September 16, 2021

Via Electronic Transmission

Marybel Batjer, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: August 2021 Public Safety Power Shutoff Public Briefings

Dear President Batjer and Commissioners,

In response to your August 31, 2021 letter regarding the presentations made in the Public Safety Power Shutoff Public Briefing, Pacific Power (dba PacifiCorp) welcomes the opportunity to provide additional information about our public safety power shutoff (PSPS) program. Like the California Public Utilities Commission (Commission) and the other investor-owned utilities (IOUs) in the state, a core principle of Pacific Power’s PSPS program is that PSPS is a measure of last resort. Our PSPS program reflects our strong commitment to that principle. Pacific Power appreciates the Commission’s efforts to ensure that the extraordinary decision to implement a PSPS is done in a manner which minimizes impacts on the public.

**PSPS Decision Making.** Pacific Power is continually borrowing and learning from PG&E, SCE, and SDG&E and those utilities’ experiences with PSPS to implement a continuously more robust and sophisticated decision-making model. Indeed, Pacific Power’s initial PSPS program, developed and implemented in 2019, drew on the experiences of those companies, and continuous improvement to Pacific Power’s PSPS program has occurred since that time along the same lines. Through their more frequent and larger-scale application of PSPS, all three companies have been influential in developing emerging industry best practices. Pacific Power monitors the public proceedings and integrates observations from PSPS events implemented by other utilities. While a particular event or Commission interaction might be specific to those companies in the short term, Pacific Power understands that the standards developing around those companies’ use of PSPS applies throughout California.

Pacific Power’s PSPS decision making improvements that have resulted from this work include but are not limited to the following:

- PSPS decision making criteria and methods to enhance situational awareness to inform more robust and sophisticated decision-making.
- Advanced technology tools to provide granular real-time situational awareness at the local circuit level with meteorological, dry fuel, and system health criteria among other factors.
- Customer and stakeholder communication protocols, tools, and emergency services collaboration in advance of a potential PSPS, in an actual PSPS and through restoration.
- Functional exercise drill design.
- Medical baseline and AFN customer programs including battery back-up programs; and
• Methods to limit PSPS customer impacts through segmentation and rapid fault detection and accelerate grid restoration following a PSPS.

Pacific Power has shared an extensive direct exchange of information with PG&E, SCE, and SDG&E on the subject of PSPS since 2019 to-date and appreciates the value of sharing information with those companies. These interactions have varied from informal meetings to more formal participation in a joint event. Multiple Pacific Power representatives, including senior management, have toured SDG&E’s Emergency Operations Center, asking questions, and sharing ideas about SDG&E’s approach to PSPS. As part of this ongoing dialogue, SDG&E senior management agreed to present at a day-long wildfire mitigation workshop hosted by PacifiCorp. As another example, Pacific Power representatives have made multiple trips to visit SCE, specifically to discuss SCE’s approach to PSPS. Indeed, Pacific Power’s use of dedicated “circuit crews” to conduct real-time, in-the-field assessments to help inform the Emergency Operations Center (EOC) during a PSPS watch event, grew out of interactions with SCE.

Pacific Power Emergency Management attended and observed PG&E’s PSPS Tabletop Exercise on May 12, 2021 and PG&E’s Full-Scale Exercise the week of May 24-28, 2021. Emergency Management staff gained new insights from the discussion of community resource centers (CRC) and their implementation, including PG&E’s approach to documentation and record keeping during the event and takeaways for a functional exercise using master scenario list and injects in a 100% virtual platform. Pacific Power is incorporating these ideas into its CRC, documentation, training, and functional exercise programs.

Pacific Power’s PSPS planning moving forward will continue to be informed by experiences with PG&E, SCE, and SDG&E. For example, Pacific Power has purchased a High-Performance Computing Cluster (HPCC) to run a high-resolution Weather Research and Forecast (WRF) model to support PSPS decision-making. HPCC specs and WRF configuration is similar to what SDG&E and SCE currently operate. With the HPCC in place, Pacific Power plans to run an operational, high-resolution WRF twice-daily across our entire service territory. In addition, Pacific Power will create a 30-year historical WRF reanalysis, which will serve as the foundation for sophisticated forecast products. Pacific Power will also correlate the historical reanalysis with various outcomes to create impacts-based and risk-based forecast products. Advanced machine learning techniques will combine reanalysis data, operational WRF data, and historical observations to generate bias-corrected wind forecasts for weather station point locations. Pacific Power has also purchased Technosylva’s Wildfire Analyst-Enterprise to support PSPS decision making. Pacific Power’s decision to purchase this product was highly informed by positive feedback from SDG&E and SCE.

The practical application of these concepts and technologies will be geared towards minimizing the impact of PSPS, which Pacific Power understands as the objective goal of developing a more robust and sophisticated decision-making model. In other words, (1) we want to implement PSPS only when necessary; (2) if we have a PSPS, we want to be sure that as few customers as possible lose power; and (3) if we have a PSPS, we want to make restoration as efficient as possible, so that the duration of the event is minimized. Along these lines, Pacific Power is developing our PSPS plans so that any potential PSPS is targeted to localized conditions. A targeted approach not only reduces the total number of people out of power for any period of time, but also significantly mitigates the impact of the PSPS event on those experiencing a loss of power. Improved weather forecasting, together with a more granular understanding of wildfire risk, as contemplated in Pacific Power Localized Risk Assessment Model (LRAM), will further enable Pacific Power to deliver on our commitment to use PSPS as a measure of last resort.
Medical Baseline Customers and Equipment. As a top priority, consistent with the Phase 3 Guidelines, Pacific Power is implementing a program, at no cost to the customer, of back-up batteries to medical baseline customers who depend on medical equipment powered by electricity. Pacific Power is pleased to update that the program is now operational. A contract with a third-party vendor was executed on September 10, 2021, and battery assessments are slated to begin in the near term. Pacific Power is using the same vendor as PG&E. Pacific Power anticipates that batteries will be delivered to all registered medical baseline customers within PSPS areas by the end of 2021.

Pacific Power is working to expand the medical baseline program by increasing the rate of participation by persons eligible for medical baseline treatment. Pacific Power is participating in the Joint IOU Statewide AFN Advisory Council meetings to gain insight into needs of the AFN community and scalable IOU programs and better identify the breadth of the community in our service territory. Currently, non-utility agencies are providing Pacific Power with non-identifiable population information that will indicate, at the zip code level, the potential number of customers that are medically dependent on electricity. Pacific Power intends to compare this information with existing customer records and identify areas underserved and not represented by the company’s current medical baseline customers. The insights obtained from this work are anticipated to enable Pacific Power to target communications to zip codes to encourage both enrollment in the medical baseline rate and increase the AFN population.

Pacific Power is also evaluating the feasibility and effectiveness of transportation and lodging services for medical baseline customers. Especially because of the unknown duration of an event and the highly individualized approach that any particular medical baseline customer might desire to take, there are many program considerations. Pacific Power will reach out to PG&E, SCE, and SDG&E for input on evolving standards related to this issue.

PSPS Exercises. In addition to tabletop exercises, Pacific Power is planning to complete more functional exercises to improve our PSPS readiness. Pacific Power will complete a full functional exercise in Siskiyou County in the spring of 2022. The full functional exercise will include conditions not yet faced in an actual PSPS event completed by Pacific Power. Since 2019, Pacific Power has implemented two PSPS events in its California service territory; each were of a relatively short duration (less than a day) and relatively limited geographic scope. The first PSPS event occurred in September 2020. During Pacific Power’s last PSPS event in August 2021, a CRC was successfully opened and staffed at all times with a representative from the company that was able to answer questions about the event and what to expect. Community members expressed strong appreciation for the CRC. Communication notices in advance of the potential PSPS, the actual PSPS and through customer restoration followed Pacific Power’s protocols and were also received positively by the impacted communities and emergency services partners.

Pacific Power’s PSPS readiness is also informed by activities in other states. One unique attribute of Pacific Power is that our service territory footprint is much larger outside California than within California. PSPS developments in California are undeniably central to evolving standards considered in other western states. By interacting with emergency response agencies, state commissions and stakeholders in other states, Pacific Power is also enhancing its PSPS readiness, as informed by those different perspectives. Pacific Power has conducted some functional exercises in other states. For example, in conjunction with a table-top de-energization exercise, Pacific Power conducted a functional CRC exercise by establishing an actual CRC in Medford, Oregon on June 29, 2021. These exercises were completed with public safety partners from Jackson, Josephine, and Douglas Counties observing, which allowed those agencies to see the actual resources
available at the CRC. This functional exercise helped inform the successful deployment of a CRC during a PSPS event in northern California in August 2021. Other functional exercises are planned in the immediate future. Members of Pacific Power Emergency Management staff are travelling to Park City, Utah for a functional CRC exercise on October 14, 2021.

Pacific Power is exploring other opportunities to complete exercises with local public safety partners. As a practical matter, coordinating exercise events in the fall is difficult for such groups, because of actual wildfire response activity. Accordingly, greater focus will be given to planning exercises in the off-season, particularly next spring.

**Wildfire Mitigation – Vegetation Management.** Pacific Power’s 2021 vegetation management activity in its California service territory is on schedule. Pacific Power’s 2021 distribution cycle program work is on track to be complete by year-end and is currently 62% complete, which includes both the pre-inspection of 795 miles of distribution circuits and subsequent pruning and tree removal. To-date in 2021, Pacific Power has pre-inspected 467 miles, pruned 25,146 trees, and removed 2,991 trees. In addition, Pacific Power’s 2021 annual pole clearing activity is also on track to be complete by year-end and is currently 68% complete, or 10,526 poles cleared of the 15,375 total planned locations.

**Access and Functional Needs (AFN) Customers.** Pacific Power recognizes the value in knowing our customers and the communities in which we serve, both for PSPS purposes but also more generally. Consistent with this goal, Pacific Power is striving to gain additional insight into the number of people within our service territory who would, or might, qualify as AFN. As previously described, Pacific Power actively participates in the Joint IOU Statewide AFN Advisory Council meetings to gain insight into needs of the AFN community and scalable IOU programs and attempt to identify the breadth of the community in our service territory. Pacific Power intends to use a deeper understanding of AFN populations to improve PSPS planning. For example, the types of services offered at a CRC might be tailored to mitigate the impacts of PSPS on a concentrated group of AFN customers. Even more fundamentally, long-term system hardening projects, including installation of devices to allow for isolation, will be better informed by an improved understanding of the AFN population. For example, if sectionalization of a hardened line section enables keeping a large assisted-living center in power, the impact of PSPS on that AFN community would be significantly reduced.

With respect to labelling a particular individual as AFN, however, Pacific Power believes that self-identification is the only option which honors individual preference. The best way to empower customers who might be AFN (and thereby potentially increase self-identification rates) is through better education of the option to self-identify. There is a distinct difference between simple “self-identification,” where a customer might have the option to self-identify as AFN, but not know how or why to do so… versus informed “self-identification,” where a customer has received detailed information, delivered in an understandable format, educating the customer on an easy and convenient method for self-identification. Pacific Power’s goal is to educate customers in PSPS areas about informed self-identification. One example of such effort is evident in the recent changes to Pacific Power’s CARE program application process which allows for customers to self-identify as AFN as a part of the application or recertification. The goal of this change was to broaden outreach to the AFN community beyond medical baseline. In June of 2021, Pacific Power distributed additional education materials to all existing CARE customers and included the opportunity for customers to self-identify as AFN as a part of recertification. As a result of this change, 91 existing CARE customers newly self-identified as AFN through this mechanism, 37 of which reside in a PSPS area. This
change reflects an approximate 40% increase in identified AFN customers overall and an approximate 45% increase in the HFTD.

**PSPS Thresholds.** Pacific Power continues to believe that the decision to implement a PSPS will require some discretion and real-time assessments of evolving weather forecasts, local system conditions, and a variety of other factors which might weigh into the balancing of interests implicated in making any PSPS decision. Nonetheless, Pacific Power understands the desire to frame the analysis around reference to specific numbers. In this context, miles per hour wind measurements (both sustained and gusts) are relevant. But the range of wind thresholds at which Pacific Power would consider calling a PSPS event is best understood in reference to historic percentiles at particular locations, because of many variances in local conditions. As discussed in Pacific Power’s Wildfire Mitigation Plan, there are specific thresholds to trigger a PSPS internal watch event, which is when Pacific Power’s internal EOC convenes to continuously monitor all of the factors which might influence the PSPS decision. Assuming critical fire weather conditions and critically dry fuels, at minimum, Pacific Power might implement a PSPS when wind gusts are forecast to exceed the 95th percentile. The likelihood of a PSPS then substantially increases when (a) wind gusts are forecast to reach or exceed the 99th percentile and (b) Pacific Power’s Localized Risk Assessment Model (LRAM) Outage Model indicates the potential for wind-related outages in the area.

Covered conductor will impact these thresholds. At this time, Pacific Power does not plan to change the criteria for when an internal watch is convened. But the hardening impact of covered conductor is an important factor that the EOC would consider during the internal watch event. First, in applying operational discretion, the existence of covered conductor (which, in light of construction efficiencies, is typically also coupled with other system hardening mitigation initiatives) will factor heavily against implementing a PSPS, even when forecasts are in the 99th percentile. Obviously, if less than 100% of the circuit (or isolated segment) was covered conductor, the factor would weigh less heavily, depending on the local circumstances. Second, over time, Pacific Power expects that covered conductor will have a dramatic impact on the LRAM Outage Model output of potential wind-related outages by reflecting an expected large reduction in the number of wind-related outages related to a line with covered conductor. It will take time to build that empirical data set, but Pacific Power expects that the objective incorporation of the LRAM Outage Model will essentially confirm the propriety of having covered conductor weigh against PSPS implementation.

Fundamentally, the installation of covered conductor changes the actual risk to the system from interference involving a conductor and a pole or other structural element. As an example of how this may work practically for a given circuit without installed covered conductor or other grid hardening elements, a wind speed of 35 mph may exceed the 95th percentile trigger and result in a watch or de-energization. Prior to the installation of covered conductor, the bare conductor is the most exposed element and at greatest risk of vegetation contact or damage. Therefore, the wind speed thresholds are determined based on the risk of tree blow-in contacting the bare conductor. After the installation of covered conductor, the conductor itself ceases to be the greatest risk element in the system. Instead, wind thresholds can be determined based on the potential for trees to damage or impact structural elements, such as poles, and it should require significantly more force to damage that type of equipment. Therefore, Pacific Power may expect the wind threshold to increase, for example, to 60 mph, after the installation of covered conductor, as the risk and mechanism have changed.
In closing, we at Pacific Power echo your concern for the safety and well-being of Californians. If we implement a PSPS, it is with this concern in mind and protecting the public from a wildfire. At the same time, the health and safety risks of de-energization are front and center in the analysis performed by our EOC whenever a PSPS is considered. Pacific Power recognizes and appreciates that PSPS is a relatively new approach and that all utilities need to be open to learning and adapting. We are committed to improving our PSPS processes and welcome engagement on this topic.

Sincerely,

Stefan A. Bird
President and CEO

cc: Service List for R.18-12-005 and I.19-11-013
    Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety  
    (caroline.thomasjacobs@energysafety.ca.gov)
    Rachel Peterson, Executive Director, CPUC  
    (rachel.peterson@cpuc.ca.gov)
    Arocles Aguilar, General Counsel, CPUC  
    (arocles.aguilar@cpuc.ca.gov)
    Shannon O'Rourke, Chief of Staff, CPUC  
    (Shannon.O'Rourke@cpuc.ca.gov)
    Nora Hawkins, Energy Advisor, CPUC  
    (Nora.Hawkins@cpuc.ca.gov)
    Leslie Palmer, Director, Safety & Enforcement Division, CPUC  
    (leslie.palmer@cpuc.ca.gov)
    Edward Randolph, Deputy Executive Director for Energy and Climate Policy, CPUC  
    (edward.randolph@cpuc.ca.gov)
### BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

| Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions | Rulemaking 18-12-005 (Filed December 19, 2018) (Not Consolidated) |
| Order Instituting Investigation on the Commission’s Own Motion on the Late 2019 Public Safety Power Shutoff Events | I. 19-11-013 (Filed November 13, 2019) (Not Consolidated) |

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **Pacific Power Response to President Batjer's Letter requesting additional information on August 4, 2021 PSPS Briefing** on all known parties to I.19-11-013 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

(See the attached Service List I.19-11-013)

Executed on **September 16, 2021**, at Portland, Oregon.

Mary Penfield  
Adviser, Regulatory Operations
CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: I1911013 - CPUC - OII ON THE LA
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: AUGUST 4, 2021

Download the Comma-delimited File
About Comma-delimited Files

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Parties

SHARON YANG
DIRECTOR OF LEGAL SERVICES
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
9750 WASHBURN ROAD
DOWNY, CA  90241
FOR: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

ANDREA TOZER
SR. ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE / PO BOX 800
ROSEMEAD, CA  91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KEITH SWITZER
VICE PRESIDENT REGULATORY AFFAIRS
GOLDEN STATE WATER COMPANY
BEAR VALLEY ELECTRIC SERVICE DIVISION
630 E. FOOTHILL BLVD.
SAN DIMAS, CA  91773
FOR: BEAR VALLEY ELECTRIC SERVICE DIVISION

DIANE CONKLIN
SPOKESPERSON
MUSSEY GRADE ROAD ALLIANCE
PO BOX 683
RAMONA, CA  92065
FOR: MUSSEY GRADE ROAD ALLIANCE

DAVID CHENG
STAFF ATTORNEY
THE UTILITY REFORM NETWORK
1620 5TH AVENUE, SUITE 810
SAN DIEGO, CA  92101
FOR: TURN

EDWARD LOPEZ
EXECUTIVE DIR
UTILITY CONSUMERS' ACTION NETWORK
3405 KENYON ST. SUITE 401
SAN DIEGO, CA  92110
FOR: UTILITY CONSUMERS' ACTION NETWORK (UCAN)

MALINDA DICKENSON
GENERAL COUNSEL
PROTECT OUR COMMUNITIES FOUNDATION

CHRISTOPHER M. LYONS
SR. COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
4452 PARK BLVD., STE 309                  8326 CENTURY PARK COURT, CP32D
SAN DIEGO, CA  92116                      SAN DIEGO, CA  92123
FOR: THE PROTECT OUR COMMUNITIES          FOR: SAN DIEGO GAS & ELECTRIC COMPANY
FOUNDATION

CATHY DEFALCO                             JACQUELINE AYER
CALIFORNIA CHOICE ENERGY AUTHORITY        2010 WEST AVENUE K, SUITE 701
44933 FERN AVENUE                         LANCASTER, CA  93536
LANCASTER, CA  93534                      FOR: ACTON TOWN COUNCIL
FOR: CALIFORNIA CHOICE ENERGY AUTHORITY (CALCHOICE)

STEPHEN KEEHN                             ANDREW J. GRAF
MGR - REGULATORY                          ASSOCIATE ATTORNEY
CENTRAL COAST COMMUNITY ENERGY            ADAMS BROADWELL JOSEPH & CARDozo
70 GARDEN COURT, SUITE 300                601 GATEWAY BOULEVARD, SUITE 1000
MONTEREY, CA  93940                       SOUTH SAN FRANCISCO, CA  94080
FOR: CENTRAL COAST COMMUNITY ENERGY       FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES

NOEL OBIORA                               WILLIAM K. SANDERS
CALIF PUBLIC UTILITIES COMMISSION         DEPUTY CITY ATTORNEY
LEGAL DIVISION                            CITY AND COUNTY OF SAN FRANCISCO
ROOM 5121                                 CITY HALL
505 VAN NESS AVENUE                       1 DR. CARLTON B. GOODLETT PL., RM 234
SAN FRANCISCO, CA  94102-3214             SAN FRANCISCO, CA  94102-4682
FOR: PUBLIC ADVOCATES OFFICE               FOR: CITY AND COUNTY OF SAN FRANCISCO

ARIEL STRAUSS                             JOHN SIMON
COUNSEL - REGULATORY                      PACIFIC GAS AND ELECTRIC COMPANY
SMALL BUSINESS UTILITY ADVOCATES          77 BEALE STREET, MC B32
548 MARKET ST., SUITE 11200               SAN FRANCISCO, CA  94105
SAN FRANCISCO, CA  94104                  FOR: PACIFIC GAS & ELECTRIC COMPANY
FOR: SMALL BUSINESS UTILITY ADVOCATES (SBUA)

NORA SHERIFF                             NORA SHERIFF
ATTORNEY                                  COUNSEL
BUCHALTER, A PROFESSIONAL CORPORATION     BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, STE 1700                55 SECOND STREET, STE. 1700
SAN FRANCISCO, CA  94105                 SAN FRANCISCO, CA  94105
FOR: CITY OF RIVERSIDE                    FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION (CLECA)

LILLIAN RAFII                             MARGARET THOMAS
ATTORNEY                                  AVP Â€“ SENIOR LEGAL COUNSEL
BUCHALTER, A PROFESSIONA CORPORATION       AT&T SERVICES, INC.
55 SECOND STREET, SUITE 1700              430 BUSH STREET, 6TH FLOOR
SAN FRANCISCO, CA  94105-3493             SAN FRANCISCO, CA  94108
FOR: ENERGY PRODUCERS AND USERS            FOR: JOINT COMMUNICATIONS PARTIES;
COALITION (EPUC)                           AT&T: PACIFIC BELL TELEPHONE COMPANY
                                          DBA AT&T CALIFORNIA, AT&T MOBILITY AND
                                          AT&T CORP

MEGAN SOMOGYI                             MEGAN M. MYERS

<table>
<thead>
<tr>
<th>Name</th>
<th>Firm/Title</th>
<th>Address</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Melissa W. Kasnitz</td>
<td>Attorney</td>
<td>3075 Adeline Street, Suite 220</td>
<td>Berkeley, CA 94703</td>
<td>Stephanie Chen</td>
<td>1125 Tampalpais Avenue</td>
<td>San Rafael, CA 94901</td>
</tr>
<tr>
<td>Michael A. Alcantar</td>
<td>ALCANTAR LAW GROUP</td>
<td>1 Blackfield Drive No. 135</td>
<td>Tiburon, CA 94920</td>
<td>Elisa Toentino</td>
<td>Office of the City Attorney</td>
<td>San Jose, CA 95113-1905</td>
</tr>
<tr>
<td>Neal M. Reardon</td>
<td>DIR - Regulatory Affairs</td>
<td>50 Santa Rosa Ave. 5th FL</td>
<td>Santa Rosa, CA 95404</td>
<td>Alexia Retallack</td>
<td>Program Specialist II</td>
<td>Rocklin, CA 95677</td>
</tr>
<tr>
<td>David Peffer</td>
<td>Attorney</td>
<td>555 Capitol Mall, Ste. 570</td>
<td>Sacramento, CA 95814</td>
<td>Jerome F. Candelaria</td>
<td>CA. Cable &amp; Telecommunication Assoc.</td>
<td>Sacramento, CA 95814</td>
</tr>
<tr>
<td>Jessica Buno Ralston</td>
<td>Sr. Attorney</td>
<td>Pacificorp</td>
<td>Portland, OR 97232</td>
<td>James Ross</td>
<td>RCS, Inc.</td>
<td>Portland, OR 00000</td>
</tr>
</tbody>
</table>

**Information Only**

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<thead>
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<th>Name</th>
<th>Firm/Title</th>
<th>Address</th>
<th>City, State, Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diane Fellman</td>
<td>Consultant</td>
<td>California Wildfire Safety</td>
<td>Email Only</td>
</tr>
<tr>
<td>James Ross</td>
<td>Email Only</td>
<td>Email Only, CA 00000</td>
<td></td>
</tr>
</tbody>
</table>

https://ia.cpuc.ca.gov/servicelists/I1911013_87397.htm
ADVISORY BOARD

KAVYA BALARAMAN                        KRISTEN CAMUGLIA
REPORTER                              COX COMMUNICATIONS
UTILITY DIVE                           EMAIL ONLY
EMAIL ONLY                             EMAIL ONLY, CA  00000
EMAIL ONLY, DC  00000

LEGAL DIVISION                        PAUL HUNT
CPUC                                   EMAIL ONLY
EMAIL ONLY                             EMAIL ONLY, CA  00000
EMAIL ONLY, CA  00000

ROSANNE RATKIEWICH                    WILLIAM MONSEN
SR. REGULATORY ANALYST                MRW & ASSOCIATES, LLC
CPUC - ENERGY DIVISION                EMAIL ONLY
EMAIL ONLY                             EMAIL ONLY, CA  00000
EMAIL ONLY, CA  00000

REGULATORY                           REGULATORY
MCE CLEAN ENERGY                      EAST BAY COMMUNITY ENERGY
EMAIL ONLY                             EMAIL ONLY
EMAIL ONLY, CA  00000
EMAIL ONLY, CA  00000

OFFICE OF THE CITY ATTORNEY           CALIFORNIA COMMUNITY CHOICE ASSOCIATION
EMAIL ONLY                             EMAIL ONLY
EMAIL ONLY, CA  00000
EMAIL ONLY, CA  00000

CALEB KELLY                           EDWIN GUYANDI
CITADEL                                ANALYST
520 MADISON AVENUE 17TH FLR            NEWTYN MANAGEMENT
NEW YORK, NY  10022

THERESA L. BUSCH                      JIM TOMLINSON
JENNER & BLOCK LLP                    DAVIS WRIGHT TREMAINE LLP
353 NORTH CLARK STREET                EMAIL ONLY
CHICGO, IL  60654-3456                EMAIL ONLY, CA  90017

BRIAN HAUCK                           JENNER & BLOCK LLP
JENNER & BLOCK LLP                    633 WEST 5TH STREET, SUITE 3600
633 W. 5TH ST., STE. 3500             LOS ANGELES, CA  90071
LOS ANGELES, CA  90071

DAN MARSH                            DANIEL W. DOUGLASS
MANAGER, RATES AND REGULATORY AFFAIRS  ATTORNEY
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC  DOUGLASS, LIDDELL & KLATT
9750 WASHBURN ROAD                    5737 KANAN ROAD, STE. 610
DOWNEY, CA  90241                     AGOURA HILLS, CA  91301-1601

ANNA VALDBERG                        CARLA PETERMAN
DIR - MANAGING ATTORNEY               SR. VP, REGULATORY AFFAIRS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

CASE ADMINISTRATION WILDF
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

NATHANIEL GONZALEZ
SR. ADVISOR
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770

JOSEPH W. MITCHELL, PH.D
M-BAR TECHNOLOGIES AND CONSULTING, LLC
19412 KIMBALL VALLEY RD.
RAMONA, CA 92065

DIANA DAY
VP, GEN COUNSEL & CHIEF RISK OFFICER
SAN DIEGO GAS & ELECTRIC COMPANY
8326 CENTURY PARK COURT, CP33B
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

KIRSTIE C. RAAGAS
MGR - REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32F
SAN DIEGO, CA 92123

SHEWIT WOLDEGIORGIS
MGR - REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123-1530

SUSAN D. WILSON
ASSISTANT CITY ATTORNEY
CITY OF RIVERSIDE
3900 MAIN STREET, 7TH FLOOR
RIVERSIDE, CA 92522
FOR: CITY OF RIVERSIDE

JEREMY WAEN
MGR - REGULATORY
PENINSULA CLEAN ENERGY
2075 WOODSIDE ROAD
REDWOOD CITY, CA 94061

KEVIN PAYNE
PRESIDENT AND CEO
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH ST.
ROSEMEAD, CA 91770

PHIL HERRINGTON
SR. VP, TRANSMISSION AND DISTRIBUTION
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH ST.
ROSEMEAD, CA 91770

DONALD C. LIDDELL, PC
COUNSEL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

KELLEN C. GILL
CALIFORNIA REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT., CP32F
SAN DIEGO, CA 92123

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT, CP31-E
SAN DIEGO, CA 92123-1530

PAUL MARCONI
DIRECTOR
BEAR VALLEY ELECTRIC SERVICE, INC.
42020 GRASTIN DRIVE / PO BOX 1547
BIG BEAR LAKE, CA 92315

JEREMIAH OWEN
PRESIDENT
THE ACTON TOWN COUNCIL
PO BOX 810
ACTON, CA 93510
FOR: ACTON TOWN COUNCIL

RACHAEL E. KOSS
ATTORNEY
ADAMS BROADWELL JOSEPH & CARDozo
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
SAN FRANCISCO, CA  94105

MARGARET L. TOBIAS
ATTORNEY
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVE
SAN FRANCISCO, CA  94107

ANDY UMANA
SR. PARALEGAL
AT&T SERVICES, INC.
430 BUSH STREET, RM 6043
SAN FRANCISCO, CA  94108

MARGARET M. THOMSON
ATTORNEY
AT&T SERVICES, INC.
430 BUSH STREET, SIXTH FL
SAN FRANCISCO, CA  94108

IKEVIN ASHE
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA  94111

VIDHYA PRABHAKARAN
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET STE 800
SF, CA  94111
FOR: AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS OF PACIFIC GAS AND ELECTRIC COMPANY

GERARDO HUERTA
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA  94120

MEREDITH ALLEN
DIR - REGULATORY AFFAIRS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B10C
SAN FRANCISCO, CA  94177

MELISSA BRANDT
SR. DIR & DEPUTY GEN COUNSEL
EAST BAY COMMUNITY ENERGY
1999 HARRISON ST., STE. 800
OAKLAND, CA  94612

ADAM BENSAD
AREA MANAGER "REGULATORY RELATIONS
AT&T SERVICES, INC.
430 BUSH STREET, 5TH FLOOR
SAN FRANCISCO, CA  94108

JEFFREY MONDON
DIR - REGULATORY
AT&T SERVICES, INC.
430 BUSH STREET, 5TH FL
SAN FRANCISCO, CA  94108

SAIRA PASHA
AREA MGR - REGULATORY RELATIONS
AT&T SERVICES, INC.
430 BUSH STREET, 5TH FL.
SAN FRANCISCO, CA  94108

LORI ANNE DOLQUEIST, ESQ
ATTORNEY AT LAW
NOSSAMAN LLP
50 CALIFORNIA STREET, 34TH FLR
SAN FRANCISCO, CA  94111

STEVEN F. GREENWALD
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA  94111-6533
FOR: AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS OF PACIFIC GAS AND ELECTRIC COMPANY

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B23A
SAN FRANCISCO, CA  94177

BRETT T. KAWAKAMI
EBMUD
375 11TH STREET, STE. 200
OAKLAND, CA  94541

ADRIAN SLIPSKI
LEGAL FELLOW
CENTER FOR ACCESSIBLE TECHNOLOGY
3075 ADELINE STREET, SUITE 220
BERKELEY, CA  94703
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Address</th>
<th>City, State, Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAURA FERNANDEZ</td>
<td>ATTORNEY</td>
<td>BRAUN BLAISING SMITH WYNNE, PC</td>
<td>SACRAMENTO, CA 95814</td>
</tr>
<tr>
<td></td>
<td></td>
<td>555 CAPITOL MALL, SUITE 570</td>
<td></td>
</tr>
<tr>
<td>LAURA MCWILLIAMS</td>
<td>STATE SENATOR JERRY HILL</td>
<td>STATE CAPITOL, ROOM 5035</td>
<td>SACRAMENTO, CA 95814</td>
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<td>REGULATORY CLERK</td>
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<td>SCOTT BLAISING</td>
<td>ATTORNEY</td>
<td>BRAUN BLAISING SMITH WYNNE, PC</td>
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<td>AMANDA COOEY</td>
<td></td>
<td>ELLISON SCHNEIDER HARRIS &amp; DONLAN, LLP</td>
<td>SACRAMENTO, CA 95816</td>
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<td>2600 CAPITOL AVE, SUITE 400</td>
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<tr>
<td>LYNN HAUG</td>
<td>ATTORNEY</td>
<td>ELLISON SCHNEIDER HARRIS &amp; DONLAN LLP</td>
<td>SACRAMENTO, CA 95816</td>
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<td>RONALD LIEBERT</td>
<td>ATTORNEY</td>
<td>ELLISON, SCHNEIDER HARRIS &amp; DONLAN LLP</td>
<td>SACRAMENTO, CA 95816</td>
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<td>SAMANTHA G. NEUMYER</td>
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<td>ANDREW B. BROWN</td>
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<td>ELLISON SCHNEIDER HARRIS &amp; DONLAN LLP</td>
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<td>JEDEDIAH J. GIBSON</td>
<td>ATTORNEY</td>
<td>ELLISON SCHNEIDER HARRIS &amp; DONLAN LLP</td>
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<td>JOY MASTACHE</td>
<td>SR. ATTORNEY - OFF. OF GEN. COUNSEL</td>
<td>SACRAMENTO MUNICIPAL UTILITY DISTRICT</td>
<td>SACRAMENTO, CA 95817</td>
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<td>ANTHONY NOLL</td>
<td>CALIF PUBLIC UTILITIES COMMISSION</td>
<td>WILDFIRE SAFETY &amp; ENFORCEMENT BRANCH</td>
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<td>DANJEL BOUT</td>
<td>CALIF PUBLIC UTILITIES COMMISSION</td>
<td>SAFETY POLICY DIVISION</td>
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<td>CALIF PUBLIC UTILITIES COMMISSION</td>
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<td>ANN L. TROWBRIDGE</td>
<td>ATTORNEY AT LAW</td>
<td>DAY CARTER &amp; MURPHY, LLP</td>
<td>SACRAMENTO, CA 95864</td>
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<td>3620 AMERICAN RIVER DRIVE, SUITE 205</td>
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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions. Rulemaking 18-12-005 (Filed December 13, 2018)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the Pacific Power Response to President Batjer's Letter requesting additional information on August 4, 2021 PSPS Briefing on all known parties to R.18-12-005 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

(See the attached Service List R.18-12-005)

Executed on September 16, 2021, at Portland, Oreg

Mary Penfield
Adviser, Regulatory Operations
### Parties

<table>
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<tr>
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<th>Title</th>
<th>Company/Department</th>
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<tr>
<td><strong>JOSHUA NELSON</strong></td>
<td>ASSOCIATE</td>
<td>BEST BEST &amp; KRIEGER LLP</td>
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<td>FOR: CITY OF MALIBU</td>
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<td><strong>SEAN P. BEATTY</strong></td>
<td>PARTNER</td>
<td>BRB LAW LLP</td>
<td>EMAIL ONLY, CA 00000</td>
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<td>FOR: CONSOLIDATED COMMUNICATIONS OF CALIFORNIA COMPANY</td>
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<tr>
<td><strong>STEPHEN H. KUKTA</strong></td>
<td>DIRECTOR AND SENIOR COUNSEL</td>
<td>T-MOBILE</td>
<td>1407 WEST NORTH TEMPLE, SUITE 320</td>
<td>SALT LAKE CITY, UT 84116</td>
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<tr>
<td><strong>TIMOTHY K. CLARK</strong></td>
<td>PACIFICORP (ROCKY MOUNTAIN POWER)</td>
<td>1407 WEST NORTH TEMPLE, SUITE 320</td>
<td>SALT LAKE CITY, UT 84116</td>
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<td>FOR: PACIFIC POWER &amp; PACIFICORP</td>
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<td><strong>ROBERT E. RALGAND</strong></td>
<td>ATTORNEY</td>
<td>COUNTY OF L.A., DEPT. OF PUBLIC HEALTH</td>
<td>555 W. 5TH STREET, 35TH FLOOR</td>
<td>LOS ANGELES, CA 90013</td>
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<td>FOR: COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC HEALTH (LACDPH)</td>
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<td><strong>C.C. SONG</strong></td>
<td>DIR - REGULATORY POLICY</td>
<td>CLEAN POWER ALLIANCE OF SO. CALIF.</td>
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<td><strong>GYMEKA WILLIAMS</strong></td>
<td>COORDINATOR - EMERGENCY MGNT</td>
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<td><strong>WILLIAM E. NAYLOR</strong></td>
<td>COMMUNITY ADVOCATES</td>
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<td>TOPANGA, CA 90290</td>
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</table>
JACK BROUWER                              JEREMIAH OWEN
DIR.                                      PRESIDENT
UNIVERSITY OF CALIFORNIA IRVINE           THE ACTON TOWN COUNCIL
NATIONAL FUEL CELL RESEARCH CENTER       PO BOX 810
UNIVERSITY OF CALIFORNIA                  ACTON, CA  93510
IRVINE, CA  92697-3550                    FOR: ACTION TOWN COUNCIL
FOR: NATIONAL FUEL CELL RESEARCH CENTER

JEREMY WAEN                               RACHAEL E. KOSS
DIR - REGULATORY                          ATTORNEY
PENINSULA CLEAN ENERGY AUTHORITY          ADAMS BROADWELL JOSEPH & CARDozo
2075 WOODSIDE RD.                         601 GATEWAY BOULEVARD, SUITE 1000
REDWOOD CITY, CA  94061                   SO. SAN FRANCISCO, CA  94080
FOR: PENINSULA CLEAN ENERGY AUTHORITY     FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES

WILLIAM ROSTOV                            RYAN GRONSKY
DEPUTY CITY ATTORNEY                      CALIF PUBLIC UTILITIES COMMISSION
CITY AND COUNTY OF SAN FRANCISCO          LEGAL DIVISION
OFFICE OF CITY ATTORNEY DENNIS HERRERA    AREA
1 DR. CARLTON B. GOODLETT PL., RM 234     505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102                  SAN FRANCISCO, CA  94102-3214
FOR: CITY AND COUNTY OF SAN FRANCISCO     FOR: PUBLIC ADVOCATES OFFICE
FOR: PENINSULA CLEAN ENERGY AUTHORITY

JAMES M. BIRKELUND                        JANE WHANG
PRESIDENT                                 STAFF COUNSEL
SMALL BUSINESS UTILITY ADVOCATES          VERIZON
548 MARKET STREET, STE. 11200             201 SPEAR STREET, 7TH FL.
SAN FRANCISCO, CA  94104                  SAN FRANCISCO, CA  94105
FOR: SMALL BUSINESS UTILITY ADVOCATES     FOR: CELLCO PARTNERSHIP LLC D/B/A
FOR: PUB L A Y W A V E S

MICHAEL ALCANTAR                          NORA SHERIFF
ATTORNEY AT LAW                           ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION     BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, SUITE 1700              55 SECOND STREET, STE 1700
SAN FRANCISCO, CA  94105                  SAN FRANCISCO, CA  94105
FOR: WESTERN STATES PETROLEUM             FOR: CITY OF RIVERSIDE
ASSOCIATION (WSPA)

NORA SHERIFF                              NORA SHERIFF, ESQ.
COUNSEL                                  ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION     BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, SUITE 1700              55 SECOND STREET, SUITE 1700
SAN FRANCISCO, CA  94105                  SAN FRANCISCO, CA  94105-3493
FOR: ENERGY PRODUCERS AND USERS          FOR: CA LARGE ENERGY CONSUMERS
COALITION                                ASSOCIATION

MARGARET M. THOMSON                       LISA A. COTTLE
AVP - SR. LEGAL COUNSEL                   ATTORNEY
AT&T SERVICES, INC.                       WINSTON & STRAWN LLP
430 BUSH STREET, 6TH FL.                  101 CALIFORNIA STREET
SAN FRANCISCO, CA  94108                  SAN FRANCISCO, CA  94111
FOR: AT&T SERVICES INC.                   FOR: NEXTERA ENERGY TRANSMISSION WEST,
CHARGEPOINT, INC.
254 EAST HACIENDA AVENUE
CAMPBELL, CA  95008
FOR: CHARGEPOINT, INC.

COUNTY OF SANTA CLARA
70 WEST HEDDING STREET
SAN JOSE, CA  95110
FOR: COUNTY OF SANTA CLARA

ELISA TOLENTINO
SR. DEPUTY CITY ATTORNEY
CITY OF SAN JOSE'
OFFICE OF THE CITY ATTORNEY
200 EAST SANTA CLARA STREET, 16TH FL.
SAN JOSÉ, CA  95113
FOR: CITY OF SAN JOSE

YUE-HAN CHOW
SR. DEPUTY CITY ATTORNEY
CITY OF SAN JOSE
200 E. SANTA CLARA STREET, 16TH FL
SAN JOSE, CA  95113
FOR: CITY OF SAN JOSÉ

C. SUSIE BERLIN
ATTORNEY
LAW OFFICES OF SUSIE BERLIN
1346 THE ALAMEDA, STE. 7, NO. 141
SAN JOSE, CA  95126
FOR: GOLDEN STATE POWER COOPERATIVE

C. SUSIE BERLIN
LAW OFFICES OF SUSIE BERLIN
1346 THE ALAMEDA, STE. 7, NO. 141
SAN JOSE, CA  95126
FOR: NORTHERN CALIFORNIA POWER AGENCY

NEAL M. REARDON
DIR - REGULATORY AFFAIRS
SONOMA CLEAN POWER AUTHORITY
50 SANTA ROSA AVE. 5TH FL
SANTA ROSA, CA  95404
FOR: SONOMA CLEAN POWER AUTHORITY

WILLIAM B. ABRAMS
COMMUNITY ADVOCATE
1519 BRANCH OWL PLACE
SANTA ROSA, CA  95409
FOR: WILLIAM B. ABRAMS

JORDAN PINJUV
SR. COUNSEL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM, CA  95630
FOR: CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION (CAISO)

NICHOLAS LEVENHAGEN
ATTORNEY
1831 K STREET
SACRAMENTO, CA  95811
FOR: DISABILITY RIGHTS CALIFORNIA

BRITTANY ILES
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
915 L STREET, STE. 1480
SACRAMENTO, CA  95814
FOR: THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION (CALCCA)

BRITTANY ILES
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
915 L STREET, STE. 1480
SACRAMENTO, CA  95814
FOR: CENTRAL COAST COMMUNITY ENERGY AUTHORITY (MBCP)

BRITTANY ILES
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
915 L STREET, SUITE 1480
SACRAMENTO, CA  95814
FOR: PIONEER COMMUNITY ENERGY

CHELSEA HAINES
SR. REGULATORY ADVOCATE
ASSOCIATION OF CALIFORNIA WATER AGENCIES
980 9TH STREET, SUITE 1000
SACRAMENTO, CA  95814
FOR: ASSOCIATION OF CALIFORNIA WATER AGENCIES (ACWA)

JUSTIN WYNNE
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
815 L STREET, SUITE 1480
SACRAMENTO, CA  95814
FOR: CENTRAL COAST COMMUNITY ENERGY AUTHORITY (MBCP)

KRISTIN L. JACOBSON
ATTORNEY
DLA PIPER LLP (US)
Information Only

ANGELA GOULD
CALIFORNIA ENERGY COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

BILL POWERS, P.E.
TECHNICAL ADVISOR
POWERS ENGINEERING
EMAIL ONLY

ANWAR SAFVI
CPUC - WILDFIRE SAFETY
EMAIL ONLY
EMAIL ONLY, CA 00000

DANIEL MARSH
MGR - RATES & REGULATORY
LIBERTY UTILITIES
933 ELOISE AVE.
SO. LAKE TAHOE, CA 96150
FOR: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

DANIEL GARCIA
CITY OF RIVERSIDE
EMAIL ONLY
<table>
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<tr>
<th>Name</th>
<th>Organization</th>
<th>Title</th>
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<tr>
<td>DARREN LEE</td>
<td>BRB LAW LLP</td>
<td>Office Manager</td>
<td><a href="mailto:dllee@brblaw.com">dllee@brblaw.com</a></td>
</tr>
<tr>
<td>DAVID PECK</td>
<td>CPUC - EXEC</td>
<td></td>
<td><a href="mailto:dpeck@cpuc.com">dpeck@cpuc.com</a></td>
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<tr>
<td>FRANCIS CHOI</td>
<td>CLEAN POWER ALLIANCE</td>
<td></td>
<td><a href="mailto:francischoi@cleanno.com">francischoi@cleanno.com</a></td>
</tr>
<tr>
<td>JEAN HAWLEY</td>
<td>TELECOMMUNICATIONS PARALEGAL</td>
<td>Email Only</td>
<td><a href="mailto:jean@friendhuddak.com">jean@friendhuddak.com</a></td>
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<td>JENNY KAN</td>
<td>PACIFIC GAS &amp; ELECTRIC COMPANY</td>
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<td><a href="mailto:jenny@pacificgas.com">jenny@pacificgas.com</a></td>
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<td><a href="mailto:jparillo@libertyutilities.com">jparillo@libertyutilities.com</a></td>
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<td>CALIFORNIA PUBLIC UTILITIES COMMISSION</td>
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<td>REPORTER</td>
<td>Email Only</td>
<td><a href="mailto:kabalaraman@utilitydive.com">kabalaraman@utilitydive.com</a></td>
</tr>
<tr>
<td>KE HAO OUYANG</td>
<td>PROGRAM &amp; PROJECT SUPERVISOR - CPED</td>
<td></td>
<td><a href="mailto:kehao@utilitydive.com">kehao@utilitydive.com</a></td>
</tr>
<tr>
<td>KEVIN ASHE</td>
<td>HOLLAND &amp; KNIGHT LLP</td>
<td>Email Only</td>
<td><a href="mailto:kevin@hollandknights.com">kevin@hollandknights.com</a></td>
</tr>
<tr>
<td>KRISTEN CAMUGLIA</td>
<td>COX COMMUNICATIONS</td>
<td></td>
<td><a href="mailto:kristen@coxcommunications.com">kristen@coxcommunications.com</a></td>
</tr>
<tr>
<td>LAUREN MILLER</td>
<td>PARALEGAL</td>
<td>Email Only</td>
<td><a href="mailto:lauren@attorneyherrera.com">lauren@attorneyherrera.com</a></td>
</tr>
<tr>
<td>LEGAL DIVISION</td>
<td>CPUC</td>
<td></td>
<td><a href="mailto:legal@cpuc.com">legal@cpuc.com</a></td>
</tr>
<tr>
<td>LES GULIASI</td>
<td>RACHEL CARSON COLLEGE</td>
<td>Email Only</td>
<td><a href="mailto:les@rachelcarsoncollege.com">les@rachelcarsoncollege.com</a></td>
</tr>
<tr>
<td>MADDY STRUTNER</td>
<td>SAN DIEGO GAS &amp; ELECTRIC</td>
<td></td>
<td><a href="mailto:maddy@saniegogas.com">maddy@saniegogas.com</a></td>
</tr>
<tr>
<td>MCE REGULATORY</td>
<td>MARIN CLEAN ENERGY</td>
<td>Email Only</td>
<td><a href="mailto:mec@mccleanenergy.com">mec@mccleanenergy.com</a></td>
</tr>
<tr>
<td>NATHAN POON</td>
<td>OFFICE OF ENERGY INFRASTRUCTURE SAFETY</td>
<td></td>
<td><a href="mailto:nathan@energyinfrastructure.com">nathan@energyinfrastructure.com</a></td>
</tr>
</tbody>
</table>
PAUL HUNT
EMAIL ONLY
EMAIL ONLY, CA  00000

SCOTT DUNBAR
KEYES & FOX LLP
EMAIL ONLY
EMAIL ONLY, CA  00000
FOR: SUNRUN INC.

VICTOR ROOSEN
EMAIL ONLY
EMAIL ONLY, CA  00000

WALTER PARK
DESIGNING ACCESSIBLE COMMUNITIES
EMAIL ONLY
EMAIL ONLY, CA  00000

REGULATION AFFAIRS TEAM
PACIFICORP
EMAIL ONLY
EMAIL ONLY, AA  00000

MRW & ASSOCIATES LLC
EMAIL ONLY
EMAIL ONLY, CA  00000

CAMERON-DANIEL, P.C.
EMAIL ONLY
EMAIL ONLY, CA  00000

CHRISTOPHER CHOW
PUBLIC INFORMATION OFFICER
CPUC
EMAIL ONLY
EMAIL ONLY, CA  00000-0000

PAUL CHERNICK
PRESIDENT
RESOURCE INSIGHT
5 WATER ST.
ARLINGTON, MA  02476

OLIVIA B. WEIN
STAFF ATTORNEY
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
WASHINGTON, DC  20036-5528

AMANDA VANEGA
EQ RESEARCH LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC  27511

BLAKE ELDER
POLICY RESEARCH ANALYST
EQ RESEARCH, LLC
1155 KILDAIRE FARM ROAD, SUITE 202-203
CARY, NC  27511

STEVEN GRECO
REGULATORY AFFAIRS ANALYST
HORIZON WEST TRANSMISSION, LLC
700 UNIVERSE BLVD
JUNO BEACH, FL  33407

THERESA L. BUSCH
JENNER & BLOCK LLP
353 NORTH CLARK STREET
CHICAGO, IL  60654-3456

JIM ROSS
RCS, INC.
266 PENNINGTON LANE
CHESTERFIELD, MO  63005

TRACY C. DAVIS
SR. ATTORNEY
NEXTERA ENERGY TRANSMISSION, LLC
5920 W. WILLIAM CANNON DR., BLDG 2
AUSTIN, TX  78749

STELLA FOGLEMAN
DIR
COUNTY OF LOS ANGELES
600 S. COMMONWEALTH AVE., STE.700
LOS ANGELES, CA  90005
FOR: COUNTY OF LOS ANGELES, DEPARTMENT

HEIDI LIU
ASSOC COUNTY COUNSEL
COUNTY OF LOS ANGELES
500 WEST TEMPLE ST., STE. 651
LOS ANGELES, CA  90012
FOR: COUNTY OF LOS ANGELES
OF PUBLIC HEALTH

JAMIE GARCIA                              JEFFERY A. WILLIAMS
LOS ANGELES DEPT OF WATER AND POWER SUPERINTENDENT - CODES & ORDINANCES
11 N. HOPE ST. ROOM 856                     L.A. DEPT OF WATER & POWER
LOS ANGELES, CA  90012                     111 NORTH HOPE STREET, RM. 856
LOS ANGELES, CA  90012

BRYAN PENA                                CHRISTOPHER MOORE
CALIF PUBLIC UTILITIES COMMISSION           CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH      BUSINESS AND COMMUNITY OUTREACH
320 West 4th Street Suite 500               320 West 4th Street Suite 500
Los Angeles, CA  90013                     Los Angeles, CA  90013

ERIC WU                                   FADI DAYE
CALIF PUBLIC UTILITIES COMMISSION           CALIF PUBLIC UTILITIES COMMISSION
SAFETY MANAGEMENT SYSTEM BRANCH             ELECTRIC SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500               320 West 4th Street Suite 500
Los Angeles, CA  90013                     Los Angeles, CA  90013

JOAN WEBER                                KOKO M. TOMASSIAN
CALIF PUBLIC UTILITIES COMMISSION           CALIF PUBLIC UTILITIES COMMISSION
WILDFIRE SAFETY & ENFORCEMENT BRANCH        COMPLIANCE
320 West 4th Street Suite 500               320 West 4th Street Suite 500
Los Angeles, CA  90013                     Los Angeles, CA  90013

MATTHEW LANGER                            NANCY WHANG
ATTORNEY                                   GENERAL COUNSEL
CLEAN POWER ALLIANCE OF SO. CALIF.          CLEAN POWER ALLIANCE OF SO. CALIF.
555 WEST 5TH STREET, 35TH FL               555 WEST 5TH STREET, 35TH FLOOR
LOS ANGELES, CA  90013                     LOS ANGELES, CA  90013

RAFFY STEPANIAN                           B. TILDEN KIM
CALIF PUBLIC UTILITIES COMMISSION           ATTORNEY
ELECTRIC SAFETY AND RELIABILITY BRANCH      RICHARDS, WATSON & GERSHON
320 West 4th Street Suite 500               350 SOUTH GRAND AVENUE, 37TH FL
Los Angeles, CA  90013                     LOS ANGELES, CA  90071
FOR: CITY OF MOORPARK

BRIAN HAUCK                               JENNER & BLOCK LLP
JENNER & BLOCK LLP                         633 WEST 5TH STREET, SUITE 3600
633 W. 5TH ST., STE. 3500                   LOS ANGELES, CA  90071
LOS ANGELES, CA  90071

ZEB C. ZANKEL                             JANE E. TERJUNG
PARTNER                                   COMMUNITY ADVOCATES
JENNER & BLOCK LLP                         TOPANGA COMMUNITY ALLIANCE
633 WEST 5TH STREET, STE. 3600              1639 OAK DRIVE
LOS ANGELES, CA  90071-2054                 TOPANGA, CA  90290
FOR: JANE E. TERJUNG & WILLIAM E. NAYLOR

FRED G. YANNEY, ESQ.                       GREGORY S.G. KLATT
ATTORNEY                                   ATTORNEY
YANNEY LAW OFFICE
17409 MARQUARDT AVE. STE. C-4
CERRITOS, CA  90703

ANNA VALDBERG
DIR & MANAGING ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA  91770

CONNOR J. FLANIGAN
SR. ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA  91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KAREN CHUNG
MGR - PROJECT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA  91770

RYAN STEVENSON
PRIN ADVISOR, REG AFFAIRS & COMPL
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA  91770

JESSICA KIRSHNER
LAW CLERK
LAW OFFICES OF SHAWN E. CAINE, A.P.C.
1221 CAMINO DEL MAR
DEL MAR, CA  92014

JOSEPH W. MITCHELL, PH.D
M-BAR TECHNOLOGIES AND CONSULTING, LLC
19412 KIMBALL VALLEY RD.
RAMONA, CA  92065

PAUL CLARKE
DIR - OPER & WATER QUALITY
PADRE DAM MUNICIPAL WATER DISTRICT
9300 PANITA PARKWAY
SANTEE, CA  92071

ASHLEY L. SALAS
STAFF ATTORNEY
THE UTILITY REFORM NETWORK
1620 5TH AVENUE, SUITE 810
SAN DIEGO, CA  92101

DOUGLASS & LIDDELL
411 E. HUNTINGTON DR., STE 107-356
ARCADIA, CA  91006

CASE ADMINISTRATION WILDF
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA  91770

DEREK MATSUSHIMA
EDISON INTERNATIONAL
2244 WALNUT GROVE AVE.
ROSEMEAD, CA  91770

NATHANIEL GONZALEZ
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA  91770

DR. QUAN NGUYEN
BEAR VALLEY ELECTRIC SERVICE, INC.
630 E. FOOTHILL BLVD.
SAN DIMAS, CA  91773

SHAWN E. CAINE
LAW OFFICES OF SHAWN E. CAINE
1221 CAMINO DEL MAR
DEL MAR, CA  92014

MARK NIEMIEC
INTERIM DIR - ENGINEERING & PLANNING
PADRE DAM MUNICIPAL WATER DISTRICT
9300 PANITA PARKWAY
SANTEE, CA  92071

GARY ARANT
GENERAL MGR.
VALLEY CENTER MUNICIPAL WATER DISTRICT
29300 VALLEY CENTER ROAD
VALLEY CENTER, CA  92082

CHRISTINE MAILLOUX
ATTORNEY
THE UTILITY REFORM NETWORK
1620 FIFTH AVENUE, SUITE 810
SAN DIEGO, CA  92101
DONALD C. LIDDELL, PC  
COUNSEL  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA  92103  

COURTNEY COOK  
PARALEGAL / OFFICE ADMIN.  
UTILITY CONSUMERS' ACTION NETWORK  
3405 KENYON STREET, SUITE 401  
SAN DIEGO, CA  92110  

CLAY FABER  
DIR. CA & FEDERAL REGULATORY  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32F  
SAN DIEGO, CA  92123  

KELLEN C. GILL  
REGULATORY CASE MGR.  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP 32D  
SAN DIEGO, CA  92123  

KIRSTIE C. RAAGAS  
REGULATORY COUNSEL  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32F  
SAN DIEGO, CA  92123  

SHEWIT WOLDEGIORGIS  
MGR - REGULATORY  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT., CP32F  
SAN DIEGO, CA  92123  

TAYLOR MARVIN  
SAN DIEGO GAS & ELECTRIC COMPANY  
326 CENTURY PARK CT  
SAN DIEGO, CA  92123  

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT, CP31-E  
SAN DIEGO, CA  92123-1530  

TIM LYONS  
REGULATORY AFFAIRS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT, CP32F  
SAN DIEGO, CA  92123-1530  

PAUL MARCONI  
DIRECTOR  
BEAR VALLEY ELECTRIC SERVICE, INC.  
42020 GRASITIN DRIVE / PO BOX 1547  
BIG BEAR LAKE, CA  92315  

GEORGE R. HANSON  
ASSIST. GEN. MGR.  
CITY OF RIVERSIDE - PUBLIC UTILITIES  
3750 UNIVERSITY AVE.  
RIVERSIDE, CA  92501  

SUSAN D. WILSON  
ASSISTANT CITY ATTORNEY  
CITY OF RIVERSIDE  
3900 MAIN STREET, 7TH FLOOR  
RIVERSIDE, CA  92522  

JESUS G. ROMAN  
ASSIST. GEN. COUNSEL  
VERIZON  
15505 SAND CANYON AVE. D201  
IRVINE, CA  92618  

KELLY HUBBARD  
WEROC PROGRAMS MANAGER  
MUNICIPAL WATER DIST OF ORANGE COUNTY  
18700 WARD STREET  
FOUNTAIN VALLEY, CA  92708  

VICKI OSBORN  
MWDOC  
18700 WARD STREET  
FOUNTAIN VALLEY, CA  92708  

JON ANSOLAEBHERE  
CHIEF DEPUTY COUNTY COUNSEL  
COUNTY OF SAN LUIS OBISPO  
1055 MONTEREY ST., STE D320  
SAN LUIS OBISPO, CA  93408  

RITA L. NEAL  
COUNTY COUNSEL  
COUNTY OF SAN LUIS OBISPO  
1055 MONTEREY ST., STE D320  
SAN LUIS OBISPO, CA  93408  

https://ia.cpuc.ca.gov/servicelists/R1812005_86199.htm  9/16/21
JOHN J. WALLER  
2675 AVENA ROAD  
LOMPOC, CA  93436

CHARLOTTE COSTAN  
THE ACTON TOWN COUNCIL  
EMAIL ONLY  
EMAIL ONLY, CA  93510

STEPHEN KEEHN  
MGR - REGULATORY  
CENTRAL COAST COMMUNITY ENERGY  
70 GARDEN COURT, SUITE 300  
MONTEREY, CA  93940

SUE MARA  
CONSULTANT  
RTO ADVISORS, L.L.C.  
164 SPRINGDALE WAY  
REDWOOD CITY, CA  94062

ILANA PARMER MANDELBAUM  
DEPUTY COUNTY COUNSEL  
SAN MATEO COUNTY COUNSEL'S OFFICE  
400 COUNTY CENTER, 6TH FLOOR  
REDWOOD CITY, CA  94063

ANDREW J. GRAF  
ASSOCIATE ATTORNEY  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA  94080

MARC D. JOSEPH  
ATTORNEY AT LAW  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA  94080

DIANA GALLEGOS  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, SUITE 2030  
SAN FRANCISCO, CA  94102

TARA KAUSHIK  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, SUITE 2030  
SAN FRANCISCO, CA  94102

AARON LOUIE  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

AMY B. CHAMARTY  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER AFFAIRS BRANCH  
ROOM 5210  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANAND DURVASULA  
CALIF PUBLIC UTILITIES COMMISSION  
PRESIDENT BATJER  
ROOM 5130  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANDREW DUGOWSON  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSIONER SHIROMA  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANIL BALIVADA  
CALIF PUBLIC UTILITIES COMMISSION  
CARRIER OVERSIGHT AND PROGRAMS BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANNA YANG  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANALISSA A. HERBERT  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214

ANNE KIM  
CALIF PUBLIC UTILITIES COMMISSION  
ARThUR FISHER  
CALIF PUBLIC UTILITIES COMMISSION

https://ia.cpuc.ca.gov/servicelists/R1812005_86199.htm
CALIFORNIA STRATEGIES AND ADVOCACY
1 EMBARCADERO CENTER, SUITE 1060
SAN FRANCISCO, CA  94111

ATTORNEY
GOODIN, MACBRIDE, SQUERI & DAY, LLP
505 SANSOME ST., STE. 900
SAN FRANCISCO, CA  94111
FOR: COUNTY OF MENDOCINO, THE COUNTY OF NAPA, AND THE COUNTY OF SONOMA

DAVID HUANG
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

JIM TOMLINSON
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

KELCIE ABRAHAM
BCG
2 EMBARCADERO CENTER SUITE 24
SF, CA  94111

LORI ANNE DOLQUEIST
ATTORNEY
NOSSAMAN LLP
50 CALIFORNIA STREET, 34TH FLR.
SAN FRANCISCO, CA  94111
FOR: CALIFORNIA WATER ASSOCIATION

MARK P. SCHREIBER
ATTORNEY
COOPER, WHITE & COOPER LLP
201 CALIFORNIA ST., 17TH FL.
SAN FRANCISCO, CA  94111

PATRICK FERGUSON
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

SARAH DEYOUNG
EXECUTIVE DIR
CALTEL
50 CALIFORNIA ST., STE. 1500
SAN FRANCISCO, CA  94111

TAHIYA SULTAN
ASSOCIATE
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA  94111

VIDHYA PRABHAKARAN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST., STE. 800
SAN FRANCISCO, CA  94111
FOR: AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS OF PACIFIC GAS AND ELECTRIC COMPANY

DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA  94111

ALLIE DETRIO
ATTORNEY
REIMAGINE POWER
77 SALA TERRACE
SAN FRANCISCO, CA  94112

IRENE K. MOOSEN
ATTORNEY AT LAW
LAW OFFICE OF IRENE K. MOOSEN
53 SANTA YNEZ STREET
SAN FRANCISCO, CA  94112
FOR: LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION (LGSEC)

GERARDO HUERTA
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA  94120
CASE COORDINATION  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000; MC B23A  
SAN FRANCISCO, CA  94177  
ALEXEY ORKIN  
CONSULTANT  
FLYNN RESOURCE CONSULTANTS INC.  
5440 EDGEVIEW DRIVE  
DISCOVERY BAY, CA  94505  

BARRY FLYNN  
PRESDENT  
FLYNN RESOURCE CONSULTANTS INC.  
5440 EDGEVIEW DRIVE  
DISCOVERY BAY, CA  94505  
PUSHKAR WAGLE  
MANAGING CONSULTANT  
FLYNN RESOURCE CONSULTANTS INC.  
5440 EDGEVIEW DRIVE  
DISCOVERY BAY, CA  94505  

MICHAEL ROCHMAN  
MANAGING DIR.  
SCHOOL PROJECT UTILITY RATE REDUCTION  
1850 GATEWAY BLVD., STE. 235  
CONCORD, CA  94520  
BRETT T. KAWAKAMI  
EBMUD  
375 11TH STREET, STE. 200  
OAKLAND, CA  94541  

GREG LAMBERG  
PETERSON POWER SYSTEMS, INC.  
2828 TEAGARDEN STREET  
SAN LEANDRO, CA  94577  
BENJAMIN BODELL  
ATTORNEY  
BEST BEST AND KRIEGER LLP  
2001 N MAIN ST., STE. 390  
WALNUT CREEK, CA  94596  
FOR: PADRE DAM MUNICIPAL WATER DISTRICT (PDMWD); VALLEY CENTER MUNICIPAL WATER DISTRICT (VCMWD)  

SAJI THOMAS PIERCE  
EAST BAY MUNICIPAL UTILITY DISTRICT  
375 11TH STREET  
OAKLAND, CA  94607-4240  
STEPHEN CAMPBELL  
PROJECT MGR.  
GRID ALTERNATIVES  
1171 OCEAN AVE., SUITE 200  
OAKLAND, CA  94608  

CATHERINE E. YAP  
CONSULTANT  
BARKOVICH & YAP, INC.  
PO BOX 11031  
OAKLAND, CA  94611  
FEBY BOEDIARTO  
REGULATORY ANALYST  
EAST BAY COMMUNITY ENERGY  
1999 HARRISON STREET, STE. 800  
OAKLAND, CA  94612  

SARAH J. BANOLA  
ATTORNEY  
BRB LAW LLP  
PO BOX 70527  
OAKLAND, CA  94612  
MARILYN GOLDEN  
SR POLICY ANALYST  
DISABILITY RIGHTS EDUCATION & DEFENSE FUND  
3075 ADELINE STREET, STE. 210  
BERKELEY, CA  94703  
FOR: DISABILITY RIGHTS EDUCATION & DEFENSE FUND  

PAUL SCHULMAN  
SR RESEARCH FELLOW  
CTR FOR CATASTROPHIC RISK MGNT  
MILLS COLLEGE  
UNIVERSITY OF CALIFORNIA  
BERKELEY, CA  94720  
MICHAEL CALLAHAN  
REGULATORY COUNSEL  
MARIN CLEAN ENERGY  
1125 TAMALPAIS AVENUE  
SAN RAFAEL, CA  94901  

https://ia.cpuc.ca.gov/servicelists/R1812005_86199.htm  
9/16/21
ROCKLIN, CA  95677

SAMUEL JAIN
STAFF ATTORNEY II
DISABILITY RIGHTS CALIFORNIA
1831 K STREET
SACRAMENTO, CA  95811
FOR: DISABILITY RIGHTS CALIFORNIA

AMY WARSHAUER
MGR - GOV'T & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
1201 K STREET, SUITE 1980
SACRAMENTO, CA  95814
FOR: AGRICULTURAL ENERGY CONSUMERS ASSOCIATION

CAROLINE THOMAS JACOBS
CALIF PUBLIC UTILITIES COMMISSION
WILDFIRE SAFETY DIVISION
300 Capitol Mall
Sacramento, CA  95814

COLBY BERMEL
POLITICO
925 L STREET STE 150
SACRAMENTO, CA  95814
FOR: SONOMA CLEAN POWER AUTHORITY

DAVID PEFFER
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
555 CAPITOL MALL, STE. 570
SACRAMENTO, CA  95814
FOR: MARIN CLEAN ENERGY, PENINSULA CLEAN ENERGY

FRANK HARRIS
MGR OF ENERGY REGULATORY POLICY
CA MUNICIPAL UTILITIES ASSOCIATION
915 L STREET, SUITE 1460
SACRAMENTO, CA  95814

LINETTE YOUNG
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER AFFAIRS BRANCH
300 Capitol Mall
Sacramento, CA  95814

MICHAEL BOCCADORO
PRESIDENT
WEST COAST ADVISORS
925 L STREET, SUITE 800
SACRAMENTO, CA  95814

ROCKLIN, CA  95677

ALCO ROBINSON
ASSISTANT
AT&T
1215 K ST. ROOM 1600
SACRAMENTO, CA  95814

BETH OLHASSO
WEST COAST ADVISORS
925 L STREET, SUITE 800
SACRAMENTO, CA  95814
FOR: AGRICULTURAL ENERGY CONSUMERS ASSOCIATION

CHARLIE BORN
DIR - GOV'T & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
1201 K STREET, STE. 1980
SACRAMENTO, CA  95814

DAVID PEFFER
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
555 CAPITOL MALL, STE. 570
SACRAMENTO, CA  95814
FOR: MARIN CLEAN ENERGY, PENINSULA CLEAN ENERGY

ELIZABETH MCALPINE
CALIF PUBLIC UTILITIES COMMISSION
COMPLIANCE
300 Capitol Mall
Sacramento, CA  95814

FRANK HARRIS
MGR OF ENERGY REGULATORY POLICY
CA MUNICIPAL UTILITIES ASSOCIATION
915 L STREET, SUITE 1460
SACRAMENTO, CA  95814

LEIGH KAMMERICH
REGULATORY AFFAIRS SPECIALIST
RURAL COUNTY REPRESENTATIVES OF CA
1215 K STREET, SUITE 1650
SACRAMENTO, CA  95814

MAHDI JAHAMI
CALIF PUBLIC Utilities COMMISSION
COMPLIANCE
300 Capitol Mall
Sacramento, CA  95814

MICHAEL BOCCADORO
PRESIDENT
WEST COAST ADVISORS
925 L STREET, SUITE 800
SACRAMENTO, CA  95814

REGULATORY CLERK
BRAUN BLAISING SMITH WYNNE, PC
915 L STREET, STE. 1480
SACRAMENTO, CA  95814

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GENERAL MANAGER                           ASSISTANT GEN. COUNSEL
GOLDEN STATE POWER COOPERATIVE            PACIFICORP
PO BOX 1815                               825 NE MULTNOMAH ST., STE. 1800
GRAEGLE, CA  96103-1815                   PORTLAND, OR  97232
FOR: PACIFICORP

HEIDE MARIE CASWELL                       MELISSA NOTTINGHAM
PACIFICORP                                REGULATORY AND CUSTOMER MANAGER
825 NE MULTNOMAH, STE. 1700               PACIFICORP
PORTLAND, OR  97232                       825 NE MULTNOMAH, SUITE 2000
FOR: PACIFICORP

POOJA KISHORE
DIR - REGULATORY AFFAIRS
PACIFICORP
825 NE MULTNOMAH ST., LCT 2000
PORTLAND, OR  97232
FOR: PACIFIC POWER

**State Service**

MICHAEL MINKUS
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214

[Top of Page]
[Back to Index of Service Lists]