BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

Rulemaking 08-02-007
(Filed February 14, 2008)

SAN DIEGO GAS & ELECTRIC COMPANY’S (U-902-E)
PROPOSALS AND COMMENTS REGARDING CRR/VIRTUAL
BIDDING/ADDITIONAL MRTU CONCERNS

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SAN DIEGO GAS & ELECTRIC COMPANY’S (U-902-E)
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Pursuant to the Assigned Commissioner’s Ruling and Scoping Memo on the 2008 Long-Term Procurement Proceeding, Phase I (Scoping Memo), dated August 28, 2008, San Diego Gas & Electric Company (SDG&E) is pleased to provide the following comments and proposals regarding Market Redesign Technology Update (MRTU) developments, including Congestion Revenue Rights (CRRs) and virtual bidding.

I. COMMENTS AND PROPOSALS REGARDING CRRs AND VIRTUAL BIDDING

In the Scoping Memo, the Commission directs the Investor-Owned Utilities (IOUs) to address the impact of two components of the MRTU market design on utility long term procurement plans. Those two components are the acquisition and retention of CRRs and virtual bidding. CRRs are financial products that allow market participants to hedge congestion costs to manage congestion cost risks. Virtual bidding, also known as convergence bidding, is a mechanism where market participants can take a financial position in the day-ahead market that must be liquidated in the real-time market. The purpose of virtual bidding is to provide market pressures that will cause day-head and real-time prices to converge. CRRs will be implemented with the MRTU go-live date,
while virtual bidding will be implemented within twelve months after the MRTU go-live date.

A. SDG&E’s Comments Regarding CRRs

As the Scoping Memo points out, the three IOUs have sought and received in Resolution E-4136 (Resolution) authority to acquire CRRs through the California Independent System Operator (CAISO)’s allocation and auction process. Included in the Resolution are criteria for establishment of the upfront and achievable standards for acquisition and retention of CRRs by the IOUs for incorporation into their Long Term Procurement Plans (LTPPs). Most notable of the criteria provided in the Resolution is Ordering Paragraph No. 3, stating that the IOUs “shall not use CRRs as a method of financial speculation in congestion markets.” The Scoping Memo also poses specific topics related to CRR procurement for the parties to address. Those additional topics are, for the most part, related to the tools and processes for evaluation of CRRs.

While CRRs are a part of the new market mechanisms that will be introduced as part of MRTU, the process that SDG&E will employ to evaluate, prioritize, acquire and retain CRRs is not unlike the process that it currently uses for existing market products that are already part of its LTPP, such as Firm Transmission Rights (FTRs).

As with any product intended to serve as a hedge against a potential portfolio cost, the first step in the CRR procurement process is to evaluate potential portfolio congestion costs. This evaluation will include both the potential congestion prices of individual resource locations as well as the magnitude of projected congestion costs from the resource energy deliveries. SDG&E will evaluate the congestion costs of its current portfolio, as well as already committed resources that will deliver energy in the near
future. The primary analytical tool for conducting this evaluation of potential congestion costs is a transmission network simulation model that incorporates a production cost model. These models are typically used by the utilities as part of their normal transmission planning processes. Due to FERC requirements that restrict the sharing of information between transmission and merchant functions, SDG&E electric procurement will develop the capability to use these transmission models with internal resources or rely on outside vendors that offer congestion cost evaluation services, using their own proprietary transmission models.

The Scoping Memo asks whether the current analytical tools for assessing congestion costs are adequate, and if a standard analytical tool should be adopted by all the IOUs. The transmission models in use at SDG&E were not put in place to conduct CRR congestion analyses, but they are more than adequate for that service, since congestion cost relief is a key factor in economic justification for new transmission. SDG&E has relied both on its existing transmission planning tools as well as outside consultants to analyze congestion costs in the past. The tools currently available in the market are adequate for the purpose of CRR analysis. Also, there is no pressing need for standardization of analytical tools, since utilities have significant investments in their existing tools, the process of CRR evaluation is not significantly different from current congestion analysis and each entity may make use of different assumptions. Finally, in the initial years of the CRR allocation process where no CRR history is available, the transmission models are the only means to assess potential congestion costs. As MRTU develops a track record, historic congestion costs can be brought into the CRR analysis.
The development of SDG&E’s CRR nomination strategy will start with projections of locational prices that result from the transmission simulation models. These models have the capability to generate nodal prices at the hourly level for the desired period, typically the CRR nomination year. Once the individual locational prices are developed, aggregate prices, such as those at trading hubs and load aggregation points (LAP), must be determined from individual resource prices using CAISO-provided weight factors. From the locational prices, the congestion price for each resource is determined by the difference between the source (resource) and sink (LAP) locational prices. The congestion cost is the congestion price for the resource times the energy delivery quantity. From this data, SDG&E will project congestion costs for each of its portfolio resources, current and future, for all of the CRR nomination periods specified in the upcoming CASIO CRR process. Once projected congestion costs are determined, it will be possible to rank resources by their congestion cost for each nomination period. From these rankings of congestion costs and with knowledge of the CAISO tariff rules for CRRs, it is possible to start developing a CRR nomination strategy.

From the congestion cost ranking of portfolio resources, SDG&E can identify those resources that have the highest value as a hedge. Based on past experience, it is typical for the congestion cost ranking of portfolio resources to have a group of resources with high congestion costs, a group with moderate to low congestion costs and even a group with very low to negative costs. For resources with very low or negative congestion costs, SDG&E may elect not to acquire CRRs for such resources, since congestion risks are low. Selection of just the highest ranking resources for CRR nomination does not complete the development of a CRR nomination strategy. The CRR
rules contained in the CAISO tariff set limits on CRR volume in each nomination round and establish criteria for which portfolio resources can qualify to be nominated in certain rounds. In addition, within a group of resources with similar costs, where nomination limits do not permit all resources to be requested in the same round, it may be necessary to give one resource a higher nomination priority over another due to its location and the probability that its nomination will be in competition with nominations of other participants at the same or nearby competing locations. The competition among market participants for high value CRRs may also require that SDG&E nominate more than its desired CRR quantity, in anticipation that competition for that location will result in a lower award than the nomination. The additional CRRs would come from foregoing CRR nominations on very low or negatively valued CRRs. The final CRR nomination strategy for SDG&E will include identification of its high priority resources, and the order and magnitude that each CRR will be nominated in each round.

Once SDG&E has developed its CRR nomination strategy, it will share the details of that strategy with the Procurement Review Group (PRG) prior to submitting its nominations. The PRG review will include the results of its congestion cost analysis as well as the resulting nomination strategy by resource and proposed nomination volumes.

Once the first CRR nominations are made, the strategy must also be updated for a subsequent nomination round, after the award results from the previous round are made available. After individual market participants are notified of their award, the CAISO makes public the CRR awards of all market participants. From the award results, SDG&E can use its transmission model to determine remaining CRR capacity for its high priority resource and estimate a probability of CRR award in the next nomination round.
Based on the results of this analysis, SDG&E may have to alter its CRR nomination strategy in subsequent rounds to ensure the best utilization of its remaining CRR MWs.

The Scoping Memo also asks the IOUs the address CRR hedging strategy issues, such as the use of short-term or long-term CRRs and dealing with CRRs whose valuation changes over time. CRR strategies are not unlike any other procurement product strategy, and are based on such a wide variety of criteria (e.g., risk tolerance, portfolio, projected congestion costs, grid topography, etc.) that commonality among IOUs would not be expected. In general, the consideration of long-term versus short-term CRRs is based on the relative value of the certainty of locking in a long-term position versus the flexibility of renewing that position every year. When considering these criteria for selection of potential long-term CRRs, only one, relatively small resource met SDG&E criteria for (1) remaining term; (2) projected congestion cost; and (3) risk that new grid topography would change the relative value of the CRR. In addition, when considering the rules for renewal of short-term CRRs compared with those of long-term CRRs, SDG&E has determined that, for its current portfolio, the renewal certainty of high value CRRs is essentially the same for short-term and long-term CRRs, but the flexibility afforded by short term CRR renewal is best for SDG&E. As SDG&E’s portfolio changes over time, it will continually reassess the value of long-term CRRs to its overall CRR portfolio. As with its annual allocation nomination strategy, each year, SDG&E will share its long-term CRR nomination strategy with the PRG, which is the best forum for IOU CRR strategy oversight.

The process described above is for development of SDG&E’s CRR nomination strategy for the annual allocation process, where about 75% of SDG&E’s CRR portfolio
will be acquired. The CAISO also conducts a monthly CRR allocation process. In this process, SDG&E will acquire the remainder of its CRR portfolio. The priorities for CRR nomination established for the annual allocation will remain the same for the monthly allocation. The process for determining the CRR nomination volumes for the monthly allocation are also essentially the same as those used in the annual allocation.

The allocation process is not the only means for SDG&E to acquire CRRs. The CAISO also conducts annual and monthly CRR auctions after the respective allocations. Unlike the allocation where participation is limited to load serving entities (LSEs) and CRR sink locations are limited to the LAP of the LSE, the CRR auctions are open to all market participants and no limitations are placed on CRR source and sink locations. The CRRs available in the auction are those remaining after the preceding allocation process in complete. To date, SDG&E has not participated in the CRR auction, since the type of CRRs (i.e., those whose sink location is the SDG&E LAP) needed to hedge congestion costs of SDG&E’s current portfolio are available through the allocation process. If SDG&E foresees the need to participate in the CRR auction to obtain CRRs not available to it through the allocation process, it will brief the PRG on the need to participate in the auction and the evaluation of its auction bids.

B. SDG&E’s Comments Regarding Virtual Bidding

Virtual bidding is the other new MRTU product included in the Scoping Memo. The Commission acknowledged in the 2007 LTPP Decision\(^1\) that if virtual bidding emerges as an MRTU product, it may have value to the IOUs and thus procurement rules may need to be changed to authorize use of the product. However, the Commission deferred authorization of virtual bidding until a later proceeding.

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\(^1\) D.07-12-052 at footnote 283.
Virtual bidding is a mechanism by which a party can submit a bid to buy or sell energy in the day-ahead market and along with an equal and opposite transaction in the real-time market. The bid is purely a financial transaction, is not backed by any load or supply, and if cleared, results in no net change in supply or load. The actual price differences between the day-ahead and real-time markets will determine if the holder makes or loses money. Virtual bidding has been introduced in other nodal markets, such as PJM, and its purpose is to mitigate market power and provide market pressures for the convergence of day-ahead and real-time prices.

SDG&E agrees with the Commission’s prior conclusion that virtual bidding could be a useful electric procurement tool, and seeks Commission authorization for its use. However, 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 our current spot market authority (5%). This would give us experience with the product while assuring the Commission that it will not cause market problems.

II. SDG&E’S PROPOSAL FOR A LTPP RULE DESIGNED TO MITIGATE UNFAIRNESS STEMMING FROM THE INITIAL ALLOCATION OF CRRs

SDG&E is facing a serious challenge in obtaining the CRRs it needs to hedge the congestion-related effects of delivering its growing renewable procurement portfolio from the Imperial Valley to San Diego. Gradually purging the CRR allocation system of the initial priority allocations based on CDWR contracts would enable CRR “have-not” load-serving entities like SDG&E to enjoy better prospects for obtaining an equitable future allocation of useful CRRs based on load share ratio. SDG&E has signed contracts for over 400 MWs of new, renewable generation that relies for delivery upon the South West Power Link (SWPL), the only 500 KV transmission line serving San Diego.
Notwithstanding the clear historical record demonstrating SDG&E’s reliance on SWPL, the CAISO has implemented CRR allocation rules based on quirks in logic and fact that have left SDG&E with a very small number of CRRs at SWPL’s Imperial Valley substation. SDG&E’s ability to serve its load at reasonable costs has thus been compromised. The Commission has an opportunity in the LTPP proceeding to mitigate the damage done and provide SDG&E a minimal safety net designed to ensure basic fairness.

The CAISO’s CRR allocation rules effectively reverse decades of SDG&E efforts to provide its ratepayers access to remote generation resources on reasonable terms. Unlike the CAISO and FERC, SDG&E cannot merely assume that the needed CRRs will somehow materialize just in time to hedge its emerging portfolio of renewable resources that were already under contract when the CAISO proposed, and FERC approved, the initial CRR allocation rules. Ensuring that its native load customers do not bear an unjust and disproportionate financial burden under the new MRTU markets is of critical importance to SDG&E. 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.

Accordingly, SDG&E proposes the following LTPP rule:

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.
A. The CAISO’s Source-Verified CRR Allocation Rules Fail To Recognize SDG&E’s Historic Reliance On SWPL.

1. Restructuring Of The California Electric Industry And The Ensuing California Energy Crisis Temporarily Interrupted SDG&E’s Historical Use Of SWPL Capacity.

The California electricity restructuring process and resulting energy crisis in 2000-2001 significantly disrupted SDG&E’s power procurement practices. When the California Power Exchange (CalPX) began operations in 1998, the CPUC directed SDG&E and the other IOUs to refrain from signing additional long-term power contracts and to purchase the balance of their load requirements in the CalPX spot market. The obligation to purchase from the CalPX prevented SDG&E from renewing expiring long-term contracts and from entering into new ones for power imported via SWPL. Consequently, the relative importance of such long-term contracts in SDG&E’s resource portfolio temporarily declined.

During the energy crisis, the CPUC reversed course and strongly encouraged long-term contracts, but the electricity crisis effectively precluded the California IOUs from signing such contracts on their own. Therefore, the California Department of Water Resources (CDWR) stepped in and signed forward contracts to supply energy to the IOUs. The CPUC later allocated the CDWR contracts among the IOUs in a manner that departed substantially from historical patterns of trading and procurement. Specifically, PG&E and SCE were allocated contracts that relied substantially on generators that are interconnected at the Imperial Valley substation, thereby establishing the factual predicate later used by the CAISO to assign source-verified CRR allocation priorities to PG&E and SCE at the Imperial Valley substation.
The aftermath of the electricity crisis also resulted in a push by the CPUC for California IOUs to secure power from local resources to enhance local reliability. In response to these concerns, SDG&E purchased new generation resources in the heart of SDG&E’s service area and signed a long-term contract to take power from a new combined-cycle plant in the southern portion of the San Diego area. These new local resources, however, will have a very limited impact on SDG&E’s future import needs because of the expected retirement of old local plants, load growth, and SDG&E’s need to import increasing amounts of renewable resources from the Imperial Valley. The net effect of these responses to the CPUC’s directives was to reduce SDG&E’s reliance on power imports over SWPL in 2006, the historical “snapshot” year used by the CAISO to determine allocation priorities based on past use of the grid.\[^2\]


SDG&E could not obtain an adequate number of SWPL CRRs in the initial Tier 1 and Tier 2 allocations because it had only one small 2006 verified source with an injection point on SWPL. SDG&E nominated large numbers of CRRs originating from the Imperial Valley in Tier 3, but got little for its efforts because the lion’s share of these CRRs had already been taken in the source-verified Tier 1 and Tier 2 allocations.

Importantly, the CAISO tariff does not require that CRRs be released when the initial

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\[^2\] Further, in June 2004, President Peevey directed SDG&E to reduce its scheduling on SWPL in order to mitigate intra-zonal congestion at the Miguel substation. See Assigned Commissioner Ruling Regarding Reliability Issues, CPUC Docket R.04-04-003 (June 10, 2004). SDG&E responded to this directive by temporarily reducing its use of SWPL, departing even further from its historical reliance upon SWPL for bulk power imports. SDG&E also undertook significant transmission upgrades to increase capacity at its Miguel substation to further alleviate congestion over SWPL. See SDG&E Advice Letter 1641-E (December 3, 2004), available at http://www.sdge.com/tm2/pdf/1641-E.pdf.
terms of the underlying contracts that gave rise to the priority Tier 1 and Tier 2 allocations have expired.

SDG&E’s procurement profile during the 2006 historical year used by the CAISO to develop source-verified priority allocations represented a sharp departure from SDG&E’s planned and, in significant measure, already committed procurement patterns going forward. Beginning in 2004, as part of its LTPP and in response to California’s Renewable Portfolio Standard, SDG&E started negotiating and ultimately signing long-term contracts for power generated from renewable sources in the Imperial Valley. Because the San Diego area has only limited opportunities for generating electricity from renewable sources, SDG&E must meet most of its renewable electricity requirements through power purchase contracts from resources outside the San Diego area. The combined capacity of executed contracts with renewable resource developers in the Imperial Valley is more than ten times the meager number of on-peak SWPL CRRs that SDG&E has been able to obtain in the source-verified CRR allocation scheme implemented by the CAISO.

B. The CPUC Should Act Now To Implement A LTPP Rule Designed To Facilitate Better Alignment of CRR Allocations With Evolving Procurement Portfolios.

SDG&E urges the Commission to adopt a LTPP rule that directs the IOUs not to seek indefinite renewal in the PNP tier for those CRRs that were initially allocated because a CDWR contract was used to verify a source and thus justify a priority allocation in Tier 1 and Tier 2. Instead, when the initial term of the underlying CDWR contract has expired, the relevant IOU should be directed to allow the associated CRR allocation to lapse and be returned to the pool of CRRs available to be nominated by all in the post-PNP tiers. Such a LTPP rule would gradually purge the CRR allocation
system of the initial priority allocations based on CDWR contracts, thereby enabling “have-not” load-serving entities like SDG&E to enjoy better prospects for obtaining an equitable future allocation of useful CRRs based on load share ratio.

The CPUC has previously supported at FERC a somewhat broader version of the rule proposed here. The CPUC has already directed the IOUs to cover their physical positions and not to engage in speculation. Moreover, the CPUC was effective in encouraging FERC to reduce the number of CRRs that could be converted to long-term CRRs, thereby enhancing the amount of flexibility in the system to react to future circumstances. These measures are all salutary but, in SDG&E’s judgment, in need of reinforcement if SDG&E is to have a reasonable opportunity to obtain a fair allocation of CRRs.

C. The CPUC And The CAISO Have Previously Recognized That Preferential Allocations Based On Current Energy Contracts Should Be Curtailed When The Initial Term Of The Contract Expires.

The CPUC endorsed in the FERC proceeding a slightly broader version of the rule SDG&E is proposing here, correctly noting that “by eliminating LSEs’ ability to obtain priority renewal of source-verified CRRs once the source contract expires, the CAISO would increase the availability of unused CRRs for those LSEs that will use them in the future as a hedge for energy procurement costs.” Similarly, on June 21, 2007, the CPUC adopted a procedure for allocating for Resource Adequacy (RA) purposes the Path 26 constraint between southern and northern California. To smooth transitional effects, existing contracts that are being delivered over Path 26 are “grandfathered.” Relevant to

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3 See Answer of the California Public Utilities Commission, Docket Nos. ER06-615-000 and ER07-869-000, at 3-4.
4 CPUC Answer at 7.
5 Opinion on Phase 2 –Track 1 Issues, R.05-12-013 (June 21, 2007).
the discussion at hand, “[o]nce the Grandfathered RA Commitments expire, an LSE’s baseline share will revert to its load-ratio share.”\textsuperscript{6} In short, the priority accorded to existing uses is purged once the grandfathered contract expires, thereby allowing the primary allocation rule – load-ratio share – to govern going forward.

Similarly, on March 22, 2007, the CAISO filed amendments to the CAISO Tariff to modify the way import capacity is assigned for RA purposes.\textsuperscript{7} To support the RA process, the CAISO established a protocol for determining the maximum import capability into the CAISO control area and assigned the available capability among the various load serving entities. Unlike the CRR allocation process, however, the CAISO’s import capacity assignment protocols provide that the initial preferential assignments based on pre-existing contracts will not continue after the underlying contract expires. As explained by the CAISO, “the Import Capability Assignment Amendments balance the competing interests of stakeholders by clarifying that a Pre-RA Import Commitment will be deemed to terminate and lose its priority status upon expiration of the arrangement’s original term regardless of the presence of any ‘evergreen’ or renewal provision.”\textsuperscript{8}

In sum, the uncertainty inherent in the CRR nomination process aggravates the initial disparity SDG&E faces from the CAISO’s unfettered use of the 2006 baseline. SDG&E did not receive in the initial, source-verified allocation the CRRs that it will need two or three years down the road. As matters now stand, SDG&E faces a bleak prospect of being able to obtain the CRRs that it knows it will need in future years.

\textsuperscript{6} Id. at 13.
\textsuperscript{8} Import Capability Amendments Filing at 7.
SDG&E’s proposed LTPP rule would enhance its prospects for success in future CRR allocations and produce results that are in line with the principles underlying the Import Capacity/RA procedures and the Path 26 RA counting procedures.

III. CONCLUSION

SDG&E respectfully submits the foregoing comments and proposals regarding CRR and virtual bidding issues. Additionally, SDG&E looks forward to the opportunity to expand on these comments and proposals in workshops focusing on such issues, assuming the Commission determines that such workshops are necessary.

Respectfully submitted,

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DATED at San Diego, California, this 3rd day of October, 2008.
CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true and correct copy of the foregoing SAN DIEGO GAS & ELECTRIC COMPANY’S (U-902-E) PROPOSALS AND COMMENTS REGARDING CRR/VIRTUAL BIDDING/ADDITIONAL MRTU CONCERNS to each party of named in the official service list for R.08-02-007 by electronic mail. Those parties without an email address were served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Commissioner Michael Peevey and Administrative Law Judge Carol A. Brown, who have been assigned to this proceeding.

Executed this 3rd day of October 2008, at San Diego, California.

_/s/ Lisa Fucci-Ortiz_
Lisa Fucci-Ortiz