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

Order Instituting Rulemaking to Develop)
Additional Methods to Implement the California) Rulemaking: 06-02-012
Renewables Portfolio Standard Program) (Filed February 16, 2006)
_____)

**Opening Comments
of the California Wind Energy Association,
the California Cogeneration Council,
the Large-scale Solar Association, and
the Solar Alliance
on the Proposed Decision of ALJ Simon**

R. Thomas Beach
Patrick G. McGuire
Crossborder Energy
2560 Ninth Street, Suite 213A
Berkeley, California 94710
Telephone: 510-549-6922
Facsimile: 510-649-9793
E-mail: tomb@crossborderenergy.com

On Behalf of
**CALIFORNIA WIND ENERGY ASSOCIATION,
CALIFORNIA COGENERATION COUNCIL,
LARGE-SCALE SOLAR ASSOCIATION, and
THE SOLAR ALLIANCE**

October 6, 2008

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In accordance with the Commission’s Rule 14.3, the California Wind Energy Association (CalWEA), the California Cogeneration Council (CCC), the Large-scale Solar Association (LSA), and the Solar Alliance (SA) hereby submit opening comments on the Proposed Decision of ALJ Anne Simon (PD) on methodological issues associated with the 2008 market price referent (2008 MPR). CalWEA, CCC, LSA, and SA (CalWEA *et al.*) share the same positions on issues concerning the 2008 MPR, and filed joint post-workshop comments on June 6 and 18, 2008.

CalWEA *et al.* commend ALJ Simon for a thoughtful and comprehensive PD, and are pleased to support most aspects of the draft decision. In particular, CalWEA *et al.* support the following provisions of the PD:

- **The MPR should remain public.** The PD finds that Pacific Gas & Electric (PG&E) and the other investor-owned utilities (IOUs) presented no evidence that RPS bidders “chase the MPR.” In a time of rising fossil fuel prices and power plant construction costs, it is logical for RPS bids to increase as well, and this does not mean that the public nature of the MPR price distorts the market for renewable generation. *PD, at 30 -32.*
- For the MPR **gas price forecast**, the PD adopts the use of the full 12 years of NYMEX gas price data. In addition, CalWEA *et al.* can support the PD’s new method for setting the price in year 13 and beyond, an approach that is close to the proposals of CalWEA *et al.* and the Union of Concerned Scientists. The PD’s adopted changes to the MPR gas forecast will move the method closer to capturing the full costs of a fixed-price supply of

natural gas for all years used in the MPR model, as required by statute.¹ *PD, at 11.*

- CalWEA *et al.* also believe that the PD's direction to use California basis adjustments that are consistent with the underlying Henry Hub data sources is reasonable and uses the best available information. *PD, at 12-13.*
- CalWEA *et al.* support the PD's findings that **the GHG Adder should become a permanent part of the MPR** and that Energy Division staff should use GHG mitigation values from **up-to-date, comprehensive, and public models** of the costs of reducing GHG emissions. *PD, at 28.*
- The PD correctly determines that the MPR model's 2004 - 2005 values for **combined-cycle gas turbine (CCGT) capital costs** need to be inflated to the present using more realistic and up-to-date cost indices. *PD, at 20-21.*
- The PD is reasonable in requiring the **escalation in CCGT capital costs** to continue for five years after the current year. *PD, at 22-23.*
- The PD directs Energy Division to extend the MPR model to **25-year contracts**, because at times the IOUs have negotiated non-standard RPS contracts with terms of 25 years. CalWEA *et al.* note that the PD is careful not to prejudge the issue of whether the utilities should be required to offer 25-year RPS contracts, an issue that is not within the scope of this case. *PD, at 24.*

CalWEA *et al.* will not comment further on these issues, in deference to the Commission's rules that ask parties to focus on errors in proposed decisions. To the extent that other parties challenge any of the above aspects of the PD, we will respond in reply comments.

As set forth below, CalWEA *et al.* recommend changes to the PD in four areas.

¹ § 399.15(c)(2) of the Public Utilities Code.

I. THE MPR MODEL SHOULD USE A REALISTIC CCGT CAPACITY FACTOR.

The PD adopts TURN's position that the MPR model should use a 92% "technical" capacity factor for the benchmark CCGT plant, in essence assuming that the CCGT operates as a base load plant. The PD begins its discussion of this issue by observing that "the fundamental purpose of the MPR in RPS procurement is to 'establish a methodology to determine the market price of electricity. . . ' [§ 399.15(c)]." The PD also seeks a method that is simple and transparent. Earlier, the PD notes that § 399.15(c)(3) requires the Commission to establish a MPR methodology that reflects accurately the costs of several electricity products – base load, peaking, and as-available. Prior to D. 05-12-042, the Commission actually set separate base load and peaking MPRs: the base load MPR used CCGT costs with TURN's "technical" capacity factor of 92%, while the peaking MPR was based on a simple-cycle combustion turbine (CT) peaker.²

In D. 05-12-042, the Commission attempted to simplify the MPR by combining the base load and peaking MPRs into a single MPR determined by allowing each IOU to apply its time-of-delivery (TOD) factors to the costs of a CCGT. The peaking MPR then became the single MPR times the utility's on-peak TOD factor.³ The Commission also determined that the TOD factors should be applied to a CCGT cost calculated using a realistic, "economic" capacity factor, and adopted a method to calculate that capacity factor that relied on the utilities' TOD factors. Over time, it has become very clear that the IOUs' TOD factors are problematic – they are not transparent, they vary widely from utility to utility even though the utilities operate in closely-linked markets, and they produce widely varying CCGT capacity factors based on the method adopted in D. 05-12-042.⁴ For example, the 2007 summer on-peak TOD factors for PG&E, Edison, and SDG&E were 3.28, 2.037, and 1.64, respectively. One of the few details

² See the 2004 base load and peaking MPRs adopted in Resolution E-3942.

³ D. 05-12-042, at 30-35. Each utility's set of TOD factors average 1.0 over all hours of the year.

⁴ See CalWEA / CCC / CSP Pre-workshop Comments, at 7-11.

concerning the IOUs' TOU factors that has come to light is the fact that SDG&E's RPS TOU factors are energy-only factors, and are not "all-in" factors that combine both energy and capacity values.⁵ The lack of any capacity value in SDG&E's summer on-peak TOD factor is why its 2007 factor is just 50% of Edison's summer on-peak TOD factor. Thus, it is highly questionable whether SDG&E's factors are appropriate for use in time-differentiating the MPR, which is an all-in price combining both energy and capacity. Even TURN acknowledges that the IOUs' TOD factors are not consistent,⁶ and the Commission has indicated that it will review TOD factors in the next long-term procurement plan proceeding.⁷ Given the problems with the utility TOD factors, the PD takes the wrong course in finding that we can rely entirely on the TOD factors to produce a time-differentiated MPR that correctly reflects the economic value of both base load and peaking products, as required by § 399.15(c)(3).

Let's assume, for argument's sake, that the use of a 92% capacity factor is appropriate for the base load MPR, as TURN argues and the PD accepts. Does this result in a reasonable peaking MPR? **Table 1** uses the adopted 2007 MPR model to calculate the MPR for a 20-year contract starting in 2009 using a 92% CCGT capacity factor – \$91 per MWh. The table then applies the utilities' summer on-peak TOD factors to the \$91 per MWh MPR to calculate the peaking MPR. The peaking MPRs vary widely because the utilities' on-peak TOD factors are not consistent. The table also shows the California Energy Commission's (CEC) 2007 cost of simple-cycle CT peaking capacity from the generation cost study prepared for the *2007 Integrated Energy Policy Report*,⁸ based on virtually identical natural gas costs and the same capacity factors used for the peaking MPRs. Clearly, the utilities' existing TOD factors applied to an MPR using a 92% capacity factor produces peaking MPRs that are far too low compared to

⁵ SDG&E Advice Letter 1952-E, at pages 8 and 9: "SDG&E's MPR TOD factors are appropriate for an energy market application because they do not include an additional capacity cost component."

⁶ TURN Post-workshop Comments, at 7.

⁷ D. 08-07-048, at 3 and Ordering Paragraph 1, modifying D. 07-09-040.

⁸ Available on the CEC website at <http://www.energy.ca.gov/2007publications/CEC-200-2007-011/CEC-200-2007-011-SF.PDF>.

Table 1

Calculation of the Peaking MPR

<u>Utility</u>	2007 MPR in <u>2009</u> [1] \$/MWh	Summer On-peak <u>TOD Factor</u>	<u>Peaking MPR</u> \$/MWh	<u>Capacity factor</u> %
PG&E	\$91	2.04	\$185	7.8%
SCE	\$91	3.28	\$297	5.8%
SDG&E	\$91	1.64	\$149	7.8%
Average	\$91	2.32	\$210	7.1%
CEC 2007 IEPR			\$600	5.0%
simple-cycle CT [2]			\$483	7.1%
			\$357	9.4%

NOTES:

[1] Uses 2007 MPR for 20 years starting in 2009, with a 92% capacity factor for the CCGT.

[2] Source: Table 27: 2007 IEPR vs. 2003 IEPR – Simple Cycle CT
in CEC Comparative Generation Cost Study (# CEC-200-2007-011-SF)

the CEC benchmark for the cost of peaking capacity.

How can we remedy this? Reforming the IOUs' TOD factors is beyond the scope of this proceeding. The best we can do in this case is to use a lower, more realistic capacity factor for the CCGT. The adopted 2007 MPR used a more realistic 76% capacity factor, and this increased the 2007 MPR for a 20-year contract starting in 2009 from \$91 to \$97 per MWh. This 6% increase in the MPR represents less than a third of the increase in the overall MPR that would result from increasing the peaking MPR shown in Table 1 to a level comparable with the CEC peaking values.⁹ Thus, although the use of a realistic capacity factor in the MPR does not correct completely the shortfall in the peaking MPR, it does achieve a better balance between the peaking and the base load MPRs. We are asking the time-differentiated MPR to represent the costs of multiple products, and given the inconsistencies and plain errors in the utilities' TOD factors, the use of a realistic CCGT capacity factor achieves a more balanced and equitable valuation of all of the products that the MPR must represent.

Another way to look at the time-differentiated MPR is as the measure of the all-in market price for electric supplies in California – in other words, the all-in costs of the marginal electric resource. During the high-demand on-peak hours, the all-in market price is well above the all-in costs for a CCGT, and a resource that is more expensive than a CCGT (a CT) is on the margin. During these on-peak hours, the time-differentiated MPR also must serve as the proxy for a peaking resource. As a result, the all-in market price in California during peak hours exceeds what is necessary to compensate a base load CCGT, because a more expensive CT is the marginal resource.¹⁰ As a result, the MPR price averaged over all hours exceeds the cost of a CCGT at a 92% capacity factor. Edison complains about this, but the utility ignores the fact that

⁹ For example, increasing the peaking MPR to align with CEC values, i.e. from \$210 to \$483 per MWh in 7.1% of the hours of the year, would increase the overall MPR by \$19 per MWh (i.e. an increase of \$273 per MWh times 0.071).

¹⁰ California does not actually have an all-in market that would enable a CCGT to over-earn during peak periods. In reality, a CCGT will be limited by competition with other CCGTs to recover no more than its costs during the peak period.

the present MPR also functions to determine the MPR for a peaking resource. A more expensive CT, not a CCGT, is the marginal unit during peak hours, and the MPR needs to capture these costs as well as the costs for a base load resource. TURN's 92% capacity factor assumes that a CCGT operating as a base load resource is the marginal unit in all hours, including peak hours. This ignores the reality that simple-cycle CTs – a more expensive resource than a CCGT – are being built in California to provide peaking power.¹¹ During on-peak hours, the all-in market price in California exceeds what is necessary to compensate a CCGT, because more expensive CTs are the marginal resource.

In setting the MPR, the Commission cannot ignore the higher all-in costs of CT peaking resources – indeed, the RPS statute requires the Commission to consider the costs of peaking as well as base load resources. The proposals of TURN and Edison at best would be adequate for a base load MPR; they are not adequate for an MPR that must represent the costs of multiple power products, including peaking as well as base load products.¹² The reality of all-in marginal costs in the California market today for both base load and peaking products is that they are best, if imperfectly, represented by the time-differentiated costs of a CCGT operating at a realistic capacity factor, as CalWEA *et al.* have shown in Table 1 above and in our other presentations in this case.

The one change that needs to be made to the methodology adopted D. 05-12-042 is to find a simpler and more transparent method to calculate a realistic capacity factor for the CCGT. CalWEA *et al.* have proposed such a method, using the simple daily dispatch model for a CCGT that the California Independent System Operator (CAISO) has used for many years. The CAISO method, using recent historical daily gas and electric prices, produces stable, consistent, and realistic CCGT capacity factors averaging about 70%. The CAISO has shown consistent results

¹¹ Edison itself completed four such units in 2007.

¹² Indeed, the Commission used the 92% technical capacity factor for the CCGT in the 2004 MPR, when the CCGT was used solely to set the base load MPR price. See Resolution E-3942 adopting a staff report on the 2004 MPR.

using this approach over a number of years in which the California market has experienced a wide range of gas and electric market prices.

II. THE COLUSA PLANT’S COST CAP CANNOT BE INCLUDED IN THE MPR DATA SET OF COMBINED-CYCLE CAPITAL COSTS UNLESS MORE INFORMATION ON PG&E’S ACQUISITION OF COLUSA IS MADE PUBLIC.

TURN and Edison proposed that the cost cap approved for the Colusa combined-cycle gas turbine (CCGT) plant should be included in the MPR data set of installed CCGT capital costs.¹³ The PD, at page 20, allows the Energy Division staff to include the Colusa cost cap in the MPR data set, if the staff justifies the inclusion of this data in its draft resolution.

Pages 19-20 of the PD explain the background for this issue: in essence, PG&E acquired the Colusa plant from a developer who was unable to complete the project. Past CPUC orders on the MPR establish clearly that cost data from “distressed” or partially-completed power plants that are then acquired by a utility should not be used to set the MPR, unless there are detailed data available on the considerations received by each side to the sale of such a project.¹⁴ As explained in the PD, “D.05-12-042 determined that staff could use data from plants sold in secondary market transactions if sufficient data are publicly available for staff and parties to be able to evaluate the cost information.”¹⁵ Although the Commission approved the Colusa cost cap (and made the cost cap public) in D. 08-02-019, the Commission has not make public sufficient data to allow the parties to evaluate whether PG&E received consideration from the original developer that is not included in the approved cost cap. D. 05-12-042 clearly requires that such details must be disclosed to the parties as well as to Energy Division staff, if the cost cap for a distressed plant such as Colusa is to be used in the MPR data set. CalWEA *et al.* submit that the

¹³ TURN Post-workshop Comments, at 1. Edison Post-Workshop Comments, at 2-3. Edison refers to this plant as “Colusa 8,” which appears to be a confusion with PG&E’s other new CCGT – Contra Costa Unit 8, now called Gateway.

¹⁴ D. 05-12-042, at 26-27 (emphasis added).

¹⁵ PD at 20 (emphasis added).

PD should be modified to provide that the Colusa cost cap cannot be used in the MPR data set until this hurdle is cleared and the details of PG&E's acquisition of this plant have been made public to the parties to this docket.

Furthermore, even PG&E, who obviously knows these details about Colusa, did not originally support the use of the Colusa cost cap. PG&E first argued that the Colusa cost cap should not be used for the MPR, because it may not accurately reflect the project's actual costs, including the possibility that the plant may earn certain performance incentives above the cost cap.¹⁶ Thus, the PD also should specify that, if the Colusa cost cap is to be used in the MPR data set, PG&E must supply an estimate of the performance incentives that the plant is likely to earn.

III. THE LINE LOSS ADJUSTMENT CAN BE REMOVED FROM THE MPR USED IN AMF CALCULATIONS, BUT THIS SHOULD NOT PREJUDGE INCLUDING LOCATIONAL VALUES IN THE MPR-BASED AB 1969 FEED-IN TARIFFS.

The current MPR model uses a CAISO generation meter multiplier (GMM) of 0.985 as the measure of average line losses on the CAISO system, in other words, average line losses of 1.5%. CalWEA *et al.* have shown that actual CAISO system average transmission lines losses are 3.1%. The current MPR model understates losses because it uses an incorrect simple average of CAISO line loss factors for generators in the state, instead of an accurate generation-weighted average.¹⁷ Because the current MPR model includes a line loss factor that represents losses incurred in moving power from a generator's busbar to the load center, the current MPR is priced at the load center.

¹⁶ PG&E Post-workshop Comments, at 3. PG&E argued as follows:

“...the manner by which the cost cap was established makes Colusa unsuitable for inclusion in the market survey. The cost cap is based upon a forecasted stream of payments payable under a Purchase and Sale Agreement ("PSA"). The seller's compensation pursuant to the PSA is subject to variation, however, due to the inclusions of performance incentives and penalties which originated as part of the PSA structure and were carried over into the ownership cost model. This injects a “significant unknown” into the cost cap, so, like partially completed projects that fall into a “secondary market,” simply using the cost cap would be inappropriate.”

¹⁷ CalWEA *et al.* Pre-workshop Comments, at 11-13 and Table 4.

The PD would adopt a proposal from SCE that essentially changes the point at which the MPR is assessed, from the load center to the busbar.¹⁸ SCE asserts that CCGTs typically are paid for power at the busbar; therefore, the MPR should be calculated as a busbar cost, and the line loss adjustment should be removed from the MPR calculation. The PD accepts this argument.

Today, the MPR serves two important functions. The first purpose of the MPR is to establish a benchmark that allows the Commission to determine the above-market costs associated with each RPS contract. If the MPR is a busbar cost, as the PD specifies, then the amount of above-market funds (AMFs) required for any RPS generator also must be calculated at the busbar, by comparing the MPR to the RPS generator's bid price calculated at the busbar. We understand from discussions with Energy Division staff that AMFs are calculated at the busbar; therefore, for the purpose of assessing the above-market costs associated with the RPS program, it is reasonable to calculate the MPR at the busbar and to remove the line loss adjustment, as SCE and the PD propose. CalWEA *et al.* caution the Commission, however, that many RPS contracts specify that the contract delivery point is at the load center (e.g. at NP-15 or SP-15), and thus the prices in these contracts will need to be adjusted back to the busbar in order to calculate AMFs accurately.

The second vital function of the MPR is to serve as the price in the AB 1969 feed-in tariffs (FITs) for small, distributed renewable generation. In this context, CalWEA *et al.* have a major problem with the use of a single, statewide MPR, calculated at the busbar, for the price in all AB 1969 contracts, regardless of where the small renewable generator is located. The fundamental purpose of the AB 1969 feed-in tariffs is to encourage small renewable generation projects of 1.5 MW or smaller that would otherwise have difficulty obtaining RPS contracts.¹⁹ In

¹⁸ PD, at 23.

¹⁹ In D. 07-07-027, the Commission noted that “these ‘feed-in tariffs’ present a simple mechanism for small renewable generators to sell power to a utility at predefined terms and conditions, without contract negotiations.” CPUC President Michael Peevey observed that the AB 1969 feed-in tariffs would allow small generators to participate in the RPS program, because “up until now, only large renewable generators were able to

addition, these projects can be sited in or near the major load centers and on the utilities' distribution systems, such that major transmission upgrades are not required and the renewable generation can provide valuable local generation that promotes a more reliable grid. None of these beneficial attributes will be reflected in the AB 1969 price, if that price is a single, statewide value that is the same at every busbar in California.

CalWEA *et al.* recognize that the scope of this proceeding does not include the pricing of power under AB 1969 FITs, and acknowledge that the Commission recently took comments in R. 06-05-027 on needed changes to the AB 1969 FIT program. In that proceeding, a number of parties representing renewable generators, including the Solar Alliance, have proposed that the MPR-based pricing applicable to AB 1969 contracts should include the quantifiable, locational impacts of where the small renewable generation is sited.²⁰ In order to avoid serious confusion in R. 06-05-027 and in the market for distributed renewable generation, the PD in this case should state explicitly that the Commission's determination that the MPR is a busbar value for the purpose of calculating AMFs does not prejudice the issue of the locational valuation of renewable distributed generation that is now under consideration in R. 06-05-027.

IV. THE E3 GHG VALUES ADOPTED IN D. 04-12-048 DO NOT COMPLY WITH THE PD'S CRITERIA FOR UP-TO-DATE GHG MITIGATION VALUES.

The PD adopts the following criteria for the models that will be used to establish GHG mitigation values in the MPR model, beginning in 2012 with the full implementation of AB 32:

- publicly available;
- based on multiple scenarios and sources of information;
- based on realistic and public assessments of policy proposals and scenarios; and

effectively participate in the RPS program.” See the CPUC's February 14, 2008 press release, “CPUC Approves Feed-In Tariffs...,” available at http://docs.cpuc.ca.gov/WORD_PDF/NEWS_RELEASE/78824.PDF.

²⁰ See the July 9, 2008, comments of the Vote Solar Initiative and Recurrent Energy, Inc. on the AB 1969 FITs, filed in R. 06-05-027, at 21-28. Also see the March 6, 2008, comments of GreenVolts, Cleantech America, and the Community Environmental Council on the 2008 MPR, filed in this docket.

- based on the most current reliable information that conforms to the other three criteria.²¹

CalWEA *et al.* concur that these criteria are reasonable for the models or studies used to establish the GHG mitigation values used in the MPR.

Unfortunately, the PD then opines that either the “E3 model” adopted in D. 04-12-048 or the Synapse Energy Economics model examined in this proceeding meet these criteria and could be used by staff for the 2008 MPR. CalWEA *et al.* strongly disagree with the PD’s conclusion that the E3 GHG values adopted in D. 04-12-048 comply with all of the above criteria, particularly the final criteria that the GHG values must be “based on the most current reliable information.” The GHG values included in the “E3 model” were published four years ago in October 2004 by the E3 consulting firm in its report to the Commission on the avoided costs associated with energy efficiency programs.²² In that report, E3 reviewed modeling work from 1999 - 2001 on reaching the CO₂ emission targets under the Kyoto Protocol and limited data from the initial efforts in European Union (EU) countries to trade carbon offsets. E3 chose these values from the low end of the spectrum of GHG emission costs that it examined, and characterized them as “reasonable and conservative, albeit uncertain.”²³ Although E3’s 2004 analysis was a significant, path-breaking effort for 2004, much has happened since then, including the passage of AB32, the California Air Resources Board’s (CARB) approval of early action measures to reduce GHG emissions, progress in formulating regional GHG reduction strategies in many parts of the U.S., the opening of the European Union’s continent-wide carbon market, and increasing efforts to form an international consensus that moves beyond the Kyoto Protocol. We believe that the most recent information on the expected long-term costs of GHG mitigation measures, including the costs of CARB’s early action measures, shows that the 2004

²¹ PD, at 28.

²² “Methodology and Forecast of Long-term Avoided Costs for the Evaluation of California Energy Efficiency Programs,” prepared by E3 for the CPUC’s Energy Division (October 25, 2004); hereafter, the “E3 Report.” The E3 Report is available at www.ethree.com/cpuc_avoidedcosts.html. See Section 2.4.4, pages 82-89, of the E3 Report for its discussion of the costs of mitigating GHG emissions.

²³ *Ibid.*, at 89.

E3 GHG values used in the 2007 MPR's GHG adder are understated.²⁴

In contrast to E3's 2004 work, the August 2006 Synapse Energy Economics (Synapse) study reviewed a wide range of more recent models of long-term GHG mitigation costs, including models run by EIA, EPA, MIT, and the Tellus Institute between 2003 and 2006.²⁵ Moreover, Synapse updated its projections for GHG allowance costs in August 2008. This current study is the work that CalWEA *et al.* recommend that the Commission should use in determining the GHG adder for the 2008 MPR.²⁶ We believe that this most up-to-date Synapse study meets all of the criteria set forth in the PD, including providing the “most current reliable information.”

CalWEA, CCC, LSA, and SA appreciate the Commission's attention to these opening comments on ALJ Simon's Proposed Decision on the 2008 MPR. We urge the Commission to make changes to the text of the PD, for the reasons set forth in the body of these comments.

²⁴ CalWEA *et al.* summarized the costs of some of these early-action measures in its Pre-workshop Comments, at 18 and Table 5.

²⁵ Synapse Energy Economics, “Climate Change and Power: Carbon Dioxide Emissions Costs and Electricity Resource Planning,” at 50-55. This study is an attachment to testimony filed before the Florida Public Service Commission in March 2007, and is available at <http://www.synapse-energy.com/Downloads/SynapseTestimony.2007-03.Earthjust.FPL-Glades-Coal-Plants-GHG-&-CO2.07-017A.pdf>.

²⁶ The August 2008 Synapse update is available at <http://www.synapse-energy.com/Downloads/SynapsePaper.2008-07.0.2008-Carbon-Paper.A0020.pdf>.

There does not appear to be a need to change the findings of fact and conclusions of law that are included in the PD.

Respectfully submitted,

/ s / R. Thomas Beach

R. Thomas Beach
Patrick G. McGuire
Crossborder Energy
2560 Ninth Street, Suite 213A
Berkeley, California 94710
Telephone: 510-549-6922
Facsimile: 510-649-9793
E-mail: tomb@crossborderenergy.com

October 6, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of the foregoing document, **Opening Comments of the California Wind Energy Association, the California Cogeneration Council, the Large-scale Solar Association, and the Solar Alliance on the Proposed Decision of ALJ Simon**, by Electronic Mail where possible and First-Class Mail where not, on all known parties to R. 06-02-012, named on the service list attached to the original certificate of this document pursuant to the Commission's Rules of Practice and Procedure.

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

Executed at Berkeley, California, Monday, October 6, 2008.

/s/ Christa Goldblatt

Christa Goldblatt

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK, CA 94598
philha@astound.net

CLARE BREIDENICH
224 1/2 24TH AVE. EAST
SEATTLE, WA 98112
cbreidenich@yahoo.com

GRAIG COOPER
55 2ND STREET, SUITE 525
SAN FRANCISCO, CA 94105
gcooper@cpv.com

PAUL D. HUNT
4929 WEBSTER STREET
OAKLAND, CA 94609-2116
pdh9@columbia.edu

TODD JAFFE
3420 KEYSER ROAD
BALTIMORE, MD 21208
tjaffe@energybusinessconsultants.com

LIZBETH MCDANNELL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD, CA 91770
lizbeth.mcdannel@sce.com

DAVID MORSE
1411 W, COVELL BLVD., SUITE 106-292
DAVIS, CA 95616-5934
demorse@omsoft.com

DAVID TOWNLEY
18 BASSWOOD AVENUE
OAK PARK, CA 91377
David.Townley@townleytech.com

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016
rwalth@pacbell.net

KEITH WHITE
312 KELLER ST
PETALUMA, CA 94952
keithwhite@earthlink.net

3 PHASES ENERGY SERVICES
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266

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

GABE PETLIN
3DEGREES
6 FUNSTON AVENUE
SAN FRANCISCO, CA 94129
gpetlin@3degreesinc.com

DENNIS W. DE CUIR
A LAW CORPORATION
2999 DOUGLAS BLVD., SUITE 325
ROSEVILLE, CA 95661
dennis@ddecuir.com

MARC D. JOSEPH
ADAMS, BROADWELL, JOSEPH &
CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
mdioseph@adamsbroadwell.com

JAMES WEIL
AGLET CONSUMER ALLIANCE
PO BOX 37
COOL, CA 95614
jweil@aglet.org

GARY COLLORD
AIR RESOURCES BOARD
1001 I STREET, PO BOX 2815
SACRAMENTO, CA 95812
gcollord@arb.ca.gov

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
filings@a-klaw.com

MICHAEL ALCANTAR
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE
2200
SAN FRANCISCO, CA 94104
mpa@a-klaw.com

DONALD BROOKHYSER
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97210
deb@a-klaw.com

ROD AOKI
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE
2200
SAN FRANCISCO, CA 94104
rsa@a-klaw.com

EVELYN KAHL
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE
2200
SAN FRANCISCO, CA 94104
ek@a-klaw.com

NORA SHERIFF
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE
2200
SAN FRANCISCO, CA 94104
nes@a-klaw.com

SEEMA SRINIVASAN
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE
2200
SAN FRANCISCO, CA 94104
sls@a-klaw.com

TODD J. MARTIN
ALTERNITY WIND POWER, LLC
ONE CRAGWOOD ROAD
SOUTH PLAINFIELD, NJ 07080
tmartin@alternitywindpower.com

AMERICAN UTILITY NETWORK
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737
pssed@adelphia.net

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

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.
PO BOX 391909
ANZA, CA 92539
GloriaB@anzaelectric.org

AOL UTILITY CORP.
12752 BARRETT LANE
SANTA ANA, CA 92705

STACY AGUAYO
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
stacy.aguayo@apses.com

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
jenine.schenk@apses.com

APS ENERGY SERVICES COMPANY,
INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
stacy.aguayo@apses.com

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
johnredding@earthlink.net

ROGER LEE
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626
rblee@bakerlaw.com

CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626
csteen@bakerlaw.com

STEVEN S. SCHLEIMER
BARCLAYS BANK, PLC
200 PARK AVENUE, FIFTH FLOOR
NEW YORK, NY 10166
steven.schleimer@barclayscapital.com

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
brbarkovich@earthlink.net

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714
rschmidt@bartlewells.com

RYAN WISER
BERKELEY LAB
1 CYCLOTRON ROAD, MS-90-4000
BERKELEY, CA 94720
rhwiser@lbl.gov

RYAN PLETKA
BLACK & VEATCH
2999 OAK ROAD, SUITE 490
WALNUT CREEK, CA 94597
pletkarj@bv.com

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

SCOTT BLAISING
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814
blaising@braunlegal.com

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L STREET SUITE 1420
SACRAMENTO, CA 95814
mclaughlin@braunlegal.com

BRIAN C. FRECKMANN
C/O FOUNDATION PARTNERS
100 DRAKES LANDING ROAD NO. 125
GREENBRAE, CA 94904
brian@banyansec.com

JAN MCFARLAND
CAEATFA
915 CAPITOL MALL, RM. 457
SACRAMENTO, CA 95814
jmcfarland@treasurer.ca.gov

Amanda C. Baker
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
ab1@cpuc.ca.gov

Paul Douglas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
psd@cpuc.ca.gov

Dorothy Duda
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
dot@cpuc.ca.gov

Gretchen T. Dumas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
gtd@cpuc.ca.gov

Julie A. Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
jf2@cpuc.ca.gov

Anne Gillette
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
aeg@cpuc.ca.gov

Louis M. Irwin
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
lmi@cpuc.ca.gov

Sara M. Kamins
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
smk@cpuc.ca.gov

Cheryl Lee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
cni@cpuc.ca.gov

Mark R. Loy
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
mrl@cpuc.ca.gov

Jaclyn Marks
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
jm3@cpuc.ca.gov

Burton Mattson
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
bwm@cpuc.ca.gov

Beth Moore
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
blm@cpuc.ca.gov

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
nao@cpuc.ca.gov

David Peck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
dbp@cpuc.ca.gov

Brian D. Schumacher
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
bds@cpuc.ca.gov

Andrew Schwartz
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
as2@cpuc.ca.gov

Anne E. Simon
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
aes@cpuc.ca.gov

Sean A. Simon
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
svn@cpuc.ca.gov

Donald R. Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
dsh@cpuc.ca.gov

Elizabeth Stoltzfus
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
eks@cpuc.ca.gov

DAN ADLER
CALIFORNIA CLEAN ENERGY FUND
5 THIRD STREET, SUITE 1125
SAN FRANCISCO, CA 94103
Dan.adler@calcef.org

BETH VAUGHAN
CALIFORNIA COGENERATION
COUNCIL
4391 N. MARSH ELDER COURT
CONCORD, CA 94521
beth@beth411.com

HOLLY B. CRONIN
CALIFORNIA DEPARTMENT OF
WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821
hcronin@water.ca.gov

MOHAN NIROULA
CALIFORNIA DEPARTMENT OF
WATER RESOURCES
3310 EL CAMINO AVENUE, STE 256
SACRAMENTO, CA 95821
mniroula@water.ca.gov

JOSEPH FLESHMAN
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814
jflashma@energy.state.ca.us

LORRAINE GONZALES
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-45
SACRAMENTO, CA 95814
lgonzale@energy.state.ca.us

BILL KNOX
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 28
SACRAMENTO, CA 95814-5504
bknox@energy.state.ca.us

CLARE LAUFENBERG
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO, CA 95814
claufenb@energy.state.ca.us

HEATHER LOUIE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95818
hlouie@energy.state.ca.us

MANPREET MATTU
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814
Mmattu@energy.state.ca.us

ROSS MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814
rmiller@energy.state.ca.us

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814
hrait@energy.state.ca.us

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814
kzocchet@energy.state.ca.us

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST.
SAN FRANCISCO, CA 94117
cem@newsdata.com

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. SUITE 303
SAN FRANCISCO, CA 94117
cem@newsdata.com

KAREN MILLS
CALIFORNIA FARM BUREAU
FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
kmills@cfbf.com

CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
e-recipient@caiso.com

BALDASSARO DICAPPO
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
bdicapo@caiso.com

GRANT A. ROSENBLUM
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
grosenblum@caiso.com

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
jsanders@caiso.com

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

SARAH BESERRA
CALIFORNIA REPORTS.COM
39 CASTLE HILL COURT
VALLEJO, CA 94591
sbeserra@sbcglobal.net

NANCY RADER
CALIFORNIA WIND ENERGY
ASSOCIATION
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710
nrader@calwea.org

KEVIN DUGGAN
CALPINE COPROPRATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
duggank@calpine.com

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
kowalewskia@calpine.com

VENKAT SURAVARAPU
CAMBRIDGE ENERGY RESEARCH
ASSOCIATES
1150 CONNECTICUT AVENUE NW,
STE. 201
WASHINGTON, DC 20036

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
949 EAST ANNADALE AVE., A210
FRESNO, CA 93706
Joe.Langenberg@gmail.com

STEPHEN A. S. MORRISON
CITY & COUNTY OF SAN FRANCISCO
1 DR CARLTON B. GOODLET PLACE
SAN FRANCISCO, CA 94102-4682
stephen.morrison@sfgov.org

KERRY EDEN
CITY OF CORONA DEPT. OF WATER &
POWER
730 CORPORATION YARD WAY
CORONA, CA 92880
kerry.eden@ci.corona.ca.us

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS, CA 94024
pepper@cleanpowermarkets.com

COURTNEY WEDDINGTON
COMMERCE ENERGY INC
222 W. LAS COLINAS BLVD., STE.
950-E
IRVING, TX 75039
cweddington@commerceenergy.com

MELANIE FALLS
COMPETITIVE POWER VENTURES,
INC.
55 SECOND STREET, SUITE 525
SAN FRANCISCO, CA 94105

CONSTELLATION NEW ENERGY, INC.
350 SOUTH GRAND AVENUE, SUITE
3800
LOS ANGELES, CA 90071
bill.chen@constellation.com

TONY CHEN
COOL EARTH
7665 HAWTHORNE AVE
LIVERMORE, CA 94550
tchen@coolearthsolar.com

DANIELLE MATTHEWS SEPERAS
CALPINE CORPORATION
1127 11TH STREET, SUITE 242
SACRAMENTO, CA 95814
dseperas@calpine.com

STEVEN SIEGEL
CENTER FOR BIOLOGICAL DIVERSITY
3421 PARK PLACE
EVANSTON, IL 60201
ssiegel@biologicaldiversity.org

CLAIRE E. TORCHIA
CHADBOURNE & PARKE LLP
350 SOUTH GRAND AVE., STE 3300
LOS ANGELES, CA 90071
ctorchia@chadbourne.com

SANDRA ROVETTI
CITY AND COUNTY OF SAN
FRANCISCO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
srovetti@sfgov.org

FREDERICK M. ORTLIEB
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1200
SAN DIEGO, CA 92101
fortlieb@sandiego.gov

BILL BARNES
CLEANTECH AMERICA, INC.
50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO, CA 94111
b.barnes@cleantechamerica.com

ANN HENDRICKSON
COMMERCE ENERGY, INC.
222 WEST LAS COLINAS BLVD., SUITE
950E
IRVING, TX 75039
ahendrickson@commerceenergy.com

SEAN J. FINNERTY
COMPETITIVE POWER VENTURES,
INC.
35 BRAINTREE HILL OFFICE PARK,
SUITE 400
BRAintree, MA 02184

SARA O'NEILL
CONSTELLATION NEWENERGY, INC.
ONE MARKET STREET, SPEAR
TOWER, 36TH FR.
SAN FRANCISCO, CA 94105
sara.oneill@constellation.com

MARCIE MILNER
CORAL ENERGY RESOURCES, L P
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
marcie.milner@shell.com

LINDA Y. SHERIF
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
linda.sherif@calpine.com

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PO BOX 29512
SAN FRANCISCO, CA 94129
jhamrin@resource-solutions.org

BILL GOLOVE
CHEVRON ENERGY SOLUTIONS
345 CALIFORNIA STREET, 18TH
FLOOR
SAN FRANCISCO, CA 94104
whaolove@chevron.com

NEAL DE SNOO
CITY OF BERKELEY
2180 MILVIA AVENUE
BERKELEY, CA 94704
ndesnoo@ci.berkeley.ca.us

SUSAN MUNVES
CITY OF SANTA MONICA
1212 5TH STREET, FIRST FLOOR
SANTA MONICA, CA 90401
susan.munves@smgov.net

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062
janreid@coastecon.com

TAMLYN M. HUNT
COMMUNITY ENVIRONMENTAL
COUNCIL
26 W. ANAPAMU ST., 2ND FLOOR
SANTA BARBARA, CA 93101
thunt@cecmail.org

CYNTHIA A. FONNER
CONSTELLATION ENERGY GROUP
INC
500 WEST WASHINGTON ST, STE 300
CHICAGO, IL 60661
Cynthia.A.Fonner@constellation.com

CLYDE MURLEY
CONSULTANT TO NRDC
1031 ORDWAY STREET
ALBANY, CA 94706
clyde.murley@comcast.net

JAMES MCMAHON
CRA INTERNATIONAL
50 CHURCH ST.
CAMBRIDGE, MA 02138
jmcmahon@crai.com

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

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE
800
SAN FRANCISCO, CA 94111-6533
iudvpau@dwt.com

LARRY F. EISENSTAT
DICKSTEIN SHAPIRO LLP
1825 EYE STREET, NW
WASHINGTON, DC 20006

WILLIAM F. DIETRICH
DIETRICH CONSULTING
2977 YGNACIO VALLEY ROAD, NO. 613
WALNUT CREEK, CA 94598-3535
dietrichlaw2@earthlink.net

GREGORY S. G. KLATT
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
klatt@energyattorney.com

AUDRA HARTMANN
DYNEGY INC.
980 NINTH STREET, SUITE 2130
SACRAMENTO, CA 95814
Audra.Hartmann@Dynegy.com

AIMEE BARNES
ECOSECURITIES
206 W. BONITA AVENUE
CLAREMONT, CA 91711
aimee.barnes@ecosecurities.com

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95811
abb@eslawfirm.com

JEDEDIAH J. GIBSON
ELLISON SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95811
jig@eslawfirm.com

SNULLER PRICE
ENERGY AND ENVIRONMENTAL
ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104
snuller@ethree.com

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS, CA 95762
dougdpucmail@yahoo.com

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

RICHARD LEHFELDT
DICKSTEIN SHAPIRO LLP
1825 EYE STREET, NW
WASHINGTON, DC 20006

RONALD M. CERNIGLIA
DIRECT ENERGY SERVICES, LLC
40 COLUMBINE DRIVE
GLENMONT, NY 12077-2966
ron.cerniglia@directenergy.com

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
liddell@energyattorney.com

JOSEPH PAUL
DYNEGY, INC.
4140 DUBLIN BLVD., STE. 100
DUBLIN, CA 94568
joe.paul@dynegy.com

MARK E. IRWIN
EDISON MISSION ENERGY
18101 VON KARMAN AVE. STE 1700
IRVINE, CA 92612
mirwin@edisonmission.com

JEFFREY HARRIS
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO, CA 95811
jdh@eslawfirm.com

LYNN M. HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814-3109
lmh@eslawfirm.com

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION STREET
PASADENA, CA 91103
steve@energyinnovations.com

ROBERT B. GEX
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE
800
SAN FRANCISCO, CA 94111-6533
bobaex@dwt.com

BALWANT S. PUREWAL
DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821
bpurewal@water.ca.gov

MARK L. PERLIS
DICKSTEIN SHAPIRO LLP
1825 EYE STREET, NW
WASHINGTON, DC 20006
perlism@dicksteinshapiro.com

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367
douglass@energyattorney.com

DAN L. CARROLL
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
dcarroll@downeybrand.com

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY
DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607
ramonaa@ebmud.com

ROY D. MCCOY
ELECTRIC RELIABILITY COUNCIL OF
TEXAS
2705 W. LAKE DRIVE
TAYLOR, TX 76574
rmccov@ercot.com

GREGGORY L. WHEATLAND
ELLISON SCHNEIDER & HARRIS L.L.P.
2015 H STREET
SACRAMENTO, CA 95811-3109
glw@eslawfirm.com

DOUGLAS K. KERNER
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
dkk@eslawfirm.com

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND, CA 95776
cmkehrein@ems-ca.com

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301
kjsimonsen@ems-ca.com

KEVIN PORTER
EXETER ASSOCIATES, INC.
5565 STERRETT PLACE
COLUMBIA, MD 21044
porter@exeterassociates.com

BARRY H. EPSTEIN
FITZGERALD, ABBOTT & BEARDSLEY,
LLP
1221 BROADWAY, 21ST FLOOR
OAKLAND, CA 94612
bepstein@fablaw.com

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH, FL 33408
garson_knapp@fpl.com

KEITH SWITZER
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773-9016
kswitzer@gswater.com

JOSEPH F. WIEDMAN
GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
iwiedman@goodinmacbride.com

GREGORY MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
gmorris@emf.net

MARY ANNE SULLIVAN
HAGAN & HARTSON, LLP
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20006
MASullivan@hhlaw.com

BRENDA LEMAY
HORIZON WIND ENERGY
1600 SHATTUCK, SUITE 222
BERKELEY, CA 94709
brenda.lemay@horizonwind.com

PETER BREHM
INFINIA CORPORATION
6811 OKANOGAN PLACE
KENNEWICK, WA 99336
pbrehm@infiniacorp.com

DOUGLAS E. COVER
ENVIRONMENTAL SCIENCE
ASSOCIATES
225 BUSH STREET, SUITE 1700
SAN FRANCISCO, CA 94104
dcover@esassoc.com

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY
COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630
saeed.farrokhpay@ferc.gov

JANINE L. SCANCARELLI
FOLGER, LEVIN & KAHN, LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111
jscancarelli@flk.com

STANDISH O'GRADY
FRIENDS OF KIRKWOOD
ASSOCIATION
31 PARKER AVENUE
SAN FRANCISCO, CA 94118
sho@oogradv.us

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY
ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773
rkmoore@aswater.com

BRIAN CRAGG
GOODIN, MAC BRIDE, SQUERI, DAY &
LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
bcraaa@goodinmacbride.com

CRAIG LEWIS
GREENVOLTS
50 FIRST STREET, SUITE 507
SAN FRANCISCO, CA 94105
craig.lewis@greenvolts.com

WILL PLAXICO
HELIOS ENERGY, LLC
31897 DEL OBISPO ST. SUITE 220
SAN JUAN CAPISTRANO, CA 92675
wplaxico@heliosenergy.us

DONALD N. FURMAN
IBERDROLA RENEWABLES INC
1125 NW COUCH STREET, SUITE 700
PORTLAND, OR 97209

MICHAEL J. GILMORE
INLAND ENERGY
3501 JAMBOREE RD
NEWPORT BEACH, CA 92660
michaelgilmore@inlandenergy.com

BILL MASON
ENXCO, INC.
PO BOX 581043
N. PALM SPRINGS, CA 92258
billm@enxco.com

SAMARA MINDEL
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE,
SUITE 2000
LOUISVILLE, KY 40223
smindel@knowledaeinenergy.com

DIANE I. FELLMAN
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
diane_fellman@fpl.com

RICH LAUCKHART
GLOBAL ENERGY
2379 GATEWAY OAKS DR.
SACRAMENTO, CA 95833
rlauckhart@globalenergy.com

MICHAEL B. DAY
GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
mdav@goodinmacbride.com

JAMES D. SQUERI
GOODIN, MACBRIDE, SQUERI, DAY &
LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
isqueri@goodinmacbride.com

DIARMUID MCGARRY
GREENWOOD ENVIRONMENTAL
330 TOWNSEND ST. SUITE 118
SAN FRANCISCO, CA 94107
diarmuid@greenwoodenv.com

AMY C. ROMA
HOGAN & HARTSON, LLP
555 THIRTEENTH STREET, N.W.
WASHINGTON, DC 20004
ACRoma@hhlaw.com

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814
steven@iepa.com

ALEX KANG
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND, CA 94607
alex.kang@itron.com

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609
jody_london_consulting@earthlink.net

NELLIE TONG
KEMA, INC.
492 NINTH STREET, SUITE 220
OAKLAND, CA 94607
nellie.tong@us.kema.com

TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND STREET
VANCOUVER, WA 98683
castille@landsenergy.com

WILLIAM H. BOOTH
LAW OFFICE OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94596
wbooth@booth-law.com

JEREMY D. WEINSTEIN
LAW OFFICES OF JEREMY D.
WEINSTEIN
1512 BONANZA STREET
WALNUT CREEK, CA 94596
jeremv.weinstein@pacificorp.com

SARA STECK MYERS
LAW OFFICES OF SARA STECK
MYERS
122 28TH AVE.
SAN FRANCISCO, CA 94121
ssmyers@att.net

JANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF
CALIFORNIA
64 LOS ALTOS SQUARE
LOS ALTOS, CA 94022
jturnbu@ix.netcom.com

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVENUE
CORTE MADERA, CA 94925
lynn@lmaconsulting.com

PATRICK STONER
LOCAL GOVERNMENT COMMISSION
1303 J STREET, SUITE 250
SACRAMENTO, CA 95814
pstoner@lgc.org

PAUL FENN
LOCAL POWER
4281 PIEDMONT AVE.
OAKLAND, CA 94611
paulfenn@local.org

ELIZABETH DOUGLASS
LOS ANGELES TIMES
202 WEST FIRST STREET
LOS ANGELES, CA 90012
elizabeth.douglass@latimes.com

JOHN W. LESLIE
LUCE, FORWARD, HAMILTON &
SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130-2592
ileslie@luce.com

CYNTHIA WOOTEN
LUMENX CONSULTING, INC.
1126 DELAWARE STREET
BERKELEY, CA 94702
cwooten@lumenxconsulting.com

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616
rmccann@umich.edu

JACK MCNAMARA
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS, CA 91376-1380
jackmack@suesec.com

RANDALL W. KEEN
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064
rkeen@manatt.com

DAVID L. HUARD
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064
dhuard@manatt.com

C. SUSIE BERLIN
MCCARTHY & BERLIN LLP
100 PARK CENTER PLAZA, STE. 501
SAN JOSE, CA 95113
sberlin@mccarthyllaw.com

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS
COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801
cswoollums@midamerican.com

THOMAS S KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95352-4060
tomk@mid.org

DAVID OLIVARES
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352
davido@mid.org

JOY A. WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
joyw@mid.org

SEAN HAZLETT
MORGAN STANLEY
555 CALIFORNIA ST., SUITE 2200,
21ST FL
SAN FRANCISCO, CA 94104
sean.hazlett@morganstanlev.com

NICK ALLEN
MORGAN STANLEY RESEARCH
555 CALIFORNIA STREET STE 2200
21ST FLR
SAN FRANCISCO, CA 94104
Nick.Allen@morganstanlev.com

PETER W. HANSCHEN
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE
450
WALNUT CREEK, CA 94596
phansch@mofo.com

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

JOHN DUTCHER
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875
ralf1241a@cs.com

WHITNEY BARDWICK
MP2 CAPITAL
1101 5TH AVENUE, SUITE 360
SAN RAFAEL, CA 94901

BRAD BAUER
MP2CAPITAL
1101 FIFTH AVENUE, SUITE 360
SAN RAFAEL, CA 94901
brad@mp2capital.com

MICHAEL LAINE
MP2CAPITAL
1101 5TH AVENUE, STE. 360
SASN RAFAEL, CA 94901
michael@mp2capital.com

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612
mrw@mrwassoc.com

DAVID OLIVER
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670
david.oliver@navigantconsulting.com

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
jdalessi@navigantconsulting.com

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

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

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

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
cpucrulings@navigantconsulting.com

KENNETH SWAIN
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DR., SUITE 600
RANCHO CORDOVA, CA 95670
kenneth.swain@navigantconsulting.com

FRED WELLINGTON
NAVIGANT CONSULTING, INC.
1 MARKET ST., SPEAR ST. TOWER,
STE 1200
SAN FRANCISCO, CA 94105
fred.wellington@navigantconsulting.com

ROBERT NICHOLS
NEW WEST ENERGY
PO BOX 61868 MAILING STATION ISB
665
PHOENIX, AZ 85082-1868
rsnichol@srpnet.com

JAMES B. WOODRUFF
NEXTLIGHT RENEWABLE POWER, LLC
101 CALIFORNIA STREET, STE 2450
SAN FRANCISCO, CA 94111
jwoodruff@nextlighttrp.com

KERRY HATTEVIK
NRG ENERGY
829 ARLINGTON BLVD.
EL CERRITO, CA 94530
kerry.hattevik@nrgenergy.com

HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE, CA 93501
hal@rwitz.net

OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, SUITE 110
HOUSTON, TX 77046
ej_wright@oxy.com

ANN MOORE
OFFICE OF THE CITY ATTORNEY
276 FOURTH AVENUE
CHULA VISTA, CA 91910
amoore@ci.chula-vista.ca.us

VALERIE WINN
PACIFIC GAS & ELECTRIC
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105
vjw3@pge.com

EVELYN C. LEE
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
ECL8@pae.com

BIANCA BOWMAN
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105
brbc@pae.com

CASE COORDINATION
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177
rearelcpuccases@pae.com

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442
cpuccases@pae.com

MATHEW A. FOGELSON
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 7442, MC B30A-2487
SAN FRANCISCO, CA 94120-7442
MAFv@pae.com

SHAUN HALVERSON
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
SEHC@pae.com

ARTHUR L. HAUBENSTOCK
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105-1814
nxk2@pae.com

EDWARD V. KURZ
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE ST., B30A
SAN FRANCISCO, CA 94105
evk1@pae.com

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
S1L7@pae.com

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
GXL2@pae.com

ED LUCHA
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
ELL5@pae.com

WILLIAM V. MANHEIM
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE STREET, ROOM 3025-B30A
SAN FRANCISCO, CA 94105
wvm3@pae.com

CORY M. MASON
PACIFIC GAS AND ELECTRIC
COMPANY
77 BEALE STREET, MC B30A
SAN FRANCISCO, CA 94105-1814
cmmw@pae.com

CHARLES MIDDLEKAUFF
PACIFIC GAS AND ELECTRIC
COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
crmd@pge.com

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH ST., 20TH FLOOR
PORTLAND, OR 97232
kyle.l.davis@pacificorp.com

MAGGIE CHAN
PG&E
PO BOX 770000
SAN FRANCISCO, CA 94177
MMCL@pge.com

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

PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
rick_noger@praxair.com

TOM HAMILTON
QUALITY BUILT
15330 AVENUE OF SCIENCE
SAN DIEGO, CA 92128
thamilton@qualitybuilt.com

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

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT,
LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450
dgulino@ridgewoodpower.com

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY
DISTRICT
6201 S STREET MS 75
SACRAMENTO, CA 95817
rroth@smud.org

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123
centralfiles@semprautilities.com

DAVID SAUL
PACIFIC SOLAR & POWER
CORPORATION
2850 W. HORIZON RIDGE PKWY,
SUITE 200
HENDERSON, NV 89052

RYAN FLYNN
PACIFICORP
825 NE MULTNOMAH, SUITE 1800
PORTLAND, OR 97232
ryan.flynn@pacificorp.com

PILOT POWER GROUP, INC.
8910 UNIVERSITY CENTER LANE, STE
520
SAN DIEGO, CA 92122
tdarton@pilotpowergroup.com

LISA WEINZIMER
PLATTS MCGRAW-HILL
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
lisa_weinzimer@platts.com

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
rick_noger@praxair.com

ERIC LARSEN
RCM INTERNATIONAL, L.L.C.
PO BOX 4716
BERKELEY, CA 94704
elarsen@rcmdigesters.com

JASON ABIECUNAS
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK, KS 66211
abiecunasjp@bv.com

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT,
LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450
bshort@ridgewoodpower.com

WILLIAM W. WESTERFIELD III
SACRAMENTO MUNICIPAL UTILITY
DISTRICT
6201 S STREET
SACRAMENTO, CA 95817
wwester@smud.org

JENNIFER WRIGHT
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK, CT
SAN DIEGO, CA 92123
jwright@semprautilities.com

CATHIE ALLEN
PACIFICORP
825 NE MULTNOMAH STREET, SUITE
2000
PORTLAND, OR 97232
californiadockets@pacificorp.com

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH STREET, NW,
SUITE 800
WASHINGTON, DC 20005
csmoots@perkinscoie.com

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

THOMAS ELGIE
POWEREX CORPORATION
1400, 666 BURRAND ST
VANCOUVER, BC V6C 2X8
Tom.Elgie@powerex.com

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

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660
dws@r-c-s-inc.com

LENNY HOCHSCHILD
RENEWABLE ENERGY MARKETS
425 MARKET STREET, SUITE 2200
SAN FRANCISCO, CA 94105
lennyh@evomarkets.com

MICHAEL DEANGELIS
SACRAMENTO MUNICIPAL UTILITY
DISTRICT
6201 S STREET
SACRAMENTO, CA 95817-1899
mdeanae@smud.org

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY
DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899
vwood@smud.org

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC
COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102
wblattner@semprautilities.com

KIM F. HASSAN
SAN DIEGO GAS & ELECTRIC
COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101
khassan@sempra.com

MICHAEL A. HYAMS
SAN FRANCISCO PUBLIC UTILITIES
COMM
1155 MARKET ST., 4TH FLOOR
SAN FRANCISCO, CA 94103
mhvams@sfgwater.org

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

LINDA WRAZEN
SEMPRA ENERGY REGULATORY
AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101
lwrazen@sempraenergy.com

DANIEL M. HECHT
SEMPRA ENERGY TRADING CORP.
58 COMMERCE ROAD
STANFORD, CT 06902
dhecht@sempratrading.com

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL RD.
RENO, NV 89511
emello@sppc.com

KEVIN DAVIES
SOLAR DEVELOPMENT INC.
5420 DOUGLAS BLVD. STE F
GRANITE BAY, CA 95746-6253
kevin@solardevelop.com

FRANK W. HARRIS
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE
ROSEMEAD, CA 91770
frank.w.harris@sce.com

CATHY A. KARLSTAD
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
cathv.karlstad@sce.com

SETH D. HILTON
STOEL RIVES
111 SUTTER ST., SUITE 700
SAN FRANCISCO, CA 94104
sdhilton@stoel.com

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC
COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO, CA 92123-1530
dniehaus@semprautilities.com

DAVID ORTH
SAN JOAQUIN VALLEY POWER
AUTHORITY
4886 EAST JENSEN AVENUE
FRESNO, CA 93725
dorth@krcd.org

AIMEE M. SMITH
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101
amsmith@sempra.com

SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017
email@semprasolutions.com

THEODORE ROBERTS
SEMPRA GLOBAL
101 ASH STREET, HQ 12B
SAN DIEGO, CA 92101-3017
troberts@sempra.com

MARCO LEMES
SMUD
6201 S STREET MS B257
SACRAMENTO, CA 95817-1899
mlemes@smud.org

RHONE RESCH
SOLAR ENERGY INDUSTRIES
ASSOCIATION
805 FIFTEENTH STREET, N.W., SUITE
510
WASHINGTON, DC 20005

WILLIAM V. WALSH
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
william.v.walsh@sce.com

JAMES B. WOODRUFF
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE, SUITE
342, GO1
ROSEMEAD, CA 91770

JANICE LIN
STRATEGEN CONSULTING LLC
146 VICENTE ROAD
BERKELEY, CA 94705
janice@strategenconsulting.com

THERESA L. MUELLER
SAN FRANCISCO CITY ATTORNEY
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102-4682
theresa.mueller@sfgov.org

YVONNE GROSS
SEMPRA ENERGY
101 ASH STREET, HQ08C
SAN DIEGO, CA 92101
ygross@sempraglobal.com

THOMAS P. CORR
SEMPRA ENERGY GLOBAL
ENTERPRISES
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101
tcorr@sempra.com

GREG BASS
SEMPRA ENERGY SOLUTIONS
401 WEST BROADWAY, STE 500
SAN DIEGO, CA 92101-3017
gbass@semprasolutions.com

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD, MS S4A50
RENO, NV 89520-0024
tdillard@sppc.com

SOCAL WATER/BEAR VALLEY
ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
kswitzer@gswater.com

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
gary.allen@sce.com

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
case.admin@sce.com

RASHA PRINCE
SOUTHERN CALIFORNIA GAS
COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013
rprince@semprautilities.com

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
2633 WELLINGTON CT.
CLYDE, CA 94520
jchamberlin@strategicenergy.com

STRATEGIC ENERGY, LTD.
7220 AVENIDA ENCINAS, SUITE 120
CARLSBAD, CA 92009
customerrelations@sel.com

JP ROSS
SUNGEVITY
1625 SHATTUCK AVE., STE 210
BERKELEY, CA 94709
jpross@sungevity.com

JOE GRECO
TERRA-GEN POWER LLC
9590 PROTOTYPE COURT, SUITE 200
RENO, NV 89521
jgreco@terra-genpower.com

NINA SUETAKE
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE. 350
SAN FRANCISCO, CA 94102
nsuetake@turn.org

ASHLEE M. BONDS
THELEN REID BROWN
RAYSMAN&STEINER LLP
101 SECOND STREET
SAN FRANCISCO, CA 94105
abonds@thelen.com

MICHAEL SHAMES
UTILITY CONSUMERS' ACTION
NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
mshames@ucan.org

SHERIDAN J. PAUKER
WILSON SONSINI GOODRICH &
ROSATI
ONE MARKET ST
SAN FRANCISCO, CA 94105
spauker@wsqr.com

DAN PERKINS
WWW.ENERGYSMARTHOMES.NET
983 PHILLIPS ST.
VISTA, CA 92083
dan@energysmarthomes.net

ELIZABETH BAKER
SUMMIT BLUE CONSULTING
1722 14TH STREET, SUITE 230
BOULDER, CO 80304
bbaker@summitblue.com

ED SMELOFF
SUNPOWER CORPORATION
1414 HARBOUR WAY SOUTH
RICHMOND, CA 94804
ed.smeloff@sunpowercorp.com

ROBERT FINKELSTEIN
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., SUITE 350
SAN FRANCISCO, CA 94102
bfinkelstein@turn.org

MICHEL P. FLORIO
THE UTILITY REFORM NETWORK
(TURN)
711 VAN NESS AVENUE, SUITE.350
SAN FRANCISCO, CA 94102
mflorio@turn.org

CLIFF CHEN
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94708
cchen@ucsusa.org

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563
andy.vanhorn@vhcenergy.com

KAREN E. BOWEN
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH
FLOOR
SAN FRANCISCO, CA 94111
ikarp@winston.com

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, SUITE 210
WALNUT CREEK, CA 94597
pthompson@summitblue.com

KEITH MCCREA
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
keith.mccrea@sablaw.com

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
marcel@turn.org

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

SCOTT J. ANDERS
UNIVERSITY OF SAN DIEGO SCHOOL
OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
scottanders@sandiego.edu

CHRISTOPHER O'BRIEN
VP STRATEGY AND GOVERNMENT
RELATIONS
3808 ALTON PLACE NW
WASHINGTON, DC 20016
obrienc@sharpsec.com

JOSEPH M. KARP
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH
FLOOR
SAN FRANCISCO, CA 94111-5894
ikarp@winston.com