



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

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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)

**COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE  
LARGE-SCALE SOLAR ASSOCIATION  
ON GREENHOUSE GAS REGULATORY STRATEGIES  
FOR THE ELECTRICITY AND NATURAL GAS SECTORS**

**CALIFORNIA WIND ENERGY ASSOCIATION**

Nancy Rader  
Executive Director  
Telephone: 510-845-5077  
Email: [nrader@calwea.org](mailto:nrader@calwea.org)

**LARGE-SCALE SOLAR ASSOCIATION**

Shannon Eddy  
Executive Director  
Telephone: 916-731-8371  
Email: [shannon@consciousventuresgroup.com](mailto:shannon@consciousventuresgroup.com)

Joseph M. Karp  
Karleen M. O'Connor  
Winston & Strawn LLP  
101 California Street, 39th Floor  
San Francisco, California 94111-5894  
Telephone: (415) 591-1000  
Facsimile: (415) 591-1400  
Email: [jkarp@winston.com](mailto:jkarp@winston.com)  
*Attorneys for the California Wind Energy Association  
and the Large-scale Solar Association*

June 2, 2008

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**I. INTRODUCTION**

Pursuant to the Administrative Law Judges' Rulings issued on April 16 and April 22, 2008, and consistent with the California Public Utilities Commission's Rules of Practice and Procedure 1.9 and 1.10, and with Resolution ALJ-188, the California Wind Energy Association ("CalWEA") and the Large-scale Solar Association ("LSA") respectfully submit these comments addressing greenhouse gas ("GHG") regulatory strategies for the electricity and natural gas sectors. CalWEA's and LSA's comments focus, in particular, on whether the Public Utilities Commission and the Energy Commission should recommend adopting a specific renewable energy requirement.

Increased renewable energy requirements would employ an already-established, readily implementable and verifiable means to achieve a substantial proportion of California's GHG goals. While reducing our carbon footprint, increased renewable energy requirements would simultaneously provide the energy needed to return our economy to vibrancy, produce sustainable jobs, and contribute to the tax base. In addition, renewable energy requirements offer important "co-benefits" in pollution reduction beyond their contributions to the fight against climate change.

As renewables provide a wide array of benefits, their costs must be considered in light of their overall value, and not simply on a carbon basis. Indeed, the established regulatory regime for renewables does exactly that; the Public Utilities Commission, as discussed below,

comprehensively oversees the reasonableness of all renewables costs by assessing their energy value, their GHG contribution, and their co-benefits. The cost of renewables as a carbon-reduction tool, after their energy and other co-benefits values are subtracted, could be minimal or even negative depending on events over the next decade; continuing regulatory cost-control oversight will ensure that it remains cost-effective as future conditions develop.

A comprehensive approach to renewables is fundamentally important if they are to play a significant part in GHG reduction. Renewables are a capital-intensive industry with long-term planning needs, both for the facilities themselves and the transmission infrastructure necessary to support them. It is unrealistic to expect the substantial investment needed for renewables to exceed the current 20% target based on a brand new pricing signal from a yet-to-be established cap-and-trade system, which, based on the experience of other markets, is certain to be somewhat volatile in its fledgling years. A strong commitment to a set renewables percentage is necessary to spur this investment, although, as is the case today, reasonable cost controls must be an integral part of that commitment. Continued RPS-specific cost-control measures, taking into consideration all of renewables' benefits, will not only ensure that costs are proportional to those overall benefits; they will also assure investors of the long-term stability and sustainability of the program. The Public Utilities Commission and the Energy Commission should therefore strongly recommend a specific renewable energy requirement as a swift, sure means of achieving carbon reductions with a highly favorable cost-benefit balance.

In these comments, CalWEA and LSA explain why establishing a 33%-by-2020 RPS as part of the ARB's Scoping Plan would (i) provide cost-controlled carbon reductions that convey benefits beyond those addressed through a carbon-only cap-and-trade program, and (ii) be reliably achieved through an established regulatory infrastructure while measures needed to support alternative carbon-reduction approaches are discussed, designed, approved and implemented. CalWEA and LSA also comment on how a portion of the proceeds from the auctioning of emission allowances could be used in conjunction with a 33%-by-2020 RPS.

## II. DISCUSSION

### A. The Joint Decision & Contribution of Renewable Energy Requirements

In March, the Public Utilities Commission and the Energy Commission adopted a joint decision<sup>1</sup> (“Joint Decision”) recommending that, in implementing AB 32, the Air Resources Board (“ARB”) adopt a mix of mandatory regulatory requirements for the electricity and natural gas sectors together with a cap-and-trade system for the electricity sector with some auctioning of emission allowances. Since that time, a number of workshops were held to consider remaining policy issues for the electricity and natural gas sectors, including a May 2 workshop covering the topic of renewable energy and related transmission issues, among other issues.

In the Joint Decision, the two Commissions concluded that all retail electricity providers (including Investor-Owned Utilities (“IOUs”), Publicly-Owned Utilities (“POUs”), Electric Service Providers (“ESPs”), and Community Choice Aggregators (“CCAs”)) should be required to go beyond the current 20% Renewables Portfolio Standard (“RPS”) requirement, rejecting the suggestion of some parties that renewable energy requirements should be replaced by an AB 32 cap. The Commissions left the exact percentage requirements or deadlines open for consideration, however, pending further analysis. (Joint Decision at p. 4.)

The Joint Decision recommends that the Energy Commission, the Public Utilities Commission, and the ARB jointly seek legislation “that requires retail electricity providers to obtain a greater proportion of their power from renewables by a date certain, with flexibility to allow the Public Utilities Commission and/or ARB to require exceeding that level under certain conditions (subject to a cost-effectiveness evaluation, for example).” (Joint Decision at p. 35.)

The Joint Decision explained further that mandatory regulatory programs must be used *in tandem* with cap-and-trade, particularly in initial years as the cap-and-trade program is developed and tested in the complex, multi-sector environment:

While we fundamentally favor a certain minimum level of mandatory reductions from existing programs ... [such as the RPS], a cap-and-trade system in combination with these mandatory reductions should be able to produce the GHG emissions reductions required by AB 32 at a lower cost than sole reliance on additional mandatory reductions. ... The additional

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<sup>1</sup> Public Utilities Commission Decision D.08-03-018 (adopted March 13, 2008) and Energy Commission Interim Decision CEC-100-2008-002-F (adopted March 12, 2008), respectively.

reductions due to a cap-and-trade system from the electricity sector will likely be small beginning in 2012, but may expand as experience with the mechanism and compliance obligations increase over the AB 32 time period. ... This opportunity to gain experience with the cap-and-trade mechanism, in addition to finding real least-cost reductions, is a major reason for our recommendation to proceed now with cap-and-trade for the electricity sector. (Joint Decision at p. 39.)

The Commissions have thus clearly recognized the advantage for carbon reduction of pairing mandatory regulatory programs with market-based measures, particularly during the developmental stages of the market-based approaches. Renewables, with their significant long-term investment and planning needs, are best suited for the mandatory regulatory approaches, at least until such time as the market-based approaches have achieved a robust, steady state sufficient to foster infrastructure planning and development.

**B. All Renewables Costs— Including Carbon Reduction Costs— are Kept Reasonable by the Public Utilities Commission in a Comprehensive Fashion**

Renewables, unlike many other carbon emission-reduction strategies, are engines for producing valuable products needed for a healthy economy—*i.e.*, the products collectively referred to as energy.<sup>2</sup> In addition, renewables produce other economic and environmental benefits. Renewables' carbon-reduction function is thus only one of many values that renewables provide; to isolate the cost of their carbon-reduction function, the value of those other benefits must first be subtracted from renewables' total costs. Under the current regulatory paradigm, the reasonableness of renewables' total costs is comprehensively assessed by the Public Utilities Commission through evaluation of three categories of "products": the reasonable cost for the greenhouse gas reduction function is modeled through a greenhouse gas ("GHG") "adder";<sup>3</sup> the reasonable cost for energy products is modeled by the Market Price Referent ("MPR"), less the greenhouse gas adder;<sup>4</sup> and the reasonable cost for co-benefits is now

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<sup>2</sup> For purposes of this discussion, energy is treated as a single product, although in reality it consists of energy, capacity and ancillary services.

<sup>3</sup> In Decision D.07-09-024, the Public Utilities Commission adopted the use of a temporary GHG adder in calculating the 2007 MPR, as a proxy for the cost of the GHG allowances that the MPR proxy gas plant would need to purchase under AB 32. The Commission directed further that consideration be given to the GHG adder in the 2008 MPR and later years; accordingly, the GHG adder component of the 2008 MPR is presently being evaluated in Rulemaking 06-02-012.

<sup>4</sup> The MPR represents the market cost of energy, which the Commission has determined, at present, to be based on the costs of a proxy natural gas-fired combined-cycle turbine. Time of Delivery ("TOD") factors are applied to the MPR to produce a market price for different products including baseload, peaking, and as-available output.

addressed through the Above-Market Funds (“AMFs”).<sup>5</sup> This regulatory paradigm, under existing Public Utilities Commission’s jurisdiction, assures that the RPS will be both cost-effective and just and reasonable not only for carbon reduction, but as a means of producing energy and co-benefits.<sup>6</sup> To determine the reasonable cost of renewables as a carbon-reduction tool relative to other alternatives, only the greenhouse gas adder should be considered; the remainder of renewables’ values should be viewed as bearing their own costs.

Since renewables will be subject to regulatory oversight to ensure that they remain cost-effective on an overall basis, the renewables target should be based on potential feasibility, rather than on a projection from models that cannot be relied upon to predict the overall future costs and values associated with renewables (indeed, as shown in the Section VI, the E3 model dramatically undervalues energy and thus overestimates the cost of renewables).

### **C. Renewables Require Long-Term Investments, Planning & Stability, and Promise a Return of Expedited, Enhanced Carbon Reductions**

The current 20% RPS target has created substantial new development activity – to wit, many national and international development companies that were not active in California prior to the passage of SB 1078 in 2002 are now actively developing projects in and around the state. The RPS program has produced contracts for thousands of megawatts of capacity from a diverse set of technologies with reputable developers, a substantial mark of success that promises more to come.

Some question the success of RPS, as relatively few projects have been built thus far. The most significant barriers to expedited construction, however, are transmission and land-use policies, which continue to be addressed through focused efforts such as the Renewable Energy Transmission Initiative. Developers have thus far been willing to undertake the difficulties and substantial costs associated with these transmission and land-use issues due to the strength of California’s commitment to the 20% renewable energy goal. In other words, it has only been California’s commitment to a set percentage of renewable energy that has provided developers

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<sup>5</sup> The AMFs supersede the “supplemental energy payments” that previously derived from the “Public Goods Charge” – a line-item charge on utility bills. The AMFs derive directly from utility consumers and are tracked by the IOUs and the Public Utilities Commission.

<sup>6</sup> The Public Utilities Commission’s ongoing jurisdiction provides assurance that reasonable renewables costs will keep pace—whether upwards or downwards—as the value of the products they provide change. Under the current paradigm, for example, the Public Utilities Commission revisits the MPR annually, adjusting its value in accordance with the market price of energy.

with confidence that a market will exist for their products at a price that will reward their investment and their efforts to overcome current obstacles.

As California's firm commitment is needed to spur renewables development, renewables should be thought of as a foundation to which other carbon-reduction strategies will be added, rather than as an element that should compete for revenues in a cap-and-trade paradigm. The pricing signals sent by cap-and-trade cannot be expected to incent developers to overcome the transmission and land use issues facing renewables today, let alone to drive the long-term capital investments required for significant energy production. Capital investments in energy production, especially after the boom-and-bust California has experienced the energy sector, presently require long-term commitments; although energy market pricing signals may someday provide sufficient stimulus for merchant investment, those market signals cannot be expected to drive capital-intensive investment until they are proven to be robust, stable and reasonably predictable.<sup>7</sup> It will take some time after cap-and-trade has been established before the market will venture to invest on its strength.

Due to the capital intensity and long-term planning needs of renewables, the theoretical contribution that renewables could provide over the current 20% requirement simply will not become a reality in time to contribute to the 2020 goal if cap-and-trade revenues are driver for renewables development, rather than a set renewables percentage. . Renewables require considerable lead time, as does the associated transmission development needed to deliver renewable energy (as discussed in the next section). Under a scenario in which renewables development above 20% is dependent on cap-and-trade revenues, renewables development would not even begin to any significant degree until after a cap-and-trade program has become mature enough to support investment—likely years after the program has been designed, approved, and first implemented.

Recognizing the need to address renewables outside of the cap-and-trade framework, at least until cap-and-trade has reached maturity, will have an additional and substantial benefit: it will diversify the “portfolio” of carbon-reduction incentives, ensuring that fluctuations in carbon-trading pricing, which can be expected based on the experience of other such programs, do not

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<sup>7</sup> For detailed discussions of the limitations of short-term market pricing signals in stimulating new energy resource development and the long-term certainty needed for such investment, see “California Public Utilities Commission Staff Recommendations on Capacity Market Structure: A Report on the August 2007 Workshops in Collaboration with the CAISO,” (Jan. 2008) (issued in Public Utilities Commission Docket No. R.05-12-013), *available at* [http://docs.cpuc.ca.gov/word\\_pdf/REPORT/77949.pdf](http://docs.cpuc.ca.gov/word_pdf/REPORT/77949.pdf).

undermine the progress needed to achieve carbon-reduction goals. As discussed above, renewables would be assured to be cost-effective under a regulatory oversight program that comprehensively considers *all* of the products renewables provide-- energy, GHG and RPS co-benefits. To the extent that the achievable quantity of cost-effective renewables exceeds the amount that carbon-focused modeling would predict, the “extra” renewables would provide, at worst, a margin of error for other efforts intended to achieve AB 32 goals and, at best, would achieve earlier or greater carbon reductions over the targets, all at a price that is just and reasonable considering everything that the RPS provides to California. This would be an excellent outcome in the face of the threat of climate change, and would pave the way toward achieving the AB 32 goals for 2050. Therefore, the Commissions can confidently recommend to the ARB that it adopt a 33%-by-2020 RPS as one of the core measures of the AB 32 Scoping Plan.

**D. An Express 33% RPS Target is Necessary to Drive the Transmission Expansion California Needs to Achieve a 33% RPS Goal**

As important as an express 33% RPS target is to renewable project development, it is perhaps even more so as a driver for the transmission planning and build-out needed to deliver of that renewable energy. Even with the 20% RPS goal having been established five years ago, the state is still substantially lagging in planning for— let alone building— the necessary transmission infrastructure for that smaller quantity of renewable energy. If an express 33% RPS target is not established, there is every reason to be pessimistic that the 33% RPS goal could be achieved, due to lack of supporting transmission— regardless of whether that much new renewable procurement is necessary to achieve AB 32 goals (as was indicated in the 2006 Climate Action Team Report to the Governor and Legislature).<sup>8</sup>

Under the reformed generation interconnection and transmission planning process that the CAISO is now undertaking to design, developers will be required to post very substantial deposits to obtain transmission cost studies and upon signing an interconnection agreement to obtain the necessary transmission upgrades. Given the five to seven years’ lead time that it takes to plan, permit and construct transmission, much of the planning and deposits must be accomplished within the next few years in order to achieve the 33% RPS target over the next

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<sup>8</sup> Available at [http://www.climatechange.ca.gov/climate\\_action\\_team/index.html](http://www.climatechange.ca.gov/climate_action_team/index.html).

decade.<sup>9</sup> Without signed long-term power purchase agreements or the strong prospect of such, developers will not make the quantity of investments needed to achieve a 33% goal, and the necessary transmission upgrades will not be made. Thus, to achieve the renewables level that will be required to attain the AB 32 goals, it will be necessary to establish a 33%-by-2020 RPS target as a “core measure” of the ARB Scoping Plan this year. Waiting for a cap-and-trade program to become sufficiently robust to support investment will push additional renewables investment and the transmission infrastructure needed to support it too far into the future to contribute to the 2020 AB 32 goals.

**E. The E3 Model Misstates Renewables’ Value, Overstating the Cost of a 33% Target**

CalWEA and LSA have conducted a detailed review of the E3 calculator used to model the 33% RPS scenario. The conclusions of the E3 calculator appear to be in error, in significant part due to faulty assumptions on the relative costs of gas-fired and renewable generation. CalWEA and LSA are confident that, far from the relatively high cost per metric ton (“tonne”) predicted by the E3 model for a 33% RPS, the carbon reduction component of RPS costs may well approach zero— and could possibly even become negative; in other words, the carbon reduction may come at no additional cost, and may even save money relative to gas-fired generation.

The E3 model shows a large margin between renewable resource costs and the alternative costs of gas-fired generation. In the 33% RPS case, the incremental costs for renewable resources are \$135 per MWh. In comparison, the model assumes gas-fired power is available for about half that price, \$69 per MWh. Such a large difference in costs is not reasonable, and is the product of erroneous assumptions.

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<sup>9</sup> The 2007 CEC Intermittency Analysis Project (“IAP”) report found that there is sufficient flexible capacity on the California grid to accommodate 33% renewables, but that this capability is not necessarily being used. Note that establishing an express 33% RPS target will put greater emphasis on the need to plan the rest of the system accordingly – e.g., deterring utility commitments to fossil fuel resources that will be unnecessary with 33% renewables, and optimizing the use of existing system resources (including hydro, pumped hydro storage, and dispatchable fossil fuel resources as well as some large loads), allowing for optimized renewable resource integration that can reduce both the carbon footprint and the cost of the energy system.

**Table 1: E3 Model Assumed Renewable Costs in 2008 \$ (\$/MWh)**

	Fixed Cost	Variable	Transmission	Total
Renewables	\$109	\$14	\$12	\$135
Gas-fired	\$15	\$54	\$0	\$69
Difference				\$66

CalWEA and LSA first note that, if the average price of a new renewable resource were equal to the cost of incremental gas-fired generation, as measured by the all-in costs of the combined-cycle gas turbine (“CCGT”) plant that is the basis for the Public Utilities Commission’s MPR, there would be *no* additional costs for renewable resources, and the cost per tonne for GHG reductions from incremental renewables would thus equal zero (*i.e.*, their energy products would be provided carbon-free, at no additional cost). CalWEA and LSA show below the adopted 2007 MPR for a 20-year contract starting in 2008, excluding the GHG adder, in comparison to the same renewable costs. All costs are in 2008 dollars. The difference is then \$44 per MWh, which is 33% lower than the E3 calculation. This comparison strongly suggests that the E3 calculator exaggerates the cost difference between renewable and gas-fired resources.

**Table 2: E3 Model Assumed Renewable Costs vs. the 2007 MPR, in 2008 \$ (\$/MWh)**

	Fixed Cost	Variable	Transmission	Total
Renewables	\$109	\$14	\$12	\$135
Gas-fired (2007 MPR)	\$27	\$65	\$0	\$91
Difference				\$44

CalWEA and LSA’s review has identified the following problems with E3's calculator:

- **Starting natural gas price.** Natural gas prices today are above \$10 per MMBtu at the California border. E3 uses a gas price of \$7.85 per MMBtu for the cost of fuel. If the cost of gas is increased to \$10 per MMBtu, the cost of GHG reductions from a 33% RPS decreases from \$133 to \$106 per tonne.
- **Constant real cost of fossil fuel.** The E3 model uses a constant real cost of natural gas (\$7.85 per MMBtu) for the entire 2008 – 2020 period. The capital costs for new generation also are expressed in constant 2008 dollars. These assumptions do not consider the likelihood that natural gas prices and generation capital costs will escalate at

significantly different rates. In the 18 years since 1989, natural gas prices at the California border have escalated by 6.4% per year, while general inflation has averaged 2.9%.<sup>6</sup> In the long-run, fossil fuel prices can be expected to exhibit a positive real escalation rate, as they become increasingly difficult to find and produce. In addition, the structure of the E3 model does not recognize the potential for renewable resource costs to decline over time, as renewable technologies improve. These differential escalation rates become particularly significant over the multi-decade timeframe in which the GHG reduction program will operate. *Indeed, one of the primary benefits of renewables is that they substitute capital costs for fuel costs, and are a long-term hedge against future fuel price escalation.* The E3 model's use of constant, 2008 dollar costs in all years ignores these significant benefits of renewables. CalWEA and LSA have re-run the E3 calculator, assuming that a natural gas price of \$10 per MMBtu in 2008 increases at the historical long-term real escalation rate of 3.5%; using this rate, the natural gas price would exceed \$15 per MMBtu in 2020. This change in the profile of natural gas prices used in the E3 calculator results in a GHG mitigation cost for a 33% RPS of \$43 per ton.

- **Too-low market heat rates and electricity market prices that are inconsistent with the MPR methodology.** The electricity market prices used in the model average \$54 per MWh. Assuming variable O&M of \$2.50 per MWh in the market price and dividing the remainder by the gas price results in a market heat rate of approximately 6,600 Btu/kWh. This is 5% below the “clean & new” heat rate of a new CCGT, and is inconsistent with typical market heat rates of 8,000 Btu per kWh observed in the California wholesale market in recent years— and thus with the assumptions underlying the Public Utilities Commission's MPR, which is based on a new CCGT. CalWEA and LSA used a market heat rate of 8,000 Btu per kWh to re-calculate electric market prices in the E3 calculator. This change, plus the gas price scenario described above (\$10 per MMBtu in 2008; \$15 per MMBtu in 2020), reduced the GHG mitigation cost for a 33% RPS to a *negative* \$11 per ton— i.e., renewables would provide carbon reductions at an overall cost savings, not at any additional expense.
- **Avoided capacity costs fail to consider renewables longevity.** The E3 model shows that a 33% RPS will not just avoid new CCGTs, but that the added renewable capacity also will displace existing CCGT capacity. The model thus limits the capacity costs that renewables avoid because 76% of the displaced CCGTs in 2020 are assumed to be existing units. However, the model ends in 2020, and the renewable capacity added between 2008 - 2020 will operate for 30 years. Even if new renewables initially displace existing generation, over time they will displace other new generation that would have been needed as loads grow. As a result, the E3 model's calculation of the capacity costs avoided by a 33% RPS is understated. This is a structural failure of the E3 calculator that cannot be remedied simply by changing input assumptions, but that artificially inflates the perceived cost of a 33% renewables scenario.

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<sup>6</sup> In 1989, southern California border natural gas prices averaged \$2.11 per MMBtu; in 2007 they averaged \$6.42 per MMBtu. General inflation is based on the GDP price deflator.

- **Transmission cost estimates are too high and are not properly allocated.** The assumed transmission cost difference between gas-fired and renewable resources is inappropriately inflated. While gas-fired resources may be located closer to load centers than some renewable resources, it is improper—and unfair—to look at transmission only on the renewable side. In addition, transmission built to bring renewable power to market will have network benefits as a result of eliminating existing and future congestion within California and increasing the state’s capacity to import power. For example, the 4,500 MW Tehachapi transmission project will relieve north-south transmission constraints on Path 26. Thus, at a minimum, transmission cost adders should be net of system benefits and of transmission upgrades for gas-fired generation. Finally, the model allocates transmission costs to renewables only in the 33% RPS case; such costs also should be allocated to the reference case – it is improper to allocate the entire cost of transmission on renewables to the 33% case. These are again structural failures of the E3 calculator that cannot be remedied simply by changing input assumptions, but that artificially inflate the perceived cost of a 33% renewables scenario.

CalWEA and LSE appreciate E3’s candid comment, on Slide 27 of its May 6 workshop presentation, that its GHG calculator “should not be used for resource planning decisions.” The deficiencies noted above simply reinforce this point. Clearly, the Commissions should first recognize that re-running the E3 calculator with more appropriate assumptions results in a *negative* cost for the renewables’ carbon-reduction function— *before* accounting for the other errors that would require reprogramming the model. The Commissions, following the E3 caveat and in light of these concerns, should not look to the E3 model in making a determination on the appropriate percentage of renewables, but should rather select the maximum feasible renewables contribution conditioned on the continued regulatory cost control measures that will ensure renewables remain cost-effective overall.

**F. The Co-Benefits of Renewables Can Be Reflected in the “Above-Market Fund,” Which Could be Supplied by a Portion of Auction Revenues [Responds to ALJ Questions 10 & 11]**

AB 32 requires the ARB to adopt regulations “to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions,” and further requires the ARB to consider the “co-benefits” of regulation. These co-benefits include the “overall societal benefits including reductions in other air pollutants, diversification of energy sources and other economic, environmental and public health benefits.”<sup>10</sup>

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<sup>10</sup> Health and Safety Code § 38562(b)(6).

Renewables provide a variety of co-benefits, including, but not limited to, the avoided security and environmental risks of LNG shipment and import infrastructure; avoided environmental impacts and fossil fuel use associated with the extraction, production and transportation of fossil fuels; reduction in air, water, and solid waste emissions relative to fossil-fuel powered energy plants;<sup>11</sup> health benefits, and rural economic development benefits. The cost of those benefits can be provided through AMFs, to the extent that they are paid for and not already incorporated, under the current regulatory paradigm, in the MPR.<sup>12</sup> Presently, the AMF derives from ratepayers as the utilities pass along the above-market costs of RPS contracts. In the Joint Decision, one of the two methods for returning revenues from allowance auctions to benefit electricity consumers identified by the Commission was the augmentation of investments in energy efficiency and renewable power. Using auction revenues to either supply all or a portion of the AMFs would benefit ratepayers through offsetting the charges that they would otherwise pay for these valuable benefits.

#### **G. Establishing a 33%-by-2020 RPS Is Consistent with the ARB's Priorities**

At the May 19, 2008, Scoping Plan Workshop, the ARB identified criteria for crafting a “preferred approach” to its Scoping Plan.<sup>13</sup> Establishing a 33% RPS will meet a number of these criteria:

- **Meet the Key Scoping Plan Objectives:**
  - **Achieve the target for 2020.** Establishing a 33%-by-2020 express RPS target now will promote the development of whatever amount of renewables prove to be cost-effective, and the transmission needed to support it. Unlike cap-and-trade, the RPS program is already established and functioning smoothly (although additional work will be required to apply RPS equally to the POUs).

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<sup>11</sup> Although the MPR reflects the cost of a gas plant that uses SCR technology and purchases offsets for those air emissions for which offsets are available, it does not address environmental and/or health impacts from remaining emissions, including those not currently or fully regulated.

<sup>12</sup> See n.11, supra. Note also that the MPR is time-differentiated to account for the value of power during peak periods. We believe that some of these factors are significantly under-valued in the current MPR, and that PG&E's TOD factors are too low. These factors should be fully valued in the MPR methodology rather than be accounted for through AMFs.

<sup>13</sup> See [http://www.arb.ca.gov/cc/scopingplan/meetings/051908/5\\_19\\_spwrkshop\\_slides\\_am.pdf](http://www.arb.ca.gov/cc/scopingplan/meetings/051908/5_19_spwrkshop_slides_am.pdf).

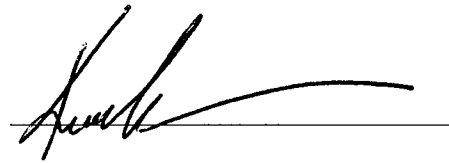
- **Maximize economic benefits and minimize economic harm.** Along with energy and capacity to support the state’s economic activity, promoting renewables will bring jobs and tax base to the state and its rural communities.
  - **Maximize societal benefits, including environmental and public health co-benefits.** Replacing fossil-fueled energy production with renewable generation will provide a wide array of environmental, public health and economic benefits, as discussed above.
  - **Assure that emissions reductions required of each sector are equitable.** Establishing a 33% RPS will increase the likelihood that the electric sector is achieving its full, cost-effective potential for emissions reduction.
  - **Provide leadership and influence other Governments.** More than 20 other states have established RPS requirements, including most of the WECC states, as do many other countries. Raising the goal as part of achieving GHG targets will encourage these states, and the world, to follow California’s lead and adopt yet another suite of California-developed technologies.
- **Consider additional factors, such as:**
    - **Ability to enforce reductions.** RPS compliance is readily verifiable and enforceable upon IOUs, ESPs and CCAs by the Public Utilities Commission. The Energy Commission must be given similar authority over the POUs.
    - **Durability and flexibility in program implementation.** The RPS contains established flexibility provisions– both energy delivery and compliance timing flexibility– and is likely to be made more flexible through unbundled tradable Renewable Energy Credits (“RECs”). The combination of a firm target, qualified only by continued cost-effectiveness oversight, provides the strength of commitment needed for development while remaining sufficiently flexible to ensure costs remain manageable and appropriate to the benefits received.

### III. CONCLUSION

The renewables contribution needed to attain the AB32 2020 goals can only be obtained through a firm, 33% RPS-by-2020 commitment. The ongoing regulatory oversight to ensure that renewables are cost-effective, considering all of the products and benefits they convey, is the appropriate counterbalance to that firm commitment. The combination of a set percentage and regulatory cost oversight is a far better fit to the long-term capital-intensive investment needed for renewable development than a fledgling cap-and-trade program, which simply cannot be expected to provide the necessary incentives for renewable development. By building on the

increasing success of the RPS program to date, a 33% RPS-by-2020 commitment will provide a firm cornerstone of California's carbon reduction program, allowing for a greater degree of flexibility and experimentation in the cap-and-trade component and ultimately a stronger and more reliable carbon reduction program overall.

Respectfully submitted,



**CALIFORNIA WIND ENERGY ASSOCIATION**

Nancy Rader  
Executive Director  
Telephone: 510-845-5077  
Email: [nrader@calwea.org](mailto:nrader@calwea.org)

**LARGE-SCALE SOLAR ASSOCIATION**

Shannon Eddy  
Executive Director  
Telephone: 916-731-8371  
Email: [shannon@consciousventuresgroup.com](mailto:shannon@consciousventuresgroup.com)

Joseph M. Karp  
Karleen M. O'Connor  
Winston & Strawn LLP  
101 California Street, 39th Floor  
San Francisco, California 94111-5894  
Telephone: (415) 591-1000  
Facsimile: (415) 591-1400  
Email: [jkarp@winston.com](mailto:jkarp@winston.com)

*Attorneys for the California Wind Energy Association  
and Large-Scale Solar Association*

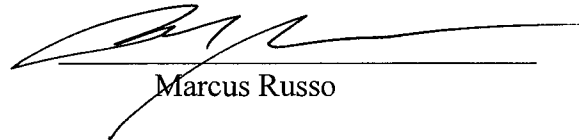
## Certificate of Service

I hereby certify that I have this day served a copy of the

**COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE  
LARGE-SCALE SOLAR ASSOCIATION ON GREENHOUSE GAS REGULATORY  
STRATEGIES FOR THE ELECTRICITY AND NATURAL GAS SECTORS**

on all known parties to R.06-04-009 (as well as by email under CEC Docket No. 07-OIIP-01 to [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us) and [kgriffin@energy.state.ca.us](mailto:kgriffin@energy.state.ca.us)) by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on June 2, 2008, at San Francisco, California.



Marcus Russo



California Public  
Utilities Commission

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### Parties

---

DAN HECHT  
SEMPRA ENERGY  
58 COMMERCE ROAD  
STANFORD, CT 06902

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

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

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

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

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

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

CATHY S. WOOLLUMS  
MIDAMERICAN ENERGY HOLDINGS COMPANY  
106 EAST SECOND STREET  
DAVENPORT, IA 52801  
FOR: KERN RIVER GAS TRANSMISSION

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

THOMAS DILL  
PRESIDENT  
LODI GAS STORAGE, L.L.C.  
1021 MAIN ST STE 1500

CHICAGO, IL 60661  
FOR: CONSTELLATION ENERGY GROUP INC

HOUSTON, TX 77002-6509

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COALITION/SOUTHERN CALIFORNIA PUBLIC  
POWER AUTHORITY

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

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

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

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

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

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

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

AKBAR JAZAYEIRI  
DIR. REVENUE & TARIFFS, RM 390  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800, 2241 WALNUT GROVE AVE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KRISTIN GRENFELL

MICHAEL P. ALCANTAR

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

EDWARD W. O'NEILL  
 ATTORNEY AT LAW  
 DAVIS WRIGHT TREMAINE LLP  
 505 MONTGOMERY STREET, SUITE 800  
 SAN FRANCISCO, CA 94111-6533  
 FOR: CALIFORNIA LARGE ENERGY CONSUMERS  
 ASSOCIATION

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

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

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

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

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

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

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

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

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

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

KEVIN BOUDREAU  
CALPINE POWER AMERICA-CA, LLC  
4160 DUBLIN BLVD.  
DUBLIN, CA 94568  
FOR: CALPINE POWER AMERICA

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

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

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

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

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

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

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

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

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

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

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

MODESTO, CA 95354

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

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

WAYNE AMER  
PRESIDENT  
MOUNTAIN UTILITIES  
PO BOX 205  
KIRKWOOD, CA 95646  
FOR: MOUNTAIN UTILITIES

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

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

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

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

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

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

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
FOR: SIERRA PACIFIC POWER COMPANY

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

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

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

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

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

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

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

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

## COOPERATIVE

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

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

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

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

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

## Information Only

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

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

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

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

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

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

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

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

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

DALLAS BURTRAW  
1616 P STREET, NW  
WASHINGTON, DC 20036

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

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

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

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

LOUISVILLE, KY 40223

BARRY RABE  
1427 ROSS STREET  
PLYMOUTH, MI 48170

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

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

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

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  
FOR: SUMMIT BLUE CONSULTING

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

LOUISVILLE, KY 40223

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

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

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.  
HOUSTON, TX 77079

ED CHIANG  
ELEMENT MARKETS, LLC  
ONE SUGAR CREEK CENTER BLVD., SUITE 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 DEPARTMENT  
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

S. NANCY WHANG  
 ATTORNEY AT LAW  
 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

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

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

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

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

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

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

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

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

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

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

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

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

KIM KIENER  
504 CATALINA BLVD.  
SAN DIEGO, CA 92106

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

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

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

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

SEPHRA A. NINOW  
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  
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

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

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

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

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

JAN PEPPER  
CLEAN POWER MARKETS, INC.  
PO BOX 3206  
418 BENVENUE AVENUE

FOR: LANDSITE, INC

LOS ALTOS, CA 94024

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

LOULENA A. MILES  
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  
FOR: FPL ENERGY PROJECT MANAGEMENT INC

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

BRAD WETSTONE  
 236 HARTFORD STREET  
 SAN FRANCISCO, CA 94114

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

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

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

SHAUN ELLIS  
 2183 UNION STREET  
 SAN FRANCISCO, CA 94123

ED LUCHA

GRACE LIVINGSTON-NUNLEY

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

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

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

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

KATE BEARDSLEY  
 PG&E  
 MAILCODE B9A  
 PO BOX 770000  
 SAN FRANCISCO, CA 94177

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

JOSEPH HENRI  
31 MIRAMONTE ROAD  
WALNUT CREEK, CA 94597

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CARLA PETERMAN  
UCEI  
2547 CHANNING WAY  
BERKELEY, CA 94720

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

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

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

EMMA POELSTERL  
SUNPOWER  
1414 HARBOUR WAY SOUTH  
RICHMOND, CA 94804

KARI SMITH  
SUNPOWER  
1414 HARBOUR WAY SOUTH  
RICHMOND, CA 94804

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

JOSE CARMONA  
DIRECTOR OF ADVOCACY  
CEERT  
1100 11TH STREET, STE 311  
SACRAMENTO, CA 95814  
FOR: CENTER FOR ENERGY EFFICIENCY AND  
RENEWABLE TECHNOLOGIES (CEERT)

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

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

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

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

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

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

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

RYAN BERNARDO  
BRAUN BLAISING MCLAUGHLIN, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SAM SADLER  
OREGON DEPARTMENT OF ENERGY  
625 NE MARION STREET

LISA SCHWARTZ  
SENIOR ANALYST  
ORGEON PUBLIC UTILITY COMMISSION

SALEM, OR 97301-3737

PO BOX 2148  
SALEM, OR 97308-2148CLARE BREIDENICH  
WESTERN POWER TRADING FORUM  
224 1/2 24TH AVENUE EAST  
SEATTLE, WA 98112  
FOR: WESTERN POWER TRADING FORUMDONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660JESUS ARREDONDO  
NRG ENERGY INC.  
4600 CARLSBAD BLVD.  
CARLSBAD, CA 99208CHARLIE BLAIR  
DELTA ENERGY & ENVIRONMENT  
15 GREAT STUART STREET  
EDINBURGH, UK EH2 7TP  
UNITED KINGDOMTHOMAS 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 94102DAVID ZONANA  
DEPUTY ATTORNEY GENERAL  
CALIFORNIA ATTORNEY GENERAL'S OFFICE  
455 GOLDEN GATE AVENUE, SUITE 11000  
SAN FRANCISCO, CA 94102ADAM LANGTON  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214AMY C. YIP-KIKUGAWA  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214ANDREW CAMPBELL  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5203  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214ANNE GILLETTE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214BETH MOORE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRABISHU CHATTERJEE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214CATHLEEN A. FOGEL  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214CHARLOTTE TERKEURST  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5117  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214CHRISTINE S. TAM  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4209  
505 VAN NESS AVENUEDONALD R. SMITH  
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

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

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

LANA TRAN  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRIC GENERATION PERFORMANCE BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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 GAS BRA  
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

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

MICHAEL COLVIN  
 CALIF PUBLIC UTILITIES COMMISSION  
 POLICY & PLANNING DIVISION  
 ROOM 5119  
 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

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

PAUL S. PHILLIPS  
 CALIF PUBLIC UTILITIES COMMISSION  
 ELECTRICITY PLANNING & POLICY BRANCH  
 ROOM 4101  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

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

RAHMON MOMOH  
 CALIF PUBLIC UTILITIES COMMISSION  
 ELECTRICITY PLANNING & POLICY BRANCH  
 ROOM 4205  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

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

SARA M. KAMINS  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY 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

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

THERESA CHO  
 CALIF PUBLIC UTILITIES COMMISSION  
 EXECUTIVE DIVISION  
 ROOM 5207  
 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

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

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

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

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

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

MICHAEL SCHEIBLE  
 DEPUTY EXECUTIVE OFFICER

GARY COLLORD  
 STATIONARY SOURCE DIVISION

CALIFORNIA AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95677  
FOR: CALIFORNIA AIR RESOURCES BOARD

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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