

**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)
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**COMMENTS OF FPL ENERGY PROJECT MANAGEMENT, INC.
CALIFORNIA PUBLIC UTILITY COMMISSION'S FINAL OPINION ON
GREENHOUSE GAS REGULATORY STRATEGIES**

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Robert Garvin
FPL Energy, LLC
Vice President of Regulatory Affairs
700 Universe Blvd
Juno Beach, FL 33408
Telephone (561) 694-4058
Robert_Garvin@fpl.com

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FPL Energy Project Management, Inc. (FPLE) submits these comments in response to Commissioner Michael R. Peevey's proposed decision (PD)¹. The PD represents the final recommendation of the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) (collectively, Commissions) to the California Air Resource Board (CARB) for the treatment of the electricity and natural gas sectors within California's greenhouse gas (GHG) reduction program prescribed by AB32. Since the electricity and natural gas sectors will play a key role in California's strategy to reduce GHG emissions, the treatment of these sectors is central in gauging the ultimate success of the program. FPLE recognizes the Commissions' efforts in meeting the challenge of balancing the interests of all stakeholders to achieve the necessary GHG reductions.

Broadly, FPLE supports the Commissions' direction in the PD and endorses the following recommendations contained in the PD as it has throughout this proceeding:

¹ *Final Opinion on Greenhouse Gas regulatory Strategies*, Public Utilities Commission, Agenda ID#7922, Rulemaking 06-04-009, September 12, 2008.

- Rapid transition to 100% auction
- “Pure” output-based allocation fallback position
- Avoidance of a California-only GHG cap and trade program
- 3 year compliance periods
- Unlimited banking
- Use of high quality offsets without imposing geographic limitations.

However, there are three specific concepts discussed in the PD which FPLE does not support. These are listed below and discussed in greater detail in the body of these comments:

- “In a fuel-differentiated output-based allocation approach, it is reasonable that a higher weighting factor be applied for all coal generation delivered to the California grid.”²
- The auction should be open only to entities with compliance obligations rather than all market participants to avoid unnecessary costs.³
- “Price triggers and safety valves could very likely distort or defeat the cap-and-trade market by creating uncertainty that investments in emissions reduction technologies will achieve returns commensurate with the level of reductions needed to meet the State’s emissions reduction goals.”⁴

² *Ibid*, Section9, Finding of Fact, # 29, p 282

³ *Ibid*, p254-256

⁴ *Ibid*, Section 9, Findings of Fact, #53, p285

1. FPLE opposes the use a fuel adjustment factor to distribute allowances

The PD recommends an 80% fuel-adjusted free allocation of the allowances in the initial compliance year with the remaining 20% of allowances distributed via auction. The percentage of free allocation would then decrease by 20% per year until 100% of the allowances are auctioned in 2016. FPLE supports the PD's recommendation for a rapid transition to 100% auction. However, FPLE disagrees with the PD's recommendation to use a fuel adjustment factor during the free allocation period. The PD asserts the proposed fuel-differentiated output-based allowance allocation would provide "first deliverers" with the amount of allowances they will need to operate while reducing potential windfall profits. It further mentions it is reasonable to apply a higher weighting factor to coal based generating sources.⁵ The addition of a fuel adjustment factor would, in essence, act as a subsidy to higher emitting sources. Lower emitting sources are already paying a premium price for the less carbon intensive fuels they utilize. They should not have to also pay to subsidize the cost of the carbon associated higher emitting sources. This is not "reasonable" as asserted by the PD.

The recent vacatur of EPA's Clean Air Interstate Rule (CAIR) depicts fuel adjustment factors as an example of bias against the lower emitting resources. The D.C. Federal District Court ruled that EPA's use of a fuel adjustment factor when distributing NOx allowances resulted in "subsidized reductions" with oil

⁵ *Ibid*, Findings of Fact #27, 28, 29 p 282

and gas-fired units paying for the cleanup of coal-fired generation.⁶ In addition, the D.C. District Court referred to the EPA's use of fuel adjustment factors as "arbitrary and capricious".⁷ The intent of CAIR was to reduce the impact of emissions from "upwind" sources on out-of-state "downwind" non-attainment areas.⁸ The parties challenged the methodology EPA used to determine significant contribution to non-attainment status. The CPUC should reconsider their recommendation of distributing allowances using a fuel adjustment factor to avoid promoting any program laced with potentially bias elements.

2. FPL opposes the opening of the auction to all participants.

In the PD, the Commissions are recommending auction participation remain open to all interested parties and not be limited to those with compliance obligations.⁹ The PD outlines the different positions presented throughout this proceeding on this subject. Although not listed in the findings of fact, the PD expresses the Commissions concern with limiting participants including: market liquidity, market manipulation, and increased complexity. In contrast, FPLE supports limiting auction participation to those with a compliance obligation. The level of oversight suggested by the PD bolsters the argument that the auctioning of allowances should be restricted to entities with compliance

⁶ *State of North Carolina v. EPA*, D.C. District Court of Appeals, 2008. No 05-1244, p41

⁷ *Ibid*, p 42

⁸ Ambient air quality and non-attainment area as defined under US EPA's Clean Air Act

⁹ *Final Opinion on Greenhouse Gas regulatory Strategies*, Public Utilities Commission, Agenda ID#7922, Rulemaking 06-04-009, September 12, 2008, p 254-256

obligations. The secondary markets will give all interested investors ample opportunity to participate in the cap and trade program. Restricting the auction participants assures entities with a compliance obligation they will have an opportunity to obtain allowances without any added transaction costs or inflated pricing. In order to minimize costs associated with obtaining allowances for compliance, the Commissions should recommend that CARB limit participation in the allowance auctions to entities with a compliance obligation. FPLE agrees with PD's recommendation that the market transactions must be rigorously monitored to prevent market manipulation.¹⁰ The auction rules must be structured with a mechanism for their adjustment if the oversight authority identifies a significant problem exists within the auction structure.

3. FPL does not agree that pricing controls create uncertainty

The PD recommends CARB implement flexible compliance mechanisms in the GHG cap and trade program.¹¹ Section 7.5 of the PD describes CPUC's recommended flexible compliance mechanisms in limited detail. These provisions include unlimited banking, 3-year compliance period, and use of high quality offsets. The section immediately prior to this is the discussion related to price triggers and safety valves.¹² The PD states price triggers and safety valves would present an

¹⁰ *Ibid*, p 255

¹¹ *Ibid*, p 252-253

¹² *Ibid*, p 260-262

element of uncertainty into the carbon market.¹³ FPLE disagrees with the Commissions' reasoning on this issue. The value of using market mechanisms is they provide a level of certainty to entities with a compliance obligation while protecting the value of investments in carbon reduction. Extreme excursions in the market price of carbon would result in an artificially high price signal being passed to consumers and might damage support for the program as a whole. FPLE supports implementation of pricing controls in a manner that does not damage the integrity of the market or impede the deployment of GHG emission reduction technologies.

As FPLE has advocated throughout this proceeding, one key is to set an allowance floor price that is high enough to protect the value of reduction measures. The price floor insures the value of carbon will not drop below a pre-determined price. Therefore the value of any investments in carbon reduction technologies would never drop below this price. This creates some level of certainty for investors in carbon reduction technologies. For the PD to make the determination this market mechanism creates "uncertainty"¹⁴ in the market is, in our opinion, misguided.

The second key is the proper use of a price ceiling. The ceiling prevents extreme price fluctuations by capping the cost of carbon allowances. Entities responsible for compliance will be able to estimate their maximum compliance obligation costs and make decisions appropriately. The ceiling must be set high enough so the carbon price signal begins to drive behavioral change. At the same time the price cap must

¹³ *Ibid*, p262

¹⁴ *Ibid*, Finding of Fact # 53, p285

be low enough to prevent extreme market impacts caused by price spikes. The price cap should be raised over time until the market and its participants fully integrate the real cost of carbon into the pricing of goods and services. One benefit of using the price ceiling is that the cost of carbon is gradually and predictably introduced to consumers. The price ceiling and floor work together to limit risk to regulated entities and assure investors in carbon reduction technologies their projects will maintain some a value in future markets.

Conclusion

FPLE appreciates the effort of the Commissions in the development of the PD and supports the majority of the recommendations. As discussed previously, the three main areas of disagreement FPLE has with the current recommendations contained in the PD are:

- **The use a fuel adjustment factor to distribute free allowances creates bias**
- **The opening of the auction to all participants may increase costs**
- **Lack of pricing controls can create market certainty**

FPLE looks forward to working with the CPUC, CEC, and CARB during the next several years to develop the regulations that will implement the GHG scoping plan under the authority of AB32.

Respectfully submitted this 2nd day of October, 2008,

/s/ Robert Garvin

Robert Garvin
FPL Energy, LLC
Vice President of Regulatory Affairs
700 Universe Blvd
Juno Beach, FL 33408
Telephone (561) 694-4058
Robert_Garvin@fpl.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document

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has been served on the parties of record in the above captioned proceeding by electronic copy on their email address of record, by overnight mail to the Assigned Commissioner Peevey's Advisor, Nancy Ryan, and the Administrative Law Judges, and for those parties without an email address of record, by first class mail to each party on the Commission's official service list for this proceeding as posted on the California Public Utilities Commission website for proceeding R.06-04-009.

This Certificate of Service is dated this 2nd day of October, 2008 in Juno Beach, Florida.

/s/ Garson R. Knapp

dhecht@sempratrading.com	klatt@energyattorney.com	fjs@cpuc.ca.gov
steven.schleimer@barclayscapital.com	rhelgeson@scppa.org	achang@nrdc.org
steven.huhman@morganstanley.com	douglass@energyattorney.com	rsa@a-klaw.com
rick_noger@praxair.com	aimee.barnes@ecosecurities.com	ek@a-klaw.com
Keith.mccrea@sablau.com	pssed@adelphia.net	kgrenfell@nrdc.org
Kyle_boudreaux@fpl.com	bwallerstein@aqmd.gov	mpa@a-klaw.com
cswollums@midamerican.com	akbar.jazayeri@sce.com	sls@a-klaw.com
Cynthia.A.Fonner@constellation.com	cathy.karlstad@sce.com	epoole@adplaw.com
Kevin.boudreaux@calpine.com	Nancy.Allred@sce.com	agrimaldi@mckennalong.com
trdill@westernhubs.com	rkmoore@gswater.com	bcragg@goodinmacbride.com
todil@mckennalong.com	dwood8@cox.net	dhuard@manatt.com
steve.koerner@el Paso.com	atrial@sempra.com	jsqueri@gmssr.com
jenine.schenk@apses.com	apak@sempraglobal.com	jarmstrong@goodinmacbride.com
jbw@slwplc.com	daking@sempra.com	lcottle@winston.com
Kelly.barr@srpnet.com	troberts@sempra.com	mday@goodinmacbride.com
rrtaylor@srpnet.com	liddell@energyattorney.com	smalllecs@cwclaw.com
smichel@westernresources.org	kmelville@sempra.com	vprabhakaran@goodinmacbride.com
roger.montgomery@swgas.com	marcie.milner@shell.com	jkarp@winston.com
jgreco@terra-genpower.com	rwinthrop@pilotpowergroup.com	edwardoneill@dwt.com
Lorraine.Paskett@ladwp.com	tdarton@pilotpowergroup.com	jeffreyGray@dwt.com
ron.deaton@ladwp.com	lschavrien@semprautilities.com	cjw5@pge.com
snewsom@semprautilities.com	GloriaB@anzaelectric.org	ssmyers@att.net
curtis.kebler@gs.com	llund@commerceenergy.com	lars@resource-solutions.org
dehling@klng.com	thunt@cecmil.org	alho@pge.com
npedersen@hanmor.com	mdjoseph@adamsbroadwell.com	bkc7@pge.com
mmazur@3phasesRenewables.com	jeanne.sole@sfgov.org	aweller@sel.com
ej_wright@oxy.com	john.hughes@sce.com	jchamberlin@strategicenergy.com
Vitaly.lee@aes.com	marcel@turn.org	beth@beth411.com
tiffany.rau@bp.com	nsuetake@turn.org	kerry.hattevik@nrgenergy.com
hcronin@water.ca.gov	dil@cpuc.ca.gov	kowalewskia@calpine.com

hoerner@redefiningprogress.org	cynthia.schultz@pacificorp.com	nlenssen@energy-insights.com
janill.richards@doj.ca.gov	kyle.l.davis@pacificorp.com	bbaker@summitblue.com
gmorris@emf.net	ryan.flynn@pacificorp.com	william.tomlinson@elpaso.com
cchen@ucsusa.org	jason.dubchak@niskags.com	kjsimonsen@ems-ca.com
tomb@crossborderenergy.com	bjones@mjb Bradley.com	jholtkamp@hollandhart.com
kjinnovation@earthlink.net	kcolburn@symbioticstrategies.com	Sandra.ely@state.nm.us
bmcc@mccarthy law.com	rapcowart@aol.com	bmcquown@reliant.com
sberlin@mccarthy law.com	harry.singh@rbssempira.com	dbrooks@nevpc.com
Mike@alpinenaturalgas.com	Kathryn.Wig@nrgenergy.com	anita.hart@swgas.com
joyw@mid.org	sasteriadis@apx.com	randy.sable@swgas.com
brbarkovich@earthlink.net	george.hopley@barcap.com	bill.schrand@swgas.com
bdicapo@caiso.com	mdorn@mwe.com	jj.prucnal@swgas.com
UHelman@caiso.com	myuffee@mwe.com	keith.layton@swgas.com
wamer@kirkwood.com	vb@pointcarbon.com	ckmitchell1@sbcglobal.net
mary.lynch@constellation.com	garson_knapp@fpl.com	chilen@sppc.com
abb@eslawfirm.com	gbarch@knowledgeinenergy.com	emello@sppc.com
glw@eslawfirm.com	smindel@knowledgeinenergy.com	dsoyars@sppc.com
jdh@eslawfirm.com	brabe@umich.edu	tdillard@sppc.com
BDombrowski@calretailers.com	bpotts@foley.com	leilani.johnson@ladwp.com
mclaughlin@braunlegal.com	james.keating@bp.com	randy.howard@ladwp.com
dkk@eslawfirm.com	jimross@r-c-s-inc.com	Robert.Rozanski@ladwp.com
jluckhardt@downeybrand.com	ahendrickson@commerceenergy.com	robert.pettinato@ladwp.com
rachel@ceert.org	tcarlson@reliant.com	HYao@SempraUtilities.com
lmh@eslawfirm.com	ghinners@reliant.com	rprince@semprautilities.com
westgas@aol.com	zaiontj@bp.com	LeeWallach@SolelUS.com
scohn@smud.org	julie.martin@bp.com	rkeen@manatt.com
atrowbridge@daycartermurphy.com	fiji.george@elpaso.com	nwhang@manatt.com
dansvec@hdo.net	echiang@elementmarkets.com	david@nemtzow.com
jnelson@psrec.coop	fstern@summitblue.com	harveyederpspc@hotmail.com
akelly@climatetrust.org	nenbar@energy-insights.com	slins@ci.glendale.ca.us

jrathke@capstoneturbine.com	annabelle.malins@britishconsulatesf.gov.uk	jen@cnt.org
sgillette@capstoneturbine.com	filings@a-klaw.com	cem@newsdata.com
bjeider@ci.burbank.ca.us	lfletcher@nrdc.org	lisa_weinzimer@platts.com
rmorillo@ci.burbank.ca.us	nes@a-klaw.com	lfletcher@nrdc.org
case.admin@sce.com	obystrom@cera.com	nes@a-klaw.com
Jairam.gopal@sce.com	sdhilton@stoel.com	obystrom@cera.com
tim.hemig@nrgenergy.com	scarter@nrdc.org	sdhilton@stoel.com
bjl@bry.com	abonds@thelen.com	scarter@nrdc.org
sfirooz@firstwind.com	brbc@pge.com	abonds@thelen.com
tcorr@sempraglobal.com	cbaskette@enernoc.com	brbc@pge.com
jlaun@apogee.net	fred.wellington@navigantconsulting.com	cbaskette@enernoc.com
jkloberdanz@semprautilities.com	jwmctarnaghan@duanemorris.com	fred.wellington@navigantconsulting.com
jennifer.porter@energycenter.org	kkhoja@thelenreid.com	jwmctarnaghan@duanemorris.com
sephra.ninow@energycenter.org	ray.welch@navigantconsulting.com	kkhoja@thelenreid.com
dniehaus@semprautilities.com	spauker@wsgr.com	ray.welch@navigantconsulting.com
jleslie@luce.com	jwmctarnaghan@duanemorris.com	spauker@wsgr.com
ekgrubaugh@iid.com	rreinhard@mofo.com	jwmctarnaghan@duanemorris.com
karambelas@fce.com	pvalen@thelen.com	rreinhard@mofo.com
mona.lloyd@att.net	steven@moss.net	pvalen@thelen.com
pepper@cleanpowermarkets.com	policy@recurrentenergy.com	steven@moss.net
gsmith@adamsbroadwell.com	Cassandra.sweet@dowjones.com	policy@recurrentenergy.com
lmiles@adamsbroadwell.com	hgolub@nixonpeabody.com	Cassandra.sweet@dowjones.com
Diane_Fellman@fpl.com	jwoodruff@nextlighttp.com	hgolub@nixonpeabody.com
hayley@turn.org	jscancarelli@flk.com	jwoodruff@nextlighttp.com
mflorio@turn.org	jwiedman@goodinmacbride.com	jscancarelli@flk.com
Dan.adler@calcef.org	koconnor@winston.com	jwiedman@goodinmacbride.com
mhyams@sflower.org	mmattes@nossaman.com	koconnor@winston.com
tburke@sflower.org	bobgex@dwt.com	mmattes@nossaman.com
norman.furuta@navy.mil	derek@evomarkets.com	bobgex@dwt.com
amber@ethree.com	bwetstone@hotmail.com	derek@evomarkets.com

bwetstone@hotmail.com	josephhenri@hotmail.com	tomk@mid.org
jen@cnt.org	pthompson@summitblue.com	fwmonier@tid.org
cem@newsdata.com	dietrichlaw2@earthlink.net	johnredding@earthlink.net
lisa_weinzimer@platts.com	alex.kang@itron.com	clark.bernier@rlw.com
ELL5@pge.com	Betty.Seto@kema.com	rmccann@umich.edu
GXL2@pge.com	JerryL@abag.ca.gov	grosenblum@caiso.com
jxa2@pge.com	jody_london_consulting@earthlink.net	tomk@mid.org
JDF1@PGE.COM	steve@schiller.com	fwmonier@tid.org
KEBD@pge.com	ahaubenstock@brightsourceenergy.com	johnredding@earthlink.net
sscb@pge.com	svolker@volkerlaw.com	clark.bernier@rlw.com
SEHC@pge.com	mrw@mrwassoc.com	rmccann@umich.edu
svs6@pge.com	rschmidt@bartlewells.com	grosenblum@caiso.com
S1L7@pge.com	lwisland@ucsusa.org	tomk@mid.org
vjw3@pge.com	tandy.mcmannes@solar.abengoa.com	fwmonier@tid.org
karla.dailey@cityofpaloalto.org	stevek@kromer.com	johnredding@earthlink.net
wetstone@alamedapt.com	clyde.murley@comcast.net	clark.bernier@rlw.com
dtibbs@aes4u.com	nrader@calwea.org	rmccann@umich.edu
ralf1241a@cs.com	carla.peterman@gmail.com	grosenblum@caiso.com
jhahn@covantaenergy.com	elvine@lbl.gov	tomk@mid.org
tdelfino@earthlink.net	rhwisner@lbl.gov	fwmonier@tid.org
andy.vanhorn@vhcenergy.com	C_Marnay@lbl.gov	johnredding@earthlink.net
sean.beatty@mirant.com	epoelsterl@sunpowercorp.com	clark.bernier@rlw.com
joe.paul@dynegy.com	ksmith@sunpowercorp.com	rmccann@umich.edu
info@calseia.org	philm@scdenergy.com	dschwyz@energy.state.ca.us
gblue@enxco.com	rita@ritanortonconsulting.com	jose@ceert.org
Patricia.R.Thompson@gmail.com	cpechman@powereconomics.com	wynne@braunlegal.com
sbeserra@sbcglobal.net	emahlon@ecoact.org	kgough@calpine.com
monica.schwebs@bingham.com	esprague@consol.ws	kellie.smith@sen.ca.gov
phanschen@mofo.com	richards@mid.org	kdw@woodruff-expert-services.com
wbooth@booth-law.com	rogerv@mid.org	pbarthol@energy.state.ca.us

pstoner@lqc.org	ahl@cpuc.ca.gov	pzs@cpuc.ca.gov
bernardo@braunlegal.com	ayk@cpuc.ca.gov	rmm@cpuc.ca.gov
steven@lipmanconsulting.com	agc@cpuc.ca.gov	ram@cpuc.ca.gov
steven@iepa.com	aeg@cpuc.ca.gov	smk@cpuc.ca.gov
wtasat@arb.ca.gov	blm@cpuc.ca.gov	sgm@cpuc.ca.gov
etiedemann@kmtg.com	bbc@cpuc.ca.gov	svn@cpuc.ca.gov
ltenhope@energy.state.ca.us	cf1@cpuc.ca.gov	scr@cpuc.ca.gov
obartho@smud.org	cft@cpuc.ca.gov	tcx@cpuc.ca.gov
wwester@smud.org	dsh@cpuc.ca.gov	zac@cpuc.ca.gov
bbeebe@smud.org	edm@cpuc.ca.gov	ken.alex@doj.ca.gov
bpurewal@water.ca.gov	eks@cpuc.ca.gov	ken.alex@doj.ca.gov
dmacmull@water.ca.gov	cpe@cpuc.ca.gov	jsanders@caiso.com
kmills@cfbf.com	hym@cpuc.ca.gov	ppetillingill@caiso.com
karen@klindh.com	jm3@cpuc.ca.gov	mscheibl@arb.ca.gov
ehadley@reupower.com	jnm@cpuc.ca.gov	gcollord@arb.ca.gov
sas@a-klaw.com	jbf@cpuc.ca.gov	jdoll@arb.ca.gov
egw@a-klaw.com	jk1@cpuc.ca.gov	pburmich@arb.ca.gov
alan.comnes@nrgenergy.com	jst@cpuc.ca.gov	vwelch@arb.ca.gov
kyle.silon@ecosecurities.com	jtp@cpuc.ca.gov	dmetz@energy.state.ca.us
californiadockets@pacificorp.com	jzr@cpuc.ca.gov	deborah.slom@doj.ca.gov
Philip.H.Carver@state.or.us	jol@cpuc.ca.gov	dks@cpuc.ca.gov
samuel.r.sadler@state.or.us	jci@cpuc.ca.gov	kgriffin@energy.state.ca.us
lisa.c.schwartz@state.or.us	jf2@cpuc.ca.gov	ldecarlo@energy.state.ca.us
cbreidenich@yahoo.com	krd@cpuc.ca.gov	mprior@energy.state.ca.us
dws@r-c-s-inc.com	lrm@cpuc.ca.gov	pperez@energy.state.ca.us
jesus.arredondo@nrgenergy.com	ltt@cpuc.ca.gov	pduvair@energy.state.ca.us
charlie.blair@delta-ee.com	mjd@cpuc.ca.gov	wsm@cpuc.ca.gov
Tom.Elgie@powerex.com	mc3@cpuc.ca.gov	ntronaas@energy.state.ca.us
clarence.binninger@doj.ca.gov	pw1@cpuc.ca.gov	hlouie@energy.state.ca.us
david.zonana@doj.ca.gov	psp@cpuc.ca.gov	hurlock@water.ca.gov
		rmiller@energy.state.ca.us