

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

Order Instituting Rulemaking on Policies)
And Practices for Advanced Metering,)
Demand Response, and Dynamic Pricing)
_____)

R.02-06-001

**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE DRAFT DECISION OF PRESIDENT PEEVEY AND ALJ COOKE
REGARDING OPINION APPROVING 2005 DEMAND RESPONSE GOALS,
PROGRAMS AND BUDGETS**

Charles F. Robinson, General Counsel
Anthony J. Ivancovich, Associate 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 the
California Independent System Operator

Dated: January 18, 2005

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

Order Instituting Rulemaking on Policies)	
And Practices for Advanced Metering,)	R.02-06-001
Demand Response, and Dynamic Pricing)	
<hr/>		

**OPENING COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE DRAFT DECISION OF PRESIDENT PEEVEY AND ALJ COOKE
REGARDING OPINION APPROVING 2005 DEMAND RESPONSE GOALS,
PROGRAMS AND BUDGETS**

In accordance with Article 19 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (“CAISO”) respectfully submits its opening comments on the draft decision of President Peevey and Administrative Law Judge (“ALJ”) Cooke entitled “Opinion Approving 2005 Demand Response Goals, Programs and Budgets,” mailed December 28, 2004, in the above-referenced proceeding (“Draft Decision”). The CAISO’s comments focus on the need (1) to preserve the efficacy of existing interruptible programs for summer 2005 and (2) to clarify the triggering event for the Demand Bidding Program.

**A. Changing the Existing Interruptible Program Structure for
Summer 2005 Creates Unnecessary System Reliability Risk**

In recognition of the “substantial concern” expressed by the regulatory community, including the CAISO, that capacity margins in California may be tight for summer 2005, President Peevey and ALJ Cooke jointly issued a “Ruling Directing the Filing of Rate Design Proposals for Large Customers” on December 8, 2004 (“ACR”). The ACR directed the utilities to propose new default critical peak pricing rate schedules

for all customers over 200 kW and to “move existing non-firm and interruptible rate customers onto that rate and concurrently enroll them in an optional program like PG&E’s proposed 2005 E-BIP.” (ACR at 2-3 and 8.) The CAISO commends President Peevey and ALJ Cooke for proactively addressing the State’s capacity needs and thoughtfully providing the utilities with flexibility in designing the new rate structure. However, the CAISO urges the Commission to carefully balance the promise of additional customer demand response with the certainty and reliability of existing interruptible programs.

The Draft Decision acknowledges that “[r]eliability-triggered programs, like interruptible rates ... serve as an important tool in mitigating unexpected shortages, local distribution problems, or transmission constraints that could result in system failures.” (Draft Decision at 5.) The CAISO agrees. Current interruptible programs, such as the Schedule I-6 rate, are relied upon by the CAISO to provide short-term responses to emergency conditions. Changing the current interruptible program structure under the compressed schedule provided in the ACR injects uncertainty into the performance of reliability demand response programs and potentially compromises the ability of the CAISO to address such unexpected contingency situations.

The CAISO’s emphasis on performance certainty going into summer 2005 leads to several general recommendations with respect to the interaction between the Draft Decision and ACR. First, customers currently enrolled in non-firm interruptible rate programs should not be required to convert to relatively untested programs, such as the E-BIP program referenced in the ACR. This recommendation should not be construed as hostility to E-BIP or any other proposed interruptible program. Indeed, based on the

small quantity of estimated incremental MW the utilities anticipate attributing to day-of reliability programs for summer 2005, it is clear that new, creative programs must be developed to increase customer participation. Second, consistent with the foregoing, new non-firm interruptible programs should be marketed aggressively to customers not currently enrolled in reliability-based demand response programs. Third, all customers enrolled in qualifying reliability-based programs should be allowed to opt-out of the critical peak pricing default tariff with no hedge premium.

The CAISO recognizes that critical peak pricing is intended to address an anticipated, chronic supply shortage, not mitigating emergencies. Notwithstanding this essential goal, the ability of the CAISO to effectively address unexpected system contingencies requires that the CAISO have voluntary, locationally diverse load shedding capability. The needed availability of curtailable load is limited to the extent critical peak pricing effectively reduces a customer's consumption to its firm service level and thereby may reduce the demand response available to mitigate system contingencies.

Thus, the CAISO does not dispute the Draft Decision's election not to reopen existing non-firm interruptible rates. The CAISO does, however, believe that the Draft Decision should be modified as stated above to provide additional guidance in developing the new tariffs called-for by the ACR.

B. Demand Bidding Program Trigger Should Be Clarified

As described in the Draft Decision, each utility currently administers an optional Demand Bidding Program ("DBP"). The DBP generally allows customers to "bid" an amount of MWs that the customer is willing to reduce from its normal load level and, in return, the customer receives a specified per MW price for the actual amount of load

reduced. No penalties are assessed for a failure to perform. (Draft Decision at 19.)

The Draft Decision proposes to adopt numerous salutary changes to the DBP.¹ One such change involves modifying the “trigger” for utility DBP bid solicitation. Previously, the DBP triggered when forecasted market prices were equal to or greater than \$.15/kWh. The Draft Decision notes that this price threshold was never triggered, in part, because of the moderating effects of long-term contracts on spot electricity prices. This fact, along with the current absence of a transparent day-ahead market, led the Draft Decision to replace the DBP price trigger with a system conditions trigger based on the CAISO issuing a “Stage 1 alert.” (Draft Decision at 21.) The use of CAISO “Stage 1 alert” nomenclature is inaccurate and should be modified to simply refer to an CAISO “alert.”

Stated simply, the CAISO does not utilize the terms Stage 1 and alert together in a manner that applies to the day-ahead time frame relevant to the DBP. The term “Stage 1” refers to a classification of emergency notice. An emergency notice, at any stage, is more of a “real-time” notice in that the CAISO declares emergencies when an operating reserve shortfall is unavoidable or is forecast to occur within the next few hours. In contrast, although an alert notice may be issued at any time there is a significant loss of generating or transmission resources, an alert notice generally occurs after the close of the Day-Ahead Market. The alert advises of marginal operating reserves and requests a market response. Thus, in order to provide bidders a day-ahead notice and permit utilities

¹ The CAISO concurs in the Draft Decision’s conclusion to eliminate the day-of components of the DBP. The performance of demand response programs designed to provide a prompt reaction to system emergencies must be reasonably predictable and certain. The CAISO agrees that the program elements of the DBP, even as modified, does not provide the necessary certainty and customers with load that can be reduced on short notice should be urged to participate in the Base Interruptible Programs.

to adjust their procurement accordingly, the DBP should be triggered simply by an CAISO alert, not Stage 1 alert.

Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission modify the Draft Decision consistent with the above-referenced recommendations.

Specifically, the CAISO urges the Commission to:

1. Modify Draft Decision section 5.2.2 to clarify that (a) customers currently enrolled in non-firm interruptible rate programs should not be required to convert to new untested programs, such as the E-BIP program referenced in the ACR, (b) new non-firm interruptible programs should be marketed aggressively to customers not currently enrolled in reliability-based demand response programs, and (c) all customers enrolled in qualifying reliability-based programs should be allowed to opt-out of the critical peak pricing default tariff with no hedge premium.
2. Modify Draft Decision section 5.1.2 to replace the trigger for the DBP from an CAISO “Stage 1 alert,” to an CAISO “alert.”

January 18, 2005

Respectfully Submitted:

By: 

Grant A. Rosenblum

Attorney for

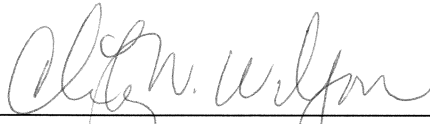
California Independent System

Operator Corporation

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 Draft Decision of President Peevey And ALJ Cooke Regarding Opinion Approving 2005 Demand Response Goals, Programs And Budgets on the service list for R.02-06-001 by electronic mail to each party.

Executed on January 18, 2005, at Folsom, California.



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

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
abb@eslawfirm.com

JIM MCGILL
4312 LISA DRIVE
UNION CITY, CA 94587
ackdmcgill@aol.com

AHMAD FARUQUI
CHARLES RIVER ASSOCIATES
29 TYSON COURT
DANVILLE, CA 94526
afaruqui@crai.com

ALAN FERNANDES
NIELSEN & MERKSAMER
1415 L ST STE 1200
SACRAMENTO, CA 95814-3972
afernandes@nmgovlaw.com

PATRICK MCDONNELL
AGLAND ENERGY SERVICES, INC.
2000 NICASIO VALLEY RD.
NICASIO, CA 94946
aglandenergy@earthlink.net

Amy Chan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, AREA 4-A
SAN FRANCISCO, CA 94102-3214
amy@cpuc.ca.gov

ANDREW CHAMBERLAIN
CLIENT SOLUTIONS GROUP
5400 LEGACY DRIVE
B1-1A-01
PLANO, TX 75024
andrew.chamberlain@eds.com

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

ANDREW A. GOETT
MICROECONOMICS & FINANCIAL STUDIES
DIV
2ND AND D STREETS SW, FNOB RM. 411
WASHINGTON, DC 20515
andy.goett@cbo.gov

ANGELA CHUANG
ALSTOM EAI
101 METRO DRIVE, SUITE 750
SAN JOSE, CA 95110
angela.chuang@esca.com

ANDREW MINGST
LAWRENCE BERKELEY NATIONAL
LABORATORY
ONE CYCLOTRON ROAD
BERKELEY, CA 94720
asmingst@lbl.gov

ANN L. TROWBRIDGE
DOWNEY BRAND SEYMOUR & ROHWER LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
atrowbridge@downeybrand.com

BEN BOYD
ITRON, INC.
5430 HICKORY VILLAGE DRIVE
KINGWOOD, TX 77345
ben.boyd@itron.com

BENEDICT G. DEUTSCH
ITRON, INC.
4401 BLAND ROAD
RALEIGH, NC 27609
ben.deutsch@itron.com

BETTINA FOSTER
GLOBAL ENERGY PARTNERS, LLC
77-350 AINANANI STREET
KAILA-KONA, HI 96740
bfoster@gepllc.com

C. WILLIAM UHR, JR.
UHR TECHNOLOGIES, LP
6705 VALLEY BROOK DRIVE
FALLS CHURCH, VA 22042
billuhr@erols.com

ROBERT BELHUMEUR
CORPORATE SYSTEMS ENGINEERING
24946 DANA FIR
DANA POINT, CA 92629
Bob.Belhumeur@cox.net

BOB FICKES
CALIFORNIA OIL PRODUCERS ELECTRIC CO-
OP.
301 EAST OCEAN BLVD, SUITE 300
LONG BEACH, CA 90801
bobfic@earthlink.net

ROBERT B. GEX
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111-3611
bobgex@dwt.com

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

BRIAN CARDOZA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
brian.cardoza@sce.com

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

BRAD VINCENT
SMUD - ENERGY EFFICIENCY GROUP
6301 S ST., MS A103
SACRAMENTO, CA 95817-1899
bvince1@smud.org

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

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

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110
Cem@newsdata.com

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

CRAIG GOODMAN
NATIONAL ENERGY MARKETERS
ASSOCIATION
3333 K STREET NW, SUITE 110
WASHINGTON, DC 20007
cgoodman@energymarketers.com

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

Christopher J. Blunt
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 4209
SAN FRANCISCO, CA 94102-3214
cjb@cpuc.ca.gov

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
cmkehrein@ems-ca.com

ROGER L. CONKLING
UNIVERSITY OF PORTLAND
2539 S.W. HILL CREST DRIVE
PORTLAND, OR 97201
conkling@up.edu

CHARLES R. TOCA
UTILITY SAVINGS & REFUND, LLC
1100 QUAIL, SUITE 217
NEWPORT BEACH, CA 92660
ctoca@utility-savings.com

DAN DELUREY
DRAM
PO BOX 33957
WASHINGTON, DC 20033
dan.delurey@dramcoalition.org

DAN MERILATT
GOODCENTS SOLUTIONS
1899 PARKER COURT
STONE MOUNTAIN, GA 30087
dan.merilatt@goodcents.com

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

DAVE BEYER
EAST BAY MUNICIPAL UTILITY DISTRICT
375 11TH STREET, MS205
OAKLAND, CA 94607-4240
dbeyer@ebmud.com

DENISE RUSHING
TACTICAL PARTNERS CONSULTING
858 ROSEDALE AVE, APT 10 LAFAYETTE
REDDING, CA 94549-5000
denise.rushing@tacticalpartners.com

DAN GEIS
AGRICULTURAL ENERGY CONSUMERS
ASSO.
925 L STREET, SUITE 800
SACRAMENTO, CA 95814
dgeis@dolphingroup.org

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

CHRIS ANN DICKERSON, PHD
FREEMAN, SULLIVAN & CO.
100 SPEAR ST., 17/F
SAN FRANCISCO, CA 94105
dickerson03@fscgroup.com

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

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

DAVID WECHSLER
LANTHORN TECHNOLOGIES
201 SOUTH STREET
BOSTON, MA 2111
dwechsler@lanthorntechnologies.com

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

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

Edgar A. Quiroz
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 4209
SAN FRANCISCO, CA 94102-3214
eaq@cpuc.ca.gov

EDWARD C. REMEDIOS
33 TOLEDO WAY
SAN FRANCISCO, CA 94123-2108
ecrem@ix.netcom.com

ED YATES
980 NINTH STREET, SUITE 230
SACRAMENTO, CA 95814
ed@clfp.com

EVELYN KAHL
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
ek@a-klaw.com

ELLIE A. DOYLE
LANDIS+GYR INC.
2800 DUNCAN ROAD
LAFAYETTE, IN 47904
ellie.doyle@us.landisgyr.com

EMMETT KELLY, JR.
ITRON
2019 HILLCROFT DRIVE
FOREST HILL, MD 21050
emmett.kelly@itron.com

EILEEN PARKER
QUANTUM CONSULTING
2030 ADDISON STREET
BERKELEY, CA 94704
eparker@qcworld.com

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

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

BRUCE FOSTER
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102
fosterbc@sce.com

GARY PAUL
CP GEMINI ERNST AND YOUNG
200 N. SEPULVEDA BLVD
EL SEGUNDO, CA 90245
gary.e.paul@cgey.com

GLORIA BELL
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE, SUITE 120
SACRAMENTO, CA 95821
gbell@water.ca.gov

SUSAN ROBISON
GLOBAL ENERGY PARTNERS, LLC
3569 MT. DIABLO BLVD., SUITE 200
LAFAYETTE, CA 94549
gephq@gepllc.com

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

GREGORY LIZAK
IMSERV NORTH AMERICA
PO BOX 80926
SAN MARINO, CA 94118-8926
gregory.lizak@imserv.invensys.com

GRANT A. ROSENBLUM
ELECTRICITY OVERSIGHT BOARD
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
grosenblum@caiso.com

GERALD GRUNDSTEIN
GROUNDSTONE ENTERPRISE
4900 TASSAJARA ROAD, 1220
DUBLIN, CA 94568
groundstone@earthlink.net

JOEL M. HVIDSTEN
KINDER MORGAN ENERGY PARTNERS
1100 TOWN & COUNTY ROAD, SUITE 700
ORANGE, CA 92868
jhvidstenj@kindermorgan.com

JACK GREENHALGH
NEW ERA ENERGY, INC.
1423 BLUE HERON ROAD
VIRGINIA BEACH, VA 23454
jack@jackgreenhalgh.com

JAMES M. LEHRER
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
james.lehrer@sce.com

JAY EVENSEN
BUSINESS DEVELOPMENT
30000 MILL CREEK AVE. SUITE 100
ALPHARETTA, GA 30022
jay.evensen@cellnet.com

JANET BENISH
COSTCO WHOLESALE CORPORATION
999 LAKE DRIVE
ISSAQUAH, WA 98028
jbenish@costco.com

JOHN BERLIN
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE, CA 95678
jberlin@ncpa.com

JULIE BLUNDEN
KEM-XENERGY
492 9TH ST., STE. 220
OAKLAND, CA 94607
jblunden@kema-xenergy.com

JAMES R. CROSSEN
APX INCORPORATED
5201 GREAT AMERICA PARKWAY 522
SANTA CLARA, CA 95054
jcrossen@apx.com

JEFF FRANCETIC
LANDIS+GYR, INC.
14891 LAGO DRIVE
RANCHO MURIETA, CA 95683
jeff.francetic@us.landisgyr.com

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

JENNIFER R. HASBROUCK
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 345
ROSEMEAD, CA 91770
jennifer.hasbrouck@sce.com

JENNIFER HOLMES
ITRON INC.
153 WOODCREST PLACE
SANTA CRUZ, CA 95065
jennifer.holmes@itron.com

GERALD LAHR
ASSOCIATION OF BAY AREA GOVERNMENTS
PO BOX 2050
OAKLAND, CA 94604-2050
jerry@abag.ca.gov

Julie A Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 5203
SAN FRANCISCO, CA 94102-3214
jf2@cpuc.ca.gov

JOHN FLORY
ENMARKET CORPORATION
1229 VILLAVARDE LANE, SUITE A
DAVIS, CA 95616
jflory@enmarket.biz

JAMES P. LOSLEBEN
HONEYWELL/CANNON TECHNOLOGIES
815 HAZEL COURT
MENDOTA HTS., MN 55120-1626
jim@cannontech.com

JULIA K. LARKIN
KEMA-XENERGY
492 NINTH STREET, SUITE 220
OAKLAND, CA 94607
jlarkin@kema-xenergy.com

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

JEANETTE MERTZ
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630
jmertz@caiso.com

JOSEPH PETER COMO
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM.
234
SAN FRANCISCO, CA 94102
joe.como@sfgov.org

JOSEPH DESMOND
INFOTILITY, INC.
4847 HOPYARD ROAD, SUITE 4311
PLEASANTON, CA 94588
joe@infotility.com

JOHN PACHECO
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE, ROOM 120
SACRAMENTO, CA 95821
jpacheco@water.ca.gov

JOHN P. CLARKE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE, B10C
SAN FRANCISCO, CA 94120
jpc2@pge.com

JAMES PRICE
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
jprice@caiso.com

JOHN SALAMANSKI
ECHELON CORPORATION
1616 17TH STREET, STE 476
DENVER, CO 80202
jsalamanski@echelon.com

JOHN SUGAR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 42
SACRAMENTO, CA 95814
jsugar@energy.state.ca.us

JAMES R. TISCHER
CENTER FOR IRRIGATION TECHLOGY
863 TUFTS CT.
WOODLAND, CA 95695
jtischer@csufresno.edu

Jonathan J Reiger
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION ROOM 5130
SAN FRANCISCO, CA 94102-3214
jzr@cpuc.ca.gov

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843
karen@klindh.com

KEVIN T. CORNISH
DCSI
66 MARYLAND AVENUE
BERKELEY, CA 94707
kcornish@twacs.com

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

KEITH E. FULLER
ITRON, INC.
11236 EL CAMINO REAL
SAN DEIGO, CA 92130-2650
keith.fuller@itron.com

KEITH MCCREA
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
keith.mccrea@sablaw.com

KENT W. MUELLER
BRAYDEN AUTOMATION
1807 E. MULBERRY AVE
FORT COLLINS, CO 80524
kent@brayden.com

KEVIN FRASER
FRASER LIMITED
195 MICHELE CIRCLE
NOVATO, CA 94947
kevin@fraserlimited.com

KURT J. KAMMERER
K. J. KAMMERER & ASSOCIATES
PO BOX 60738
SAN DIEGO, CA 92166-8738
kjk@kjkammerer.com

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

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

KAREN NOTSUND
UC ENERGY INSTITUTE
2547 CHANNING WAY
BERKELEY, CA 94720-5180
knotsund@uclink.berkeley.edu

MARY KRAYESKE
CONSOLIDATED EDISON COMPANY OF NY 4
IRVING PLACE, ROOM 1815-S
LAW DEPARTMENT
NEW YORK, NY 10003
krayeskem@coned.com

KEVIN G. WISE
ALLEGHENY ENERGY
800 CABIN HILL DRIVE
GREENSBURG, PA 15601
KWISE1@allegHENYenergy.com

LISA A. HOM
STATESIDE ASSOCIATES, INC.
2300 CLARENDON BLVD., 4/F
ARLINGTON, VA 22201
lah@stateside.com

LAURA GENAO
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
laura.genao@sce.com

LOTHAR BUDIKE, JR.
POWERWEB TECHNOLOGIES, INC.
415 EAST BALTIMORE PIKE
MEDIA, PA 19065
lbudike@powerweb.com

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

LULU WEINZIMER
CALIFORNIA ENERGY CIRCUIT
695 9TH AVE. NO.2
SAN FRANCISCO, CA 94118
lisaweinzimer@sbcglobal.net

LARRY JOHNSON
SATEC UBC
10 MILLTOWN COURT
UNION, NJ 7083
ljohnson@oksatec.com

LEANDRA MACDONALD
ICF CONSULTING
60 BROADWAY
SAN FRANCISCO, CA 94111
lmacdonald@icfconsulting.com

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

LAWRENCE M. OLIVA
COREPOINT ASSOCIATES, INC.
22 TESORO
SAN CLEMENTE, CA 92673
lmo@corepointassociates.com

Lainie Motamedi
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 5119
SAN FRANCISCO, CA 94102-3214
lrm@cpuc.ca.gov

LISA URICK
SAN DIEGO GAS & ELECTRIC COMPANY
555 W. 5TH STREET, SUITE 1400
LOS ANGELES, CA 90013-1011
lurick@sempra.com

LON W. HOUSE
ASSOCIATION OF CALIFORNIA WATER
AGENCIES
4901 FLYING C ROAD
CAMERON PARK, CA 95682-9615
lwhouse@innercite.com

LINDA WRAZEN
SEMPRA ENERGY REGULATORY AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101
lwrazen@sempraglobal.com

DALFORD L. ENGLAND
GOODCENTS SOLUTIONS
1899 PARKER COURT
STONE MOUNTAIN, GA 30087
lynn.england@goodcents.com

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

MARIO NATIVIDAD
APPLIED METERING TECHNOLOGIES, INC.
9244 BERMUDEZ ST.
PICO RIVERA, CA 90660
Mario.Natividad@appliedmetering.com

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

Moises Chavez
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, AREA 4-A
SAN FRANCISCO, CA 94102-3214
mcv@cpuc.ca.gov

MARC D. JOSEPH
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BOULEVARD, SUITE 900
SOUTH SAN FRANCISCO, CA 94080
mdjoseph@adamsbroadwell.com

MICHAEL VECCHI
CELLNET BY ATOS ORIGIN
431 UNION ST.
MILLIS, MA 02054-1123
michael.vecchi@atosorigin.com

MICHAEL GIBBS SR.VP
ICF CONSULTING
14724 VENTURA BLVD. 1001
SHERMAN OAKS, CA 91403
michaelgibbs@icfconsulting.com

MICHAEL PETERS
BOC GASES, INC.
575 MOUNTAIN AVENUE
4W
MURRAY HILL, NJ 7974
Michel.Peters@us.gases.bcc.com

MIKE MONTOYA
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.,
ROSEMEAD, CA 91770
Mike.Montoya@sce.com

MIKE JASKE
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
mjaske@energy.state.ca.us

MARK J. BERMAN
DAVIS ENERGY GROUP
123 C STREET
DAVIS, CA 95616
mjberm@davisenergy.com

Michelle Cooke
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 5006
SAN FRANCISCO, CA 94102-3214
mlc@cpuc.ca.gov

M.L. CHAN
AURIGA CORPORATION
890 HILLVIEW COURT, SUITE 130
MILPITAS, CA 95035
mlchan@aurigacorp.com

MIKE MESSENGER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-28
SACRAMENTO, CA 95814
mmesseng@energy.state.ca.us

MICHAEL MILES
INFINITE CONSULTING
215 NW 138TH TERRACE, STE. 200
JONESVILLE, FL 32669
mmiles@infiniteconsulting.org

MICHAEL ALCANTAR
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201
mpa@a-klaw.com

ROBERT B. WEISENMILLER
MRW & ASSOCIATES, INC.
1999 HARRISON STREET, STE 1440
OAKLAND, CA 94612-3517
mrw@mrwassoc.com

MICHAEL SHAMES
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
mshames@ucan.org

MICHELE WYNNE
GRID SERVICES, INC.
5230 PACIFIC CONCOURSE DRIVE, SUITE 200
LOS ANGELES, CA 90045
mwynne@gridservices.com

NICOLE HOPPER
LAWRENCE BERKELEY NATIONAL
LABORATORY
ONE CYCLOTRON RD, MS 90-4000
BERKELEY, CA 94720
nchopper@lbl.gov

NORMAN J. FURUTA
DEPARTMENT OF THE NAVY
2001 JUNIPERO SERRA BLVD., SUITE 600
DALY CITY, CA 94014-3890
norman.furuta@navy.mil

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 SOUTH FLOWER ST., SUITE 1500
LOS ANGELES, CA 90071
npedersen@hanmor.com

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

PETER CANESSA
CALIFORNIA STATE UNIVERSITY
665 ASILO
FRESNO FOUNDATION
ARROYO GRANDE, CA 93420
pcanessa@charter.net

PATRICK J. FORKIN III
ROCKHOUSE RESEARCH
7711 CARONDELET AVE, STE. 306
CLAYTON, MO 63105
pforkin@rkhs.net

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

PATRICK J. POWER
1300 CLAY STREET, SUITE 600
OAKLAND, CA 94612
pjpowerlaw@aol.com

PAUL TAYLOR
R. W. BECK
14635 N. KIERLAND BLVD. SUITE 130
SCOTTSDALE, AZ 85254
ptaylor@rwbeck.com

PETER OUBORG
PACIFIC GAS AND ELECTRIC COMPANY
POST OFFICE BOX 7442
LAW DEPARTMENT
SAN FRANCISCO, CA 94120
pxo2@pge.com

DANIEL L. RIAL
KINDER MORGAN ENERGY PARTNERS
500 DALLAS STREET, SUITE 1110
ONE ALLEN CENTER
HOUSTON, TX 77002
raild@kindermorgan.com

BOYD WILSON
ROBERTSON-BRYAN, INC.
9766 WATERMANN RD., SUITE L-2
ELK GROVE, CA 95624
rbi@robertson-bryan.com

RENEE H. GUILD
AREVA T&D CORP.
101 METRO DRIVE, STE. 750
SAN JOSE, CA 95110-1099
renee.guild@areva-td.com

RUSS GOOLD
GLOBAL ENERGY PARTNERS
3569 MT. DIABLO BLVD., SUITE 200
LAFAYETTE, CA 94549
rgoold@geplc.com

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

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

ROB MCEVER
CELLNET BY ATOS ORIGIN
3218 IDLEWOOD WAY
FAYETTEVILLE, AZ 72703
Rob.McEver@atosorigin.com

GEORGE ROBERTS
SCHLUMBERGER SEMA
30000 MILL CREEK AVENUE
ALPHARETTA, GA 30022
roberts7@slb.com

MICHAEL ROCHMAN
SCHOOL PROJECT UTILITY RATE
REDUCTION
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520
RochmanM@spurr.org

ROGER GRAY
GOODCENTS SOLUTIONS
1899 PARKER COURT
STONE MOUNTAIN, GA 30087
roger.gray@goodcents.com

ROGER LEVY
LEVY AND ASSOCIATES
2805 HUNTINGTON ROAD
SACRAMENTO, CA 95864
rogerl47@sbcglobal.net

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

SHIRLEY FREDERICKSON
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B8R
SAN FRANCISCO, CA 94177
SAF5@pge.com

MARK SAVAGE
CONSUMERS UNION OF U.S., INC.
1535 MISSION STREET
SAN FRANCISCO, CA 94103
savama@consumer.org

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

KENNETH R. SCHWEIGERT
WORLD MINERALS, INC.
2500 MIGUELITO CYN RD
LOMPOC, CA 93436
schweigertk@worldminerals.com

Scarlett Liang-Uejio
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 4209
SAN FRANCISCO, CA 94102-3214
scl@cpuc.ca.gov

SCOTT J. ANDERS
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY - SUITE 110
SAN DIEGO, CA 92123
scott.anders@sdenenergy.org

SCOTT H. DEBROFF
LEBOEUF, LAMB, GREENE & MACRAE LLP
200 NORTH THIRD STREET, SUITE 300
PO BOX 12105
HARRISBURG, PA 17108-2105
sdebloff@llgm.com

SUSAN DOWLING
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
MAIL CODE B8R
SAN FRANCISCO, CA 94177-0001
SEB4@PGE.COM

STEPHEN GEORGE
CHARLES RIVER ASSOCIATES
285 HAMILTON AVENUE, SUITE 370
PALO ALTO, CA 94301-2539
sgeorge@crai.com

STANLEY I. ANDERSON
POWER VALUE INCORPORATED
964 MOJAVE CT
WALNUT CREEK, CA 94598
sia2@pwrval.com

Steven C Ross
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 4209
SAN FRANCISCO, CA 94102-3214
sro@cpuc.ca.gov

STEVEN R. RIVKIN
LAW OFFICE
8013 MAPLE RIDGE ROAD
BETHESDA, MD 20814-1307
srrivkin@msn.com

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

STEVEN MOSS
FRANCISCO COMMUNITY POWER
COOPERATIVE
2325 3RD STREET, STE 344
SAN FRANCISCO, CA 94120
steven@moss.net

TERRENCE J. MORAN
PUBLIC SERVICE ELECTRIC & GAS COMPANY
80 PARK PLAZA T-7
NEWARK, NJ 7102
terrence.moran@pseg.com

TANYA A. GULESSERIAN
ADAMS BROADWELL JOSEPH & GARDOZO
651 GATEWAY BOULEVARD, SUITE 900
SOUTH SAN FRANCISCO, CA 94080
tgulesserian@adamsbroadwell.com

TOM MULHOLLAND
GOLDEN ENERGY SERVICES, INC.
9088 S. RIDGELINE BLVD, STE. 104
HIGHLANDS RANCH, CO 80129
thomas.mulholland@goldenenergyservices.com

TOM NICOTRE
48 PASO NOGAL COURT.
PLEASANT HILL, CA 94523
tnicotre@attbi.com

TONY FOSTER
ITRON INC.
1010 ATLANTIC AVE
ALAMEDA, CA 94501
tony.foster@itron.com

ANDREW J. VAN HORN
VAN HORN CONSULTING
61 MORAGA WAY, SUITE 1
ORINDA, CA 94563
vhconsult@earthlink.net

VICKI L. THOMPSON
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-13
SAN DIEGO, CA 92101
vthompson@sempra.com

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

H. WARD CAMP
TWACS BY DCSI
5657 CAMPUS PARKWAY
HAZELWOOD, MO 63042
wcamp@twacs.com

BILL PHILLIMORE
PARAMOUNT FARMING COMPANY
33141 E. LERDO HIGHWAY
BAKERSFIELD, CA 93308
wdp@paramountfarming.com

CHRISTOPHER WEARE
PUBLIC POLICY INSTITUTE OF CALIFORNIA
500 WASHINGTON STREET, SUITE 800
SAN FRANCISCO, CA 94111
weare@ppic.org

DON MILLSTEIN
E-MON
ONE OXFORD VALLEY, SUITE 418
LANGHORNE, PA 19047

VANCE HALL
UDRI
2212 ARLINGTON DOWNS RD., SUITE 204
ARLINGTON, TX 76011

FRANK RUSSELL
METERSMART
1175 COMSTOCK RD.
HOLLISTER, CA 95023

MR. BOVANKOVICH
E-MON
ONE OXFORD VALLEY, SUITE 418
LANGHORNE, PA 19047

MICHAEL M. REIDENBACH
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
MAIL CODE B30A
SAN FRANCISCO, CA 94120

BRUCE MAST
FRONTIER ASSOCIATES LLC
PO BOX 31356
OAKLAND, CA 94604