

March 25, 2003

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

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

Dear Clerk:

Enclosed for filing please find an original and eight copies of the Comments of the California
Independent System Operator on the March 14, 2003 Workshop and the Questions Raised by
Judge Gottstein in Docket # I.00-11-001. Please date stamp one copy and return to California ISO
in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé
Regulatory Counsel

Cc: Attached Service List

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

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

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR ON THE
MARCH 14, 2003 WORKSHOP AND THE QUESTIONS RAISED BY JUDGE
GOTTSTEIN**

Charles F. Robinson, General Counsel
Jeanne M. Solé, 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: March 25, 2003

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

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

I.00-11-001

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
ON THE MARCH 14, 2003 WORKSHOP AND THE QUESTIONS RAISED BY JUDGE
GOTTSTEIN**

In accordance with the Administrative Law Judge’s (“ALJ”) January 29, 2003 Ruling and Notice of Evidentiary Hearings on Tehachapi Transmission Project (“January 29 Ruling”), the California Independent System Operator (“CA ISO”) respectfully submits its comments on the March 14, 2003 Workshop and the questions raised by Judge Gottstein in her ruling. Judge Gottstein’s ruling provides: “[a]fter the workshop, the ISO, utilities and interested parties should file comments on their recommended approach to applying the generic economic methodology, consistent with the direction given above. . . . The recommendations should present procedural and scheduling options for the Commission, and include one option that would allow the Commission to hold evidentiary hearings on Phase 5 by early August 2003.” The CA ISO recommends that the CPUC facilitate a policy discussion on the key elements and appropriate approaches to determining the economic value of transmission projects through an exchange of comments and through expert panel discussions rather than proceeding with detailed evidentiary hearings.

The CA ISO would very much welcomes guidance from the CPUC indicating how the CPUC will evaluate the economic benefits of transmission projects in the context of Certificate of Public Convenience and Necessity (“CPCN”) applications. In this manner, the utilities and the CA ISO can consider the CPUC’s requirements in the CA ISO led transmission planning process. Nonetheless, the CA ISO considers that it would be far more beneficial for the CPUC to facilitate a policy discussion on an economic methodology using rulemaking procedures than evidentiary hearings at this juncture.

A policy discussion would be more productive because the methodology developed by the CA ISO presents a number of new concepts and ideas that should be vetted and discussed before engaging in drawn out debates and litigation about the details of the assumptions and specific approaches to be used. For example, a Proposed Decision by Judge Gottstein in this matter has questioned the propriety of assessing the potential impacts of market power in assessing the economic benefits of transmission projects. While the outcome of this question is still unresolved, it is clear that if the CPUC will not consider the market power benefits of transmission projects in the context of CPCN proceedings, it makes no sense to engage in prolonged evidentiary hearings about how the CPUC would prefer utilities to model these types of impacts.

In addition, an evidentiary hearing designed to discuss the methodology in the context of its rigorous application to a specific transmission project (e.g. Path 26) will likely result in too much attention being paid to the modeling assumptions unique to that project rather than the merits of the different modeling components (e.g. market power, new generation investment decisions, scenario analysis etc.) that comprise the general methodology. Thus, it would be a far better use of limited resources for the CPUC to provide broad policy guidance in the first instance on the elements that it is interested in considering to assess the economic benefits of transmission projects, and the general types of approaches that it finds to be acceptable before engaging in detailed evidentiary hearings about the details of application of the methodology to a particular transmission project.

The CA ISO has put forward its ideas on the components of a sound economic assessment and an approach for obtaining results for each of the components. Further, the CA ISO presented at the March 14 workshop illustrative cases using Path 26 as an example for how the methodology would be applied. While the CA ISO considers that to undertake a definitive study of Path 26, additional cases should be considered and a more detailed model should be used, the information presented so far provides an ample basis for the policy discussion that should follow.

Thus, the CA ISO suggests that rather than undertaking evidentiary hearings in August, the CPUC should facilitate a policy level discussion. Parties could be given a further opportunity to file detailed comments on the CA ISO's economic methodology, and/or to

propose a methodology of their own, and an opportunity should be provided for responsive comments. The Commission could then schedule panel discussions of experts. On this basis, the Commission could provide general guidance on its requirements for a methodology to assess the economic benefits of transmission projects, and evidentiary hearings about the propriety of particular input assumptions and the application of the approaches favored by the Commission to particular cases would be undertaken in the context of individual CPCN applications. The schedule could be as follows:

May 30, Parties filed comments or alternative methodologies

June 27, Reply comments

July – Panel Discussions are scheduled

August – Draft Decision issued

The CA ISO notes moreover that this proceeding has been categorized as a rate-setting proceeding because the Commission determined in December of 2000 that the proceeding would involve more issues of specific rate setting than policy determinations. See D00-12-060 at 3-4. However, the issuance of Commission guidance on the appropriate elements and approaches for assessments of the economic benefits of transmission projects is a policy/rulemaking exercise. Accordingly, rulemaking requirements, including rulemaking ex parte rules are more appropriate to this endeavor. Thus, it would be most appropriate for the CPUC to open a new rulemaking to address this matter. Opening a rulemaking to address generically an economic methodology for assessing transmission projects need not delay the schedule substantially. If an order is issued promptly, the schedule set forth above could be maintained generally, or at worst slip one month, providing for panel discussions in August (the time frame indicated by ALJ Gottstein for evidentiary hearings on the economic methodology).

Finally, the CA ISO notes that, as it represented during the prehearing conference, it is unable to complete a full and comprehensive assessment of Path 26 or any other transmission project in time for hearings in August, given limited resources and the many demands on key Department of Market Analysis staff. The CA ISO notes that at the workshop, there appeared to be consensus that if a project is to be assessed further, the best candidate would be Path 26.

The CA ISO would like to take the opportunity to make a few further clarifications about its economic methodology consistent with the discussion during the March 14 workshop:

- 1) The report on the economic methodology is a public document that sets forth an approach that the CA ISO supports for a comprehensive determination of the economic benefits of transmission facility additions. The CA ISO welcomes use of the methodology by other parties and does not have any intent to limit such use to the CA ISO. To the contrary, the CA ISO expects that, as in the case of reliability driven project, project sponsors will in the first instance evaluate the economic benefits of transmission projects, and present beneficial projects to the CA ISO in its transmission planning process, and, for projects requiring CPCNs to the CPUC. Moreover, the CA ISO expects that, in the future, project sponsors presenting economically driven projects for consideration by the CA ISO will use assessments that are consistent with the CA ISO's economic methodology to derive the economic benefits of such projects.
- 2) The CA ISO does not purport to dictate to any other party what underlying modeling software they should use to apply the methodology. Rather, the CA ISO is engaged in its own internal process to obtain a modeling software that it will use for purposes of undertaking its own assessments. The propriety of a particular modeling software to evaluate a particular project is a matter that will have to be addressed on a case-by-case basis depending on the particular characteristics of the project undergoing analysis, the characteristics of the model in question, and the types of economic benefits that a particular transmission project is intended to produce.
- 3) The CA ISO does not believe that utilities should delay proposing to the CA ISO (or to the CPUC) beneficial economic projects while further proceedings are underway regarding a generic methodology. The CA ISO is interested in working with utilities, and California state agencies to facilitate the expeditious implementation of transmission upgrades that are needed to maintain reliability or that could offer substantial economic benefits to California consumers.

In sum, the CA ISO would welcome guidance by the CPUC on the elements it considers important in an economic assessment to support a CPCN, and the approaches it deems acceptable to assess these elements. The CA ISO considers that this guidance is primarily a policy matter that is best resolved through rulemaking procedures rather than through evidentiary

hearings. Such procedures could be scheduled over the summer in accordance with the schedule proposed herein.

March 25, 2003

Respectfully Submitted:

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

PROOF OF SERVICE

I hereby certify that on March 25, 2003, I served by electronic and U.S. mail, the Comments of the California Independent System Operator on the March 14, 2003 Workshop and the Questions Raised by Judge Gottstein in Docket # I.00-11-001.

DATED at Folsom, California on March 25, 2003.

Mui (Karen) Voong
An Employee of the California
Independent System Operator

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

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

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

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

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

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

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

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

DANIEL W. DOUGLASS
ATTORNEY AT LAW
LAW OFFICES OF DANIEL W. DOUGLASS
5959 TOPANGA CANYON BLVD., SUITE 244
WOODLAND HILLS, CA 91367

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

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

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

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

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

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

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

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

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

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

MARY TURLEY
REGULATORY CASE ADMINISTRATOR
SAN DIEGO GAS & ELECTRIC CO.
8315 CENTURY PARK COURT - CP22D
SAN DIEGO, CA 92123-1550

BARBARA DUNMORE
COUNTY OF RIVERSIDE
4080 LEMON STREET, 12TH FLOOR
RIVERSIDE, CA 92501-3651

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

HAL ROMANOWITZ
OAK CREEK ENERGY
14633 WILLOW SPRINGS ROAD
MOJAVE, CA 93501

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

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

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

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

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

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

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

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

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

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

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

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

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

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

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

DIANE FELLMAN
ENERGY LAW GROUP, LLP
1999 HARRISON STREET, SUITE 2700
OAKLAND, CA 94612-3572

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

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

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

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

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

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

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

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

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

DAVID MARCUS
PO BOX 1287
BERKELEY, CA 94702

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

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

SUSAN E. BROWN
ATTORNEY AT LAW
LATINO ISSUES FORUM
785 MARKET STREET, 3RD FLOOR
SAN FRANCISCO, CA 94103-2003

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

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

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

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
PO BOX 10250
PALO ALTO, CA 94303

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

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

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

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

ROY AND RITA LOMPA
4998 AIRLINE HIGHWAY
HOLLISTER, CA 95023

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

BILLIE C BLANCHARD
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

CHARLES H. MAGEE
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
STRATEGIC PLANNING BRANCH AREA 2-D
SAN FRANCISCO, CA 94102-3214

HARRIETT J BURT
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
PUBLIC ADVISOR OFFICE ROOM 2103
SAN FRANCISCO, CA 94102-3214

JESSE A ANTE
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

KAREN M SHEA
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

KENNETH LEWIS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DECISION-MAKING SUPPORT BRANCH
ROOM 4002
SAN FRANCISCO, CA 94102-3214

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

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

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

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

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

ROBERT ELLIOT
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

SHYSHENQ P LIOU
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

WENDY M PHELPS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

XUGUANG LENG
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

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

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

MEG GOTTSTEIN
ADMINISTRATIVE LAW JUDGE
PO BOX 210
21496 NATIONAL STREET
VOLCANO, CA 95689

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

AUDRA HARTMANN
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
EXECUTIVE DIVISION
SACRAMENTO, CA 95814

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

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

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

RODERICK A CAMPBELL
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
INVESTIGATION, MONITORING &
COMPLIANCE BRANCH
SACRAMENTO, CA 95814

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

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

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

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

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

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