

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

Order Instituting Rulemaking to Promote
Policy and Program Coordination and
Integration in Electric Utility Resource
Planning.

R.04-04-003

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION ON THE DRAFT
DECISION OF ALJ MAILED ON JUNE 28, 2004**

Anthony J. Ivancovich
Senior Regulatory Counsel
Stephen A. S. Morrison
Corporate Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-608-7135
Facsimile: 916-608-7296

Counsel for the
California Independent System Operator

Dated: July 1, 2004

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I. INTRODUCTION AND EXECUTIVE SUMMARY

In accordance with California Public Utilities Commission (“CPUC”) Rules 77.2 and 77.3, and the Notice of Availability of ALJ Draft Decision Interim Order Regarding Electricity Reliability Issues, the California Independent System Operator Corporation (“CAISO”) respectfully submits its comments on the Draft Decision of ALJ, titled Interim Order Regarding Electric Reliability (“Draft Decision”), which was mailed on June 28, 2004. The CAISO supports the Draft Decision and urges the CPUC to adopt the Draft Decision at its July 8, 2004 meeting, with the CAISO’s proposed clarifications regarding cost recovery and market power. The Draft Decision establishes the proper direction and, as suggested by the CAISO, should include, an expedited process to determine implementation details. This expedited process should last approximately two weeks following issuance of a final CPUC order and would allow the CAISO, the utilities and the CPUC to work out the details associated with up front guidance that can be provided to address market power concerns and facilitate cost recovery and general compliance with the CPUC’s order.

The CAISO submits that the Draft Decision constitutes a major step toward addressing certain scheduling and procurement practices that affect the efficient and the reliable operation of the electric transmission system in California. The CAISO commends the CPUC on its swift action to address acknowledged conditions that adversely impact the CAISO's ability to operate the transmission grid reliably.

The Draft Decision accurately recognizes that, in recent months, the CAISO has had to increasingly manage congestion and address location-specific operating requirements in real-time, rather than in the day-ahead time frame in certain parts of the transmission system. The CAISO concurs with the Draft Decision that transmission congestion arises in these areas, in part, due to the scheduling of resources that are not deliverable to load. These scheduling practices pose operational difficulties for the CAISO and raise concerns about reliability. Adoption of the recommendations in the Draft Decision will improve reliability by mitigating the excessive volume of real-time dispatch now experienced by the CAISO and allowing utilities to effectively serve their load.

The CAISO agrees with the characterization of the roles of the various parties as set forth in the Draft Decision. In particular, the CAISO agrees that it has the responsibility to ensure and maintain grid reliability on a day-to-day basis and that Load Serving Entities ("LSEs") have the responsibility to procure and schedule resources in a manner that enables the CAISO to reasonably carry out its responsibilities. The CAISO wholly endorses the Draft Decision's emphasis on the utilities' responsibility to effectively meet their customers' needs by taking into account of all CAISO-related commitment costs (*e.g.* congestion, re-dispatch, and must offer) in their procurement practices. The CAISO also agrees that the principles adopted in the Draft Decision should apply statewide to all jurisdictional entities. The CAISO recognizes that actions

taken by LSEs to comply with this decision may result in costs being incurred by LSEs that are different from those being incurred today. As stated in the Draft Decision, it is the expectation that, while procurement based on deliverability may add to the total costs incurred by LSEs, the significant reliability costs currently being incurred by the CAISO (and thus, the LSEs) will be reduced with effective LSE forward scheduling and dispatch. Accordingly, the CAISO commits to assist the CPUC as necessary in developing upfront standards and criteria that the LSEs can rely upon for purposes of subsuming purchases made pursuant to this order within the protection of AB 57.

The CAISO also is committed to providing the information and data necessary to permit the CPUC to monitor effectively the utilities' compliance with any final CPUC order. Further, the CAISO will work within the confines of its Tariff to provide useful information and guidance to facilitate compliance with any CPUC order.

Finally, the CAISO believes that any final CPUC order should provide further clarification and guidance regarding cost recovery and market power issues. First, the CAISO believes that the utilities should be permitted to recover all of their prudently incurred reliability costs through their FERC Reliability Services Tariffs and/or applicable CPUC cost recovery mechanisms, including AB 57. Second, the CPUC should set some guidelines for determining the prudence of expenditures associated with supporting reliable grid operations in the face of potential market power.

For the reasons set forth below, the CAISO urges the CPUC to adopt the proposed Findings of Fact and Conclusions of Law in the Draft Decision with the CAISO's clarifications regarding cost recovery and market power.

II. THE CPUC SHOULD ADOPT THE DRAFT DECISION SUBJECT TO THE CAISO'S CLARIFICATIONS REGARDING COST RECOVERY AND MARKET POWER

A. The Practices Addressed By The Draft Decision Affect Reliability

The Draft Decision appropriately recognizes the CAISO's concerns regarding reliability noting that:

[S]cheduling of resources that are not deliverable to load ... [poses] operational difficulties for the CAISO and concerns about reliability, particularly for summer months when the system is stressed.¹

The scheduling of resources without regard to deliverability and the CAISO's location-specific operating requirements directly impacts the CAISO's ability to operate the grid reliably. In that regard, such practices require the CAISO to re-dispatch large volumes of energy in real time to account for forward schedules that are undeliverable or fail to satisfy other operating requirements. The excessive daily volume of real-time redispatch complicates the CAISO's efforts to maintain system reliability. Reducing that burden and its attendant complications will enable the CAISO to operate the grid more reliably, thereby benefiting all users of the transmission system.

The Draft Decision also appropriately recognizes that the summer months are a particularly stressed time for the transmission system in California. The CAISO is, therefore, especially appreciative of the speed with which the CPUC has acted to address reliability concerns and its continued attention to this ongoing issue. This will enhance the CAISO's ability

¹ Draft Decision at.3

to operate the grid reliably during this summer when conditions are expected to be very challenging, as well as during the following months, and until resource adequacy provisions and the CAISO's market redesign ensure that adequate locational capacity is made available to the CAISO.

B. The Clarification Of Roles Regarding Reliability

The CAISO agrees with the Draft Decision's conclusion that:

The CAISO has the authority, experience, knowledge, tools, process and ability to fulfill its responsibility to assure reliable grid operations. Procurement, however, is not part of CAISO's core functions.²

Stated differently, the CAISO has the responsibility to ensure and maintain reliable grid operations, and LSEs have the responsibility to procure sufficient and appropriate resources to make that reasonably possible.³ The CAISO's procurement authority should be a "backstop reliability tool" only.

The CAISO appreciates the Draft Decision's understanding of the role of the CAISO because it serves to illuminate the role of LSEs as the entities primarily responsible for procurement and scheduling. The Draft Decision also appropriately recognizes that, in making procurement and scheduling decisions, LSE's must take into account the capabilities, and limitations, of the transmission system. In that regard, "the CAISO's ability to operate the transmission system in a reliable fashion is contingent on the utilities fulfilling their responsibility to have sufficient resources to serve load (not just systemwide but also locally) and to schedule resources in a manner reasonably consistent with reliable grid operations."⁴ The Draft Decision fairly allocates the responsibility for reliability between the CAISO and the

² Ibid at 7.

³ Ibid.

⁴ Ibid at 8.

utilities. The CAISO endorses the implications that this has for LSEs, *i.e.*, to take into account of all cost-related factors – including CAISO-related forward commitment costs – in their procurement and scheduling decisions. Procurement at minimum cost should not be deemed to exclude reliability-related costs.

Further, the Draft Decision states “we rely on the CAISO to take all reasonable steps to enable market participants to increase reliability by scheduling and procuring resources in a manner that minimizes CAISO operational problems while letting CAISO fulfill its fundamental mission of ensuring reliable grid operation.” The approach adopted in the Draft Decision will serve to improve system reliability *and* efficiency to the benefit of all grid users. The CAISO fully commits to working collaboratively with the utilities and the CPUC to facilitate compliance with the Draft Decision.

Finally, the Draft Decision states it is a “utility responsibility to procure all the resources necessary to meet its load, not only service area wide but also locally” [R04-04-003 pg2]. Additionally, the Draft Decision makes it clear that the LSEs are responsible for procuring resources that are deliverable to their load. The CAISO strongly supports these conclusions.

C. The Role Of RMR Contracts And Bilateral Contracts

The CPUC has been clear elsewhere regarding its desire to minimize the use of and reliance upon RMR contracts.⁵ The CAISO agrees that RMR contracts should be a “backstop” measure in the long-term reliability equation. It should be noted that RMR contracts play a significant role by providing a mechanism to limit the potential market power of resources within transmission constrained areas of the grid. However, the CAISO has long taken the position that it is not the supplier of last resort. Rather, it is the responsibility of all LSEs to procure sufficient

⁵ CPUC D.04-10-050

resources to serve their load. Therefore, the CAISO believes it will be able to phase-out the quantity of RMR contracts it enters into. That position notwithstanding, the CAISO still requires recourse to RMR contracts at this time. In any event, RMR contracts do not address or resolve the problems being addressed in the Draft Decision. *See* CAISO's Reply Comments On Assigned Commissioner's Ruling Regarding Reliability Issues, at 5-6, June 21, 2004. Not only would greater reliance on RMR be shortsighted, as the Draft Decision recognizes, it is too blunt an instrument to deal with the particular reliability concerns presented by the excessive and repetitive use of infeasible schedules. In that regard, the CAISO may only dispatch Energy under the RMR contract to maintain "local" reliability and manage intra-Zonal congestion (and only when market bids cannot be used in merit order to meet local reliability needs or manage intra-zonal congestion). Further, the CAISO is prohibited from dispatching energy under the RMR contract to manage inter-zonal congestion or to meet general imbalance energy requirements. Moreover, the CAISO does not have authority to reduce or limit a unit's output under the RMR contract – a key functionality when managing congestion.

For similar reasons, bilateral contracts may only provide perceived relief to the CAISO's reliability concerns if they do not result in feasible schedules or fully satisfy applicable locational requirements.

D. Statewide Applicability Of The Principles Adopted In The Draft Decision

The CAISO endorses the Draft Decision's conclusion that any order must have statewide application to all jurisdictional entities. In that regard, congestion concerns are not limited to the SCE service area. Further, it is reasonable that all utilities be required to schedule resources so as to not increase known or reasonably anticipated congestion and to schedule resources consistent with established reliability requirements. Further, all LSEs should be procuring

resources that are deliverable to their respective load, therefore this obligation is not unique to SCE. The CAISO is heartened by the Draft Decision’s conclusion that the principles adopted in the order should apply to “other areas with the same facts causing the same problems”.⁶ The CAISO urges the CPUC to adopt the approach in the Draft Decision which addresses both known and anticipated issues of system reliability.

E. The CAISO’s Position On Providing Data

The Draft Decision anticipates the establishment of a program to monitor the implementation of the order in the Draft Decision. The CAISO agrees with the Commission that there is a need for such monitoring, and the CAISO commits to cooperating with the CPUC to effectively implement such monitoring. The CAISO believes that any criteria the CAISO will apply in its monitoring role must be clearly spelled out and communicated to the LSEs and the CAISO in advance, , and that monitoring should be based on key indicators of procurement and scheduling practices of each LSE that would be reflective of the impacts that each LSE practices may have on reliability. The CAISO also notes that in many, if not most cases, the CPUC will need to combine data from the CAISO with data from the LSE’s to accurately monitor the impacts of the order in the Draft Decision.

The CAISO notes that in its Amendment No. 60 Tariff Filing with the Federal Energy Regulatory Commission, the CAISO stated that it “..

has agreed to publish on OASIS, for each hour, the total number of units, total MW of minimum load, total MW capacity, and total minimum load cost for units whose waivers were revoked or denied, categorized by Zone and the reason the unit’s waiver was revoked or denied. The CAISO will also publish total monthly start-up costs categorized by Zone and the reason the units’ waiver was revoked or denied. This information will be published for an entire month 30 days after the end of the proceeding month.

⁶ Draft Decision at 19

The CAISO anticipates that it would utilize a similar approach for re-dispatch costs, either by Zone or by location (*e.g.*, Miguel).

The CAISO also stands ready and willing to work collaboratively with the CPUC and affected market participants to provide useful and relevant information and guidance in order to facilitate compliance with the Draft Decision and minimize the incurrence of real-time redispatch costs, subject to the constraints in the CAISO Tariff that apply to the disclosure of information. Under CAISO Tariff Section 20.3, the CAISO is not authorized to disclose to any third party confidential or commercially-sensitive information unless there is a legal requirement to do so and adequate protection is in place to maintain the confidentiality of that information. Further, under CAISO Tariff Section 2.1.1, the CAISO must provide open and non-discriminatory access to the grid and cannot accord any Market Participant preferential treatment by providing it information or access to information that is not equally available to other Market Participants. Within these constraints, the CAISO commits to provide the CPUC and affected Market Participants information containing the maximum specificity the Tariff allows.

As a final matter, the CAISO also recognizes that further discussions may be needed between the CAISO, the CPUC and the utilities to work out implementation details of any final CPUC order. The CAISO is fully committed to working collaboratively with the parties to resolve any such outstanding issues and providing the maximum amount of guidance consistent with the provisions of the CAISO Tariff. This should take place on an expedited timeframe –the two week time period identified above -- to ensure that the benefits of this order are achieved for this summer.

F. Market Power

The CAISO agrees with comments made by others that there is a risk that forward procurement actions taken by LSEs to ensure deliverability to load can result in some market participants having market power. To this end, the CAISO recommends that the CPUC modify the decision to provide for a mechanism that limits the ability of market participants to exercise market power. The Order should encourage procurement of such resources by LSEs by providing for cost recovery of prudently incurred expenses, along with clear up front guidelines or criteria for determining the prudence of such expenditures. For example, these guidelines should include specific formulas or other similarly specific standards that may be used by LSEs for the minimum and maximum prices that may be offered by LSE's for incremental capacity and energy necessary to meet locational reliability requirements identified by the CAISO. Any such guidelines for minimum prices that may be offered must reflect the fact that in many cases the operating costs of some capacity (and energy) needed to meet local reliability requirements exceeds market prices, and is therefore not in operation unless the price offered for such capacity and energy is in excess of market prices. At the same time, for most of the major locational constraints within the CAISO system, there are typically only one or two suppliers with non-committed capacity that may be procured to meet locations requirements, so that upper purchase price limits are necessary to prevent suppliers with locational market power from demanding unreasonably high prices. Since all local market power mitigation mechanisms administered by the CAISO's require approval by FERC, the locational market power of suppliers in forward spot markets can only be addressed purchase price limits established for LSE procurement by the CPUC. Market power mitigation administered by the CAISO serves as a "backstop" in the event

that sellers demand a price higher than any such purchase price limits, and the power must ultimately be purchased in the CAISO market.

In developing such criteria, the CPUC needs to balance the fact that any local capacity and energy requirements not met by LSE purchases will result in the CAISO incurring both the costs and grid management problems associated with real time mitigation efforts.

G. Cost Recovery Issues

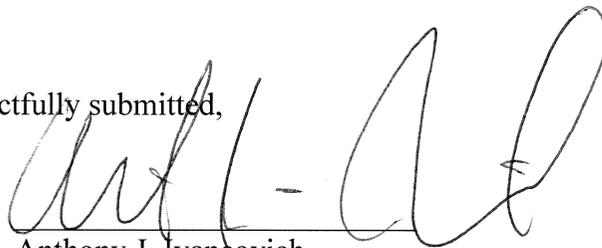
The utilities likely will have concerns about the recovery of any reliability-related cost that are incurred in complying with the Draft Decision. The CAISO acknowledges that these cost recovery concerns are valid. Although the utilities should not be given a “blank check,” they should be permitted to recover **all** prudently incurred reliability-related costs through their FERC Reliability Services Tariff and/or any applicable CPUC cost recovery mechanism, including AB 57.

III. CONCLUSION

The CAISO respectfully urges the CPUC to adopt the Draft Decision with the CAISO's proposed clarifications regarding market power and cost recovery. The approach adopted in the Draft Decision clarifies the roles and responsibilities of the entities whose scheduling and procurement practices have a significant impact on system reliability in California and will promote the maintenance of a more efficient and reliable transmission system.

Respectfully submitted,

By:



Anthony J. Ivancovich
Senior Regulatory Counsel
Stephen A.S. Morrison
Corporate Counsel

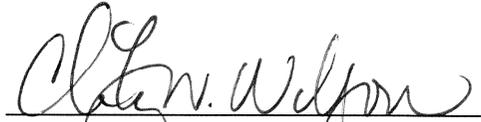
Counsel for the California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, California 95630
Phone: (916) 608-7135
Fax: (916) 608-7296

Date: July 1, 2004

PROOF OF SERVICE

I hereby certify that on July 1, 2004 I served, by electronic mail, the Comments of the California Independent System Operator Corporation on the Draft Decision of ALJ Mailed on June 28, 2004 in Docket # R.04-04-003.

DATED at Folsom, California on July 1, 2004.

A handwritten signature in cursive script, appearing to read "Charity N. Wilson", written over a horizontal line.

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

KEITH MCCREA
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415

ROGER A. BERLINER
MANATT, PHELPS & PHILLIPS, LLP
1501 M STREET, N.W., SUITE 700
WASHINGTON, DC 20005-1702

JAMES ROSS
RCS CONSULTING, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017

LISA URICK
SAN DIEGO GAS & ELECTRIC COMPANY
555 W. FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1011

ROSS A. MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS 20
SACRAMENTO, CA 96814-5512

JAMES OZENNE
SAN DIEGO GAS & ELECTRIC COMPANY
555 W. FIFTH ST., STE. 1400
LOS ANGELES, CA 90013-1034

HOWARD CHOY
COUNTY OF LOS ANGELES
1100 NORTH EASTERN AVENUE
INTERNAL SERVICES DEPARTMENT
LOS ANGELES, CA 90063

DAVID L. HUARD
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064

RANDALL W. KEEN
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064

GREGORY S.G. KLATT
LAW OFFICES OF DANIEL W. DOUGLASS
411 E. HUNTINGTON DRIVE, SUITE 107-356
ARCADIA, CA 91006

KEVIN DUGGAN
CAPSTONE TURBINE CORPORATION
21211 NORDHOFF STREET
CHATSWORTH, CA 91311

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

BETH A. FOX
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

ELIZABETH HULL
CITY OF CHULA VISTA
276 FOURTH AVENUE
CHULA VISTA, CA 91910

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

ALVIN S. PAK
SEMPRA ENERGY GLOBAL ENTERPRISES
101 ASH STREET, HQ15
SAN DIEGO, CA 92101-3017

JOSEPH R. KLOBERDANZ
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1530

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

KEITH E. FULLER
ITRON, INC.
11236 EL CAMINO REAL
SAN DEIGO, CA 92130-2650

DAVID OLSEN
3804 PACIFIC COAST HIGHWAY
VENTURA, CA 93001

CHRIS KING
CALIF. CONSUMER EMPOWERMENT
ALLIANCE
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065

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

JOSEPH P. COMO
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM.
234
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102

MICHEL PETER FLORIO
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

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

DIAN M. GRUENEICH
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104

JACK MC GOWAN
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104

JODY S. LONDON
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO, CA 94104

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104

NORA SHERIFF
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

ROD AOKI
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20/F
SAN FRANCISCO, CA 94104

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

JENNIFER K. POST
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 2496
SAN FRANCISCO, CA 94105

CHRISTOPHER HILEN
DAVIS, WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, 6TH FLOOR
SAN FRANCISCO, CA 94111

JOSEPH M. KARP
WHITE & CASE LLP
3 EMBARCADERO CENTER, STE 2100
SAN FRANCISCO, CA 94111

STEVEN F. GREENWALD
DAVIS WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, 6TH FLOOR
SAN FRANCISCO, CA 94111

EDWARD W. O'NEILL
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111-3834

JEFFREY GRAY
DAVIS WRIGHT TREMAINE
ONE EMBARCADERO CENTER, 6TH FLOOR
SAN FRANCISCO, CA 94111-3834

LISA A. COTTLE
WHITE & CASE LLP
3 EMBARCADERO CENTER, SUITE 2210
SAN FRANCISCO, CA 94111-4050

JOHN W. BOGY
PACIFIC GAS & ELECTRIC
PO BOX 7442
SAN FRANCISCO, CA 94120

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

AVIS CLARK
CALPINE CORPORATION
4160 DUBLIN BLVD.
DUBLIN, CA 94568

LINDA Y. SHERIF
CALPINE CORP.
4160 DUBLIN BOULEVARD
DUBLIN, CA 94568

MARJORIE OXSEN
CALPINE CORPORATION
4160 DUBLIN BOULEVARD
DUBLIN, CA 94568

STEVEN S. SCHLEIMER
CALPINE CORPORATION
4160 DUBLIN BLVD.
DUBLIN, CA 94568-6600

JOE DESMOND
INFOTILITY, INC.
4847 HOPYARD RD. STE. 4311
PLEASANTON, CA 94588

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

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607

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

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710

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

JOHN R. REDDING
31 EUCALYPTUS LANE
SAN RAFAEL, CA 94901

JOHN REDDING
SILICON VALLEY MANUFACTURING GROUP
31 EUCALYPTUS LANE
SAN RAFAEL, CA 94901

JENNIFER HOLMES
ITRON INC.
153 WOODCREST PLACE
SANTA CRUZ, CA 95065

JUSTIN D. BRADLEY
SILICON VALLEY MANUFACTURING GROUP
224 AIRPORT PARKWAY, SUITE 620
SAN JOSE, CA 95110

BARRY F. MCCARTHY
MCCARTHY & BERLIN, LLP
2005 HAMILTON AVENUE, SUITE 140
SAN JOSE, CA 95125

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

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
1231 ELEVENTH STREET
MODESTO, CA 95354

SCOTT T. STEFFEN
MODESTO IRRIGATION DISTRICT
1231 ELEVENTH STREET
MODESTO, CA 95354

DAVID KATES
DAVID MARK AND COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA, CA 95403-5571

GRANT A. ROSENBLUM
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630

MATTHEW V. BRADY
MATTHEW V. BRADY & ASSOCIATES
2339 GOLD MEADOW WAY
GOLD RIVER, CA 95670

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

DOUGLAS K. KERNER
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

LYNN M. HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814-3109

RONALD LIEBERT
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

MICHAEL ALCANTAR
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201

DONALD W. SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660

CARLO ZORZOLI
ENEL NORTH AMERICA, INC.
1 TECH DRIVE, SUITE 220
ANDOVER, MA 1810

GARY HINNERS
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON, TX 77001-0148

JOHN HILKE
FEDERAL TRADE COMMISSION
125 SOUTH STATE STREET
ROMM 2105
SALT LAKE CITY, UT 84138

DAVID SAUL
SOLEL, INC.
439 PELICAN BAY COURT
HENDERSON, NV 89012

CYNTHIA K. MITCHELL
ECONOMIC CONSULTING INC.
530 COLGATE COURT
RENO, NV 89503

KEVIN R. MCSPADDEN
MILBANK, TWEED, HADLEY & MCCLOY LLP
601 SOUTH FIGUEROA STREET, 30TH FLOOR
LOS ANGELES, CA 90017

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 SOUTH FLOWER STREET, SUITE 1500
LOS ANGELES, CA 90071

COLIN M. LONG
PACIFIC ECONOMICS GROUP
201 SOUTH LAKE AVENUE, SUITE 400
PASADENA, CA 91101

ROGER PELOTE
THE WILLIAMS COMPANIES, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770

BERJ K. PARSEGHIAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

FRANK J. COOLEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE RM 345
ROSEMEAD, CA 91770

LAURA GENAO
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DOUGLAS MITCHELL
SEMPRA ENERGY GLOBAL ENTERPRISES
101 ASH STREET, HQ-15G
SAN DIEGO, CA 92101

IRENE M. STILLINGS
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

SCOTT J. ANDERS
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY - SUITE 110
SAN DIEGO, CA 92123

JOSE C. CERVANTES
CITY OF SAN DIEGO
9601 RIDGEHAVEN CT., SUITE 120
SAN DIEGO, CA 92123-1636

MARK SHIRILAU
ALOHA SYSTEMS, INC.
14801 COMET STREET
IRVINE, CA 92604-2464

CHARLES R. TOCA
UTILITY RESOURCE MANAGEMENT GROUP
1100 QUAIL, SUITE 217
NEWPORT BEACH, CA 92660

MARK J. SKOWRONSKI
SOLARGENIX AT INLAND ENERGY GROUP
3501 JAMBOREE ROAD, SUITE 606
NEWPORT BEACH, CA 92660

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

MATTHEW FREEDMAN
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

Regina DeAngelis
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION ROOM 4107
SAN FRANCISCO, CA 94102-3214

SEAN CASEY
SAN FRANCISCO PUBLIC UTILITIES
COMMISSIO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

SEAN CASEY
SAN FRANCISCO PUBLIC UTILITIES
COMMISSIO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

DEVRA BACHRACH
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

VALERIE J. WINN
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

PETER BRAY
PETER BRAY AND ASSOCIATES
3566 17TH STREET, SUITE 2
SAN FRANCISCO, CA 94110-1093

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431

BRIAN CRAGG
GOODIN, MAC BRIDE, SQUERI, RITCHIE &
DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JAMES A. BOOTHE
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, 28TH FLOOR
SAN FRANCISCO, CA 94111

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

DANIEL W. FESSLER
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA 94111-4726

LISA WEINZIMER
CALIFORNIA ENERGY CIRCUIT
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
MAIL CODE: B9A
SAN FRANCISCO, CA 94177

SEBASTIEN CSAPO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
MAIL CODE B9A
SAN FRANCISCO, CA 94177

MICHAEL ROCHMAN
SCHOOL PROJECT UTILITY RATE
REDUCTION
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520

KEITH WHITE
931 CONTRA COSTA DRIVE
EL CERRITO, CA 94530

JAY BHALLA
INTERGY CORPORATION
4713 FIRST STREET, SUITE 235
PLEASANTON, CA 94566

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

PHILIPPE AUCLAIR
MIRANT CORPORATION
1350 TREAT BLVD., SUITE 500
WALNUT CREEK, CA 94597

STANLEY I. ANDERSON
POWER VALUE INCORPORATED
964 MOJAVE CT
WALNUT CREEK, CA 94598

TED POPE
COHEN VENTURES, INC./ENERGY
SOLUTIONS
1738 EXCELSIOR AVENUE
OAKLAND, CA 94602

CATHERINE E. YAP
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND, CA 94611

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612

DAVID MARCUS
PO BOX 1287
BERKELEY, CA 94701

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704

CRAIG TYLER
TYLER & ASSOCIATES
2760 SHASTA ROAD
BERKELEY, CA 94708

EDWARD VINE
LAWRENCE BERKELEY NATIONA LAB
BUILDING 90-4000
BERKELEY, CA 94720

RYAN WISER
BERKELEY LAB
ONE CYCLOTRON ROAD
MS-90-4000
BERKELEY, CA 94720

KAREN NOTSUND
UC ENERGY INSTITUTE
2547 CHANNING WAY
BERKELEY, CA 94720-5180

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903

WILLIAM B. MARCUS
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95616

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

GARY DESHAZO
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

PHILIP D. PETTINGILL
CAISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

ROBERT SPARKS
CALIFORNIA INDEPENDANT SYSTEM
OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

JAMES WEIL
AGLET CONSUMER ALLIANCE
PO BOX 1599
FORESTHILL, CA 95631

VICTORIA P. FLEMING
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6026

ED CHANG
FLYNN RESOURCE CONSULTANTS, INC.
2165 MOONSTONE CIRCLE
EL DORADO HILLS, CA 95762

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

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814

LOREN KAYE
POLIS GROUP
1115 11TH STREET, SUITE 100
SACRAMENTO, CA 95814

MELANIE GILLETTE
DUKE ENERGY NORTH AMERICA
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814

TERRY A. GERMAN
LIVINGSTON & MATTESICH LAW
CORPORATION
1201 K STREET, SUITE 1100
SACRAMENTO, CA 95814-3938

GREG BROWNELL
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, M.S. B306
SACRAMENTO, CA 95817-1899

CAROLYN A. BAKER
7456 DELTAWIND DRIVE
SACRAMENTO, CA 95831

KAREN NORENE MILLS
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

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

NATHAN TOYAMA
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET
RATES DEPARTMENT, MS 44
SACRAMENTO, CA 95852-1830

GAIL HAMMER
GAS TRANSMISSION NORTHWEST
1400 SW 5TH AVE., SUITE 900
PORTLAND, OR 97201

KEVIN CHRISTIE
GAS TRANSMISSION NORTHWEST
CORPORATION
1400 SW 5TH AVENUE, STE. 900
PORTLAND, OR 97201

LESLIE FERRON-JONES
GAS TRANSMISSION NORTHWEST
1400 SW 5TH AVE., SUITE 900
PORTLAND, OR 97201

G. ALAN COMNES
DYNEGY POWER CORP.
3934 SE ASH STREET
PORTLAND, OR 97214

LAURA J. SCOTT
LANDS ENERGY CONSULTING INC.
2366 EASTLAKE AVENUE EAST
SUITE 311
SEATTLE, WA 98102-3399

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

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

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

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

Bruce Kaneshiro
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

Burton Mattson
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5104
SAN FRANCISCO, CA 94102-3214

Clayton K. Tang
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRIC INDUSTRY & FINANCE AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

Donna J Hines
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRICITY RESOURCES AND PRICING
BRANCH ROOM 4102
SAN FRANCISCO, CA 94102-3214

Eli W Kollman
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

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

Jay Luboff
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

Jeanette Lo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY ROOM 4006
SAN FRANCISCO, CA 94102-3214

Julie A Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 5203
SAN FRANCISCO, CA 94102-3214

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

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

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

Mark S. Wetzell
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5009
SAN FRANCISCO, CA 94102-3214

Marshal B. Enderby
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENERGY COST OF SERVICE BRANCH ROOM
4205
SAN FRANCISCO, CA 94102-3214

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

Meg Gottstein
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5044
SAN FRANCISCO, CA 94102-3214

Moises Chavez
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

Nilgun Atamturk
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION ROOM 4107
SAN FRANCISCO, CA 94102-3214

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

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

Shannon Eddy
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 4102
SAN FRANCISCO, CA 94102-3214

Stephen St. Marie
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRIC INDUSTRY & FINANCE AREA
SAN FRANCISCO, CA 94102-3214

Trina Horner
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 5217
SAN FRANCISCO, CA 94102-3214

Valerie Beck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

Zenaida G. Tapawan-Conway
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY AREA 4-A
SAN FRANCISCO, CA 94102-3214

ANDREW ULMER
SIMPSON PARTNERS LLP
900 FRONT STREET, SUITE 300
SAN FRANCISCO, CA 94111

CALIFORNIA POWER AUTHORITY
901 P STREET, SUITE 142A
CAP COUNSEL OFFICE
SACRAMENTO, CA 95814

CLARE LAUFENBERG
CALIFORNIA ENERGY COMMISSION
1516 9TH ST., MS 46
SACRAMENTO, CA 95814

CONNIE LENI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

EMILIO E. VARANINI, III
CALIFORNIA POWER AUTHORITY
901 P STREET, SUITE 142A
SACRAMENTO, CA 95814

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

KAREN GRIFFIN
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 39
SACRAMENTO, CA 95814

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-500
SACRAMENTO, CA 95814

MICHAEL MESSENGER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

Wade McCartney
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
NATURAL GAS, ENERGY EFFICIENCY AND
RESOURCE ADVISORY
SACRAMENTO, CA 95814

HELEN SABET
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814-5512

ARLEN ORCHARD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, M.S. B406
SACRAMENTO, CA 95817-1899

RON WETHERALL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS 20
SACRAMENTO, CA 95814-5512