

July 23, 2003

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket # I.00-11-001, Order Instituting Investigation Into Implementation of Assembly Bill 970 Regarding the Identification of Electric Transmission and Distribution Constraints, Actions to Resolve Those Constraints, and Related Matters Affecting the Reliability of Electric Supply

Dear Clerk:

Enclosed for filing please find an original and five copies of the California Independent System Operator's Reply Brief on Phase 6 in Docket # I.00-11-001. Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé
Regulatory Counsel

Cc: Attached Service List

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

Order Instituting Investigation into)
implementation of Assembly Bill 970 regarding) I.00-11-001
the identification of electric transmission and)
distribution constraints, actions to resolve those)
constraints, and related matters affecting the)
reliability of electric supply.)

**THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR'S REPLY BRIEF ON
PHASE 6**

Jeanne M. Solé, Regulatory Counsel
Charles F. Robinson, Vice President and
General Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-351-4400
Facsimile: 916-608-7222

Attorneys for the
California Independent System Operator

Dated: July 23, 2003

TABLE OF CONTENTS

I.	THE ALTERNATIVES PROPOSED BY THE CA ISO REQUIRE FURTHER STUDY.	1
II.	THE RECORD DOES NOT SUPPORT A DETERMINATION AT THIS TIME THAT THE COSTS OF NETWORK FACILITIES NEEDED TO INTERCONNECT ADDITIONAL WIND GENERATION AT TEHACHAPI SHOULD BE ROLLED INTO RATES.	3
III.	CONCLUSION.	8

TABLE OF AUTHORITIES

California Public Utilities Commission Rules

CPUC Rule 75.....1

Statutes

Public Utilities Code § 399.25.....8

Federal Energy Commission Decisions

Southern California Edison Company, 100 FERC ¶ 61,219 (2002).....4,5

Other

D. 90-09-059, 1990 Cal. PUC Lexis 1473 at 24-25 (1989).....6
D. 03-07-033 (2003).....8

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

Order Instituting Investigation into)
implementation of Assembly Bill 970 regarding)
the identification of electric transmission and)
distribution constraints, actions to resolve those)
constraints, and related matters affecting the)
reliability of electric supply.)
_____)

I.00-11-001

**THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR’S REPLY BRIEF ON
PHASE 6**

In accordance with California Public Utilities Commission (“CPUC” or “Commission”) Rule 75 and Judge Terkeurst’s ruling on June 11, 2003, the California Independent System Operator (“CA ISO”) respectfully submits its reply brief on Phase 6. In this brief, the CA ISO:

- reiterates that the alternatives it described in its testimony and opening brief require further study, and responds to the claim in the opening brief of Southern California Edison Company (“SCE”) that the alternatives proposed by the CA ISO are problematic;
- reiterates that the record does not support a determination at this time that the costs of network facilities (Reliability Upgrades) required to interconnect additional wind generation at Tehachapi should be rolled into transmission rates and responds to the arguments for such determination in the opening brief of Oak Creek Energy Systems, Inc. (“Oak Creek”).

I. THE ALTERNATIVES PROPOSED BY THE CA ISO REQUIRE FURTHER STUDY.

In its opening brief, SCE indicates that, without being ordered to do so, it “will study the CA ISO alternative, as well as other alternatives, in order to comply with the CA ISO’s planning process and statues and general orders governing the [Certificate of Public Convenience and

Necessity (“CPCN)] application process.” Opening Brief of Southern California Edison Company on Phase 6 of the AB 970 Proceeding (“SCE Brief”) at 11. The CA ISO appreciates this clarification on the part of SCE because the alternatives identified by the CA ISO merit further study.

Notwithstanding this commitment, SCE argues in its opening brief that that there are flaws in the alternatives proposed by the CA ISO. These arguments are apparently based on “studies” performed by Mr. Chacon beginning on the evening of June 4th through the morning of June 8th. Tr. (Chacon) at 1346: 22-23. The studies and their results were not shared or discussed with the CA ISO; tr. (Chacon) at 1346: 26. Instead, SCE tried to introduce them in response to cross-examination, and when this was not allowed, Mr. Chacon referred orally to the results of his “study” during cross-examination. As to one argument for a supposed flaw in the CA ISO’s alternatives, SCE provides references to this testimony by Mr. Chacon; another argument contains no citation to the evidentiary record. See SCE brief at 10-11.

As noted in the CA ISO’s opening brief and stated by Ms. Solé on the record, upon a review of Mr. Chacon’s “analysis”, CA ISO experts had questions about the validity of the study.¹ Tr. (Solé) at 1371: 12-17. Moreover, Mr. Chacon studies were undertaken quickly and have not been subjected to a fair and rigorous assessment by disinterested parties. They therefore provide no basis for dismissing the CA ISO’s proposed alternatives. Accordingly, SCE

¹ CA ISO witness Sparks believes based on the information that was provided by SCE of its “studies”, that SCE did not correctly model certain components; that SCE modeled an infeasible generation dispatch in its analysis; and that SCE did not optimize the use of phase shifters in its analysis. Moreover, SCE’s has not shared its congestion analysis but in any event, SCE fails to point out the potential for congestion benefits for Midway-Vincent in the south to north direction. With the addition of significant additional generation at Tehachapi and the Southwest these benefits could outweigh concerns about north to south congestion. Further, the CA ISO is unaware of any analysis of Reliability Must Run needs that substantiate SCE’s claim that the CA ISO’s alternatives would result in the need for expensive additional RMR contracts. Finally, SCE’s critique of the alternatives proposed by the CA ISO fails to account for the benefits of increased ability to utilize the Helms pumped storage project. Finally, the CA ISO notes that its proposed alternatives could be combined with SCE’s proposed alternatives in a phased program that provides for the implementation first of components that provide optimal regional benefits. In other words, if so much wind generation in fact develops in Tehachapi so as to merit components of SCE’s proposal, subsequent to the implementation of components of the CA ISO alternative, this can be done.

has provided no valid evidentiary support for its disparaging comments on the CA ISO's proposed alternatives.

The CA ISO is pleased that SCE has stated in its opening brief that it will nonetheless assess the alternatives proposed by the CA ISO further. The CA ISO believes, however, that it is important that these studies be undertaken cooperatively with all the relevant parties, at a minimum (as suggested by Oak Creek) the CA ISO, SCE, Pacific Gas & Electric Company ("PG&E") and the wind developers. SCE's criticisms of the alternatives in its brief (again without once having attempted to discuss its "concerns with the CA ISO), coupled with its attempts to disparage the CA ISO's alternatives during the hearings in a manner that precluded a full study and airing of potential issues, are not very heartening. As the CA ISO noted in its opening brief, the CA ISO concedes that the alternatives it has proposed may prove sub-optimal upon further review. Nonetheless, the CA ISO considers that the assessment of alternatives needs to proceed, and that it should take place fairly, without preconceived elimination of alternatives, and with an adequate opportunity for input by all the affected entities.

II. THE RECORD DOES NOT SUPPORT A DETERMINATION AT THIS TIME THAT THE COSTS OF NETWORK FACILITIES NEEDED TO INTERCONNECT ADDITIONAL WIND GENERATION AT TEHACHAPI SHOULD BE ROLLED INTO RATES.

The discussion regarding cost allocation in the opening brief of Oak Creek is somewhat confusing and does not clearly distinguish between two different issues: 1) whether a facility is, using the definitions in the CA ISO Tariff a "Direct Assignment Facility", or a "Reliability Upgrade" (in the language used by FERC a "network facility"); and 2) whether the costs of a transmission facility should be rolled-into transmission rates or paid for initially by an interconnecting generator. Apparently using FERC tests for the distinction between Direct Assignment Facilities and Reliability Upgrades (network facilities), Oak Creek argues that the costs of the Reliability Upgrades needed to interconnect additional generation to the CA ISO

Controlled Grid should be rolled into transmission rates. This argument is flawed; FERC precedent does not require rolled in treatment for all Reliability Upgrades (network facilities). Oak Creek supports its position by a citation to a 1989 CPUC decision that 1) is not dispositive since Oak Creek itself acknowledges FERC jurisdiction over the allocation of transmission costs; and 2) supports the CA ISO's position set forth in our opening brief that it is premature to make a determination about costs allocation without further study of alternatives.

Nonetheless, the CA ISO generally supports the recommendation of Oak Creek that a study group of the relevant parties should be created to assess alternatives, although as the CA ISO explained in its opening brief the allocation of the costs of the study will need to be resolved. Moreover, the CA ISO agrees with Oak Creek that the implementation of additional transmission facilities should be phased to match the development of additional wind in the Tehachapi area. Finally, as set forth in the CA ISO's opening brief, and acknowledged in the Commission's recent decision in this matter, D.03-07-033, it will be necessary to consider further whether and how rolled-in treatment for facilities needed to facilitate compliance with the Renewables Portfolio Standard (RPS) can be justified on economic grounds, where there is insufficient justification on reliability grounds alone.

On pages 7-10, the Oak Creek opening brief sets forth FERC precedent regarding the definition of network facilities, and discusses the components of the interconnection facilities that meet this definition. Oak Creek cites a number of FERC decisions that note that facilities beyond the point of interconnection are "network facilities" even if they would not have been installed but for a particular request for service. See e.g. Southern California Edison Company, 100 FERC ¶ 61,219 (2002). On page 30, the Oak Creek opening brief argues that in accordance with FERC precedent, the cost of "network facilities" should be rolled into transmission rates. However, Oak Creek's reasoning is flawed.

Oak Creek is correct that FERC has stated that facilities beyond the point of interconnection are "network facilities". However, as is explained in the CA ISO opening brief, "network facilities" (which correspond to Reliability Upgrades in the CA ISO Tariff) must be

paid for in the first instance by interconnecting generators, unless they are identified in an annual transmission plan to correct existing system deficiencies. As acknowledged in the CA ISO's opening brief, pursuant to FERC precedent, interconnecting generators are entitled to receive back over time their investment in "network facilities" through credits. FERC's August 2002 decision in Southern California Edison Company sets out the matter quite clearly:

The Commission has found that the transmission grid is a single piece of equipment whose use can be priced on either an average or incremental investment cost basis, but not by way of direct assignment. The Commission reasoned that, even if a customer causes the addition of a grid facility (that is, the facility would not be needed "but for" that customer's request for service), the addition is a system expansion used by and benefiting all users due to the integrated nature of the grid. In Consumers Energy Company, the Commission rejected the direct assignment of integrated grid facilities even if those facilities would not have been installed but for a particular request for service. Further, long-standing Commission policy prohibits the direct assignment of network facilities. Network facilities include all facilities "at or beyond the point" where the generator connects to the grid. This policy is without regard to the purpose of upgrading them (e.g., to relieve overloads, to remedy stability and short circuit problems, to maintain reliability, or to provide protection and service restoration). We find that the point of interconnection is where the line from the Whitewater generating facility dead-ends into the Sanwind Substation. Facilities that are at or beyond the point of interconnection, including the substation, are network facilities for which SoCal Edison is required to provide transmission credits. Accordingly, we will direct SoCal Edison to modify the Agreements consistent with this finding.

Southern California Edison Company, 100 FERC ¶ 61,219 (2002). If Oak Creek were correct that the costs of all network facilities must be rolled into transmission rates, the final two sentences in the passage above would state that the costs of the network facilities should be rolled into transmission rates, instead of requiring credits.

Oak Creek attempts to bolster its argument by citing to a CPUC 1989 decision, even though Oak Creek itself acknowledges that the allocation of costs is subject to FERC jurisdiction. See Oak Creek Opening Brief at 2. Interestingly, in the decision cited by Oak Creek, the CPUC found that interconnecting generators, rather than ratepayers, should pay for the bulk of transmission facilities that were needed primarily to interconnect new generators. Among the factors cited by the Commission are 1) that there was no clear answer as to whether the new line creates system-wide benefits; 2) that it was not clear that the best alternative had

been selected; and 3) that alternatives to the proposed project may not have been given full weight in the planning process. D. 90-09-059, 1990 Cal. PUC LEXIS 1473 at 24-25 (1989). In assessing the project in some detail, the CPUC ultimately determined that one small component of the project would provide benefits primarily to ratepayers, and allocated the costs of this component only to ratepayers. *Id.* at 26. Similarly, in this case, there has yet to be a thorough study of alternatives or selection of the best alternative, and no clear case has been made about which components of the project clearly benefit ratepayers; thus it would be inappropriate to assign to ratepayers upfront all of the costs of all network facilities needed to interconnect additional wind generation at Tehachapi.

To further support its argument that the costs of network facilities needed to interconnect additional wind generation at Tehachapi should be rolled into transmission rates, Oak Creek lists a number of “existing criteria violations” that it argues will be remedied by such additional facilities. However, as the CA ISO detailed in its opening brief, existing problems do not justify the need for facilities of the magnitude needed to interconnect additional wind generation at Tehachapi. Thus, the existing record does not provide a basis for determining now that the cost of all network facilities (Reliability Upgrades) should be rolled into transmission rates.

. In addition, in the final report produced by SCE in the CA ISO annual grid planning process the CA ISO encouraged SCE to continue to work with the Tehachapi wind community to mitigate loading and voltage problems in the area. Exh. 6-612, SCE 2002 Transmission Expansion Plan, Project Specific Comments at 4. As Mr. Chacon testified, shortly thereafter a project was approved by the ISO in the Antelope Bailey 66 kV system that Mr. Chacon indicated would support the system significantly². Tr. (Chacon) at 1398, 1426, 1440-1. Moreover, as Mr.

² On April 7, 2003 SCE proposed upgrades to the Antelope - Bailey 66 kV Subtransmission System. The project proposes to construct approximately 3.9 miles of new 66 kV transmission line by converting an existing single circuit pole-line to double circuit H-frame. The project will eliminate the overload identified in SCE’s 2002 Transmission Expansion Plan on the Cal Cement-Monolith-Rosamond-Windfarm 66 kV line. In addition, the new line section was found to decrease transmission line reactive losses by 8.5 MVAR. The ISO approved this project

Sparks explained, if the latest approach to address the problems in Tehachapi fails to correct existing issues, there are several potentially lower-cost options than a new 230 kV facility that could effectively solve remaining problems. Tr. (Sparks) at 1204: 13-14. As Mr. Sparks stated, if no new generation is added in the Tehachapi wind area, adding a 230 kV facility would be more than what is necessary. Id. Thus, without knowing the best alternative to interconnect Tehachapi wind generation, and without understanding the alternatives that are available to address any problems that remain in Tehachapi absent new generation, it is premature to determine that all the costs of all the network facilities needed to interconnect additional wind in Tehachapi should be rolled into transmission rates.

Oak Creek suggests that the Commission direct the formation of a study group to promptly explore alternatives to interconnect additional wind generation at Tehachapi. This recommendation is largely consistent with the recommendation of the CA ISO, as set forth in its testimony, Exh. 6-100, Opening Testimony of Robert Sparks Regarding Transmission Upgrades Related to Tehachapi on Behalf of the CA ISO, at 5. However, as explained in the CA ISO's opening brief, it will be necessary to fashion agreement among the parties about a study process that is timely and provides for a fair allocation of the costs of the studies among the affected entities. A study group could develop additional information on alternatives, and their relative benefits to Tehachapi wind generators, and ratepayers; this information that is critical to determinations on cost-allocation which will have to be presented to FERC and which may be considered by the CPUC. Moreover, the study group could, as suggested by Oak Creek, review options for phasing. To date there does not appear to be any disagreement that a phased approach should be pursued.

on April 29, 2003. Mr. Chacon referred to this project several times in his testimony, most extensively on pages 1440-1 of the transcript.

Finally, the CA ISO reiterates as it noted in its opening brief, that it would be beneficial to undertake further exploration of an economic justification for rolled in treatment for certain transmission facilities needed to interconnect resources required for compliance with the RPS. The CPUC's recent decision in this docket, D.03-07-033, acknowledges the need for further efforts to harmonize implementation of Public Utilities Code Section 399.25 with FERC requirements. The CA ISO remains committed to work with the CPUC and other interested parties on this matter, generically or in the context of subsequent proceedings related to the interconnection of wind generation in Tehachapi.

In sum, as set forth in the CA ISO's opening brief, the current record does not support a determination to roll into transmission rates, the costs of all network facilities (Reliability Upgrades) needed to interconnect additional wind generation at Tehachapi. Additional study of alternatives and their relative benefits to wind generators and ratepayers, as well as additional analysis of economic issues, is needed to make determinations about the appropriate allocation of costs.

III. CONCLUSION.

The CA ISO considers that a thorough review of alternatives, including the alternatives suggested by the CA ISO, remains to be undertaken, and that this review will provide some of the outstanding information needed for determinations on cost allocation.

July 23, 2003

Respectfully Submitted:

By: _____
Jeanne M. Solé, Regulatory Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-351-4400
Facsimile: 916-351-2350

PROOF OF SERVICE

I hereby certify that on July 23, 2003, I served by electronic and U.S. mail, of the California Independent System Operator's Reply Brief on Phase 6 in Docket # I.00-11-001.

DATED at Folsom, California on July 23, 2003.

Meaghan McGuire
An Employee of the California
Independent System Operator

RICHARD ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG NJ, 07849-1313

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE
WASHINGTON DC, 20004-2415

KAY DAVOODI
FEA
1314 HARWOOD STREET, S.E.
WASHINGTON NAVY YARD DC, 20374-5018

SAM DE FRAWI
NAVY RATE INTERVENTION
1314 HARWOOD STREET, SE
WASHINGTON NAVY YARD DC, 20374-5018

JAMES ROSS
REGULATORY & COGENERATION SERVICES,
INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD MO, 63017

MAURICE BRUBAKER
BRUBAKER & ASSOCIATES, INC.
1215 FERN RIDGE PARKWAY, SUITE 208
ST. LOUIS MO, 63141

DAVID M. NORRIS
ASSOCIATE GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD, PO BOX 10100
RENO NV, 89520

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
444 SOUTH FLOWER ST., SUITE 1500
LOS ANGELES CA, 90071-2916

DANIEL W. DOUGLASS
ATTORNEY AT LAW
LAW OFFICES OF DANIEL W. DOUGLASS
6303 OWENSMOUTH AVENUE, TENTH FLOOR
WOODLAND HILLS CA, 91367-2262

CASE ADMINISTRATION
LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 321
ROSEMEAD CA, 91770

JULIE A. MILLER
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM. 345
PO BOX 800
ROSEMEAD CA, 91770

MICHAEL D. MACKNESS
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON CO
2244 WALNUT GROVE AVENUE
ROSEMEAD CA, 91770

MICHAEL TIERNEY
SEMPRA ENERGY RESOURCES
101 ASH STREET
SAN DIEGO CA, 92101

STACY VAN GOOR
ATTORNEY AT LAW
SOUTHERN CALIFORNIA GAS CO/SDG&E
101 ASH STREET, HQ13
SAN DIEGO CA, 92101

STEVEN C. NELSON
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ 13D
SAN DIEGO CA, 92101-3017

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
600 WEST BROADWAY, SUITE 2600
SAN DIEGO CA, 92101-3391

FREDERICK M. ORTLIEB
CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO CA, 92101-4100

CARL C. LOWER
THE POLARIS GROUP
717 LAW STREET
SAN DIEGO CA, 92109-2436

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO CA, 92121

JOSEPH KLOBERDANZ
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO CA, 92123

CHRIS BING
CASE ADMINISTRATOR
SAN DIEGO GAS AND ELECTRIC
8330 CENTURY PARK COURT
REGULATORY AFFAIRS - CP32D
SAN DIEGO CA, 92123-1530

LINDA BROWN
SENIOR ENGINEER
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT
FERC REGULATORY AFFAIRS-CP32D
SAN DIEGO CA, 92123-1530

ROBERT BUSTER
SUPERVISOR-DISTRICT 1
COUNTY OF RIVERSIDE
4080 LEMON STREET, 14TH FLOOR
RIVERSIDE CA, 92501-3651

HAROLD M. ROMANOWITZ
CHIEF OPERATING OFFICER
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE CA, 93501

SARA HUNT
EXECUTIVE ASSISTANT
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE CA, 93501

WILLIAM L. NELSON
REECH, INC.
785 TUCKER ROAD, SUITE G
KERN-INYO LIAISON SITE, POSTNET PMB
#424
TEHACHAPI CA, 93561

NORMAN J. FURUTA
ATTORNEY AT LAW
DEPARTMENT OF THE NAVY
2001 JUNIPERO SERRA BLVD., SUITE 600
DALY CITY CA, 94014-3890

KATE POOLE
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BOULEVARD, SUITE 900
SOUTH SAN FRANCISCO CA, 94080

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BOULEVARD, SUITE 900
SOUTH SAN FRANCISCO CA, 94080

DIANE I. FELLMAN
ATTORNEY AT LAW
LAW OFFICES OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO CA, 94102

MARC B. MIHALY
ATTORNEY AT LAW
SHUTE MIHALY & WEINBERGER LLP
396 HAYES STREET
SAN FRANCISCO CA, 94102

MATTHEW FREEDMAN
TURN
711 VAN NESS AVENUE, NO. 350
SAN FRANCISCO CA, 94102

OSA ARMI
ATTORNEY AT LAW
SHUTE MIHALY & WEINBERGER LLP
396 HAYES STREET
SAN FRANCISCO CA, 94102

ROBERT FINKELSTEIN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., SUITE 350
SAN FRANCISCO CA, 94102

JAMES E. SCARFF
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION ROOM 5121
SAN FRANCISCO CA, 94102-3214

THERESA L. MUELLER
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL ROOM 234
SAN FRANCISCO CA, 94102-4682

ITZEL BERRIO
ATTORNEY AT LAW
THE GREENLINING INSTITUTE
785 MARKET STREET, 3RD FLOOR
SAN FRANCISCO CA, 94103-2003

SUSAN E. BROWN
ATTORNEY AT LAW
LATINO ISSUES FORUM
785 MARKET STREET
SAN FRANCISCO CA, 94103-2003

CATHERINE H. GILSON
ATTORNEY AT LAW
FARELLA, BRAUN & MARTEL, LLP
235 MONTGOMERY STREET
RUSS BUILDING, 30TH FLOOR
SAN FRANCISCO CA, 94104

LAURA ROCHE
ATTORNEY AT LAW
FARELLA, BRAUN & MARTEL, LLP
235 MONTGOMERY STREET
RUSS BUILDING, 30TH FLOOR
SAN FRANCISCO CA, 94104

EVELYN K. ELSESSER
ATTORNEY AT LAW
ALCANTAR & ELSESSER LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA, 94104-4354

WILLIAM V. MANHEIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 3025-B30A
SAN FRANCISCO CA, 94105

DIANE E. PRITCHARD
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
425 MARKET STREET
SAN FRANCISCO CA, 94105-2482

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA, 94111

RICHARD W. RAUSHENBUSH
ATTORNEY AT LAW
LATHAM & WATKINS
505 MONTGOMERY STREET, SUITE 1900
SAN FRANCISCO CA, 94111

LINDSEY HOW-DOWNING
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO CA, 94111-3834

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO CA, 94114

DAVID T. KRASKA
ATTORNEY AT LAW
PACIFIC GAS & ELECTRIC COMPANY
MAILCODE B30A PO BOX 7442
SAN FRANCISCO CA, 94120-7442

SARA STECK MYERS
ATTORNEY AT LAW
122 - 28TH AVENUE
SAN FRANCISCO CA, 94121

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
250 HAMILTON AVENUE
PALO ALTO CA, 94301

BARRY R. FLYNN
PRESIDENT
FLYNN AND ASSOCIATES
4200 DRIFTWOOD PLACE
DISCOVERY BAY CA, 94514-9267

MARK J. SMITH
FPL ENERGY
7445 SOUTH FRONT STREET
LIVERMORE CA, 94550

ALI AMIRALI
CALPINE CORPORATION
4160 DUBLIN BLVD.
DUBLIN CA, 94568

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, 5TH FLOOR
WALNUT CREEK CA, 94596

WILLIAM H. CHEN
CONSTELLATION NEW ENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK CA, 94596

SETH HILTON
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK CA, 94596-4087

DAVID MARCUS
PO BOX 1287
BERKELEY CA, 94701

JULIA LEVIN
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY CA, 94704

PATRICK G. MCGUIRE
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY CA, 94710

BARBARA R. BARKOVICH
BARKOVICH AND YAP, INC.
31 EUCALYPTUS LANE
SAN RAFAEL CA, 94901

JOSEPH M. KARP
ATTORNEY AT LAW
WHITE & CASE LLP
THREE EMBARCADERO CENTER, SUITE 2210
SAN FRANCISCO CA, 94941

ROY AND RITA LOMPA
4998 AIRLINE HIGHWAY
HOLLISTER CA, 95023

BARRY F. MC CARTHY
ATTORNEY AT LAW
2105 HAMILTON AVENUE, SUITE 140
SAN JOSE CA, 95125

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
2005 HAMILTON AVENUE, SUITE 140
SAN JOSE CA, 95125

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO CA, 95352-4060

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO CA, 95605

JEFF NAHIGIAN
JBS ENERGY, INC.
311 D STREET
WEST SACRAMENTO CA, 95605

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & ASSOCIATES
8980 MOONEY ROAD
ELK GROVE CA, 95624

JEANNE M. SOLE
REGULATORY COUNSEL
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA, 95630

DENNIS W. DE CUIR
ATTY AT LAW
A LAW CORPORATION
2999 DOUGLAS BLVD., SUITE 325
ROSEVILLE CA, 95661

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO CA, 95814

JENNIFER TACHERA
CALIFORNIA ENERGY COMMISSION
1516 - 9TH STREET
SACRAMENTO CA, 95814

LYNN M. HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO CA, 95814

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET SUITE 900
SACRAMENTO CA, 95814

WILLIAM W. WESTERFIELD III
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 14
SACRAMENTO CA, 95814

FERNANDO DE LEON
ATTORNEY AT LAW
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-14
SACRAMENTO CA, 95814-5512

STEVE S. RUPP
R. W. BECK, INC.
2710 GATEWAY OAKS DR., STE 300S
SACRAMENTO CA, 95833-3502

MAURY KRUTH
EXECUTIVE DIRECTOR
TRANSMISSION AGENCY OF NORTHERN
CALIF.
PO BOX 15129
SACRAMENTO CA, 95851-0129

ARLEN ORCHARD
ATTORNEY AT LAW
SACRAMENTO MUNICIPAL UTILITY DISTRICT
PO BOX 15830, MS-B406
SACRAMENTO CA, 95852-1830

JAMES C. PAINE
ATTORNEY AT LAW
STOEL RIVES LLP
900 S.W. FIFTH AVENUE, STE 2600
PORTLAND OR, 97204

DANIEL W. MEEK
ATTORNEY AT LAW
RESCUE
10949 S.W. 4TH AVENUE
PORTLAND OR, 97219

STEVE MUNSON
VULCAN POWER COMPANY
1183 NW WALL STREET, SUITE G
BEND OR, 97701

DON SCHOENBECK
RCS, INC
900 WASHINGTON STREET, SUITE 780
VANCOUVER WA, 98660

MARIA E. STEVENS
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
EXECUTIVE DIVISION
LOS ANGELES CA, 90013

AARON J JOHNSON
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION
ROOM 5205
SAN FRANCISCO CA, 94102-3214

BILLIE C BLANCHARD
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

CHARLOTTE TERKEURST
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5021
SAN FRANCISCO CA, 94102-3214

DAVID K. LEE
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

JESSE A ANTE
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

JUDY COOPER
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
PUBLIC ADVISOR OFFICE
AREA 2-E
SAN FRANCISCO CA, 94102-3214

KAREN M SHEA
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRIC INDUSTRY & FINANCE
AREA 4-A
SAN FRANCISCO CA, 94102-3214

KELLY C LEE
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
WATER AND NATURAL GAS BRANCH
ROOM 4102
SAN FRANCISCO CA, 94102-3214

KENNETH LEWIS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE ROOM 4002
SAN FRANCISCO CA, 94102-3214

LAINIE MOTAMEDI
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF STRATEGIC PLANNING
ROOM 5119
SAN FRANCISCO CA, 94102-3214

MARK ZIERING
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
STRATEGIC PLANNING BRANCH
ROOM 2202
SAN FRANCISCO CA, 94102-3214

OURANIA M. VLAHOS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION
ROOM 5037
SAN FRANCISCO CA, 94102-3214

PAMELA NATALONI
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION
ROOM 4300
SAN FRANCISCO CA, 94102-3214

ROBERT ELLIOT
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

SCOTT LOGAN
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRICITY RESOURCES AND PRICING
BRANCH ROOM 4209
SAN FRANCISCO CA, 94102-3214

SHYSHENQ P LIOU
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

WENDY M PHELPS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

XUGUANG LENG
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENGINEERING, ENVIRONMENTAL STUDIES,
CUSTOMER SERVICE AREA 4-A
SAN FRANCISCO CA, 94102-3214

SUSAN LEE
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO CA, 94104

JIM MC CLUSKEY
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO CA, 94814

KAREN GRIFFIN
MANAGER, ELECTRICITY ANALYSIS
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-20
SACRAMENTO CA, 95184

ALAN LOFASO
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
EXECUTIVE DIVISION
SACRAMENTO CA, 95814

ANN PETERSON
TECHNOLOGY SYSTEMS DIVISION
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO CA, 95814

CARLOS A MACHADO
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
EXECUTIVE DIVISION
SACRAMENTO CA, 95814

GRANT A. ROSENBLUM
STAFF COUNSEL
ELECTRICITY OVERSIGHT BOARD
770 L STREET, SUITE 1250
SACRAMENTO CA, 95814

MARK HESTERS
CALIFORNIA ENERGY COMMISSION
1519 9TH STREET, MS 46
SACRAMENTO CA, 95814

PAMELA DOUGHMAN
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
TECHNOLOGY SYSTEMS DIVISION
SACRAMENTO CA, 95814

TOM FLYNN
POLICY ADVISOR
ELECTRICITY OVERSIGHT BOARD
770 L STREET SUITE 1250
SACRAMENTO CA, 95814

DON KONDOLEON
TRANSMISSION EVALUATION UNIT
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO CA, 95814-5512

FERNANDO DE LEON
ATTORNEY AT LAW
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-14
SACRAMENTO CA, 95814-5512

JAMES HOFFSIS
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-45
SACRAMENTO CA, 95814-5512

JUDY GRAU
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-46
SACRAMENTO CA, 95814-5512

MELINDA MERRITT
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 45
SACRAMENTO CA, 95814-5512