

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

Order Instituting Rulemaking Regarding
Policies and Protocols for Demand Response,
Load Impact Estimates, Cost-Effectiveness
Methodologies, Megawatt Goals and
Alignment with California Independent System
Operator Market Design Protocols

Rulemaking 07-01-041
(January 25, 2007)

**SUPPLEMENTAL RECOMMENDATION AND
PRE-WORKSHOP COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR
IN RESPONSE TO THE ASSIGNED COMMISSIONER'S
AMENDED SCOPING RULING**

On July 8, 2009, Assigned Commissioner Chong issued a ruling (ACR) amending the scoping memo and schedule established in the July 18, 2008 Assigned Commissioner and Administrative Law Judge's Amended Scoping Memo and Ruling (Scoping Memo). The ACR requested that, by July 27, 2009, the California Independent System Operator (ISO) supplement its original recommendation as to an appropriate quantity of emergency-triggered demand response (DR) that would be useful to the system during serious system emergencies by identifying the number of MW reductions that could be assigned to each Investor Owned Utility (IOU) to achieve that goal.¹

¹ ACR at 9. For the purposes of this supplemental filing, the ISO will continue to use the term "emergency-triggered DR," consistent with the terminology used in the ACR. However, the ISO notes that a better term would be "reliability-based" DR because it better reflects recent events within the last year which have moved the triggering mechanism of these DR programs from a technical emergency declaration to conditions immediately prior to the ISO declaration of an emergency. These conditions constituting the trigger mechanism have been discussed in resolutions approved by the Commission during the period July 2008 to the present and are contained within certain ISO operating procedures.

The ACR establishes three workshops around which the work of Phase III of the proceeding will largely be undertaken. The ACR states that “[t]he first workshop will examine whether there is an optimal size for the Commission’s emergency-triggered DR program, and, if so, what is the optimal size for the program.”² Toward this end, the focus of the workshop discussion will be “to determine the amount of emergency-triggered DR that is needed, by IOU service territory, to maintain grid reliability.”³

The ACR requests that the ISO provide further detail information related to the ISO’s prior, June 25, 2008 filing on emergency triggered Demand Response programs: “CAISO is requested to supplement its original recommendation with its estimate of megawatts (MW) reductions that currently could be assigned to each of the specific IOUs.”⁴ In response to that request, the ISO hereby submits its supplemental recommendation as to the MW reductions that could be assigned to each IOU and the underlying methodology for deriving that number. Additionally, the ACR gave parties the opportunity to submit pre-workshop comments concerning the issues to be addressed at Workshop 1, and the ISO has included such comments in this filing.⁵

I. BACKGROUND

The foundation of Phase III is found in three questions posed by ALJ Hecht to the ISO in her June 9, 2008 ruling in Phase 2⁶:

- How much emergency-triggered demand response (in megawatts) does the state need to have available to mitigate declared electricity emergencies?
- How was this amount determined?
- How does the estimated amount needed compare to the amount of emergency-triggered DR currently available?

The ISO provided the following information in its June 25, 2008 responsive comments

² ACR at p. 7.

³ *Id.*

⁴ ACR at p 9.

⁵ ACR at p.8.

⁶ Administrative Law Judges’ Ruling Requesting California Independent System Operator Information on Emergency-triggered Demand Response, R.07-01-041, dated June 9, 2008.

- A range of 500 to 1,000 MWs, corresponding to a range of between 1 and 2 percent of peak system load, is an appropriate quantity of emergency-triggered DR that would be useful to the system during system emergencies to help prevent involuntary load shedding.
- This amount was based on an analysis of three criteria:
 - Historic load shedding events and MW quantities
 - Protecting spinning reserves and minimizing the potential for firm load shedding
 - Comparison with what other ISOs/RTOs carry with respect to similar emergency DR products
- The ISO's recommended range of 500 to 1,000 MWs is approximately 700 to 1,200 MWs less than the currently-available emergency-triggered DR.⁷

II. SUPPLEMENTAL INFORMATION

The ACR has asked the ISO to determine how the 500-1,000 MWs of emergency-triggered DR should be allocated to the IOUs. In formulating its response, the ISO proposes to rely on its emergency operating procedures to derive the proportionate share for each IOU. Specifically, the ISO's methodology for determining reliability-based DR program quantity allocations relies on the ISO's Emergency Operating Procedure E-508A- Load Shedding Guide (EOP-508A).⁸ This procedure, among other things, describes the procedures that will be followed by the ISO in the event that reserve requirements and load demand exceed available resources and the ISO must perform involuntary load shedding to maintain system reliability.

According to EOP-508A, each utility distribution company (UDC), including metered subsystems (MSS),⁹ would be allocated a pro-rata share of the load shedding quantity. The pro-rata load shedding share by UDC and MSS for the year is determined by calculating each of the load shedding participant's (Participant's) contribution to the

⁷ Comments of the California Independent System Operator Re: ALJ Ruling Requesting Information on Emergency Triggered Demand Response, filed June 25, 2008 in Phase 2, at pp 14-15. This document can be accessed at <http://docs.cpuc.ca.gov/efile/CM/84642.pdf>.

⁸ <http://www.caiso.com/docs/2001/03/02/2001030214322212978.pdf>

⁹ The ISO tariff defines a Metered Subsystem, in pertinent part, as:

A geographically contiguous system located within a single zone which has been operating as an electric utility for a number of years prior to the CIASO Operations Date as a municipal utility, water district, irrigation district, state agency or federal power marketing authority subsumed within the CAISO Balancing Authority Area...

ISO’s annual peak load. Specifically, a Participant’s pro-rata load shedding share is determined by dividing the Participant’s coincident load (MW) at the time of the ISO system peak by the ISO’s peak load (MW).¹⁰ The CAISO updates the pro-rata share percentages on an annual basis and publishes the new values in EOP-508A. This update occurs prior to the summer season and is generally published in the April to June timeframe of any given year.¹¹ The Commission could choose to update the emergency-triggered DR program allocation annually, based on the ISO’s updated publication of EOP-508A, or establish an allocation by DR application program cycle based on historic EOP-508A data.

EOP-508A currently sets forth the following fixed pro-rata load-shedding shares under circumstances when load-shedding by UDCs or MSSs is required:

UDC / MSS	FIXED PRO-RATA SHARE
Anaheim	1.12%
Azusa	0.12%
Banning	0.09%
Corona	0.03%
Lassen	0.04%
NCPA (Excluding Roseville, Including SVP)	1.99%
Pacific Gas & Electric	42.53%
Pasadena	0.63%
Riverside	1.14%
San Diego Gas & Electric	8.68%
Southern California Edison	43.25%
Vernon	0.38%

Thus, in response to the ACR’s supplemental information request and to reach a 100% allocation factor, the ISO proposes that the Commission allocate emergency-triggered MW quantities based on EOP-508A allocation factors to the three IOUs by

¹⁰ The UDC/MSS load coincident at the time of the ISO’s annual peak would also exclude any interruptible load that was off at the time of the ISO system peak.

¹¹ For 2009, the updated allocations in EOP-508A were published on May 12, 2009.

adding the percent load shedding shares of the non-CPUC jurisdictional entities to the IOUs allocation within whose IOU footprint the non-CPUC jurisdictional entity resides. For 2009, this allocation would be as follows, based on the table above:

CPUC Allocation of Reliability-based DR Quantities by UDC- 2009

UDC	% Allocation
Non-jurisdictional UDCs within SCE footprint	3.51%
SCE 43.25%	
Total SCE:	46.76%
Non-jurisdictional UDCs within PG&E footprint	2.03%
Pacific Gas & Electric	42.53%
Total PG&E:	44.56%
Total: SDGE:	8.68%

III. PRE-WORKSHOP COMMENTS

A. Activities by the Parties Since the ISO’s June 25, 2008 Filing Must Inform the Phase III Workshop Efforts.

In connection with the Phase III efforts, it is important that the Phase III workshop participants to be informed of activities that have transpired in the interim since July 2008, when Phase III was launched, and the present time. During this period, the IOUs, the ISO and effected end-use customer program participants engaged in negotiations and discussions culminating in a modification of the IOU Base Interruptible Programs (BIP) trigger mechanisms. The modifications to the BIP programs were approved by the Commission on January 29, 2009 in Commission Resolution 4220, issued February 2, 2009.¹² As explained in Resolution E-4220,

¹² Resolution 4220 can be accessed on the Commission Web site at http://docs.cpuc.ca.gov/WORD_PDF/FINAL_RESOLUTION/96923.PDF

The trigger condition change adopted here is an interim solution to a longstanding debate on how to best align emergency-triggered programs with CAISO operational practices. Further refinements to emergency-triggered programs are expected to occur in Phase 3 Order Instituting Rulemaking (OIR).¹³

The ISO supported the IOU modification request as a component of a larger, overall agreement reached by the ISO, the IOUs and large utility end use customer/ DR program participants that those parties would (1) accept the premise that DR programs should migrate from emergency triggered DR to price responsive programs (2) engage in meaningful efforts to do so. Because of these commitments, the ISO agreed that it would not oppose the IOU requested funding and approval levels of the BIP programs in the DR Applications (A.08-06-001; A.08-06-002; A.08-06-003). Accordingly, the ISO made the following points in its comments in support of the IOU requests for the BIP program modifications:

The draft Resolution also correctly notes that, upon modification of the BIP as proposed, the CAISO has agreed to support continued inclusion of BIP capacity as Resource Adequacy (RA) capacity, a position which the CAISO tethers to commitment by the utilities, CMTA, CLECA and other interested parties to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive demand response program during the 2010 to 2011 timeframe.¹⁴

Because the Commission qualifies emergency-triggered DR programs as Resource Adequacy (RA) capacity, the draft Resolution resolved the issue of the ISO having to declare a system emergency to access these RA resources. In other words, the ISO could technically use these DR programs to prevent an emergency versus only being able to use these resources to pull out of an emergency. However, many of the Commission's core concerns remain unresolved by Resolution E-4220. For instance, the Commission's concerns about the ISO 'double procuring' RUC capacity or the ISO

¹³ Resolution 4220 at pp 1-2.

¹⁴ ISO Comments to draft resolution E-4220, dated Jan 14, 2009. The ISO attaches a copy of the ISO's comments as Attachment A to this filing and a copy of final Resolution E-4220 as Attachment B to this filing.

procuring resources ‘out-of-market’ before using these already funded DR programs remain unresolved. Even with the positive changes made through Resolution E-4220, the trigger for these emergency-triggered DR programs still remain at a point where the ISO cannot plan around these resources. As such, they cannot be considered in the ISO’s planning process and, therefore, in no way impact the ISO’s RUC procurement target. Furthermore, before triggering the emergency-triggered DR programs per Resolution E-4220, the ISO must take appropriate actions to prevent the system from sliding into a reserve deficiency, and therefore system emergency, by purchasing energy out of market, exercising exceptional dispatches and taking other preventive measures that have cost consequences. Thus, it is important that the Commission understand what Resolution E-4220 resolved and what it did not resolve.

B. Phase III Efforts Should Begin With the Cap on Levels of Emergency Triggered DR Set Forth In The Recent Proposed Decision On The IOU DR Applications.

The recently issued Proposed Decision in the IOU application proceedings for approval of 2009-2011 programs and budgets includes a provision to cap the size of the IOU emergency triggered demand response programs to their current level of enrolled megawatts, pending a decision in Phase 3 of this rulemaking.¹⁵ Capping enrollment in existing emergency-triggered programs at the current megawatt level is appropriate while the Commission addresses the issue in this phase of the proceeding. Given the ISO perspective on the over-abundance of emergency-triggered DR programs being funded currently, the ISO would recommend that the Commission establish not only an upper limit on the amount of emergency-triggered DR, but a schedule by which that lower amount can be achieved by end of the 2009-2011 program cycle. Should enrollment

¹⁵ Proposed Decision Adopting Demand Response Activities and Budgets For 2009 Through 2011, (Proceedings A.08-06-001, A.08-06-002 and A.08-06-003, Ordering Paragraph 10, at pp 215-216. The Proposed Decision is posted to the Commission’s web page for the combined proceedings at <http://docs.cpuc.ca.gov/efile/PD/103117.pdf>.

decline below, for example, 1,000 MWs, the ISO recommends that replacement be allowed up to the cap, allocated among IOUs according to the method described in the previous section.

Thus, the ISO would expect any substantive changes to emergency-triggered DR programs, in quantity or structure, to occur in the 2012-2014 DR application cycle. In addition, given the infrequency with which the emergency-triggered DR programs are operated, the ISO urges the Commission to also incorporate at least one annual test of these programs, as a program feature and requirement, to ensure on-going compliance and to establish an the 'expected' response from these programs on an annual basis.

Dated: July 27, 2009

Respectfully submitted,

By: /s/ John Goodin
John Goodin, Lead, Demand Response
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
151 Blue Ravine Road
Folsom, CA 95630
Tel. (916) 608-7154
Fax (916) 608-7122
E-mail jgoodin@caiso.com

By: /s/ Baldassaro "Bill" Di Capo
Baldassaro "Bill" Di Capo, Esq., Counsel
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
151 Blue Ravine Road
Folsom, CA 95630
Tel. (916) 608-7157
Fax (916) 608-7222
E-mail bdicapo@caiso.com

ATTACHMENT A

January 14, 2009

VIA ELECTRONIC MAIL To: jnj@cpuc.ca.gov and US MAIL

Honesto Gatchalian,
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

VIA US Mail

Dorris Lamb,
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Subject: Draft Resolution E-4220
Response of the California Independent System Operator
Corporation

Through this response, the California Independent System Operator Corporation (CAISO) expresses its support for Commission adoption of draft Resolution E-4220, which calls for approval of the proposals by PG&E, SCE and SDG&E to modify the Base Interruptible Program (BIP) to add a new trigger condition.

As explained in the draft resolution, the utility proposals are intended to implement an “interim solution to a long-standing debate on how best to align emergency-triggered programs with CAISO operational practices.” (draft Resolution at p. 1.) The draft resolution also notes that the CAISO has expressed its support for the proposed BIP trigger modification. The CAISO has done so by way of letters of support dated December 2, 2008 letter, which the CAISO submitted for each respective utility advice letter filing.

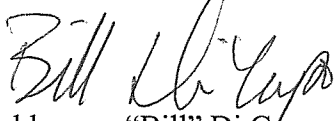
The draft Resolution also correctly notes that, upon modification of the BIP as proposed, the CAISO has agreed to support continued inclusion of BIP capacity as Resource Adequacy (RA) capacity, a position which the CAISO tethers to commitment

CAISO
151 Blue Ravine Road
Folsom, California 95630
(916) 351-4400

by the utilities, CMTA, CLECA and other interested parties to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive demand response program during the 2010 to 2011 timeframe. (See draft Resolution at p. 3.)

The CAISO supports the BIP modifications and actions set forth in the draft Resolution and strongly encourages approval by the Commission.

Respectfully submitted,



Baldassaro "Bill" Di Capo
Counsel

California Independent System Operator Corporation
151 Blue Ravine Road
Folsom, California 95630
Tel. (916) 608-7157
Fax (916) 608-7222
Email bdicapo@caiso.com

cc:

Service Lists in the following proceedings

R.07-01-041

A.08-06-001

A.08-06-002


A.08-06-003

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2009, I served, on the Service List for Consolidated Proceedings A08-06-001, A08-06-002, A08-06-003 and R.07-01-041 by electronic mail, and United States mail a copy of the foregoing:

RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO
DRAFT RESOLUTION E-4220

Executed on January 14, 2009, at Folsom,
California



Anna Pascuzzo,
An employee of the California Independent
System Operator

Service List R.07-01-041

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD STREET, STE 344
SAN FRANCISCO, CA 94107
4010@pacbell.net

Aloke Gupta
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
ag2@cpuc.ca.gov

AHMAD FARUQUI
THE BRATTLE GROUP
353 SACRAMENTO STREET, SUITE 1140
SAN FRANCISCO, CA 94111
ahmad.faruqui@brattle.com

ANDREA HORWATT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
andrea.horwatt@sce.com

LARRY B. BARRETT
CONSULTING ASSOCIATES, INC.
PO BOX 60429
COLORADO SPRINGS, CO 80960
barrettlarry@comcast.net

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

BOB HINES
SILICON VALLEY LEADERSHIP GROUP
224 AIRPORT PARKWAY, SUITE 620
SAN JOSE, CA 95110
bhines@svlg.net

BENJAMIN SCHUMAN
PACIFIC CREST SECURITIES
111 SW 5TH AVE, 42ND FLR
PORTLAND, OR 97204
bschuman@pacific-crest.com

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

Christopher Clay
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
cec@cpuc.ca.gov

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
abb@eslawfirm.com

ALAN GARTNER
ENERGYCONNECT, INC.
51 E. CAMPBELL AVEUNE, 145
CAMPBELL, CA 95008
agartner@energyconnectinc.com

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

ALICIA R. PETERSEN
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX
1146
HARRISBURG, PA 17108
apetersen@rholds-sinon.com

BARB BOICE
4309 NORWOOD AVENUE, APT. 160
SACRAMENTO, CA 95838
bboice02@yahoo.com

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

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

Bruce Kaneshiro
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
bsk@cpuc.ca.gov

CARMEN BASKETTE
ENERNOC, INC.
594 HOWARD STREET, SUITE 400
SAN FRANCISCO, CA 94105
cbaskette@enernoc.com

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530
CentralFiles@semprautilities.com

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

Andrew Campbell
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5203
SAN FRANCISCO, CA 94102-3214
agc@cpuc.ca.gov

DOUGLAS A. AMES
TRANSPHASE SYSTEMS, INC.
4971 LOS PATOS AVENUE
HUNTINGTON BEACH, CA 92649
ames_doug@yahoo.com

ALAN GARTNER
1125 PHEASANT HILL WAY
SAN JOSE, CA 95120
arg@enertechnologies.com

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY &
LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
bcragg@goodinmacbride.com

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

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

CARL SILSBEE
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
carl.silsbee@sce.com

CLINTON COLE
CURRENT GROUP, LLC
20420 CENTURY BOULEVARD
GERMANTOWN, MD 20874
CCole@currentgroup.com

CARLOS F. PENA
SEMPRA ENERGY
101 ASH STREET, HQ12
SAN DIEGO, CA 92101
cfpena@sempra.com

Service List R.07-01-041

CHRIS KING
EMETER CORPORATION
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
chris@emeter.com

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

DOCKET COORDINATOR
KEYES & FOX LLP
5727 KEITH ST.
OAKLAND, CA 94618
cpucdockets@keyesandfox.com

DAVE HANNA
ITRON INC
11236 EL CAMINO REAL
SAN DEIGO, CA 92130-2650
Dave.Hanna@itron.com

DAVID BARKER
SAN DIEGO GAS & ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123
dbarker@semprautilities.com

DAVID HUNGERFORD
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
dhungerf@energy.state.ca.us

DENISE SERIO
ENERGY CURTAILMENT SPECIALISTS, INC.
4455 GENESEE STREET, BLDG. 6
NEW YORK, NY 14225
dserio@ecsgrid.com

DAVID M. WYLIE, PE
ASW ENGINEERING
2512 CHAMBERS ROAD, SUITE 103
TUSTIN, CA 92780
dwylie@aswengineering.com

EDWARD VINE
LAWRENCE BERKELEY NATIONAL
LABORATORY
BUILDING 90R4000
BERKELEY, CA 94720
elvine@lbl.gov

ERIC C. WOYCHIK
STRATEGY INTEGRATION LLC
9901 CALODEN LANE
OAKLAND, CA 94605
eric@strategyi.com

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA, CA 95476
clark.bernier@rlw.com

JOE PRIJYANONDA
GLOBAL ENERGY PARTNERS, LLC
3569 MT. DIABLE BLVD., SUITE 200
LAFAYETTE, CA 94549
cpjoe@gepllc.com

CHARLES MIDDLEKAUFF
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO, CA 94103
crmd@pge.com

DAVID REED
SOUTHERN CALIFORNIA EDISON
6060 IRWINDALE AVE., STE. J
IRWINDALE, CA 91702
david.reed@sce.com

DANIEL C. ENGEL
FREEMAN, SULLIVAN & CO.
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104
dcengel@fscgroup.com

Dorris Lam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
dnl@cpuc.ca.gov

DANIEL M. VIOLETTE
SUMMIT BLUE CONSULTING
1722 14TH STREET, SUITE 230
BOULDER, CO 80302
dviolette@summitblue.com

Elizabeth Dorman
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
edd@cpuc.ca.gov

EDWARD G. POOLE
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818
epoole@adplaw.com

EDWARD V. KURZ
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
evk1@pge.com

CLARK E. PIERCE
LANDIS & GYR
246 WINDING WAY
STRATFORD, NJ 8084
clark.pierce@us.landisgyr.com

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

Christopher R Villarreal
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
crv@cpuc.ca.gov

DAVID NEMTZOW
NEMTZOW & ASSOCIATES
1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401
david@nemtzw.com

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

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

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941
dwood8@cox.net

ELAINE S. KWEI
PIPER JAFFRAY & CO
345 CALIFORNIA ST. SUITE 2300
SAN FRANCISCO, CA 94104
elaine.s.kwei@pjc.com

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

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

Service List R.07-01-041

RUSS GARWACRD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE
ROSEMEAD, CA 91770
garwacrd@sce.com

GLEN E. SMITH
ENERGY CURTAILMENT SPECIALISTS, INC.
3735 GENESEE STREET
BUFFALO, NY 14225
gesmith@ecsny.com

JOEL M. HVIDSTEN
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868
hvidstenj@kindermorgan.com

JAMES BOOTHE
THE ENERGY COALITION
9 REBELO LANE
NOVATO, CA 94947
ja_booth@yahoo.com

Jennifer Caron
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
jc8@cpuc.ca.gov

JEFF NAHIGIAN
JBS ENERGY, INC.
311 D STREET
WEST SACRAMENTO, CA 95605
jeff@jbsenergy.com

JENNIFER SHIGEKAWA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
Jennifer.Shigekawa@sce.com

JENNIFER HOLMES
ENERGY MARKET INNOVATIONS INC.
83 COLUMBIA STREET, SUITE 303
SEATTLE, WA 98104
jholmes@emi1.com

Joe Como
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5033
SAN FRANCISCO, CA 94102-3214
joc@cpuc.ca.gov

JOYCE LEUNG
SOUTHERN CALIFORNIA EDISON COMPANY
6060 J IRWINDALE AVE.
IRWINDALE, CA 91702
joyce.leung@sce.com

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605
gayatri@jbsenergy.com

GALEN BARBOSE
LAWRENCE BERKELEY NATIONAL LAB
1 CYCLOTRON RD.
BERKELEY, CA 94720
glbarbose@lbl.gov

HELEN ARRICK
BUSINESS ENERGY COALITION
PO BOX 770000
SAN FRANCISCO, CA 94177-0001
hxag@pge.com

JANET COMBS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
janet.combs@sce.com

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

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

JOHN GOODIN
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630
jgoodin@caiso.com

Jason R. Salmi Klotz
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
jk1@cpuc.ca.gov

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

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

GEOFF AYRES
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245
IRVINE, CA 92618
gayres@energycoalition.org

Hazlyn Fortune
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
hcf@cpuc.ca.gov

IRENE K. MOOSEN
CITY AND COUNTY OF SAN FRANCISCO
53 SANTA YNEZ AVE.
SAN FRANCISCO, CA 94112
irene@igc.org

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

JAY LUBOFF
JAY LUBOFF CONSULTING SERVICES
7 ANNIE LANE
MILL VALLEY, CA 94941
jcluboff@lmi.net

JACK ELLIS
RESERO CONSULTING
490 RAQUEL COURT
LOS ALTOS, CA 94022
jellis@resero.com

Jessica T. Hecht
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5113
SAN FRANCISCO, CA 94102-3214
jhe@cpuc.ca.gov

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO, CA 92106
jlaun@apogee.net

J. JOSHUA DAVIDSON
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111
joshdavidson@dwt.com

JEFF SHIELDS
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
11011 E. HWY 120
MANTECA, CA 95336
jshields@ssjid.com

Service List R.07-01-041

JAMES WEIL
AGLET CONSUMER ALLIANCE
PO BOX 1916
SEBASTOPOL, CA 95473
jweil@aglet.org

Joy Morgenstern
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
jym@cpuc.ca.gov

KEVIN COONEY
SUMMIT BLUE CORPORATION
1722 14TH STREET, SUITE 230
BOULDER, CO 80302
kcooney@summitblue.com

GREGORY KLATT
DOUGLASS & LIDDELL
411 E. HUNTINGTON DRIVE, STE. 107-356
ARCADIA, CA 91006
klatt@energyattorney.com

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE ENERGY,
INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124
l_brown369@yahoo.com

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

LINDA WRAZEN
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123
LWrazen@semprautilities.com

MARIAN BROWN
SOUTHERN CALIFORNIA EDISON
6040A IRWINDALE AVE.
IRWINDALE, CA 91702
marian.brown@sce.com

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

MONICA S. IINO
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX
1146
HARRISBURG, PA 17108
miimo@rhoads-sinon.com

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
jwwd@pge.com

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

KEN ABREN
245 MARKET STREET
SAN FRANCISCO, CA 94105
kea3@pge.com

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

LARRY R. COPE
SOUTHERN CALIFORNIA EDISON
PO BOX 800, 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
larry.cope@sce.com

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

MARY A. GANDESBERY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET B30A
SAN FRANCISCO, CA 94120
MAGq@pge.com

MARK S. MARTINEZ
SOUTHERN CALIFORNIA EDISON
6060J IRWINDALE AVE., SUITE J
IRWINDALE, CA 91702
mark.s.martinez@sce.com

MELANIE GILLETTE
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM, CA 95630
mgillette@enernoc.com

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5215
SAN FRANCISCO, CA 94102-3214
mjd@cpuc.ca.gov

JOY YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123
jyamagata@semprautilities.com

KA-WING MAGGIE POON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
ka-wing.poon@sce.com

KEITH R. MCCREA
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., N.W.
WASHINGTON, DC 20004-2415
keith.mccrea@sablauw.com

KATHRYN SMITH
SAN DIEGO GAS AND ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123
ksmith2@semprautilities.com

LAURA ROOKE
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND, OR 97204
laura.rooke@pgn.com

Lisa-Marie Salvacion
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
lms@cpuc.ca.gov

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

MARY LYNCH
CONSTELLATION ENERGY COMMODITIES
GRP
2377 GOLD MEDAL WAY, SUITE 100
GOLD RIVER, CA 95670
mary.lynch@constellation.com

Massis Galestan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
mgm@cpuc.ca.gov

MARK HUFFMAN
PACIFIC GAS AND ELECTRIC COMPANY
MC B30A PO BOX 770000
SAN FRANCISCO, CA 94177
mrh2@pge.com

Service List R.07-01-041

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

NORA SHERIFF
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015
nes@a-klaw.com

PAUL KARR
TRILLIANT NETWORKS, INC.
1100 ISLAND DRIVE, SUITE 103
REDWOOD CITY, CA 94065
Paul.karr@trilliantnetworks.com

PETER MALTBAEK
CONSUMERPOWERLINE
1185 ELENA PRIVADA
MOUNTAIN VIEW, CA 94040
pmaltbaek@consumerpowerline.com

JAMES R. METTLING
BLUE POINT ENERGY
1190 SUNCAST LANE, STE 2
EL DORADO HILLS, CA 95762
rmettling@bluepointenergy.com

RICH QUATTRINI
ENERGYCONNECT, INC.
51 E. CAMPBELL AVENUE, SUITE 145
CAMPBELL, CA 95008
rquattrini@energyconnectinc.com

SALLE E. YOO
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
salleyoo@dwt.com

SCOTT H. DEBROFF
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX
1146
HARRISBURG, PA 17100
sdebroyff@rhoads-sinon.com

MICHAEL ROCHMAN
SPURR
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520
Service@spurr.org

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
skg@cpuc.ca.gov

MARGARET SHERIDAN
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
msherida@energy.state.ca.us

NICHOLAS J. PLANSON
CONSUMER POWERLINE
17 STATE STREET, SUITE 1910
NEW YORK, NY 10004
nplanson@consumerpowerline.com

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

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

ROGER LEVY
LEVY AND ASSOCIATES
2805 HUNTINGTON ROAD
SACRAMENTO, CA 95864
rogerl47@aol.com

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

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97201
sas@a-klaw.com

SEAN P. BEATTY
MIRANT CALIFORNIA, LLC
PO BOX 192
PITTSBURG, CA 94565
sean.beatty@mirant.com

SHARON TALBOTT
EMETER CORPORATION
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
sharon@emeter.com

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

MONA TIERNEY-LLOYD
ENERNOC
PO BOX 378
CAYUCOS, CA 93430
mtierney-lloyd@enernoc.com

PATRICIA R. THOMPSON
SUMMIT BLUE CONSULTING
2752 DOS RIOS DR.
SAN RAMON, CA 94583
Patricia.R.Thompson@gmail.com

PAUL KERKORIAN
UTILITY COST MANAGEMENT LLC
6475 N. PALM AVENUE, SUITE 105
FRESNO, CA 93704
pk@utilitycostmanagement.com

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

ROGER VAN HOY
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
rogerv@mid.org

ROBIN J. WALTHER, PH.D.
1380 OAK CREEK DRIVE., 316
PALO ALTO, CA 94305
rwalth@pacbell.net

SHIRLEY WOO
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
saw0@pge.com

SUSAN MCNEILL
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B8M
SAN FRANCISCO, CA 94177-0001
sem4@pge.com

SHAWN COX
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868
shawn_cox@kindermorgan.com

STEVEN D. PATRICK
SAN DIEGO GAS & ELECTRIC COMPANY
555 WEST FIFTH STREET, STE 1400
LOS ANGELES, CA 90013-1011
spatrick@sempra.com

Service List R.07-01-041

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105
SRH1@pge.com

SARA STECK MYERS
122 28TH AVENUE
SAN FRANCISCO, CA 94121
ssmyers@att.net

STEVE KROMER
3110 COLLEGE AVENUE, APT 12
BERKELEY, CA 94705
stevek@kromer.com

TRENT A. CARLSON
RELIANT ENERGY
1000 MAIN STREET
HOUSTON, TX 77001
tcarlson@reliant.com

THERESA MUELLER
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102
theresa.mueller@sfgov.org

THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
tomk@mid.org

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

Rebecca Tsai-Wei Lee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
wtr@cpuc.ca.gov

GRAYSON HEFFNER
15525 AMBIANCE DRIVE
N. POTOMAC, MD 20878

BRUCE PERLSTEIN
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET
SAN FRANCISCO, CA 94105

SANDRA ROVETTI
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
srovetti@sflower.org

STACIE SCHAFFER
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
Stacie.Schaffer@sce.com

SUE MARA
RTO ADVISORS, LLC.
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062
sue.mara@rtoadvisors.com

Thomas Roberts
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4104
SAN FRANCISCO, CA 94102-3214
tcr@cpuc.ca.gov

TYLER HUEBNER
ICF INTERNATIONAL
394 PACIFIC AVE SUITE 200
SAN FRANCISCO, CA 94111
thuebner@icfi.com

TYLER BERGAN
POWERIT SOLUTIONS
114 ALASKAN WAY SOUTH, NO. 201
SEATTLE, WA 98104
tylerb@poweritsolutions.com

WILLIAM H. BOOTH
LAW OFFICE OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
wbooth@booth-law.com

Yuliya Shmidt
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4104
SAN FRANCISCO, CA 94102-3214
ys2@cpuc.ca.gov

WARREN MITCHELL
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245
IRVINE, CA 92618

BRAD MANUILOW
AMERICAN TECHNOLOGY RESEARCH
450 SANSOME ST., SUITE 1000
SAN FRANCISCO, CA 94111

STUART SCHARE
SUMMIT BLUE CONSULTING
1722, 14TH STEET, SUIET 230
BOULDER, CO 80302
sschare@summitblue.com

STEPHEN D. BAKER
SR. REG. ANALYST, FELLON-MCCORD AND
ASS.
9960 CORPORATE CAMPUS DRIVE, STE.
2000
LOUISVILLE, KY 40223

THERESA BURKE
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
tburke@sflower.org

TED POPE
ENERGY SOLUTIONS
1610 HARRISON STREET
OAKLAND, CA 94612
ted@energy-solution.com

Timothy J. Sullivan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 2106
SAN FRANCISCO, CA 94102-3214
tjs@cpuc.ca.gov

VIDHYA PRABHAKARAN
GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
vprabhakaran@goodinmacbride.com

WILLIAM D. ROSS
CONSTELLATION NEW ENERGY
520 SO. GRAND AVENUE SUITE 3800
LOS ANGELES, CA 90071-2610
william.ross@constellation.com

KEN SKINNER
INTEGRAL ANALYTICS, INC
312 WALNUT STREET, SUITE 1600
CINCINNATI, OH 45202

STEVE GEORGE
GSC GROUP
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104

Service List A.08-06-001 et al

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD STREET, STE 344
SAN FRANCISCO, CA 94107
4010@pacbell.net

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY &
LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
bcragg@goodinmacbride.com

BENJAMIN SCHUMAN
PACIFIC CREST SECURITIES
111 SW 5TH AVE, 42ND FLR
PORTLAND, OR 97204
bschuman@pacific-crest.com

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. SUITE 303
SAN FRANCISCO, CA 94117-2242
cem@newsdata.com

DARA BILTEKOFF
ENERGY CURTAILMENT SPECIALISTS
4455 GENESEE STREET
BUFFALO, NY 14225
dara@ecsgrid.com

Dorris Lam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
dnl@cpuc.ca.gov

EDWARD G. POOLE
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108
epoole@adplaw.com

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605
gayatri@jbsenergy.com

JOEL M. HVIDSTEN
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868
hvidstenj@kindermorgan.com

Jennifer Caron
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
jc8@cpuc.ca.gov

Andrew Campbell
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5203
SAN FRANCISCO, CA 94102-3214
agc@cpuc.ca.gov

BALDASSARO DI CAPO
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
bdicapo@caiso.com

Bruce Kaneshiro
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
bsk@cpuc.ca.gov

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

DAVID NEMTZOW
NEMTZOW & ASSOCIATES
1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401
david@nemtzow.com

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
douglass@energyattorney.com

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

GLEN SMITH
ENERGY CURTAILMENT SPECIALISTS
4455 GENESEE STREET
BUFFALO, NY 14225
gesmith@ecsny.com

HELEN ARRICK
BUSINESS ENERGY COALITION
77 BEALE STREET, RM 1848E
SAN FRANCISCO, CA 94105
hxag@pge.com

JEFF NAHIGIAN
JBS ENERGY, INC.
311 D STREET
WEST SACRAMENTO, CA 95605
jeff@jbsenergy.com

DOUGLAS A. AMES
TRANSPHASE COMPANY
4971 LOS PATOS AVE.
HUNTINGTON BEACH, CA 92649
ames_doug@yahoo.com

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

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

DOCKET COORDINATOR
KEYES & FOX LLP
5727 KEITH ST.
OAKLAND, CA 94618
cpucdockets@keyesandfox.com

David Peck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4103
SAN FRANCISCO, CA 94102-3214
dbp@cpuc.ca.gov

DENISE SERIO
ENERGY CURTAILMENT SPECIALISTS, INC.
4455 GENESEE STREET, BLDG. 6
NEW YORK, NY 14225
dserio@ecsgrid.com

ERIC WOYCHIK
COMVERGE, INC.
9901 CALODEN LANE, STE 1
OAKLAND, CA 94605
ewoychik@comverge.com

Hazlyn Fortune
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
hcf@cpuc.ca.gov

JANET COMBS
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
janet.combs@sce.com

JACK ELLIS
RESERO CONSULTING
490 RAQUEL COURT
LOS ALTOS, CA 94022
jellis@resero.com

Service List A.08-06-001 et al

JENNIFER SHIGEKAWA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
Jennifer.Shigekawa@sce.com

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

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO, CA 92123
jyamagata@semprautilities.com

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

MARY A. GANDESBERY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
magq@pge.com

MELANIE GILLETTE
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM, CA 95630
mgillette@enernoc.com

MONA TIERNEY-LLOYD
ENERNOC, INC.
PO BOX 378
CAYUCOS, CA 93430
mtierney-lloyd@enernoc.com

PAUL KERKORIAN
UTILITY COST MANAGEMENT LLC
6475 N. PALM AVENUE, SUITE 105
FRESNO, CA 93704
pk@utilitycostmanagement.com

ROBERT M. BREMAULT
AXIS RESOURCE LLC
1901 PLACER GOLD COURT
GOLD RIVER, CA 95670
rbremault@comcast.net

ROBERT EMMERT
CAISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630
remmert@caiso.com

JOHN GOODIN
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630
jgoodin@caiso.com

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

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

Lisa-Marie Salvacion
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
lms@cpuc.ca.gov

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

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

NANCY PRIVITT
SDG&E
8306 CENTURY PARK COURT, CP42K
SAN DIEGO, CA 92123-1530
nprivitt@semprautilities.com

PAM MELTON
ENERGY CONNECT, INC.
4141 N. HENDERSON RD., NO. 211
ARLINGTON, VA 22203
pmelton@energyconnect.com

RICHARD H. COUNIHAN
ENERNOC, INC.
500 HOWARD STREET, STE. 400
SAN FRANCISCO, CA 94105
rcounihan@enernoc.com

RONALD LIEBERT
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
rliebert@cfbf.com

Jessica T. Hecht
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5113
SAN FRANCISCO, CA 94102-3214
jhe@cpuc.ca.gov

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105
jwwd@pge.com

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

LINDA WRAZEN
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123
LWrazen@semprautilities.com

B.MARIE PIENIAZEK
CPOWER, INC.
17 STATE STREET
NEW YORK, NY 10004
marie.pieniazek@cpowered.com

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

PETER MALTBECK
CPOWER, INC.
1185 ELENA PRIVADA
MOUNTAIN VIEW, CA 94040
peter.maltbaek@cpowered.com

PAUL TYNO
ENERGY CURTAILMENT SPECIALISTS
4455 GENESEE STREET
BUFFALO, NY 14225
ptyno@ecsny.com

PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177
regrepcuccases@pge.com

JAMES R. METTLING
BLUE POINT ENERGY
1190 SUNCAST LANE, STE 2
EL DORADO HILLS, CA 95762
rmettling@bluepointenergy.com

Service List A.08-06-001 et al

RICH QUATTRINI
ENERGYCONNECT, INC.
51 E. CAMPBELL AVENUE, SUITE 145
CAMPBELL, CA 95008
rquattrini@energyconnectinc.com

SHAWN COX
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868
shawn_cox@kindermorgan.com

STEVE HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105
SRH1@pge.com

THERESA BURKE
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
tburke@sfwater.org

VIDHYA PRABHAKARAN
GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
vprabhakaran@goodinmacbride.com

SALLE YOO
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111
salleyoo@dwt.com

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
skg@cpuc.ca.gov

SARA STECK MYERS
122 28TH AVENUE
SAN FRANCISCO, CA 94121
ssmyers@att.net

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

WILLIAM H. BOOTH
LAW OFFICE OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
wbooth@booth-law.com

SHIRLEY A. WOO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
saw0@pge.com

STEVEN D. PATRICK
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14E7
LOS ANGELES, CA 90013-1011
spatrick@sempra.com

STACIE SCHAFFER
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
Stacie.Schaffer@sce.com

TYLER J. BERGAN
POWERIT SOLUTIONS
114 ALASKAN WAY SOUTH 201
SEATTLE, WA 98104
tylerb@poweritsolutions.com

Yuliya Shmidt
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4104
SAN FRANCISCO, CA 94102-3214
ys2@cpuc.ca.gov

ATTACHMENT B

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-4220

January 29, 2009

R E S O L U T I O N

Resolution E-4220. Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) are authorized to modify the trigger condition for the Base Interruptible Program (BIP).

By Advice Letter (AL) 3360-E filed on November 12, 2008 by PG&E, AL 2288-E filed on November 12, 2008 by SCE, and AL 2040-E filed on November 12, 2008 by SDG&E.

SUMMARY

This Resolution approves PG&E's, SCE's, and SDG&E's proposal to modify the BIP by adding a new trigger condition for the program: a Warning notice issued by the California Independent System Operator (CAISO) along with a determination by the CAISO that a Stage 1 emergency is imminent consistent with its operating procedure E-508B. Other triggers for the program will remain in effect, and no changes will be made to program incentives.

A one-time thirty day adjustment period is also authorized to give BIP participants the opportunity to adjust their Firm Service Level (FSL) or to opt-out of the program after they have been informed of the additional trigger condition.

The trigger condition change adopted here is an interim solution to a long-standing debate on how to best align emergency-triggered programs with CAISO operational practices. Further refinements to emergency-triggered programs are expected to occur in Phase 3 Order Instituting Rulemaking (OIR)¹.

¹ R.07-01-041

This resolution does not require a mandatory test event for BIP, but instead directs SCE to modify its BIP tariff to include an option to call a test event, consistent with PG&E's and SDG&E's BIP tariffs.

This Resolution also directs PG&E, SCE and SDG&E to make efforts to retain BIP participants in demand response programs, not just the BIP.

BACKGROUND

BIP is a demand response program that provides load reductions during emergency situations

The BIP is an emergency-triggered demand response program that the CAISO can dispatch for system emergencies, and the utilities (PG&E, SCE, and SDG&E) can dispatch for local emergencies to provide load relief. Customers enrolled in BIP receive incentive payments in exchange for committing to reduce their electrical usage to a contractually-established amount of kW, also called their Firm Service Level (FSL). Participants who fail to reduce their load to their FSL are subject to a financial penalty assessed on a kW per hour basis. Participants in the BIP program statewide are able to provide approximately 880 MWs of load drop in the event the program is triggered.

Currently, the BIP is triggered when the CAISO declares a Stage 2 Emergency (when operating reserves are less than 5 percent). CAISO has expressed opposition to current Commission policy that allows the utilities to count the BIP towards meeting their Resource Adequacy (RA) requirement on the grounds that BIP can only be called after an emergency has been declared, and thus do not contribute to the CAISO's operating reserve requirements. The utilities have asserted that BIP should continue to count for RA because it allows the utilities to avoid procuring additional generation capacity. Representatives of the large customers who participate in BIP have asserted that not counting BIP for RA will substantially reduce the incentives offered for the program, and thereby risk customer migration from the program and the loss of reliable MWs for emergencies. The issue of aligning emergency-triggered demand response programs (like BIP) with CAISO operational practices has been raised in the DR OIR Phase 3 Assigned Commissioner's Ruling dated July 18, 2008².

² <http://docs.cpuc.ca.gov/efile/RULC/85507.pdf>

The Utilities Propose to Trigger the BIP Prior to a Stage 1 Emergency

The utilities, the CAISO, and the large customer representatives - the California Manufactures and Technology Association (CMTA) and the California Large Energy Consumers Association (CLECA) - met to discuss these issues and negotiate a revision to the BIP. The aforementioned parties reached an agreement to modify BIP by adding a new trigger condition: a Warning notice issued by the CAISO and when Stage 1 is imminent. Specifically the following steps would be followed for the new trigger:

- CAISO forecasts a Stage 1 emergency and issues a Warning.
- CAISO will then take all necessary steps to prevent the further degradation of its operating reserves as outlined in CAISO's emergency operating procedure E-508B.
- If CAISO still determines that a Stage 1 emergency is imminent, it may then dispatch the BIP resource.

To effectuate the new trigger conditions as outlined above, the utilities filed advice letters on November 12, 2008. The proposed changes in the tariff will effectively allow the CAISO to call BIP before a Stage 1 emergency once it has exhausted all other options to prevent further degradation of its operating reserves. The other triggering conditions for the BIP (local emergencies, Stage 2 alerts or test events) will remain. No change is proposed for the BIP incentive.

Upon approval of the BIP tariff modification, the utilities also proposed a one-time thirty day adjustment period to allow participants the opportunity to adjust their FSLs or to opt-out of the program. The utilities requested that this adjustment period (or opt-out window) commence 15 days after approval of the advice letter filings.

Upon the modification of BIP in accordance with the above proposal, CAISO has agreed to support the continued inclusion of BIP capacity as RA capacity. The aforementioned parties have also agreed to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive DR program during the 2010 to 2011 timeframe.

NOTICE

Notice of PG&E AL 3360-E, SCE AL 2288-E, and SDG&E AL 2040-E were made by publication in the Commission's Daily Calendar. PG&E, SCE and SDG&E state that a copy of its Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-B. The Utilities also notified the service lists of R.07-01-041 and A.08-06-001 et al. by email.

PROTESTS

Responses to PG&E's AL 3360-E and SCE's AL 2288-E were filed by EnerNOC, Inc (EnerNOC) on December 1, 2008. The CAISO filed comments on all three advice letters on December 2, 2008. Replies to EnerNOC's response were filed by PG&E on December 8, 2008 and by SCE on December 9, 2008.

DISCUSSION

The new BIP trigger will temporarily resolve CAISO's concern about counting BIP for RA purposes and should be approved.

CAISO and EnerNOC support the proposed BIP trigger condition as described above. The proposed BIP trigger will result in the CAISO's support for counting BIP towards the RA requirements of the utilities, provided that the utilities and other affected parties continue meaningful discussions to promote the voluntary transition of large customers to a price-responsive demand response program during the 2010 to 2011 timeframe. We appreciate the collaborative efforts among the parties and support the proposed additional BIP trigger condition. The new trigger is an interim solution, as the DR Phase 3 of the OIR³ will make final determinations regarding emergency-triggered demand response program policy and the ultimate design of these programs.

Requiring mandatory annual test events for BIP should be deferred to Phase 3 of R.07-01-041. SCE should however amend its BIP tariff so that it has the discretion to test its BIP program.

For both of PG&E's and SCE's BIP programs, EnerNOC encourages the Commission to require at least one test event per year because it will 1) increase

³ R.07-01-041

the level of assurance that BIP resources are firm resources and should continue to qualify for RA purposes, 2) provide more information on how much actual load reduction is likely to be available in the event of a real emergency, and 3) ensure that only performing customers remain in the program.

SCE argues that EnerNOC's request for annual testing is unnecessary because the program's performance in the past has proven BIP to be a reliable resource. SCE claims that it has already determined the likely load impact from BIP based on the difference between each participant's average maximum demand and their respective FSL given the fact that a financial penalty is applied if a participant fails to reduce load to their FSL. Based on two events that had occurred in the past, SCE states that its participants' compliance rates were 98.5 percent for August 25, 2005 and 96 percent for July 24, 2006. In addition, SCE also tests the Remote Terminal Unit notification devices and phone system on a monthly basis and believes this is sufficient enough to remind customers of their responsibility to perform.

In its reply comments, PG&E argued that it has the option to call up to two test events per year and believes that it should retain the flexibility to avoid calling a test event when an actual event had been called for that year.

Through a data request, Energy Division found out that in the last five years, PG&E and SDG&E operated the BIP three times while SCE triggered the program twice⁴. EnerNOC's position implies that triggering BIP on an average of once every other year is not enough to determine the firmness of the resource for either RA or day-to-day operational purposes. EnerNOC also believes that mandatory test events will ferret out customers who do not perform.

The issue of mandatory test events for the BIP program is a technical question (how many data points are considered sufficient to determine the firmness of a resource for RA and/or day-to-day operational needs) as well as a policy question (eg. does the absence of mandatory test events in IOU-operated DR programs impact the integration of emergency-triggered demand response with the CAISO's Market Redesign and Technology Upgrade (MRTU)?). Phase 3 of the Demand Response OIR (R.07-01-041) is the appropriate forum to further

⁴ Only one of the utility events noted here was a test event.

evaluate and vet this issue as that proceeding is reviewing our policies with respect to emergency-triggered demand response programs, their potential alignment with the CAISO's wholesale markets, and their design. Furthermore the advice letter process is limited to just the utilities and parties who have filed comments on the advice letters, and we believe formal input from other stakeholders is appropriate. For example more information is needed from the CAISO as to what it believes is necessary to evaluate the firmness of these programs and if mandatory test events have an impact on MRTU integration. Therefore at this time, we decline to adopt a mandatory test event for the BIP program as recommended by EnerNOC, but we will take up this issue in Phase 3 of R.07-01-041.

Currently both PG&E and SDG&E have the discretion to call test events for BIP. SCE's BIP tariff does not provide a test event option. While we decline to adopt a mandatory annual test event for BIP at this time, we believe that SCE should have at least the discretion to test the program just as PG&E and SDG&E does. We will direct SCE to modify its BIP tariff so that it has the discretion to test the program.

The 30 day adjustment period is sufficient time for BIP customers to adjust their FSL or to opt-out of the program.

EnerNOC requested the proposed one-time 30-day adjustment period be changed from 30 days to 60 days, because 30 days is not sufficient time for all customers to make an informed decision. In its reply comments, PG&E and SCE argue that a period of 30 days, starting 15 days after final approval of the advice letter, is sufficient and is the standard norm. PG&E and SCE claim that customers have been notified that the proposed new trigger for BIP was being considered. We approve the one-time adjustment period for BIP customers to adjust their FSLs or opt-out of the program and we agree with the utilities that 30 days is a sufficient amount of time for BIP customers to understand the new trigger and make decisions on their participation in the program.

The Utilities should use the 30 day adjustment period to inform their BIP participants of other DR options.

EnerNOC takes issue with PG&E's statement that it "will make a strong effort to retain all customers in the (BIP) program" when it contacts participants about the trigger modification. EnerNOC argues that during the BIP opt-out period, PG&E should be focused on retaining customers in DR programs, not just in BIP. EnerNOC believes PG&E should devote its sales and service representatives to

be indifferent as to whether an existing BIP customer stays in BIP, or join other PG&E DR programs such as Peak Choice, AMP contract portfolios, and etc. In its reply comment, PG&E states that its primary goal is to retain existing customers in BIP and offer customers other DR options if customers feel BIP is not a viable option. We see the one-time adjustment period for BIP participants as an opportunity to inform these customers of other DR opportunities that may be better suited for them. While EnerNOC's recommendation was directed specifically at PG&E, we direct all three utilities to make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days of public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding. The 30-day comment period for the draft of this resolution was neither waived or reduced.

Accordingly, on December 23, 2008 this draft resolution was served to the parties to PG&E AL 3360-E, SCE AL 2288-E, and SDG&E AL 2040-E, as well as the service lists for R.07-01-041 and A.08-06-001 et al., for public comment, and placed on the Commission's agenda for January 29, 2009. On January 14, 2009 EnerNOC, SCE and CAISO filed comments. No party filed a reply.

All the parties support the draft resolution. Although the draft resolution declines the specific recommendations from EnerNOC, EnerNOC supports the draft resolution, particularly its direction to the utilities to inform customers of other DR opportunities during the 30-day adjustment period.

SCE suggests minor changes for purposes of clarification.

FINDINGS

1. The BIP is an emergency-triggered demand response program that the CAISO can dispatch for system emergencies, and the utilities (PG&E, SCE, and SDG&E) can dispatch for local emergencies to provide load relief.
2. Customers enrolled in BIP receive incentive payments in exchange for committing to reduce their electrical usage to a contractually-established amount of kW, also called their Firm Service Level (FSL).
3. The utilities propose to modify BIP by adding a new trigger condition: a Warning notice issued by the CAISO and when Stage 1 is imminent.
4. The proposed BIP trigger will result in the CAISO's support for counting BIP towards the RA requirements of the utilities, provided that the utilities and other affected parties continue meaningful discussions to promote the voluntary transition of large customers to a price-responsive demand response program during the 2010 to 2011 timeframe.
5. The parties who support the new BIP trigger have agreed to continue to engage in meaningful discussions to promote the voluntary transition of large customers to a forward-bid paradigm that incorporates an option for large customers to participate in a viable, price-responsive DR program during the 2010 to 2011 timeframe.
6. The issue of requiring mandatory annual test events for BIP should be deferred to Phase 3 of R.07-01-041.
7. Unlike PG&E and SDG&E, SCE does not have the discretion to call a BIP test event.
8. SCE should modify its BIP tariff so that it has the discretion to test the program.
9. A 30 day adjustment period is sufficient time for BIP customers to adjust their FSL or to opt-out of the program.
10. The utilities shall make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.

THEREFORE IT IS ORDERED THAT:

1. The requests of Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric to add a new trigger condition for BIP as requested by Advice Letter 3360-E filed by PG&E, Advice Letter 2288-E filed by SCE, and Advice Letter 2040-E filed by SDG&E, are approved.
2. Southern California Edison shall modify its BIP tariff to include an option to call a test event at its discretion.

3. The utilities shall make a reasonable effort to educate current BIP participants of all DR opportunities during the 30 day adjustment period.
4. Southern California Edison shall file a supplemental advice letter in compliance with this resolution within 3 business days of the effective date of this resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 29, 2009; the following Commissioners voting favorably thereon:

/s/ Paul Clanon

Paul Clanon
Executive Director

MICHAEL R. PEEVEY
PRESIDENT
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2009 I served, on the Service List for Proceeding R.07-01-041, by electronic mail, a copy of the foregoing Supplemental Recommendation and Pre-Workshop Comments of the California Independent System Operator In Response to the Assigned Commissioner’s Amended Scoping Ruling.

Executed on July 27, 2009 at Folsom,
California
Anna

/s/ Anna Pascuzzo

Pascuzzo,
An employee of the California Independent
System Operator