BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and
Refine Procurement Policies Underlying Long-
Term Procurement Plans.  

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO SAN
DIEGO GAS & ELECTRIC COMPANY'S CONGESTION REVENUE RIGHTS AND
VIRTUAL BIDDING PROPOSALS

MICHAEL MONTOYA
DEANA M. WHITE
AMBER E. DEAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
Telephone: (626) 302-1936
Facsimile: (626) 302-1935
E-mail: Deana.White@SCE.com

Dated: October 24, 2008
SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO SAN DIEGO GAS & ELECTRIC COMPANY’S CONGESTION REVENUE RIGHTS AND VIRTUAL BIDDING PROPOSALS

In accordance with the August 28, 2008 Assigned Commissioner’s Ruling and Scoping Memo on the 2008 Long Term Procurement Proceeding, Phase 1 (the Ruling), Southern California Edison Company (SCE) submits the following Response to San Diego Gas & Electric Company’s (SDG&E) Congestion Revenue Rights (CRR) and Virtual Bidding (VB) Proposals (the Proposal).

I. INTRODUCTION AND SUMMARY

In its Proposal, SDG&E has taken the opportunity to rehash arguments regarding the fairness of the California Independent System Operator’s (CAISO) CRR allocation methodology that have already been addressed by this Commission, the CAISO and the Federal Energy Regulatory Commission (FERC). In an effort to collaterally attack the FERC’s determination that the CAISO’s methodology is just and reasonable, SDG&E proposes that the Commission incorporate the following rule into the procurement plans of the California utilities:
The Commission directs the IOUs not to seek indefinite renewal in the priority nomination process (PNP) tier for those Congestion Revenue Rights (CRRs) that were initially allocated to them because a CDWR contract was used to verify a source and thus justify a priority allocation in the Tier 1 and Tier 2 allocations of CRR Year 1. Instead, when the initial term of the underlying CDWR contract has expired, the relevant IOU must allow the associated CRRs to lapse in the PNP tier and be returned to the pool of CRRs available to be nominated by all load serving entities in the post-PNP tiers.¹

SDG&E has not presented any new facts that would support reconsideration of what is, in essence, the same fundamentally flawed proposal it submitted to the Commission for consideration last year. Like the 2007 proposal, SDG&E’s 2008 Proposal should not be adopted because it would place regulated utility customers at a disadvantage relative to other market participants.

With respect to VB, “until the product is created and a track record is established, SDG&E proposes that under its authority to use virtual bidding, its use would be limited to its current spot market authority (5%).”² Because it would not be prudent to develop upfront standards for utility participation in VB before the framework for VB has been established by the CAISO, SCE asks that the Commission refrain from adopting a limit on VB until after the CAISO Board has approved the rules under which VB will take place.

---

¹ SDG&E’s Proposals and Comments Regarding CRR/Virtual Bidding/Additional MRTU Concerns, filed on October 3, 2008, at 9.
² Id. at 8.
II.

SDG&E’S CRR PROPOSAL SHOULD NOT BE ADOPTED BY THE COMMISSION.

A. SDG&E’s Discriminatory CRR Proposal Represents a Fourth Bite at the Apple.

As acknowledged by SDG&E in its CRR proposal, SDG&E has raised its concerns regarding the fairness of the CAISO’s CRR nomination process on numerous prior occasions. SDG&E’s concerns were first raised with the CAISO during the CRR and LT-CRR tariff development process. After careful consideration of SDG&E’s concerns, the CAISO modified its rules and rejected the earlier version of SDG&E’s proposal stating that “the CAISO has not found any evidence that the filed rules as further amended in this filing result in a distribution of CRRs that are unduly burdensome to any particular party. The justness and reasonableness of the proposed rules is based on the careful balance struck by the CAISO…”

Apparently, dissatisfied by the “careful balance struck by the CAISO,” SDG&E subsequently offered its proposal for consideration by the FERC. The FERC similarly found that SDG&E’s proposal was not supportable and indicated that “[w]e reject both of SDG&E’s proposals … we find that SDG&E’s suggested modifications are unnecessary.”

On July 4, 2007, SCE filed Advice Letter 2142-E requesting to amend its AB 57 Procurement Plan and pending 2006 Procurement Plan for authority to procure long-term CRRs with a term of up to ten years as hedges against congestion costs under the CAISO’s MRTU market. In response, SDG&E filed comments on October 9, 2007, asking that the Commission

3 See id. at 9 (“Despite numerous attempts by SDG&E to resolve this issue as part of the CAISO stakeholder process and in the FERC proceeding, no adequate solution has been adopted”).
4 See SDG&E Proposals To Modify The Resource Certification Mechanism For Establishing Priority Access To The Tier 1 And Tier 2 Allocations Of Congestion Revenue Rights, submitted to CASIO on April 6, 2007 at 5.
5 See Amendments to Facilitate Initial Congestion Rights Allocation and Auction, filed at FERC on May 7, 2007 at 22.
6 See Motion to Intervene and Protest of SDG&E, filed May 28, 2007 at 27 in FERC Docket No. ER07-869-000.
include additional restrictions on SCE’s procurement of CRRs. As it had unsuccessfully argued before both the CAISO and FERC, SDG&E once again claimed that a variety of factors resulted in the 2006 base year for CRR allocations being a poor representation of SDG&E’s expected grid use, placing SDG&E at a competitive disadvantage with regard to CRR procurement. Specifically, SDG&E requested that the Commission 1) direct SCE not to seek renewal in the Priority Nomination Process (PNP) Tier of CRRs obtained pursuant to the 2006 source-verification priority mechanism once the initial term of the underlying commercial arrangement has expired, and 2) direct SCE not to convert CRRs obtained pursuant to the 2006 source-verification mechanism to long-term CRRs unless the underlying commercial arrangement is of ten years duration or longer.

In Resolution E-4117, the Commission rejected SDG&E’s proposal to further restrict CRR procurement by SCE. The Commission found that the additional restrictions sought by SDG&E “are ill-advised because they would create discriminatory effects against the regulated utilities, creating a position of advantage for other market participants.” The Commission went on to explain:

The Commission believes that it would be poor policy to force utilities into a situation where they are systematically disadvantaged against other market participants because such a situation may result in increased costs for utility ratepayers.

Therefore, instead of adopting SDG&E’s flawed proposal, the Commission fully addressed SDG&E’s stated concern by adopting an upfront standard that ensures that the utilities will only acquire CRRs to hedge actual expected grid use and not to engage in speculation. Specifically, the Commission adopted the following limitation on IOU acquisition of CRRs:

---

8 SCE filed reply comments on October 15, 2007. PG&E filed reply comments to a similar SDG&E comment on Resolution E-4122 on October 15, 2007.
9 See Res. E-4117 at 11-12.
10 Id. at 12.
11 Id.
The Commission here approves only the acquisition of CRRs that closely resemble the LSE’s expected grid usage both in the choice of source/sink combinations and in the duration of the CRR with respect to the length of the LSE’s energy supply contracts. ¹²

Thus, upon expiration of the CDWR contracts, the only way that a utility would be allowed by current Commission regulation to renew the CRRs utilized to hedge the risk of the CDWR portfolio would be to have entered into, or to reasonably expect to enter into, a new contract that either utilizes the same source location or is highly correlated to the source location in terms of congestion risk. It is simply not true that SCE may renew these rights indefinitely without regard to its need subsequent to the expiration of the CDWR contracts and remain compliant with the regulations already imposed by the Commission.

SDG&E has not presented any new facts or arguments to support reconsideration of what is, in essence, the same fundamentally flawed proposal it submitted to the Commission last year. The 2008 version of SDG&E’s proposal to handcuff IOUs in the CRR allocation process offers only slight modifications to its 2007 version. Those slight modifications are to (1) explicitly expand the application of the restrictions to all IOUs, as opposed to just SCE, and (2) to focus the restrictions on a particular class of resources, the CDWR contracts. These slight modifications, however, do not cure the fundamental flaws in the SDG&E proposal that led to its rejection by the Commission last year. As discussed in greater detail below, the Commission’s findings in Resolution E-4117 are equally applicable to the 2008 version of SDG&E’s Proposal—SDG&E’s 2008 Proposal is “ill-advised” because, like the 2007 proposal, it “would create discriminatory effects against the regulated utilities, creating a position of advantage for other market participants.” ¹³ Moreover, SDG&E has not submitted any basis for the Commission to reverse itself and declare it good policy as opposed to “poor policy to force utilities into a situation where they are systematically disadvantaged against other market participants because such a situation may result in increased costs for utility ratepayers.” ¹⁴
B. Adoption of SDG&E’s CRR Proposal would be Harmful to Utility Customers

SDG&E’s proposal for the Commission to impose rules that limit solely the utilities’ ability to participate in the CAISO CRR allocation process, if adopted, would place the utilities at a disadvantage to non-CPUC jurisdictional entities. Assuredly, the Municipalities, Out of Control Area Load Serving Entities, Energy Service Providers, and potential Customer Choice Aggregators will not forego the priority nomination of valuable CRRs just because the underlying supply arrangement has expired. Those same entities will be eligible to request, and will likely receive, CRRs that the utilities forego at the direction of the Commission. Thus, imposition of SDG&E’s proposed rules would not necessarily benefit SDG&E, but would very likely “shrink the pie” for all utility customers. In other words, SDG&E proposes that the Commission impose a definitive harm on all utility customers in exchange for a potential benefit to SDG&E that is tenuous at best.

The appropriate place to impose rules that shift the balance of equities in the CAISO’s CRR nomination process is at the FERC where such rules can be applied and enforced equally over all CRR holders. By seeking to modify the CAISO CRR nomination process solely through regulation of the IOUs, SDG&E is proposing that the Commission adopt a very dangerous policy of socializing the risk and benefits of FERC-approved market mechanism across the IOUs, under circumstances where the results are clearly not a “zero-sum game.” In other words, by attempting to socialize the impact of its proposal across the IOUs, any benefits to be derived from the SDG&E proposal will be shared by all market participants, while the costs will be borne solely by IOU customers. Further, because the CRR allocation process is done on a confidential basis, each IOU has no direct knowledge of the needs or desires of any other IOU during the process. Thus, SDG&E’s proposal, in effect, asks each IOU to forego direct CRR benefits for its customers based on speculation that there might be a chance that some other IOU desires those same benefits. It would be unreasonable, imprudent and unworkable to impose such a restriction to prevent each IOU from taking reasonable actions to provide direct benefits to their customers.
Therefore, the newest version of SDG&E’s Proposal to hamstring the utilities in the CRR acquisition process would be just as harmful to utility customers as its earlier proposals and should once again be rejected by the Commission.

III.

THE COMMISSION SHOULD REFRAIN FROM ADOPTING UPFRONT STANDARDS FOR IOU PARTICIPATION IN VB UNTIL AFTER THE CAISO RULES HAVE BEEN DEVELOPED

In its response to the Commission’s questions on VB, SDG&E states that it “agrees with the Commission’s prior conclusion that virtual bidding could be a useful electric procurement tool, and seeks Commission authorization for its use.” SDG&E further suggests that “until the product is created and a track record is established, SDG&E proposes that under its authority to use virtual bidding, its use would be limited to its current spot market authority (5%).” SDG&E suggests that “[t]his would give us experience with the product while assuring the Commission that it will not cause market problems.”

SCE notes that SDG&E’s assertion that an IOU’s “current spot market authority” is 5% is somewhat misleading, as the Commission has not set an explicit limit on spot market purchases for IOUs. The Commission has stated that the IOUs should minimize their spot market exposure and should justify their planned spot market purchases if they exceed 5% of monthly needs. The Commission has clarified, however, that this 5% threshold is a “guideline, not a strict limitation.” SCE has conferred with SDG&E and SDG&E confirmed that it does not intend to imply otherwise in its VB proposal.

15 SDG&E’s Proposals and Comments Regarding CRR/Virtual Bidding/Additional MRTU Concerns, filed on October 3, 2008, at 8.
16 Id.
17 Id.
18 D.03-12-062 at 26.
19 D.04-07-028 at 18.
SCE shares SDG&E’s position that IOUs need to have the ability to participate in VB. As SCE stated in its VB proposal, however, it is premature to recommend specific upfront and achievable standards for VB at this time because the CAISO has not yet developed rules for how it will implement VB. SCE asks that the Commission refrain from adopting any standards with respect to VB until after the CAISO has established the rules and framework for VB.

IV.

CONCLUSION

SCE urges the Commission to reject SDG&E’s CRR proposal, because it would place the California utilities at a competitive disadvantage vis a vis other market participants in the CRR acquisition and retention process, which could ultimately lead to unnecessarily higher costs for utility customers throughout California. The CAISO’s CRR allocation process was found to be just and reasonable by both the CAISO and the FERC, and the Commission has already taken steps to address SDG&E’s concerns regarding the potential future inequities. Therefore, SDG&E’s concerns have already been fully addressed and the Commission should affirm the current CRR acquisition and retention rules in this proceeding.

---

While SCE believes the Commission should begin to develop upfront and achievable standards to govern IOU participation in VB prior to the CAISO’s implementation of VB, it is premature to develop those standards at this time. The CAISO has not yet developed the rules that will govern participation in VB, and without those rules, the IOUs have no way of predicting the framework within which they will potentially participate in VB. Therefore, SCE proposes that the Commission set an expedited schedule for the consideration of upfront and achievable standards for IOU participation in VB that begins after the CAISO Board has approved the CAISO’s proposed rules and concludes after those CAISO rules have been approved by the FERC.

Respectfully submitted,

MICHAEL MONTOYA
DEANA M. WHITE
AMBER E. DEAN

/s/ Deana M. White
By: Deana M. White

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1936
Facsimile: (626) 302-1935
E-mail: Deana.White@SCE.com

October 24, 2008
CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner’s Rules of Practice and Procedure, I have this day served a true copy of Southern California Edison Company’s (U 338-E) Response to San Diego Gas & Electric Company’s Congestion Revenue Rights and Virtual Bidding Proposals on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 24th day of October, 2008, at Rosemead, California.

/s/ Raquel Ippoliti
Raquel Ippoliti
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Ave.
Post Office Box 800
Rosemead, California 91770
CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: R0802007 - CPUC ' OIR TO INTEGR
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: OCTOBER 22, 2008

DOWNLOAD THE COMMA-DELIMITED FILE
ABOUT COMMA-DELIMITED FILES

Back to Service Lists Index

Parties

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

KEITH MCCREA
ATTORNEY AT LAW
SUTHERLAND ASHILL & BRENNAN
1275 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2415
FOR: CALIFORNIA MANUFACTURER & TECH. ASSN.

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, CA 77002
FOR: CALPINE POWER AMERICA-CA LLC

CINDY MORROW
VALLEY ELECTRIC ASSOCIATION
800 E. HWY 372
PAHRUMP, NV 89048
FOR: VALLEY ELECTRIC ASSOCIATION

MICHAEL MAZUR
8333 ZITOLA TER
PLAYA DEL REY, CA 90293-7835
FOR: 3PHASES ENERGY SERVICES

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, CA 77002
FOR: CALPINE POWER AMERICA-CA LLC

CINDY MORROW
VALLEY ELECTRIC ASSOCIATION
800 E. HWY 372
PAHRUMP, NV 89048
FOR: VALLEY ELECTRIC ASSOCIATION

E.J. WRIGHT
Occidental Power Services, Inc.
111 West Ocean Boulevard
Long Beach, CA 90802
FOR: Occidental Power Services Inc

DEANA M. WHITE
Southern California Edison Company
ATTORNEY AT LAW
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
SOUTHERN CALIFORNIA EDISON COMPANY

MICHAEL D. MONTOYA
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
10/24/2008
2244 WALNUT GROVE AVENUE                  2244 WALNUT GROVE AVENUE
ROSEMEAD, CA  91770                       ROSEMEAD, CA  91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY   FOR: SOUTHERN CALIFORNIA EDISON COMPANY

ROBERT KEELER                             RONALD MOORE
SR. ATTORNEY                              SR. REGULATORY ANALYST
SOUTHERN CALIFORNIA EDISON COMPANY        GOLDEN STATE WATER CO/BEAR VALLEY
2244 WALNUT GROVE AVENUE                  630 EAST FOUTHILL BLVD.
ROSEMEAD, CA  91770                       SAN DIMAS, CA  91773
FOR: SOUTHERN CALIFORNIA EDISON COMPANY   FOR: SOUTHERN CALIFORNIA WATER COMPANY

DON GARBER                                JOHN PACHECO
ATTORNEY AT LAW                           ATTORNEY AT LAW
SEMPRA ENERGY                             SAN DIEGO GAS & ELECTRIC
101 ASH STREET, HQ 12                     101 ASH STREET
SAN DIEGO, CA  92101                      SAN DIEGO, CA  92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY     FOR: SDG&E

LISA G. URICK                             MEGAN SAUNDERS
ATTORNEY AT LAW                           SEMPRA ENERGY SOLUTIONS
SAN DIEGO GAS & ELECTRIC COMPANY          101 ASH STREET, HQ09
101 ASH STREET, HQ-12                     SAN DIEGO, CA  92101-3017
SAN DIEGO, CA  92101                      FOR: SEMPRA ENERGY SOLUTIONS
FOR: SAN DIEGO GAS & ELECTRIC

THOMAS DARTON                             WENDY KEILANI
PILOT POWER GROUP, INC.                   REGULATORY CASE MANAGER
8910 UNIVERSITY CENTER LANE, STE 520      SAN DIEGO GAS & ELECTRIC
SAN DIEGO, CA  92122                      8330 CENTURY PARK COURT, CP32B
FOR: PILOT POWER GROUP INC               SAN DIEGO, CA  92123
FOR: SAN DIEGO GAS & ELECTRIC

STEVE RAHON                                DAVID J. COYLE
DIRECTOR, TARIFF & REG. ACCOUNTS          GENERAL MANAGER
SAN DIEGO GAS & ELECTRIC COMPANY (902)   ANZA ELECTRIC CO-OPERATIVE, INC (909)
8330 CENTURY PARK COURT, CP32C            PO BOX 391908
SAN DIEGO, CA  92123-1548                 ANZA, CA  92539-1909
FOR: SAN DIEGO GAS & ELECTRIC COMPANY     FOR: ANZA ELECTRIC CO-OPERATIVE INC

INGER GOODMAN                             LILI SHAHRIARI
COMMERCE ENERGY INC                       AOL UTILITY CORP
600 ANTON AVE., SUITE 2000                12752 BARRETT LANE
COSTA MESA, CA  92626                     SANTA ANA, CA  92705
FOR: COMMERCE ENERGY INC                  FOR: AOL UTILITY CORP

GEORGE HANSON                              TAMLYN M. HUNT
DEPARTMENT OF WATER AND POWER             ENERGY PROGRAM DIRECTOR
CITY OF CORONA                            COMMUNITY ENVIRONMENTAL COUNCIL
730 CORPORATION YARD WAY                  26 W. ANAPAMU ST., 2ND FLOOR
CORONA, CA  92880                         SANTA BARBARA, CA  93101
FOR: CITY OF CORONA                       FOR: COMMUNITY ENVIRONMENTAL COUNCIL

SUE MARA                                  MICHEL PETER FLORIO
RTO ADVISORS, LLC.                        ATTORNEY AT LAW
164 SPRINGDALE WAY                        THE UTILITY REFORM NETWORK
REDWOOD CITY, CA  94062                   711 VAN NESS AVE., SUITE 350
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS   SAN FRANCISCO, CA  94102
FOR: TURN

KAREN P. PAULL                            NOEL OBIORA
CALIF PUBLIC UTILITIES COMMISSION         CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION                            LEGAL DIVISION
ROOM 4300                                 ROOM 4107
505 VAN NESS AVENUE                       505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214             SAN FRANCISCO, CA  94102-3214
FOR: DRA                                  FOR: DRA
SEPIDEH KHOSROWJAH  
CALIF PUBLIC UTILITIES COMMISSION  
DRA - ADMINISTRATIVE BRANCH  
ROOM 4208  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA  94102-3214  
FOR: DRA

AUDREY CHANG  
DIRECTOR-CALIFORNIA CLIMATE PROGRAM  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA  94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA  94104  
FOR: CAC/EPUC

SARA O'NEILL  
CONSTELLATION NEWENERGY, INC.  
ONE MARKET STREET, SPEAR TOWER, 36TH FR.  
SAN FRANCISCO, CA  94105  
FOR: CONSTELLATION NEWENERGY, INC.

CORY M. MASON  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B30A  
SAN FRANCISCO, CA  94105-1814  
FOR: PG&E

JEANNE ARMSTRONG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA  94111  
FOR: RELIANT ENERGY, INC.

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

EDWARD O'NEILL  
ATTORNEY AT LAW  
GOODIN, MAC BRIDE, SQUERI, DAY & LAMPREY  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA  94111-6533  
FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION

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

BRIAN CREGG  
ATTORNEY AT LAW  
GOODIN, MAC BRIDE, SQUERI, DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA  94114  
FOR: INDEPENDANT ENERGY PRODUCERS

CHARLES MIDDLEKAUFF  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA  94120  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MARK HUFFMAN  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA  94120  
FOR: PACIFIC GAS & ELECTRIC CO

SARA STECK MYERS  
ATTORNEY AT LAW  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA  94121  
FOR: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES (CEERT)

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

JENNIFER CHAMBERLIN  
MGR. REG & GOV. AFFAIRS  
STRATEGIC ENERGY LTD  
2633 WELLINGTON CT.  
CLYDE, CA  94520  
FOR: STRATEGIC ENERGY LTD

ROBERT FREEHLING  
LOCAL POWER RESEARCH DIRECTOR  
LOCAL POWER  
PO BOX 606  
FAIR OAKS, CA  94574  
FOR: WOMEN'S ENERGY MATTERS (WEM)

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

LAURA MISLAND  
UNION OF CONCERNED SCIENTISTS  
2397 SHATTUCK AVE., SUITE 203  
BERKELEY, CA  94704  
FOR: UNION OF CONCERNED SCIENTISTS
Information Only

KEVIN PORTER
SENIOR ANALYST
EXETER ASSOCIATES, INC.
5565 STERRETT PLACE, SUITE 310
COLUMBIA, MD 21044

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

RALPH E. DENNIS
DENNIS CONSULTING
2805 BITTERSWEET LANE
LA GRANGE, KY 40031

GRETCHEN SCHOTT
SENIOR COUNSEL
RELIANT ENERGY, INC.
1000 MAIN STREET

http://docs.cpuc.ca.gov/published/service_lists/R0802007_76232.htm

10/24/2008
HOUSTON, TX 77002

WILLIAM W. TOMLINSON  KEVIN J. SIMONSEN
EL PASO CORPORATION  ENERGY MANAGEMENT SERVICES
2 NORTH NEVADA AVE.  646 EAST THIRD AVENUE
COLORADO SPRINGS, CA  80903  DURANGO, CO  81301

LORRAINE A. PASKETT  HUGH YAO
VICE PRES., POLICY & MARKET DEVELOPMENT  SOUTHERN CALIFORNIA GAS COMPANY
FIRST SOLAR, INC.  555 W. 5TH ST, GT2G2
350 WEST WASHINGTON STREET, SUITE 600  LOS ANGELES, CA  90013
TEMPE, AZ  85281

NORMAN A. PEDERSEN, ESQ.  AKBAR JASAYEIRI
HANNA & MORTON LLP  DIR. REVENUE & TARIFFS, RM 390
444 S. FLOWER STREET, SUITE 1500  SOUTHERN CALIFORNIA EDISON COMPANY
LOS ANGELES, CA  90071-2916  PO BOX 800, 2241 WALNUT GROVE AVE

CASE ADMINISTRATION  ROSEMEAD, CA  91770
SOUTHERN CALIFORNIA EDISON COMPANY  FOR: SOUTHERN CALIFORNIA EDISON COMPANY
PO BOX 800  101 ASH STREET, HQ12
2244 WALNUT GROVE AVE., RM 370  SAN DIEGO, CA  92101
ROSEMEAD, CA  91770

SHARON FIROOZ  YVONNE GROSS
DIRECTOR  REGULATORY POLICY MANAGER
CA BUS. DEVELOPMENT AND REG. AFFAIRS  SEMPRA ENERGY
FIRST WIND  101 ASH STREET, HQ08C
110 WEST A STREET, SUITE 675  SAN DIEGO, CA  92101
SAN DIEGO, CA  92101

TOM CORR  DON LIDDELL
MANAGER, REGULATORY POLICY  ATTORNEY AT LAW
SEMPRA GLOBAL  DOUGLASS & LIDDELL
101 ASH STREET, 8TH FL.  2928 2ND AVENUE
SAN DIEGO, CA  92101-3017  SAN DIEGO, CA  92103

MARIE MELNER  SEMPRA ENERGY UTILITIES
CORAL ENERGY RESOURCES, L P  CENTRAL FILES
4445 EASTGATE MALL, SUITE 100  8350 CENTURY PARK COURT
SAN DIEGO, CA  92121  SAN DIEGO, CA  92123-1548

JOHN W. LESLIE, ESQ.  JOEL M. HVIDSTEN
ATTORNEY AT LAW  KINDER MORGAN ENERGY FORECASTER
LUCE, FORNARD, HAMILTON & SCRIPPS, LLP  1100 TOWN & COUNTRY ROAD, SUITE 700
11988 EL CAMINO REAL, SUITE 200  ORANGE, CA  92868
SAN DIEGO, CA  92130

SHAWN COX  DAVID ORTH
KINDER MORGAN ENERGY FORECASTER  GENERAL MANAGER
1100 TOWN & COUNTRY ROAD, SUITE 700  SAN JOAQUIN VALLEY POWER AUTHORITY
ORANGE, CA  92868  4886 EAST JENSEN AVENUE

MARC D. JOSEPH  JEANNE M. SOLE'
ATTORNEY AT LAW  CITY AND COUNTY OF SAN FRANCISCO
ADAMS BROADWELL JOSEPH & CARDOZO  CITY HALL, RM 234
601 GATEWAY BLVD. STE 1000  1 DR. CARLTON B. GOODLET PLACE
SOUTH SAN FRANCISCO, CA  94080  SAN FRANCISCO, CA  94102-4682

http://docs.cpuc.ca.gov/published/service_lists/R0802007_76232.htm  10/24/2008
KERRY HATTEVIK  
DIRECTOR OF REG. AND MARKET AFFAIRS  
NRG ENERGY  
829 ARLINGTON BLVD.  
EL CERRITO, CA  94530  

JOHN KOTOWSKI  
CHIEF EXECUTIVE OFFICER  
GLOBAL ENERGY PARTNERS, LLC  
3569 MT. DIABLO BLVD., STE 200  
LAFAYETTE, CA  94549  

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

SEAN P. BEATTY  
SR. MGR. EXTERNAL & REGULATORY AFFAIRS  
MIRANT CALIFORNIA, LLC  
PO BOX 192  
FITTSBURG, CA  94565  

ARIS KOWALESKI  
VICE PRES., GOVERNMENT & REGULATORY  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA  94588  

KEVIN DUGGAN  
CALPINE CORPORATION  
3875 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA  94588  

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

ARTHUR L. HABENSTOCK  
BRIGHTSOURCE ENERGY, INC.  
1999 HARRISON STREET, SUITE 2150  
OAKLAND, CA  94612  

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

DOCKET COORDINATOR  
KEYES & FOX LLP  
5727 KEITH ST.  
OAKLAND, CA  94618  

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

ALAN H. SANSTAD  
LAWRENCE BERKELEY NATIONAL LABORATORY  
90-4000, NO. 1 CYCLOTRON RD.  
BERKELEY, CA  94720  

GALEN BARBOSE  
LAWRENCE BERKELEY NATIONAL LAB  
MS 90-4000  
1 CYCLOTRON RD.  
BERKELEY, CA  94720  

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

BARRY F. MCCARTHY  
ATTORNEY AT LAW  
MCCARTHY & BERLIN LLP  
100 W. SAN FERNANDO ST., SUITE 501  
SAN JOSE, CA  95113  

C. SUSIE BERLIN  
MCCARTHY & BERLIN LLP  
100 W. SAN FERNANDO ST., SUITE 501  
SAN JOSE, CA  95113  

SUSAN M. O'BRIEN  
MCCARTHY & BERLIN, LLP  
100 W. SAN FERNANDO ST., SUITE 501  
SAN JOSE, CA  95113  

JOY A. WARREN  
REGULATORY ADMINISTRATOR  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA  95354  

BARBARA R. BARKOVICH  
BAR Kovovich & YAP  
44010 ROSEWOOD TERRACE  
MENDOCINO, CA  95460  

MARTIN HOMEC  
ATTORNEY AT LAW  
LAW OFFICE OF MARTIN HOMEC  
PO BOX 4471  
DAVIS, CA  95617  

TOBIN RICHARDSON  
RICHARDSON GROUP  

JUDITH B. SANDERS  
ATTORNEY AT LAW  

http://docs.cpuc.ca.gov/published/service_lists/R0802007_76232.htm  10/24/2008
State Service

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

ANNE GILLETTE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Address</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bishu Chatterjee</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Carol A. Brown</td>
<td>Public Admin Law Judges</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>David Peck</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Elizabeth Dorman</td>
<td>Legal Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Elizabeth Stoltzfus</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Jaclyn Marks</td>
<td>Energy Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Jason R. Salmi Klotz</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Julie A. Fitch</td>
<td>Policy &amp; Planning Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Keith D White</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Lana Tran</td>
<td>Energy Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Mary Jo Stueve</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Matthew Crosby</td>
<td>Policy &amp; Planning Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Matthew Deal</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Matthew Tisdale</td>
<td>Energy Pricing Programs Branch</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Melissa Semcer</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Michael Colvin</td>
<td>Policy &amp; Planning Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Paul Douglas</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Peter Skala</td>
<td>Energy Division</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Robert L. Strauss</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
<tr>
<td>Sara M. Kamins</td>
<td>Calif Public Utilities Commission</td>
<td>505 Van Ness Ave, San Francisco, CA 94102-3214</td>
<td></td>
</tr>
</tbody>
</table>