

505 Sansome Street
Suite 900
San Francisco
California 94111

GOODIN, MACBRIDE,
SQUERI, DAY & LAMPREY, LLP
Attorneys at Law

 ORIGINAL

Telephone
415/392-7900
Facsimile
415/398-4321

June 16, 2008

Joseph F. Wiedman

Writer's Direct Line
415/765-8409

VIA E-MAIL AND OVERNIGHT DELIVERY

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

DOCKET	
07-OIIP-1	
DATE	JUN 16 2008
RECD.	JUN 16 2008

Re: Docket No. 07-OIIP-01; Reply Comments

Dear Sir or Madam:

Attached for filing in the above-referenced matter are the following documents:

1. Reply Comments of the Solar Alliance on Allocation Methodologies and Other Issues; and
2. Reply Comments of the California Retailers Association on Allowance Allocation Methodologies and Other Matters.

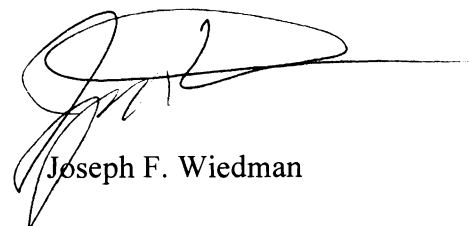
Simultaneously with this mailing, electronic copies of the above-referenced reply comments were e-mailed to the Energy Commission's Docket Unit.

Should you have any question with regard to the referenced filing, please contact the undersigned.

Very truly yours,

GOODIN, MACBRIDE,
SQUERI, DAY & LAMPREY, LLP

By



Joseph F. Wiedman

Enclosures
cc: Karen Griffin (kgriffin@energy.state.ca.us)

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA AND
THE CALIFORNIA ENERGY COMMISSION**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework
and to Examine the Integration of Greenhouse
Gas Emissions Standards into Procurement
Policies.

[Also filed at the California Energy Commission]

Rulemaking 06-04-009
(Filed April 13, 2006)

CEC Docket 07-OIIP-01

**REPLY COMMENTS OF THE CALIFORNIA RETAILERS ASSOCIATION ON
ALLOWANCE ALLOCATION METHODOLOGIES AND OTHER MATTERS**

Bill Dombrowski
President and CEO
California Retailers Association
980 9th Street, Suite 2100
Sacramento, CA 95814
Telephone: (916) 443-1975
Facsimile: (916) 441-4218
Email: BDombrowski@calretailers.com

Date: June 16, 2008

For the California Retailers Association

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA AND
THE CALIFORNIA ENERGY COMMISSION**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

[Also filed at the California Energy Commission]

Rulemaking 06-04-009
(Filed April 13, 2006)

CEC Docket 07-OIIP-01

**REPLY COMMENTS OF THE CALIFORNIA RETAILERS ASSOCIATION ON
ALLOWANCE ALLOCATION METHODOLOGIES AND OTHER MATTERS**

Pursuant to the Administrative Law Judge's Ruling Modifying Schedule and Correcting Suggested Outline for Comments and Reply Comments, the California Retailers Association submits these Reply Comments on allowance allocation methodologies and other matters. These comments are also being filed in Docket 07-OIIP-01 of the California Energy Commission (CEC).

Pursuant to Rule 1.4(b) of the Commission's Rules of Practice and Procedure, the California Retailers Association (CRA) requests to be made a party in the above captioned proceeding. CRA is a trade association representing major California department stores, mass merchandisers, supermarkets, chain drug and convenience stores, as well as specialty retailers such as auto, book and home improvement stores. CRA's members have more than 9,000 stores in California and account for more than \$100 billion in sales annually. The Commission's consideration of greenhouse gas allowance allocation methods could have a direct impact on the ability of CRA's members to make green energy claims and, therefore, their desire to invest in renewable energy resources. Accordingly, CRA's members are directly impacted by the

Commission's consideration of greenhouse gas allowance allocation methods and other matters. CRA's accepts the record in the proceeding as it is to date and our reply comments address issues raised in the proceeding regarding greenhouse gas emissions allowances and the method of their allocation.

I. COMMENTS

The California Retailers Association appreciates the opportunity to provide reply comments in response to the many thoughtful comments on allowance allocation methodologies and other matters related to the Commission's continued investigation of greenhouse gas (GHG) emission reduction measures submitted by parties on June 2, 2008. Many of CRA's members are highly motivated to reduce their GHG emissions through voluntary investments in new renewable generation or REC purchases. These efforts are motivated by many factors including the ability to make green marketing claims which our members see as valuable to their businesses and feelings of a responsibility to take voluntary actions to mitigate the potential risks and impacts of global warming. To this end, CRA's members see on-site investment in renewable generation, the voluntary purchase of renewable power, and/or the purchase of renewable energy credits as cost-effective means of voluntarily reducing their GHG emissions. These voluntary efforts should not be undermined by the establishment of compliance obligations and/or compliance markets.

In their opening comments, the Solar Alliance and the Renewable Energy Marketers Association (REMA) argued that in order to support and promote voluntary efforts in reducing GHG emissions, GHG allowances should be allocated to new renewable generation under an output based allocation approach or have allowances retired on behalf of new renewable generation by a cap and trade program administrator. The allocation of allowances to new renewable generation under an output based approach is essential to ensuring the validity

of green marketing claims and preventing other obligated entities from free-riding on the investments in new renewable generation made by CRA's members. The allocation of allowances to new renewable generation is also essential to allowing renewable generation to participate in helping other capped sectors under a multi-sector cap and trade program meet their GHG compliance obligations through on-site renewable generation or the purchase of allowances. For these reasons, CRA supports renewable generation receiving allowances under an output-based approach.

Great care must be taken in how voluntary efforts are considered within the programmatic approaches to GHG emissions reductions and who is able to claim credit for the emissions reductions taking place due to those investments in new renewable generation. CRA agrees with the Solar Alliance that, as a matter of principle, implementation of AB 32 programs should work in harmony with existing voluntary efforts and programs such as the California Solar Initiative (CSI). The Commission determined in Decision no.(D.) 07-01-018 that owners of distributed generation retained ownership of the RECs produced by their system finding, among other things, that transfer of RECs to investor-owned utilities for use in compliance with the Renewables Portfolio Standard would undermine the ability of participants in the CSI to make green marketing claims and, thereby, undermine a key motivation for many entities in making the investment in renewable generation. CRA supports D.07-01-018 and believes the rationale advanced in that decision is equally applicable in the context of this proceeding. By counting CSI related GHG reductions within programmatic measures for achieving AB 32 goals, the Commission would essentially assign GHG reductions from voluntary purchases of on-site renewable generation under the CSI to entities other than the ones actually making the investment in the new renewable generation. This outcome will undermine the ability of

participants in the CSI to make green energy claims and, therefore, undermine one of the primary motivators for participation in the CSI program. To keep the CSI successful, GHG reductions from voluntary efforts, such as participation in the CSI, should not be counted as programmatic measures for achieving GHG reductions by obligated entities. They should instead be accounted for under the AB 32 cap and trade mechanism by allocating allowances to new renewable generation.

II. CONCLUSION

For the reasons stated herein, CRA supports the proposal by the Solar Alliance and REMA that new renewable generation receive allowances under an output based approach. CRA also agrees with the Solar Alliance that the CSI should not be counted as a programmatic measure under AB 32.

Respectfully submitted this June 16, 2008 at Sacramento, California.

Bill Dombrowski
President and CEO
California Retailers Association
980 9th Street, Suite 2100
Sacramento, CA 95814
Telephone: (916) 443-1975
Facsimile: (916) 441-4218
Email: BDombrowski@calretailers.com

By: /s/ Bill Dombrowski

Bill Dombrowski
For the California Retailers Association

CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 16th day of June 2008 caused a copy of the foregoing

**REPLY COMMENTS OF THE CALIFORNIA RETAILERS ASSOCIATION ON
ALLOWANCE ALLOCATION METHODOLOGIES AND OTHER MATTERS**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be mailed as follows:

Commissioner President Michael R. Peevey
California Public Utilities Commission
505 Van Ness Avenue, Room 5218
San Francisco, CA 94102

ALJ Charlotte TerKeurst
California Public Utilities Commission
505 Van Ness Avenue, Room 5117
San Francisco, CA 94102

ALJ Amy C. Yip-Kikugawa
California Public Utilities Commission
505 Van Ness Avenue, Room 2106
San Francisco, CA 94102

ALJ Jonathan Lakritz
California Public Utilities Commission
505 Van Ness Avenue, Room 5020
San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of June 2008 at San Francisco, California.

/s/ Lisa Vieland
Lisa Vieland

Service List R.06-04-009
Last Updated 6/13/08

DAN HECHT
dhecht@sempratrading.com

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

STEVEN S. SCHLEIMER
steven.schleimer@barclayscapital.com

STEVEN HUZHMAN
steven.hushman@morganstanley.com

RICK C. NOGER
rick_noger@praxair.com

KEITH R. MCCREA
keith.mccrea@sablaw.com

KYLE D. BOUDREAU
kyle_boudreaux@fpl.com

CATHY S. WOOLLUMS
cswoolums@midamerican.com

CYNTHIA A. FONNER
Cynthia.A.Fonner@constellation.com

THOMAS DILL
trdill@westernhubs.com

E.J. WRIGHT
ej_wright@oxy.com

TIMOTHY R. ODIL
todil@mckennalong.com

STEPHEN G. KOERNER, ESQ.
steve.koerner@elpaso.com

JENINE SCHENK
jenine.schenk@apses.com

JOHN B. WELDON, JR.
jbw@slwplc.com

KELLY BARR
kelly.barr@srpnet.com

ROBERT R. TAYLOR
rrtaylor@srpnet.com

STEVEN S. MICHEL
smichel@westernresources.org

ROGER C. MONTGOMERY
roger.montgomery@swgas.com

JOSEPH GRECO
jgreco@terra-genpower.com

LORRAINE PASKETT
Lorraine.Paskett@ladwp.com

RONALD F. DEATON
ron.deaton@ladwp.com

SID NEWSOM
snewsom@semprautilities.com

DAVID L. HUARD
dhuard@manatt.com

CURTIS L. KEBLER
curtis.kebler@gs.com

DENNIS M.P. EHLING
dehling@king.com

NORMAN A. PEDERSEN
npedersen@hanmor.com

MICHAEL MAZUR
mmazur@3phasesRenewables.com

VITALY LEE
vitaly.lee@aes.com

TIFFANY RAU
tiffany.rau@bp.com

GREGORY KLATT
klatt@energyattorney.com

RICHARD HELGESON
rhelgeson@scppa.org

DANIEL W. DOUGLASS
douglass@energyattorney.com

PAUL DELANEY
pssed@adelphia.net

BARRY R. WALLERSTEIN
bwallerstein@aqmd.gov

AKBAR JAZAYEIRI
akbar.jazayeri@sce.com

CATHY A. KARLSTAD
cathy.karlstad@sce.com

LAURA I. GENAO
Laura.Genao@sce.com

RONALD MOORE
rkmoore@gswater.com

DON WOOD
dwood8@cox.net

ALLEN K. TRIAL
atrial@sempra.com

ALVIN PAK
apak@sempraglobal.com

DANIEL A. KING
daking@sempra.com

SYMONE CHANSOUK
schansouk@semprasolutions.com

THEODORE ROBERTS
troberts@sempra.com

DONALD C. LIDDELL
liddell@energyattorney.com

MARCIE MILNER
marcie.milner@shell.com

REID A. WINTHROP
rwinthrop@pilotpowergroup.com

THOMAS DARTON
tdarton@pilotpowergroup.com

STEVE RAHON
lschavrien@semprautilities.com

GLORIA BRITTON
GloriaB@anzaelectric.org

LYNELLE LUND
llund@commerceenergy.com

TAMLYN M. HUNT
thunt@cecmail.org

MARC D. JOSEPH
mdjoseph@adamsbroadwell.com

JEANNE M. SOLE
jeanne.sole@sfgov.org

JOHN P. HUGHES
john.hughes@sce.com

LAD LORENZ
llorenz@semprautilities.com

MARCEL HAWIGER
marcel@turn.org

NINA SUETAKE
nsuetake@turn.org

Diana L. Lee
dil@cpuc.ca.gov

F. Jackson Stoddard
fjs@cpuc.ca.gov

AUDREY CHANG
achang@nrdc.org

DONALD BROOKHYSER
rsa@a-klaw.com

EVELYN KAHL
ek@a-klaw.com

KRISTIN GRENFELL
kgrenfell@nrdc.org

MICHAEL P. ALCANTAR
mpa@a-klaw.com

SEEMA SRINIVASAN
sls@a-klaw.com

WILLIAM H. CHEN
bill.chen@constellation.com

EDWARD G POOLE
epoole@adplaw.com

ANN G. GRIMALDI
agrimaldi@mckennalong.com

BRIAN T. CRAGG
bcragg@goodinmacbride.com

JAMES D. SQUERI
jsqueri@gmssr.com

JEANNE B. ARMSTRONG
jarmstrong@goodinmacbride.com

KAREN BOWEN
kbowen@winston.com

LISA A. COTTLE
lcottle@winston.com

MICHAEL B. DAY
mday@goodinmacbride.com

SEAN P. BEATTY
sbeatty@cwclaw.com

VIDHYA PRABHAKARAN
vprabhakaran@goodinmacbride.com

JOSEPH M. KARP
jkarp@winston.com

EDWARD W. O'NEILL
edwardoneill@dwt.com

JEFFREY P. GRAY
jeffreyGray@dwt.com

CHRISTOPHER J. WARNER
cjw5@pge.com

SARA STECK MYERS
ssmyers@att.net

LARS KVALE
lars@resource-solutions.org

ANDREW L. HARRIS
alho@pge.com

BRIAN K. CHERRY
bkc7@pge.com

ANDREA WELLER
aweller@sel.com

JENNIFER CHAMBERLIN
jchamberlin@strategicenergy.com

BETH VAUGHAN
beth@beth411.com

KERRY HATTEVIK
kerry.hattevik@nrgenergy.com

KEVIN BOUDREAUX
kevin.boudreaux@calpine.com

AVIS KOWALEWSKI
kowalewskia@calpine.com

J. ANDREW HOERNER
hoerner@redefiningprogress.org

JANILL RICHARDS
janill.richards@doj.ca.gov

GREGG MORRIS
gmorris@emf.net

CLIFF CHEN
cchen@ucsusa.org

R. THOMAS BEACH
tomb@crossborderenergy.com

KENNETH C. JOHNSON
kjinovation@earthlink.net

BARRY F. MCCARTHY
bmcc@mccarthyllaw.com

C. SUSIE BERLIN
sberlin@mccarthyllaw.com

MIKE LAMOND
Mike@alpinenaturalgas.com

JOY A. WARREN
joyw@mid.org

BALDASSARO DI CAPO
bdicapo@caiso.com

UDI HELMAN
UHelman@caiso.com

WAYNE AMER
wamer@kirkwood.com

MARY LYNCH
mary.lynn@constellation.com

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

ANDREW BROWN
abb@eslawfirm.com

GREGGORY L. WHEATLAND
glw@eslawfirm.com

JEFFERY D. HARRIS
jdh@eslawfirm.com

BRUCE MCLAUGHLIN
mclaughlin@braunlegal.com

DOUGLAS K. KERNER
dkk@eslawfirm.com

JANE E. LUCKHARDT
jluckhardt@downeybrand.com

VIRGIL WELCH
vwelch@environmentaldefense.org

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

RAYMOND J. CZAHR, C.P.A.
westgas@aol.com

STEVEN M. COHN
scohn@smud.org

ANN L. TROWBRIDGE
atrowbridge@daycartermurphy.com

DAN SILVERIA
dansvec@hdo.net

JESSICA NELSON
jnelson@psrec.coop

CYNTHIA SCHULTZ
cynthia.schultz@pacificcorp.com

KYLE L. DAVIS
kyle.l.davis@pacificcorp.com

RYAN FLYNN
ryan.flynn@pacificcorp.com

IAN CARTER
carter@ieta.org

JASON A. DUBCHAK
jason.dubchak@niskags.com

BRIAN M. JONES
bjones@mjbradley.com

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

KENNETH A. COLBURN
kcolburn@symbioticstrategies.com

RICHARD COWART
rapcowart@aol.com

KATHRYN WIG
Kathryn.Wig@nrgenergy.com

SAKIS ASTERIADIS
sasteriadis@apx.com

GEORGE HOPLEY
george.hopley@barcap.com

MELISSA DORN
mdorn@mwe.com

MICHAEL A. YUFFEE
myuffee@mwe.com

DALLAS BURTRAW
burtraw@rff.org

VERONIQUE BUGNION
vb@pointcarbon.com

GARSON KNAPP
garson_knapp@fpl.com

GARY BARCH
gbarch@knowledgeinenergy.com

SAMARA MINDEL
smindel@knowledgeinenergy.com

BARRY RABE
brabe@umich.edu

BRIAN POTTS
bpotts@foley.com

JAMES W. KEATING
james.keating@bp.com

JAMES ROSS
jimross@r-c-s-inc.com

ANNE HENDRICKSON
ahendrickson@commerceenergy.com

COURTNEY WEDDINGTON
cweddington@commerceenergy.com

TRENT A. CARLSON
tcarlson@reliant.com

GARY HINNERS
ghinners@reliant.com

JEANNE ZAIONTZ
zaiontj@bp.com

JULIE L. MARTIN
julie.martin@bp.com

FIJI GEORGE
fiji.george@elpaso.com

ED CHIANG
echiang@elementmarkets.com

FRANK STERN
fstern@summitblue.com

NADAV ENBAR
nenbar@energy-insights.com

NICHOLAS LENSSEN
nlenssen@energy-insights.com

ELIZABETH BAKER
bbaker@summitblue.com

W. WAYNE TOMLINSON
william.tomlinson@elpaso.com

KEVIN J. SIMONSEN
kjsimonsen@ems-ca.com

JAMES A. HOLTkamp
jholtkamp@hollandhart.com

SANDRA ELY
Sandra.ely@state.nm.us

BRIAN MCQUOWN
bmcquown@reliant.com

DOUGLAS BROOKS
dbrooks@nevp.com

ANITA HART
anita.hart@swgas.com

RANDY SABLE
randy.sable@swgas.com

BILL SCHRAND
bill.schrand@swgas.com

JJ PRUCNAL
jj.prucnal@swgas.com

SANDRA CAROLINA
sandra.carolina@swgas.com

CYNTHIA MITCHELL
ckmitchell1@sbcglobal.net

CHRISTOPHER A. HILEN
chilen@sppc.com

ELENA MELLO
emello@sppc.com

DARRELL SOYARS
dsoyars@sppc.com

TREVOR DILLARD
tdillard@sppc.com

LEILANI JOHNSON KOWAL
leilani.johnson@ladwp.com

RANDY S. HOWARD
randy.howard@ladwp.com

ROBERT K. ROZANSKI
Robert.Rozanski@ladwp.com

ROBERT L. PETTINATO
robert.pettinato@ladwp.com

HUGH YAO
HYao@SempraUtilities.com

RASHA PRINCE
rprince@semprautilities.com

LEE WALLACH
LeeWallach@SolelUS.com

RANDALL W. KEEN
rkeen@manatt.com

S. NANCY WHANG
nwhang@manatt.com

DEREK MARKOLF
derek@climaterestry.org

DAVID NEMTZOW
david@nemtzw.com

HARVEY EDER
harveyederpspc@hotmail.com

STEVEN G. LINS
slins@ci.glendale.ca.us

TOM HAMILTON
THAMILTON5@CHARTER.NET

JUSTIN RATHKE
jrathke@capstoneturbine.com

STEPHEN GILLETTE
sgillette@capstoneturbine.com

BRUNO JEIDER
bjeider@ci.burbank.ca.us

RICHARD J. MORILLO
rmorillo@ci.burbank.ca.us

AIMEE BARNES
aimee.barnes@ecosecurities.com

CASE ADMINISTRATION
case.admin@sce.com

JAIRAM GOPAL
Jairam.gopal@sce.com

TIM HEMIG
tim.hemig@nrgenergy.com

TOM CORR
tcorr@sempraglobal.com

YVONNE GROSS
ygross@sempraglobal.com

JOHN LAUN
jlaun@apogee.net

KIM KIENER
kмкиener@fox.net

SCOTT J. ANDERS
scottanders@sandiego.edu

JOSEPH R. KLOBERDANZ
jkloberdanz@semprautilities.com

ANDREW MCALLISTER
andrew.mcallister@energycenter.org

JENNIFER PORTER
jennifer.porter@energycenter.org

SEPHRA A. NINOW
sephra.ninow@energycenter.org

DESPINA NIEHAUS
dniehaus@semprautilities.com

JOHN W. LESLIE
jleslie@luce.com

ELSTON K. GRUBAUGH
ekgrubaugh@iid.com

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

WILLIAM KARAMBELAS
karambelas@fce.com

MONA TIERNEY-LLOYD
mona@landsiteinc.net

JAN PEPPER
pepper@cleanpowermarkets.com

GLORIA D. SMITH
gsmith@adamsbroadwell.com

LOULENA A. MILES
lmiles@adamsbroadwell.com

DIANE I. FELLMAN
Diane_Fellman@fpl.com

HAYLEY GOODSON
hayley@turn.org

MICHEL FLORIO
mflorio@turn.org

DAN ADLER
Dan.adler@calcef.org

MICHAEL A. HYAMS
mhyams@sewater.org

THERESA BURKE
tburke@sewater.org

NORMAN J. FURUTA
norman.furuta@navy.mil

AMBER MAHONE
amber@ethree.com

ANNABELLE MALINS
annabelle.malins@fco.gov.uk

KAREN TERRANOVA
filings@a-klaw.com

LEAH FLETCHER
lfletcher@nrdc.org

NORA SHERIFF
nes@a-klaw.com

OLOF BYSTROM
obystrom@cera.com

SETH HILTON
sdhilton@stoel.com

SHERYL CARTER
scarter@nrdc.org

ASHLEE M. BONDS
abonds@thelen.com

BIANCA BOWMAN
brbc@pge.com

CARMEN E. BASKETTE
cbaskette@enernoc.com

FRED WELLINGTON
fred.wellington@navigantconsulting.com

JAMES W. TARNAGHAN
jwmctarnaghan@duanemorris.com

KEVIN FOX
kfox@wsgr.com

KHURSHID KHOJA
kkhoja@thelenreid.com

RAY WELCH
ray.welch@navigantconsulting.com

SHERIDAN J. PAUKER
spauker@wsgr.com

JAMES W. MCTARNAGHAN
jwmctarnaghan@duanemorris.com

ROBERT J. REINHARD
rreinhard@mofo.com

PETER V. ALLEN
pvallen@thelen.com

STEVEN MOSS
steven@moss.net

ARNO HARRIS
policy@recurrentenergy.com

HOWARD V. GOLUB
hgolub@nixonpeabody.com

JAMES B. WOODRUFF
jwoodruff@nextlighttp.com

JANINE L. SCANCARELLI
jscancarelli@flk.com

JOSEPH F. WIEDMAN
jwiedman@goodinmacbride.com

KARLEEN O'CONNOR
koconnor@winston.com

MARTIN A. MATTES
mmattes@nossaman.com

BRAD WETSTONE
bwetstone@hotmail.com

JEN MCGRAW
jen@cnt.org

CALIFORNIA ENERGY MARKETS
cem@newsdata.com

LISA WEINZIMER
lisa_weinzimer@platts.com

SHAUN ELLIS
sellis@fypower.org

ED LUCHA
ELL5@pge.com

GRACE LIVINGSTON-NUNLEY
GXL2@pge.com

JASMIN ANSAR
jxa2@pge.com

JONATHAN FORRESTER
JDF1@PGE.COM

KATE BEARDSLEY
KEBD@pge.com

SEBASTIEN CSAPO
sscb@pge.com

SHAUN HALVERSON
SEHC@pge.com

SOUMYA SASTRY
svs6@pge.com

STEPHANIE LA SHAWN
S1L7@pge.com

VALERIE J. WINN
vjw3@pge.com

KARLA DAILEY
karla.dailey@cityofpaloalto.org

BRAD WETSTONE
wetstone@alamedapt.com

DEAN R. TIBBS
dtibbs@aes4u.com

JOHN DUTCHER
ralf1241a@cs.com

JEFFREY L. HAHN
jhahn@covantaenergy.com

TOM DELFINO
tdelfino@earthlink.net

ANDREW J. VAN HORN
andy.vanhorn@vhcenergy.com

JOSEPH PAUL
joe.paul@dynegy.com

SUE KATELEY
info@calseia.org

GREG BLUE
gblue@enxco.com

SARAH BESERRA
sbeserra@sbcglobal.net

MONICA A. SCHWEBS, ESQ.
monica.schwebs@bingham.com

PETER W. HANSCHEN
phansch@mofo.com

WILLIAM H. BOOTH
wbooth@booth-law.com

JOSEPH HENRI
josephhenri@hotmail.com

PATRICIA THOMPSON
pthompson@summitblue.com

WILLIAM F. DIETRICH
dietrichlaw2@earthlink.net

ALEX KANG
alex.kang@itron.com

BETTY SETO
Betty.Seto@kema.com

GERALD L. LAHR
JerryL@abag.ca.gov

JODY S. LONDON
jody_london_consulting@earthlink.net

STEVEN SCHILLER
steve@schiller.com

MRW & ASSOCIATES, INC.
mrw@mrwassoc.com

REED V. SCHMIDT
rschmidt@bartlewells.com

ADAM BRIONES
adamb@greenlining.org

LAURA WISLAND
lwisland@ucsusa.org

TANDY MCMANNES
tandy.mcmannes@solar.abengoa.com

STEVE KROMER
stevek@kromer.com

CLYDE MURLEY
clyde.murley@comcast.net

BRENDA LEMAY
brenda.lemay@horizonwind.com

NANCY RADER
nrader@calwea.org

CARLA PETERMAN
carla.peterman@gmail.com

EDWARD VINE
elvine@lbl.gov

RYAN WISER
rhwiser@lbl.gov

CHRIS MARNAY
C_Marnay@lbl.gov

EMMA POELSTERL
epoelsterl@sunpowercorp.com

KARI SMITH
ksmith@sunpowercorp.com

PHILLIP J. MULLER
philm@scdenergy.com

RITA NORTON
rita@ritanortonconsulting.com

CARL PECHMAN
cpechman@powereconomics.com

MAHLON ALDRIDGE
emahlon@ecoact.org

RICHARD SMITH
richards@mid.org

ROGER VAN HOY
rogerv@mid.org

THOMAS S. KIMBALL
tomk@mid.org

WES MONIER
fwmonier@tid.org

BARBARA R. BARKOVICH
brbarkovich@earthlink.net

JOHN R. REDDING
johnredding@earthlink.net

CLARK BERNIER
clark.bernier@rlw.com

RICHARD MCCANN, PH.D
rmccann@umich.edu

GRANT ROSENBLUM, ESQ.
grosenblum@caiso.com

MELANIE GILLETTE
mgillette@enernoc.com

ROBIN SMUTNY-JONES
rsmutny-jones@caiso.com

SAEED FARROKHPAY
saeed.farrokhpay@ferc.gov

CALIFORNIA ISO
e-recipient@caiso.com

DAVID BRANCHCOMB
david@branchcomb.com

KENNY SWAIN
kenneth.swain@navigantconsulting.com

KIRBY DUSEL
kdusel@navigantconsulting.com

GORDON PICKERING
gpickering@navigantconsulting.com

LAURIE PARK
lpark@navigantconsulting.com

PAUL D. MAXWELL
pmaxwell@navigantconsulting.com

DAVID REYNOLDS
david.reynolds@ncpa.com

SCOTT TOMASHEFSKY
scott.tomashefsky@ncpa.com

ELLEN WOLFE
ewolfe@resero.com

CAROLYN M. KEHREIN
cmkehrein@ems-ca.com

AUDRA HARTMANN
Audra.Hartmann@Dynergy.com

BOB LUCAS
Bob.lucas@calobby.com

CURT BARRY
curt.barry@iwpnews.com

DANIELLE MATTHEWS SEPERAS
dseperas@calpine.com

DAVID L. MODISETTE
dave@ppallc.com

DEREK WALKER
dbwalker@edf.org

DIANA SCHWYZER
dschwyz@energy.state.ca.us

JOSE CARMONA
jose@ceert.org

JUSTIN C. WYNNE
wynne@braunlegal.com

KASSANDRA GOUGH
kgough@calpine.com

KELLIE SMITH
kellie.smith@sen.ca.gov

KEVIN WOODRUFF
kdw@woodruff-expert-services.com

PANAMA BARTHOLOMY
pbarthol@energy.state.ca.us

PATRICK STONER
pstoner@lgc.org

RACHEL MCMAHON
rachel@ceert.org

RYAN BERNARDO
bernardo@braunlegal.com

STEVEN A. LIPMAN
steven@lipmanconsulting.com

STEVEN KELLY
steven@iepa.com

WEBSTER TASAT
wtasat@arb.ca.gov

LYNN HAUG
lmh@eslawfirm.com

EDWARD J. TIEDEMANN
etiedemann@kmtg.com

LAURIE TEN HOPE
ltenhope@energy.state.ca.us

JOSHUA BUSHINSKY
bushinskyj@pewclimate.org

OBADIAH BARTHOLOMY
obartho@smud.org

WILLIAM W. WESTERFIELD III
wwester@smud.org

BUD BEEBE
bbeebe@smud.org

BALWANT S. PUREWAL
bpurewal@water.ca.gov

DOUGLAS MACMULLEN
dmacmull@water.ca.gov

KAREN NORENE MILLS
kmills@cfbf.com

KAREN LINDH
karen@klindh.com

ELIZABETH W. HADLEY
ehadley@reupower.com

ANNIE STANGE
sas@a-klaw.com

ELIZABETH WESTBY
egw@a-klaw.com

ALEXIA C. KELLY
akelly@climatetrust.org

ALAN COMNES
alan.comnes@nrgenergy.com

KYLE SILON
kyle.silon@ecosecurities.com

CATHIE ALLEN
californiadockets@pacificorp.com

PHIL CARVER
Philip.H.Carver@state.or.us

SAM SADLER
samuel.r.sadler@state.or.us

LISA SCHWARTZ
lisa.c.schwartz@state.or.us

CLARE BREIDENICH
cbreidenich@yahoo.com

DONALD SCHOENBECK
dws@r-c-s-inc.com

JESUS ARREDONDO
jesus.arredondo@nrgenergy.com

CHARLIE BLAIR
charlie.blair@delta-ee.com

THOMAS ELGIE
Tom.Elgie@powerex.com

CLARENCE BINNINGER
clarence.binninger@doj.ca.gov

DAVID ZONANA
david.zonana@doj.ca.gov

Adam Langton
ahl@cpuc.ca.gov

Amy C. Yip-Kikugawa
ayk@cpuc.ca.gov

Andrew Campbell
agc@cpuc.ca.gov

Anne Gillette
aeg@cpuc.ca.gov

Beth Moore
blm@cpuc.ca.gov

Bishu Chatterjee
bbc@cpuc.ca.gov

Cathleen A. Fogel
cf1@cpuc.ca.gov

Charlotte TerKeurst
cft@cpuc.ca.gov

Christine S. Tam
tam@cpuc.ca.gov

Donald R. Smith
dsh@cpuc.ca.gov

Ed Moldavsky
edm@cpuc.ca.gov

Elizabeth Stoltzfus
eks@cpuc.ca.gov

Eugene Cadenasso
cpe@cpuc.ca.gov

Harvey Y. Morris
hym@cpuc.ca.gov

Jaclyn Marks
jm3@cpuc.ca.gov

Jacqueline Greig
jnm@cpuc.ca.gov

Jamie Fordyce
jbf@cpuc.ca.gov

Jason R. Salmi Klotz
jk1@cpuc.ca.gov

George S. Tagnipes
jst@cpuc.ca.gov

Joel T. Perlstein
jtp@cpuc.ca.gov

Jonathan J. Reiger
jzr@cpuc.ca.gov

Jonathan Lakritz
jol@cpuc.ca.gov

Judith Ikle
jci@cpuc.ca.gov

Julie A. Fitch
jf2@cpuc.ca.gov

Kristin Ralff Douglas
krd@cpuc.ca.gov

Lainie Motamedi
lm@cpuc.ca.gov

Lana Tran
ltt@cpuc.ca.gov

Matthew Deal
mjd@cpuc.ca.gov

Michael Colvin
mc3@cpuc.ca.gov

Pamela Wellner
pw1@cpuc.ca.gov

Paul S. Phillips
psp@cpuc.ca.gov

Pearlie Sabino
pzs@cpuc.ca.gov

Rahmon Momoh
rmm@cpuc.ca.gov

Richard A. Myers
ram@cpuc.ca.gov

Sara M. Kamins
smk@cpuc.ca.gov

Scott Murtishaw
sgm@cpuc.ca.gov

Sean A. Simon
svn@cpuc.ca.gov

Steve Roscow
scr@cpuc.ca.gov

Theresa Cho
tcx@cpuc.ca.gov

Zach Church
zac@cpuc.ca.gov

BILL LOCKYER
ken.alex@doj.ca.gov

KEN ALEX
ken.alex@doj.ca.gov

JUDITH B. SANDERS
jsanders@caiso.com

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

PHILIP D. PETTINGILL
ppettingill@caiso.com

MICHAEL SCHEIBLE
mscheibl@arb.ca.gov

GARY COLLORD
gcollord@arb.ca.gov

JEFFREY DOLL
jdoll@arb.ca.gov

PAM BURMICH
pburmich@arb.ca.gov

DARYL METZ
dmetz@energy.state.ca.us

DEBORAH SLON
deborah.slon@doj.ca.gov

Don Schultz
dks@cpuc.ca.gov

KAREN GRIFFIN
kgriffin@energy.state.ca.us

LISA DECARLO
ldecarlo@energy.state.ca.us

MARC PRYOR
mpryor@energy.state.ca.us

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

PAT PEREZ
pperez@energy.state.ca.us

PIERRE H. DUVAIR
pduvair@energy.state.ca.us

Wade McCartney
wsm@cpuc.ca.gov

NANCY TRONAAS
ntronaas@energy.state.ca.us

HEATHER LOUIE
hlouie@energy.state.ca.us

CAROL J. HURLOCK
hurlock@water.ca.gov

HOLLY B. CRONIN
hcronin@water.ca.gov

ROSS A. MILLER
rmiller@energy.state.ca.us

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