14</sup> and “minimize[] costs and maximize[] benefits for California’s economy.”<sup>15</sup> To meet the legislature’s mandates and goals, California will necessarily need to develop a well-designed program that ensures that outside allowances and/or offsets meet California’s compliance criteria. Within this context, Morgan Stanley suggests that a more reasonable and consistent interpretation of Section 38580(a) is that CARB’s role is to monitor and enforce the requirements of California’s program as it applies to the California emitters. CARB will have no need to overstep its jurisdictional boundaries, because any allowance and/or offset that does not meet California’s criteria will simply not be eligible for compliance purposes in California.

---

<sup>11</sup> California Health and Safety Code § 38580(a) (“The state board shall monitor compliance with and enforce any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism adopted by the state board pursuant to this division”).

<sup>12</sup> *Id.* at §§ 38501(d)-(e) (2006).

<sup>13</sup> *Id.* at § 38501(d).

<sup>14</sup> *Id.* at §§ 38560.5(c), 38562(a).

<sup>15</sup> *Id.* at § 38501(h).

### III. CONCLUSION

Morgan Stanley respectfully requests that the Commissions and ARB consider the foregoing reply 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 16, 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 "Reply 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" on all 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](mailto:docket@energy.state.ca.us) and to [kgriffin@energy.state.ca.us](mailto:kgriffin@energy.state.ca.us).

Dated at Washington, DC, this 16<sup>th</sup> day of June, 2008.

/s/  
Melissa R. Dorn

**SERVICE LIST — R.06-04-009**

DAN HECHT  
SEMPRA ENERGY  
58 COMMERCE ROAD  
STANFORD, CT 06902

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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  
2241 WALNUT 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 BUILDING 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 0A7  
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

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

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

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

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

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

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

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI  
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

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

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

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

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

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

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

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

BRIAN POTTS  
FOLEY & LARDNER  
48170 PO BOX 1497

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ED LUCHA  
CASE COORDINATOR  
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

KATE BEARDSLEY  
PG&E  
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

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

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

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

BRAD WETSTONE  
236 HARTFORD STREET  
SAN FRANCISCO, CA 94114

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

SHAUN ELLIS  
2183 UNION STREET  
SAN FRANCISCO, CA 94123

GRACE LIVINGSTON-NUNLEY  
ASSISTANT PROJECT MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

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

SEBASTIEN CSAPO  
PG&E PROJECT MGR.  
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ADAM LANGTON  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
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

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

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

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

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

DAVID ZONANA  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OF  
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

ANNE GILLETTE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
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

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

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

EUGENE CADENASSO  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
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

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 DIVISION  
AREA 4-A  
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

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

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

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  
ROOM 4102  
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

JOEL T. PERLSTEIN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5133  
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 BR  
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

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

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

PAT PEREZ  
ASST. DIRECTOR  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 39  
SACRAMENTO, CA 95814

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

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

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

WDC99 1579019-3.043920.0236

**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**

**REPLY COMMENTS OF  
MORGAN STANLEY CAPITAL GROUP INC.**

<b>DOCKET</b>	
07-OIIP-1	
DATE	JUN 16 2008
RECD.	JUN 16 2008

**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 16, 2008**