

**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.

Rulemaking 04-04-003  
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025  
(Filed April 22, 2004)

**REPLY COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON PROPOSED DECISION OF ALJ HALLIGAN**

Nancy Saracino, General Counsel  
Sidney M. Davies, Assistant General Counsel  
Stacie L. Ford, Associate 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 Corporation**

Dated: June 4, 2007

**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.

Rulemaking 04-04-003  
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025  
(Filed April 22, 2004)

**REPLY COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON PROPOSED DECISION OF ALJ HALLIGAN**

Pursuant to Rule 14.3 (d) of this Commission's Rules of Practice and Procedure and Administrative Law Judge (ALJ) Minkin's June 1, 2007 ruling extending the time to file reply comments to June 4, 2007, the California Independent System Operator Corporation (CAISO) respectfully submits its reply comments on ALJ Halligan's proposed "Opinion on Future Policy and Pricing for Qualifying Facilities" mailed on April 24, 2007 (Proposed Decision).

**I. INTRODUCTION**

The CAISO's participation in this proceeding has been limited to the issue of the applicability of the CAISO Tariff to Qualifying Facilities (QF). Specifically, the CAISO urged the Commission in this proceeding, as a general matter, to require QFs not subject to grandfathered power purchase agreements (PPAs) under the Public Utility Regulatory Policies Act of 1978 (PURPA) to comply with the CAISO Tariff. Specifically, the CAISO urged the Commission to require new or existing QFs proposing to interconnect

to the CAISO Controlled Grid, or upgrade existing interconnections to the CAISO Controlled Grid, to comply with CAISO's interconnection policies as set forth in the CAISO Tariff. In addition, the CAISO urged the Commission to require QFs entering into new PURPA PPAs to comply with the CAISO Tariff. The CAISO was pleased with the Proposed Decision findings at page 130 "that QFs of 1 MW or greater should be required to comply with the CAISO tariffs."

The CAISO is taking this opportunity to respond to the May 25, 2007 opening comments filed by the Cogeneration Association of California and the Energy Producers and Users Coalition (CAC/EPUC) to the extent CAC/EPUC took issue with the Proposed Decision's findings. In addition, the CAISO takes this opportunity to respond to comments filed by the California Wind Energy Association (CalWEA) concerning the applicability of the CAISO Tariff to wind resources and comments filed by Pacific Gas and Electric Company (PG&E) concerning the "firmness" of energy provided under future PURPA PPAs and whether "as available" energy should be counted towards a Load Serving Entity's resource adequacy obligations.

## **II. DISCUSSION**

### **A. The Commission Should Reject CAC/EPUC Arguments that QFs Should Be Exempt from the CAISO Tariff.**

At page 17 of its comments, CAC/EPUC argues that the Proposed Decision's finding that QFs be required to comply with the CAISO tariffs is inconsistent with the "must-take" status of QF energy. The CAISO disagrees. The currently effective CAISO Tariff and the revised CAISO Tariff to implement the CAISO's Market Redesign and Technology Upgrade (MRTU) project recognize a category of energy that is "must take"

and allows Scheduling Coordinators to schedule such energy as “must take.”<sup>1</sup> The CAISO has also developed a modified version of the Participating Generator Agreement (PGA) specifically for use by QFs, the QF-PGA, which has been accepted by the Federal Energy Regulatory Commission (FERC). Accordingly, there is nothing about the “must take” status of QF energy that is inherently inconsistent with the CAISO Tariff. Indeed, the CAISO Tariff grandfathered QF PURPA PPAs not because the energy was “must take,” but because the PURPA PPAs pre-existed the formation of the CAISO. The Proposed Decision recognizes this fact at page 130, and appropriately finds that “[n]ew contracts must explicitly take the existence of the CAISO and its tariff requirements into account.” In addition, the “must take” status of QF energy will evolve over time once Section 1253(a) of the Energy Policy Act of 2005 is made effective for California. Upon issuance of the required findings by FERC, Section 1253(a) would terminate the mandatory buy/sell requirement of Section 210 of PURPA thereby eliminating the “must take” status of QF energy going forward for any new PPAs entered into after that time.

CAC/EPUC also argues that Commission-jurisdictional Rule 21 interconnection process should be retained for QFs. Rule 21 applies to, and should only apply to, distribution level interconnections. To the extent QFs are interconnected at the distribution level, the Rule 21 process would be the appropriate process. However, QFs that seek to interconnect to the CAISO Controlled Grid, or modify an existing interconnection to the CAISO Controlled Grid, should be required to comply with the CAISO’s interconnection process set forth in Section 25 of the CAISO Tariff and in Appendix U of the CAISO Tariff, which contains the Standard Large Generator

---

<sup>1</sup> See definition of “Regulatory Must-Take Generation” in Appendix A of the CAISO Tariff and Sections 4.6.3.2 and 27.1.1.6.1 of the CAISO Tariff and the corresponding sections in the MRTU Tariff at Appendix A and Sections 4.6.3.2 and 31.4.

Interconnection Procedures. The CAISO's responsibilities under both state law (Cal. Pub. Util. Code §§ 334 et seq.) and the CAISO Tariff include the reliability of the CAISO Controlled Grid. The CAISO's interconnection process ensures the reliability and, in many cases, the deliverability of resources subject to new or upgraded interconnections. Accordingly, the CAISO urges the Commission to adopt the Proposed Decision's findings at page 130 to require QFs to comply with CAISO Tariff requirements.

**B. QFs That are No Longer Subject to a Grandfathered PURPA PPA Are Subject to the CAISO Tariff**

CalWEA argues that existing QFs that do not wish to enter into new agreements should be allowed to retain their existing interconnection arrangements even if they are no longer selling to the utility, or selling as a QF. (CalWEA p. 2.) Although the CAISO agrees that resources with pre-existing interconnections whose PURPA PPAs (or QF status) terminate should not necessarily be treated as new interconnections that would require a new interconnection application to the CAISO, these resources would be required to enter into all the necessary CAISO agreements, including an interconnection agreement and either a PGA or a QF-PGA to be permitted to enter into any wholesale energy transaction, as the CPUC would have no jurisdiction over these resources under PURPA in the absence of a PURPA PPA. The process applicable to such QFs is spelled out in CAISO Tariff Sections 25.1(d) and 25.1.2, which have been developed to implement and be consistent with FERC's uniform nationwide set of transmission interconnection standards. Pursuant to these sections, an existing project may not need a new Interconnection Study if the CAISO and the relevant Participating Transmission Owner confirm that the electrical characteristics of the QF would remain substantially

unchanged. In such case, however, the resource would nevertheless be required, under the CAISO Tariff, to enter into an interconnection agreement with the CAISO.

**C. Firm Capacity QFs Should Continue Under Firm Capacity Contracts and “As-Available” Contracts Should Not Count for Resource Adequacy Purposes**

In its opening comments at page 13, PG&E argues that “QFs who originally operated under firm capacity contracts and are able to provide firm capacity only be allowed to sign the proposed firm capacity contract” and, therefore, urges the Commission to modify the Proposed Decision insofar as it would permit QFs to choose between a “firm” contract and an “as available” contract. The CAISO agrees. In addition, to the extent the “As-Available” contract is an option for any QF, the CAISO does not believe that such contracts should count for purposes of a Load Serving Entity meeting its Commission imposed resource adequacy obligation. The objective of resource adequacy is to ensure that sufficient resources are available when and where needed to serve load reliably. A commercial arrangement that neither requires the resource to make itself available to the CAISO nor includes incentives for the resource to be available when needed to promote reliability fails to comport with the goal of resource adequacy.

///

///

///

///

///

///

### **III. CONCLUSION**

For the reasons stated above, the CAISO requests the Commission to adopt the Proposed Decision of ALJ Halligan as clarified by the modifications described herein.

Respectfully submitted,

/s/ Sidney M. Davies

Sidney M. Davies

Attorney for California Independent  
System Operator Corporation

June 4, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I have served, by electronic and United States mail, the Reply  
Comments of the California Independent System Operator Corporation on Proposed  
Decision of ALJ Halligan in Docket Nos. R.04-04-003 and R.04-04-025

Executed on June 4, 2007 at Folsom, California.

*/s/ Charity N. Wilson*

Charity N. Wilson

An Employee of the California  
Independent System Operator

## SERVICE LIST – R.04-04-003 and R.04-04-025

ANDREW B. BROWN ELLISON, SCHNEIDER & HARRIS, LLP abb@eslawfirm.com	ANN G. GRIMALDI MCKENNA LONG & ALDRIDGE LLP agrimaldi@mckennalong.com	ALEXANDRE B. MAKLER CALPINE CORPORATION alexm@calpine.com	ARTHUR L. HAUBENSTOCK PACIFIC GAS AND ELECTRIC COMPANY alhj@pge.com
ANDREW J. VAN HORN VAN HORN CONSULTING andy.vanhorn@vhcenergy.com	ALAN NOGEE UNION OF CONCERNED SCIENTISTS anogee@ucusa.org	ANN L. TROWBRIDGE DAY CARTER MURPHY LLC atrowbridge@daycartermurphy.com	ANDREW ULMER CALIFORNIA DEPARTMENT OF WATER RESOURCES aulmer@water.ca.gov
Amy C. Yip-Kikugawa CALIF PUBLIC UTILITIES COMMISSION ayk@cpuc.ca.gov	BRIAN T. CRAGG GOODIN MACBRIDE SQUERI RITCHIE & DAY bcragg@goodinmacbride.com	BERJ K. PARSEGHIAN SOUTHERN CALIFORNIA EDISON COMPANY berj.parseghian@sce.com	WILLIAM B. MARCUS JBS ENERGY, INC. bill@jbsenergy.com.
BARRY LOVELL BERRY PETROLEUM COMPANY bjl@bry.com	BRADLEY MEISTER CALIFORNIA ENERGY COMMISSION bmeister@energy.state.ca.us	ROBERT B. GEX DAVIS WRIGHT TREMAINE LLP bobgex@dwf.com	WILLIAM E. POWERS POWERS ENGINEERING bpowers@powersengineering.com
BARBARA R. BARKOVICH BARKOVICH & YAP, INC. brbarkovich@earthlink.net	BRIAN THEAKER WILLIAMS POWER COMPANY brian.theaker@williams.com	BRIAN HANEY UTILITY SYSTEM EFFICIENCIES, INC. brianhaney@useconsulting.com	WILLIAM P. SHORT RIDGWOOD POWER MANAGEMENT, LLC bshort@ridgewoodpower.com
Carol A. Brown CALIF PUBLIC UTILITIES COMMISSION cab@cpuc.ca.gov	Steve Linsey CALIF PUBLIC UTILITIES COMMISSION car@cpuc.ca.gov	CARLO ZORZOLI ENEL NORTH AMERICA, INC. carlo.zorzoli@enel.it	CASE ADMINISTRATION SOUTHERN CALIFORNIA EDISON COMPANY case.admin@sce.com
CALIFORNIA ENERGY MARKETS cem@newsdata.com	CENTRAL FILES SAN DIEGO GAS & ELECTRIC centralfiles@semprautilities.com	Charlyn A. Hook CALIF PUBLIC UTILITIES COMMISSION chh@cpuc.ca.gov	CHRISTOPHER HILEN SIERRA PACIFIC POWER COMPANY chilen@sppc.com
CHRIS KING CALIFORNIA CONSUMER EMPOWERMENT chris@emeter.com	CHRISTOPHER J. MAYER MODESTO IRRIGATION DISTRICT chrism@mid.org	CHUCK MANZUK SAN DIEGO GAS AND ELECTRIC COMPANY cmanzuk@semprautilities.com	CRYSTAL NEEDHAM EDISON MISSION ENERGY cneedham@edisonmission.com
LAW DEPARTMENT FILE ROOM PACIFIC GAS AND ELECTRIC COMPANY cpuccases@pge.com	CAROL A. SMOOTS PERKINS COIE LLP csmoots@perkinscoie.com	CURTIS KEBLER GOLDMAN, SACHS & CO. curtis.kebler@gs.com	DANIEL A. KING SEMPRA ENERGY RESOURCES daking@sempra.com
DAVID SAUL SOLEL, INC. david.saul@solel.com	DAN L. CARROLL DOWNEY BRAND, LLP dcarroll@downeybrand.com	DAVID MORSE demorse@omsoft.com	DANIEL V. GULINO RIDGWOOD POWER MANAGEMENT, LLC dgulino@ridgewoodpower.com
DAVID L. HUARD MANATT, PHELPS & PHILLIPS, LLP dhuard@manatt.com	DIANE I. FELLMAN LAW OFFICE OF DIANE I. FELLMAN diane_fellman@fpl.com	CHRIS ANN DICKERSON, PHD FREEMAN, SULLIVAN & CO. dickerson06@fscgroup.com	Donna J. Hines CALIF PUBLIC UTILITIES COMMISSION djh@cpuc.ca.gov
DOUGLAS K. KERNER ELLISON, SCHNEIDER & HARRIS, LLP dkk@eslawfirm.com	Don Schultz CALIF PUBLIC UTILITIES COMMISSION dks@cpuc.ca.gov	DOUGLAS MCFARLAN MIDWEST GENERATION EME dmcfarlan@mwgen.com	DOUG DAVIE DAVIE CONSULTING, LLC dougdpucmail@yahoo.com
DANIEL W. DOUGLASS DOUGLASS & LIDDELL douglass@energyattorney.com	DESPINA PAPAPOSTOLOU SAN DIEGO GAS AND ELECTRIC COMPANY dpapapostolou@semprautilities.com	DAVID REYNOLDS ASPEN SYSTEMS CORPORATION dreynolds@aspensys.com	DEVRA WANG NATURAL RESOURCES DEFENSE COUNCIL dwang@nrdc.org
DON WOOD PACIFIC ENERGY POLICY CENTER dwood8@cox.net	DONALD SCHOENBECK RCS, INC. dws@r-c-s-inc.com	EDWARD C. REMEDIOS ecrem@ix.netcom.com	J.A. SAVAGE CALIFORNIA ENERGY CIRCUIT editorial@californiaenergycircuit.net
EVELYN KAHL ALCANTAR & KAHL, LLP ek@a-klaw.com	ERIC LARSEN RCM DIGESTERS elarsen@rcmdigesters.com	ED LUCHA PACIFIC GAS AND ELECTRIC COMPANY el5@pge.com	CHARLES R. MIDDLEKAUFF PACIFIC GAS & ELECTRIC COMPANY LAW DEPT. ermd@pge.com
EDWARD J TIEDEMANN KRONICK MOSKOVITZ TIEDEMANN AND GIRARD etiedemann@kmtg.com	EDWARD V. KURZ PACIFIC GAS AND ELECTRIC COMPANY evk1@pge.com	KAREN TERRANOVA ALCANTAR & KAHL, LLP filings@a-klaw.com	MATTHEW FREEDMAN THE UTILITY REFORM NETWORK freedman@turn.org
JOHN C. GABRIELLI GABRIELLI LAW OFFICE gabrielliclaw@sbcglobal.net	GARY L. ALLEN SOUTHERN CALIFORNIA EDISON gary.allen@sce.com	GEORGETTA J. BAKER SAN DIEGO GAS & ELECTRIC/SOCAL GAS gbaker@sempra.com	GREG BASS SEMPRA ENERGY SOLUTIONS gbass@semprasolutions.com
Robert Kinoshian CALIF PUBLIC UTILITIES COMMISSION gig@cpuc.ca.gov	GREGG MORRIS GREEN POWER INSTITUTE gmorris@emf.net	GRANT A. ROSENBLUM CALIFORNIA INDEPENDENT SYSTEM OPERATOR grosenblum@caiso.com	GRACE LIVINGSTON-NUNLEY PACIFIC GAS AND ELECTRIC COMPANY gx12@pge.com
HOWARD W. CHOY LOS ANGELES COUNTY ISD, FACILITIES OPERA hchoy@isd.co.la.ca.us	ANDREW HOERNER REDEFINING PROGRESS hoerner@redefiningprogress.org	RICHARD D. ELY DAVIS HYDRO hydro@davis.com	IRENE M. STILLINGS CALIFORNIA CENTER FOR SUSTAINABLE ENERGY irene.stillings@energycenter.org
ERIC J. ISKEN SOUTHERN CALIFORNIA EDISON COMPANY j.eric.isken@sce.com	JANET COMBS SOUTHERN CALIFORNIA EDISON COMPANY janet.combs@sce.com	JANICE LIN STRATEGEN CONSULTING LLC janice@strategenconsulting.com	JOSEPH B. WILLIAMS MCDERMOTT WILL & EMERGY LLP jbwilliams@mwe.com

## SERVICE LIST – R.04-04-003 and R.04-04-025

JEFFREY P. GRAY DAVIS WRIGHT TREMAINE LLP jeffgray@dwt.com	E. JESUS ARREDONDO NRG ENERGY, INC. jesus.arredondo@nrgenergy.com	JOHN GALLOWAY UNION OF CONCERNED SCIENTISTS jgalloway@ucsusa.org	JANET DOYLE KRAMER JUNCTION COMPANY jheckdoyle@aol.com
JAMES ROSS RCS INC. jimross@r-c-s-inc.com	JOSEPH M. KARP WINSTON & STRAWN LLP jkarp@winston.com	JOSEPH KLOBERDANZ SAN DIEGO GAS & ELECTRIC COMPANY jkloberdanz@semprautilities.com	JOHN W. LESLIE LUCE, FORWARD, HAMILTON & SCRIPPS, LLP jleslie@luce.com
JIM MCARTHUR ELK HILLS POWER, LLC jmcARTHUR@elkhills.com	Julie Halligan CALIF PUBLIC UTILITIES COMMISSION jmh@cpuc.ca.gov	Jerry Oh CALIF PUBLIC UTILITIES COMMISSION joh@cpuc.ca.gov	JOY A. WARREN MODESTO IRRIGATION DISTRICT joyw@mid.org
JANINE L. SCANCARELLI FOLGER, LEVIN & KAHN, LLP jscancarelli@flk.com	JOY C. YAMAGATA SAN DIEGO GAS & ELECTRIC/SOCALGAS jyamagata@semprautilities.com	KENNETH E. ABREU k.abreu@sbcglobal.net	KAREN LINDH LINDH & ASSOCIATES karen@klindh.com
KATHERINE RYZHAYA PACIFIC GAS & ELECTRIC COMPANY karp@pge.com	KAREN BOWEN WINSTON & STRAWN LLP kbowen@winston.com	KEVIN WOODRUFF WOODRUFF EXPERT SERVICES, INC. kdw@woodruff-expert-services.com	KEITH W. MELVILLE SEMPRA ENERGY kmelville@sempra.com
AVIS KOWALEWSKI CALPINE CORPORATION kowalewskia@calpine.com	Karen P. Paull CALIF PUBLIC UTILITIES COMMISSION kpp@cpuc.ca.gov	KRIS G. CHISHOLM CALIFORNIA ELECTRICITY OVERSIGHT BOARD kris.chisholm@eob.ca.gov	LYNNE BROWN CALIFORNIANS FOR RENEWABLE ENERGY, INC. L_brown369@yahoo.com
LAURA GENAO SOUTHERN CALIFORNIA EDISON COMPANY laura.genao@sce.com	DONALD C. LIDDELL, P.C. DOUGLASS & LIDDELL liddell@energyattorney.com	LISA M. DECKER CONSTELLATION ENERGY GROUP, INC. lisa.decker@constellation.com	LIZBETH MCDANNELL lizbeth.mcdannel@sce.com
LAWRENCE KOSTRZEWA EDISON MISSION ENERGY lkostrzewa@edisonmission.com	MARY A. GANDESBERY PACIFIC GAS AND ELECTRIC COMPANY magq@pge.com	Marion Peleo CALIF PUBLIC UTILITIES COMMISSION map@cpuc.ca.gov	MARK J. SMITH FPL ENERGY mark_j.smith@fpl.com
MAUREEN LENNON CALIFORNIA COGENERATION COUNCIL maureen@lennonassociates.com	MARGARET D. BROWN PACIFIC GAS AND ELECTRIC COMPANY mdbk@pge.com	MARC D. JOSEPH ADAMS, BROADWELL, JOSEPH & CARDOZO mdjoseph@adamsbroadwell.com	MAURICE CAMPBELL CALIFORNIANS FOR RENEWABLE ENERGY, INC. mecsoft@pacbell.net
MARC KOLB PACIFIC GAS AND ELECTRIC COMPANY mekd@pge.com	MICHEL PETER FLORIO THE UTILITY REFORM NETWORK (TURN) mflorio@turn.org	MICHAEL J. GIBBS ICF CONSULTING mgibbs@icfconsulting.com	MARK HARRER mhharrer@sbcglobal.net
MICHAEL A. BACKSTROM SOUTHERN CALIFORNIA EDISON COMPANY michael.backstrom@sce.com	MICHAEL E. BOYD CALIFORNIANS FOR RENEWABLE ENERGY, INC. michaelboyd@sbcglobal.net	MICHAEL JASKE CALIFORNIA ENERGY COMMISSION mjaske@energy.state.ca.us	Matthew Deal CALIF PUBLIC UTILITIES COMMISSION mjd@cpuc.ca.gov
Mikhail Haramati CALIF PUBLIC UTILITIES COMMISSION mkh@cpuc.ca.gov	MARY ANN MILLER CALIFORNIA ENERGY COMMISSION mmiller@energy.state.ca.us	MICHAEL ALCANTAR ALCANTAR & KAHL, LLP mpa@a-klaw.com	MARK R. HUFFMAN PACIFIC GAS AND ELECTRIC COMPANY mrh2@pge.com
MRW & ASSOCIATES, INC. mrw@mrwassoc.com	Merideth Sterkel CALIF PUBLIC UTILITIES COMMISSION mts@cpuc.ca.gov	MICHAEL A. YUFFEE MCDERMOTT WILL & EMERY LLP myuffee@mwe.com	Noel Obiora CALIF PUBLIC UTILITIES COMMISSION nao@cpuc.ca.gov
NINA BUBNOVA PACIFIC GAS AND ELECTRIC COMPANY nbb2@pge.com	NORA SHERIFF ALCANTAR & KAHL, LLP nes@a-klaw.com	NANCY RADER CALIFORNIA WIND ENERGY ASSOCIATION nrader@calwea.org	PATRICK MCDONNELL AGLAND ENERGY SERVICES, INC. pcmcdonnell@earthlink.net
JANIS C. PEPPER CLEAN POWER MARKETS, INC. pepper@cleanpowermarkets.com	PETER W. HANSCHEN MORRISON & FOERSTER, LLP phansch@mofo.com	PHILIP HERRINGTON EDISON MISSION ENERGY pherrington@edisonmission.com	W. PHILLIP REESE CALIFORNIA BIOMASS ENERGY ALLIANCE, LLC phil@reesechambers.com
PATRICK HOLLEY COVANTA ENERGY CORPORATION pholley@covantaenergy.com	Peter Lai CALIF PUBLIC UTILITIES COMMISSION ppl@cpuc.ca.gov	PAUL M. SEBY MCKENNA LONG & ALDRIDGE LLP pseby@mckennalong.com	RANDALL W. KEEN MANATT, PHELPS & PHILLIPS, LLP pucservice@manatt.com
SHAWN SMALLWOOD, PH.D. puma@davis.com	ALAN PURVES CALIFORNIA LANDFILL GAS COALITION purves@grsilc.net	RALPH E. DENNIS FELLON-MCCORD & ASSOCIATES ralph.dennis@constellation.com	REN ORENS ENERGY AND ENVIRONMENTAL ECONOMICS ren@ethree.com
ANNE FALCON EES CONSULTING, INC. rfp@eesconsulting.com	RICK NOGER PRAXAIR PLAINFIELD, INC. rick_noger@praxair.com	RICHARD LAUCKHART HENWOOD ENERGY SERVICES, INC. rlauckhart@henwoodenergy.com	Robert L. Strauss CALIF PUBLIC UTILITIES COMMISSION rls@cpuc.ca.gov
RICHARD MCCANN M.CUBED rmccann@umich.edu	ROGER BERLINER BERLINER LAW PLLC roger@berlinerlawpllc.com	RASHA PRINCE SAN DIEGO GAS & ELECTRIC rprince@semprautilities.com	ROD AOKI ALCANTAR & KAHL, LLP rsa@a-klaw.com
REED V. SCHMIDT BARTLE WELLS ASSOCIATES rschmidt@bartlewells.com	ROBERT SHAPIRO CHADBOURNE & PARKE LLP rshapiro@chadbourne.com	RON WETHERALL CALIFORNIA ENERGY COMMISSION rwether@energy.state.ca.us	SAM HITZ CALIFORNIA CLIMATE ACTION REGISTRY sam@climateregistry.org

## SERVICE LIST – R.04-04-003 and R.04-04-025

ROBERT SARVEY  
sarveybob@aol.com

Shannon Eddy  
CALIF PUBLIC UTILITIES COMMISSION  
sed@cpuc.ca.gov

Sepideh Khosrowjeh  
CALIF PUBLIC UTILITIES COMMISSION  
skh@cpuc.ca.gov

STEVEN F. GREENWALD  
DAVIS WRIGHT TREMAINE, LLP  
stevegreenwald@dwt.com

Thomas Roberts  
CALIF PUBLIC UTILITIES COMMISSION  
tcr@cpuc.ca.gov

TIMOTHY R. ODIL  
MCKENNA LONG & ALDRIDGE LLP  
todil@mckennalong.com

VALERIE J. WINN  
PACIFIC GAS AND ELECTRIC COMPANY  
vjw3@pge.com

JAMES WOODRUFF  
SOUTHERN CALIFORNIA EDISON COMPANY  
woodrjwb@sce.com

TANDY MCMANNES  
SOLAR THERMAL ELECTRIC ALLIANCE  
101 OCEAN BLUFFS BLVD.APT.504  
JUPITER, FL 33477-7362

SHIRLEY WOO  
PACIFIC GAS AND ELECTRIC COMPANY  
saw0@pge.com

RICHARD M. ESTEVES  
SESCO, INC.  
sesco@optonline.net

STEVEN A. LEFTON  
APTECH ENGINEERING SERVICES INC.  
slefton@aptecheng.com

STEVEN A. GREENBERG  
DISTRIBUTED ENERGY STRATEGIES  
steveng@destrategies.com

Theresa Cho  
CALIF PUBLIC UTILITIES COMMISSION  
tcx@cpuc.ca.gov

TOM BEACH  
CROSSBORDER ENERGY  
tomb@crossborderenergy.com

VIKKI WOOD  
SACRAMENTO MUNICIPAL UTILITY DISTRICT  
vwood@smud.org

Wade McCartney  
CALIF PUBLIC UTILITIES COMMISSION  
wsm@cpuc.ca.gov

Susannah Churchill  
CALIF PUBLIC UTILITIES COMMISSION  
sc1@cpuc.ca.gov

STACIE FORD  
CALIFORNIA ISO  
sford@calso.com

SNULLER PRICE  
ENERGY AND ENVIRONMENTAL ECONOMICS  
snuller@ethree.com

TOM JARMAN  
PACIFIC GAS AND ELECTRIC COMPANY  
taj8@pge.com

Terrie D. Prosper  
CALIF PUBLIC UTILITIES COMMISSION  
tdp@cpuc.ca.gov

TOM SKUPNJAK  
CPG ENERGY  
toms@i-cpg.com

WILLIAM H. BOOTH  
LAW OFFICES OF WILLIAM H. BOOTH  
wbooth@booth-law.com

WILLIAM W. WESTERFIELD III  
ELLISON, SCHNEIDER & HARRIS LLP  
www@eslawfirm.com

SCOTT J. ANDERS  
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW  
scottanders@sandiego.edu

Sudheer Gokhale  
CALIF PUBLIC UTILITIES COMMISSION  
skg@cpuc.ca.gov

SARA STECK MYERS  
LAW OFFICES OF SARA STECK MYERS  
ssmyers@atl.net

Traci Bone  
CALIF PUBLIC UTILITIES COMMISSION  
tbo@cpuc.ca.gov

TIM HEMIG  
NRG ENERGY, INC.  
tim.hemig@nrgenergy.com

TORY S. WEBER  
SOUTHERN CALIFORNIA EDISON COMPANY  
tory.weber@sce.com

BARBARA GEORGE  
WOMEN'S ENERGY MATTERS  
wem@igc.org

ANAN H. SOKKER  
CHADBOURNE & PARKE LLP  
1200 NEW HAMPSHIRE AVE. NW  
WASHINGTON, DC 20036