

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

Order Instituting Rulemaking on Policies and Practices for the Commission's Transmission Assessment Process

R.04-01-026

---

**OPENING COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON THE PROPOSED OPINION CLOSING PROCEEDING**

---

	Charles F. Robinson, General Counsel Grant A. Rosenblum, Regulatory Counsel California Independent System Operator 151 Blue Ravine Road Folsom, CA 95630 Telephone: 916-351-4400 Facsimile: 916-351-2350
--	--

	Attorneys for <b>California Independent System Operator</b>
--	--

June 13, 2005

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

Order Instituting Rulemaking on Policies and Practices for the Commission's Transmission Assessment Process

R.04-01-026

---

**OPENING COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON THE PROPOSED OPINION CLOSING PROCEEDING**

---

Pursuant to the Rule 77 of the Commission's Rules of Practice and Procedure, and the Notice of Availability, mailed May 23, 2005, the California Independent System Operator Corporation ("CAISO") respectfully submits its opening comments on Administrative Law Judge Vieth's draft Opinion Closing Proceeding ("Draft Opinion").

**I.**

**THE COMMISSION SHOULD COMMIT TO  
CONTINUING THE EFFORT OF IMPROVING CALIFORNIA'S  
TRANSMISSION SITING AND PLANNING PROCESS**

The Draft Opinion proposes to close this rulemaking on the basis that the statutory timeline for resolution of quasi-legislative proceedings will elapse prior to final evaluation of a common economic methodology for assessing the need for new transmission infrastructure. As noted in the Draft Opinion, the proposed modification to General Order 131-D expressly relies on adoption of a common economic methodology to realize the goal of streamlining the existing transmission planning and siting process. Consistent with this salutary goal, the CAISO developed and submitted its "transmission economic assessment methodology" ("TEAM") to the

Commission to increase the efficiency of the transmission evaluation process, improve the accuracy of the evaluation, and add greater predictability to regulatory outcomes. The CAISO also complied with directives in the Order Instituting Rulemaking for submission of standards for assessing project need based on reliability. The CAISO acknowledges that it is reasonable not to piece-meal any proposed amendment to General Order 131-D by separately evaluating the reliability and economic criteria. As such, absent the ability to timely review TEAM, the CAISO recognizes the prematurity of the present rulemaking proceeding.

However, the CAISO strongly supports the objective of this rulemaking. The Commission should not allow the temporal limitations on resolving quasi-legislative proceedings to serve as an excuse for delaying progress toward rationalizing the transmission planning and siting process in California. In this regard, the CAISO is concerned with the qualifications and ambiguity in the Draft Opinion surrounding the Commission's intention to continue the rulemaking process initiated in this proceeding. The Draft Opinion notes that the Commission "will open a new rulemaking in the future," but only "as necessary." Similarly, the Draft Opinion only commits to "continue to reevaluate the need for a new rulemaking or other appropriate proceeding" as assessment of TEAM moves forward. Rather than create uncertainty, the Commission should commit to commencing a new rulemaking proceeding that seeks to ensure coordination between the CAISO's transmission planning responsibilities, the California Energy Commission's Integrated Energy Planning Report, and the Commission's statutory authority.<sup>1</sup>

---

<sup>1</sup> The Draft Opinion accurately notes that staffs of the Commission, the CEC and the CAISO are currently engaged in informal discussions regarding the resource planning process. This informal process, as well as any effects from the Governor's recent proposal to create a Department of Energy, can be incorporated into the new rulemaking proceeding. The reality is that regardless of which governmental agency possesses the authority for siting transmission facilities, coordination with the CAISO planning and approval procedures is prudent to avoid duplication of effort and enhance the predictability of the process. This, in turn, will facilitate infrastructure investment and help ensure that resources will be constructed in time to meet the projected need.

As noted in the Draft Opinion, the Commission can reasonably commitment to a future rulemaking proceeding because of the current opportunity to move forward on evaluating TEAM. This opportunity exists based on potential coordination with Application 05-04-015 in which Southern California Edison seeks authority to construct the 500 kV Palo Verde-Devers #2 line (“PVD2”). The CAISO utilized TEAM to perform an independent economic feasibility assessment of PVD2 and therefore TEAM presently can be reviewed in practical application. Review of TEAM as a common evaluation platform, however, should not prejudice the PVD2 project or otherwise delay A.05-04-015. How this coordination is accomplished should be determined following a prehearing conference in either existing I.00-11-001 or a new proceeding specifically opened for evaluating TEAM. The Draft Opinion should affirmatively announce the Commission’s intention to utilize the CAISO’s PVD2 analysis to advance approval of a common economic methodology.

///

///

///

///

///

///

///

///

///

///

///

///

///

## II.

### CONCLUSION

The CAISO recognizes the Commission's procedural limitations may compel closure of the instant rulemaking proceeding. However, the Commission should explicitly commit to opening a new rulemaking proceeding to accomplish the objectives articulated in this proceeding. In addition, the Commission should include in this opinion the anticipated process for reinvigorating the Commission's review of the CAISO's TEAM approach through either the existing I.00-11-001 proceeding or an anticipated new proceeding.

Respectfully submitted,



---

Charles F. Robinson, General Counsel  
Grant A. Rosenblum, Regulatory Counsel  
California Independent System Operator  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: 916-351-4400  
Facsimile: 916-351-2350

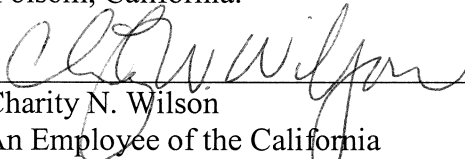
Attorneys for  
**California Independent System Operator**

Date: June 13, 2005

## CERTIFICATE OF SERVICE

I hereby certify that I have served, this day, a copy of the foregoing Opening Comments of the California Independent System Operator Corporation on the Proposed Opinion Closing Proceeding on the service list for **R.04-01-026** by electronic mail to each party.

Executed on June 13, 2005, at Folsom, California.

  
\_\_\_\_\_  
Charity N. Wilson  
An Employee of the California  
Independent System Operator

ROGER A. BERLINER  
MANATT, PHELPS & PHILLIPS, LLP  
700 12TH STREET, N.W., STE. 1200  
WASHINGTON, DC 20005  
rberliner@manatt.com  
R.04-01-026

MICHAEL D. MACKNESS  
SOUTHERN CALIFORNIA EDISON CO.  
PO BOX 800  
ROSEMEAD, CA 91770  
mike.mackness@sce.com  
R.04-01-026

DON GARBER  
SEMPRA ENERGY  
101 ASH STREET, HQ13D  
SAN DIEGO, CA 92101  
dgarber@sempra.com  
R.04-01-026

SARA PICTOU  
OAK CREEK ENERGY SYSTEMS, INC.  
14633 WILLOW SPRINGS ROAD  
MOJAVE, CA 93501  
sara@oakcreekenergy.com  
R.04-01-026

MICHEL PETER FLORIO  
THE UTILITY REFORM NETWORK (TURN)  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
mflorio@turn.org  
R.04-01-026

MICHAEL B. DAY  
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
mday@gmssr.com  
R.04-01-026

LINDA Y. SHERIF  
CALPINE CORPORATION  
4160 DUBLIN BOULEVARD  
DUBLIN, CA 94568  
lsherif@calpine.com  
R.04-01-026

DAVID KATES  
DAVID MARK & COMPANY  
3510 UNOCAL PLACE, SUITE 200  
SANTA ROSA, CA 95403  
dkates@sonic.net  
R.04-01-026

DOUGLAS K. KERNER  
ELLISON, SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
dkk@eslawfirm.com  
R.04-01-026

DAVID SAUL  
SOLEL, INC.  
439 PELICAN BAY COURT  
HENDERSON, NV 89012  
dsaul@solel.com  
R.04-01-026

RANDALL W. KEEN  
MANATT PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BLVD.  
LOS ANGELES, CA 90064  
pucservice@manatt.com  
R.04-01-026

MICHAEL T. MEACHAM  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA, CA 91910  
mmeacham@ci.chula-vista.ca.us  
R.04-01-026

JOHN W. LESLIE  
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130  
jleslie@luce.com  
R.04-01-026

MARC D. JOSEPH  
ADAMS, BROADWELL, JOSEPH & CARDOZO  
651 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080  
mdjoseph@adamsbroadwell.com  
R.04-01-026

OSA ARMI  
SHUTE MIHALY & WEINBERGER LLP  
396 HAYES STREET  
SAN FRANCISCO, CA 94102  
armi@smwlaw.com  
R.04-01-026

SARA STECK MYERS  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121  
ssmyers@att.net  
R.04-01-026

STEVEN S. SCHLEIMER  
CALPINE CORPORATION  
4160 DUBLIN BLVD.  
DUBLIN, CA 94568  
sschleimer@calpine.com  
R.04-01-026

GRANT A. ROSENBLUM  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
grosenblum@caiso.com  
R.04-01-026

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS ASSN  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814  
steven@iepa.com  
R.04-01-026

DAVID L. HUARD  
MANATT, PHELPS & PHILLIPS, LLP  
11355 WEST OLYMPIC BOULEVARD  
LOS ANGELES, CA 90064  
PUCservice@manatt.com  
R.04-01-026

SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, ROOM 370  
ROSEMEAD, CA 91770  
case.admin@sce.com  
R.04-01-026

WILLIE GATERS  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA, CA 91910  
willieg@ci.chula-vista.ca.us  
R.04-01-026

HAROLD M. ROMANOWITZ  
OAK CREEK ENERGY SYSTEMS, INC.  
14633 WILLOW SPRINGS ROAD  
MOJAVE, CA 93501  
hal@rwitz.net  
R.04-01-026

MATTHEW FREEDMAN  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
freedman@turn.org  
R.04-01-026

GRANT GUERRA  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET, ROOM 3103  
SAN FRANCISCO, CA 94105  
gxgw@pge.com  
R.04-01-026

DAVID T. KRASKA  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94177  
dtk5@pge.com  
R.04-01-026

BARRY F. MCCARTHY  
MCCARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113  
bmcc@mccarthyllaw.com  
R.04-01-026

ANDREW BROWN  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
abb@eslawfirm.com  
R.04-01-026

JAMES H. CALDWELL JR.  
PPM ENERGY  
1125 NW COUCH STREET, SUITE 700  
PORTLAND, OR 97209  
james.caldwell@ppmenergy.com  
R.04-01-026

JAMES KRITIKSON  
KRITIKSON & ASSOCIATES, INC.  
1997 VIA ARROYO  
LA VERNE, CA 91750  
jkritikson@yahoo.com  
R.04-01-026

ERIN K. MOORE  
SOUTHERN CALIFORNIA EDISON CO.  
PO BOX 800  
ROSEMEAD, CA 91770  
Erin.Moore@sce.com  
R.04-01-026

ELIZABETH HULL  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA, CA 91910  
ehull@ci.chula-vista.ca.us  
R.04-01-026

DONALD C. LIDDELL, P.C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
liddell@energyattorney.com  
R.04-01-026

CHRIS BING  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP02-170  
SAN DIEGO, CA 92123  
cbing@semprautilities.com  
R.04-01-026

SCOTT J. ANDERS  
SAN DIEGO REGIONAL ENERGY OFFICE  
8520 TECH WAY - SUITE 110  
SAN DIEGO, CA 92123  
scott.anders@sdenery.org  
R.04-01-026

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123-1530  
centralfiles@semprautilities.com  
R.04-01-026

JANE H. TURNBULL  
LEAGUE OF WOMEN VOTERS OF CA  
64 LOS ALTOS SQUARE  
LOS ALTOS, CA 94022  
jturnbu@ix.netcom.com  
R.04-01-026

RENEE H. GUILD  
AREVA T&D CORP.  
2481 PORTERFIELD COURT  
MOUNTAIN VIEW, CA 94040  
guildrenee1@aol.com  
R.04-01-026

DIANE I. FELLMAN  
LAW OFFICES OF DIANE I. FELLMAN  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102  
difellman@fellmanlaw.com  
R.04-01-026

DEVRA BACHRACH  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
dbachrach@nrdc.org  
R.04-01-026

SUSAN V. LEE  
ASPEN ENVIRONMENTAL GROUP  
235 MONTGOMERY STREET, ROOM 935  
SAN FRANCISCO, CA 94104  
slee@aspeneg.com  
R.04-01-026

MICHELLE L. WILSON  
PACIFIC GAS AND ELECTRIC COMPANY, MAIL CODE  
B30A  
77 BEALE STREET, ROOM 3179  
SAN FRANCISCO, CA 94105  
mlw3@pge.com  
R.04-01-026

JOE MIGOCKI  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105-1890  
j3m9@pge.com  
R.04-01-026

PETER BRAY  
PETER BRAY AND ASSOCIATES  
3566 17TH STREET, SUITE 2  
SAN FRANCISCO, CA 94110-1093  
peterbray@yahoo.com  
R.04-01-026

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVE.  
SAN FRANCISCO, CA 94110-1431  
cem@newsdata.com  
R.04-01-026

ANDREW ULMER  
SIMPSON PARTNERS, LLP  
900 FRONT STREET, SUITE 300  
SAN FRANCISCO, CA 94111  
andrew@simpsonpartners.com  
R.04-01-026

CHRISTOPHER HILEN  
DAVIS WRIGHT TREMAINE, LLP  
ONE EMBARCADERO CENTER, SUITE 600  
SAN FRANCISCO, CA 94111  
chrishilen@dwt.com  
R.04-01-026

DANIELLE MERIDA  
BINGHAM MCCUTCHEN  
3 EMBARCADERO, 18TH FLOOR  
SAN FRANCISCO, CA 94111  
danielle.merida@bingham.com  
R.04-01-026

WILLIAM KISSINGER  
BINGHAM MCUTCHEN  
3 EMBARCADERO CENTER, 18TH FLOOR  
SAN FRANCISCO, CA 94111  
William.Kissinger@Bingham.com  
R.04-01-026

BRIAN ORION  
329 FREDERICK STREET  
SAN FRANCISCO, CA 94117  
orionb@uschastings.edu  
R.04-01-026

LAW DEPARTMENT FILE ROOM  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO, CA 94120-7442  
cpuccases@pge.com  
R.04-01-026

BERNARD LAM  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B10C  
SAN FRANCISCO, CA 94177  
bxlc@pge.com  
R.04-01-026

FLOYD KENEIPP  
SUMMIT BLUE CONSULTING  
5433 CLAYTON ROAD SUITE K-342  
CLAYTON, CA 94517  
fkeneipp@pacbell.net  
R.04-01-026

KEITH WHITE  
931 CONTRA COSTA DRIVE  
EL CERRITO, CA 94530  
keithwhite@earthlink.net  
R.04-01-026

ELLEN YEOMAN  
255 QUARTZ CIRCLE  
LIVERMORE, CA 94550  
ehynag@comcast.net  
R.04-01-026

MRW & ASSOCIATIES, INC.  
1999 HARRISON STREET, SUITE 1440  
OAKLAND, CA 94612  
mrw@mrwassoc.com  
R.04-01-026

REED V. SCHMIDT  
BARTLE WELLS ASSOCIATES  
1889 ALCATRAZ AVENUE  
BERKELEY, CA 94703  
rschmidt@bartlewells.com  
R.04-01-026

NANCY RADER  
CALIFORNIA WIND ENERGY ASSOCIATION  
1198 KEITH AVENUE  
BERKELEY, CA 94708  
nrader@calwea.org  
R.04-01-026

RYAN WISER  
BERKELEY LAB, MS-90-4000  
ONE CYCLOTRON ROAD  
BERKELEY, CA 94720  
rhwiser@lbl.gov  
R.04-01-026

CHRISTOPHER J. MAYER  
MODESTO IRRIGATION DISTRICT  
PO BOX 4060  
MODESTO, CA 95352-4060  
chrism@mid.org  
R.04-01-026



GAYATRI M. SCHILBERG  
JBS ENERGY, INC.  
311 D STREET, SUITE A  
WEST SACRAMENTO, CA 95605  
gayatri@jbsenergy.com  
R.04-01-026

CALIFORNIA INDEPENDENT SYSTEM OPERATOR C  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
e-recipient@caiso.com  
R.04-01-026

ED CHANG  
FLYNN RESOURCE CONSULTANTS, INC.  
2165 MOONSTONE CIRCLE  
EL DORADO HILLS, CA 95762  
edchang@flynnrci.com  
R.04-01-026

MELANIE GILLETTE  
DUKE ENERGY NORTH AMERICA  
980 NINTH STREET, SUITE 1420  
SACRAMENTO, CA 95814  
mgillette@duke-energy.com  
R.04-01-026

KAREN NORENE MILLS  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
kmills@cfbf.com  
R.04-01-026

Aaron J Johnson  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5210  
SAN FRANCISCO, CA 94102-3214  
ajo@cpuc.ca.gov  
R.04-01-026

Philippe Auclair  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5218  
SAN FRANCISCO, CA 94102-3214  
pha@cpuc.ca.gov  
R.04-01-026

BRENDAN MCCARTHY  
CALIFORNIA LEGISLATURE  
925 L STREET, SUITE 1000  
SACRAMENTO, CA 95814  
brendan.mccarthy@lao.ca.gov  
R.04-01-026

KAREN GRIFFIN  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS 39  
SACRAMENTO, CA 95814  
kggriffin@energy.state.ca.us  
R.04-01-026

JUDY GRAU  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET MS-46  
SACRAMENTO, CA 95814-5512  
jgrau@energy.state.ca.us  
R.04-01-026

RICHARD MCCANN  
M.CUBED  
2655 PORTAGE BAY ROAD, SUITE 3  
DAVIS, CA 95616  
rmccann@umich.edu  
R.04-01-026

CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
e-recipient@caiso.com  
R.04-01-026

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1460  
SACRAMENTO, CA 95814  
mclaughlin@braunlegal.com  
R.04-01-026

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814-3109  
lmh@eslawfirm.com  
R.04-01-026

STEVE MUNSON  
VULCAN POWER COMPANY  
1183 NW WALL STREET, SUITE G  
BEND, OR 97701  
smunson@vulcanpower.com  
R.04-01-026

James E. Scarff  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5121  
SAN FRANCISCO, CA 94102-3214  
jes@cpuc.ca.gov  
R.04-01-026

Scott Logan  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
sjl@cpuc.ca.gov  
R.04-01-026

CLARE LAUFENBERG  
CALIFORNIA ENERGY COMMISSION  
1516 9TH ST., MS 46  
SACRAMENTO, CA 95814  
claufenb@energy.state.ca.us  
R.04-01-026

MONICA SCHWEBS  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-14  
SACRAMENTO, CA 95814  
mschwebs@energy.state.ca.us  
R.04-01-026

JANEE MARLAN  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVENUE, SUITE 120  
SACRAMENTO, CA 95821  
jmarlan@water.ca.gov  
R.04-01-026

VIKKI WOOD  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
6301 S STREET, MS A103  
SACRAMENTO, CA 95618-1899  
vwood@smud.org  
R.04-01-026

ALI AMIRALI  
CALPINE CORPORATION  
104 WOODMERE ROAD  
FOLSOM, CA 95630  
aamirali@calpine.com  
R.04-01-026

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
kdw@woodruff-expert-services.com  
R.04-01-026

LAURA O. LEWIS  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
6201 S STREET, M.S. B406  
SACRAMENTO, CA 95817-1899  
llewis@smud.org  
R.04-01-026

Maxine Harrison  
CALIF PUBLIC UTILITIES COMMISSION  
320 WEST 4TH STREET SUITE 500  
EXECUTIVE DIVISION  
LOS ANGELES, CA 90013  
omh@cpuc.ca.gov  
R.04-01-026

Jean Vieth  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5010  
SAN FRANCISCO, CA 94102-3214  
xjv@cpuc.ca.gov  
R.04-01-026

ALAN LOFASO  
PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
alo@cpuc.ca.gov  
R.04-01-026

EDWARD RANDOLPH  
ASSEMBLY UTILITIES AND COMMERCE COMMITTEE  
STATE CAPITOL  
SACRAMENTO, CA 95814  
edward.randolph@asm.ca.gov  
R.04-01-026

TOM FLYNN  
ELECTRICITY OVERSIGHT BOARD  
1516 NINTH STREET  
SACRAMENTO, CA 95814-5504  
R.04-01-026

JEANNIE S. LEE  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVENUE, ROOM 120  
SACRAMENTO, CA 95821  
jslee@water.ca.gov  
R.04-01-026

JOHN PACHECO  
CALIFORNIA DEPARTMENT OF WATER RESOURCES  
3310 EL CAMINO AVENUE  
SACRAMENTO, CA 95821  
jpacheco@water.ca.gov  
R.04-01-026