

**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
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

**OPENING BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

Charles F. Robinson, General Counsel
Stacie L. Ford, Associate Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-351-4400
Facsimile: 916-608-7222

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**OPENING BRIEF OF THE
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In accordance with Rule 75 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (“CAISO”) respectfully submits its opening brief in the above-captioned combined proceedings. These proceedings were initiated to review the investor-owned utilities’ (“IOUs”) long-term procurement plans (“LTPP”) and to address pricing terms for Qualifying Facility (“QF”) contracts, respectively. The CAISO’s opening brief focuses solely on the questions of whether 1) new QFs, and existing QFs executing new power purchase agreements (“PPAs”) or extensions to existing PPAs, including those executed pursuant to the Public Utility Regulatory Policies Act of 1978 (“PURPA”), located within the CAISO Control Area should be exempted from CAISO Tariff requirements, and 2) QFs seeking to interconnect or modify an existing facility interconnected at the transmission level directly to the CAISO Controlled Grid should be required to comply with the CAISO’s interconnection

process. In this regard, the CAISO urges the Commission to find that, unlike QFs with PPAs that predate the formation of the CAISO and associated establishment of the CAISO's markets, new QFs and QFs executing new PURPA or other PPAs or extensions to PPAs will not be exempted from CAISO Tariff requirements. Furthermore, the CAISO asks the Commission to specify that QFs seeking to interconnect or modify an existing facility interconnected directly to the CAISO Controlled Grid at the transmission level should be required to comply with the CAISO's interconnection process.

I. NEW QFs AND QFs EXECUTING NEW PURPA OR OTHER PPAs OR EXTENSIONS TO PPAs SHOULD NOT BE CLASSIFIED AS “REGULATORY MUST-TAKE GENERATION” AND SHOULD BE SUBJECT TO THE CAISO TARIFF

Section 2.2.1 of the CAISO's *pro forma* Participating Generator Agreement (“PGA”) and the CAISO's *pro forma* QF-PGA exempts certain Generators¹ with an existing PPA with a Utility Distribution Company from the requirement that they enter into a PGA or QF-PGA with the CAISO. The exemption extends to PPAs entered into and effective as of December 20, 1995,² pursuant to which the Generator sells all of its Energy (except for auxiliary load) and Ancillary Services to a Utility Distribution Company or sells any Energy through “over the fence” arrangements authorized under Section 218(b) and related provisions of the California Public Utilities Code.³ (Tr. at 4112:9-15; 4122:12-20; 4127:22-23.) In addition, Section 4.6.3.2 (formerly Section 5.1.5) of the CAISO Tariff requires the CAISO to honor the contractual rights and obligations of Regulatory Must-Take Generation (“RMTG”) where the operation of such

¹ Capitalized terms have the meaning set forth in Appendix A, Master Definitions Supplement to the CAISO Tariff.

² The relevant date is December 31, 1996, if the Generator employs landfill gas technology.

³ The exemption does not extend to Generators that participate in the CAISO's markets. Even if a QF has an “over the fence” arrangement, the QF will be required to enter into a QF-PGA (or standard PGA) if it chooses to participate in the CAISO's markets.

RMTG resources is not subject to competition, as identified by the Commission.⁴ This exemption applicable to QFs has been in effect since CAISO start-up as part of the CAISO's original *pro forma* PGA⁵ and is reflected elsewhere in the CAISO Tariff.⁶

The reason for exempting, or "grandfathering," QFs with PPAs that predate the creation and design of the CAISO was to protect the pre-existing contractual expectations of the parties. These pre-existing PPAs include provisions regarding matters such as outage coordination, operations during system emergencies, and scheduling and settlement of power deliveries that are in some cases inconsistent with the provisions of the *pro forma* PGA and the CAISO Tariff with regard to the CAISO's role as the new operator of the transmission system and the CAISO Control Area. Accordingly, rather than attempt to require QFs with these pre-existing PPAs to conform to the requirements applicable to all other Generators subject to the *pro forma* PGA and the CAISO Tariff, the CAISO preserved the expectations and contractual rights and obligations of QFs with these pre-existing PPAs. The CAISO has worked, and continues to work, with the utilities to ensure the reliability of the CAISO Control Area operations, notwithstanding the inconsistency of the requirements applicable to pre-existing QF PPAs. For similar reasons, the requirement for the CAISO to honor RMTG contracts generally has also been in effect since market start-up as part of the CAISO Tariff.

⁴ Section 4.6.3.2 of the CAISO Tariff provides, "Notwithstanding any other provision of this ISO Tariff, the ISO shall discharge its responsibilities in a manner which honors any contractual rights and obligations of the parties to contracts, or final regulatory treatment, relating to Regulatory-Must-Take Generation of which protocols or other instructions are notified in writing to the ISO from time to time and on reasonable notice."

⁵ See the CAISO's June 1, 1998 compliance filing in Commission Docket Nos. EC96-19-029 and ER96-1663-030.

⁶ See, e.g., Section 10.3.18.5.2(b)vi of the CAISO Tariff (formerly CAISO Metering Protocol MP § 13.5.2(b)vi), which provides the opportunity for a metering exemption for QFs with PPAs effective as of December 20, 1995, if the PPA is inconsistent with Section 10 or Appendix J of the CAISO Tariff; Section 34.7 of the CAISO Tariff (formerly the CAISO's Dispatch Protocol § 9.4.2), which applies to QFs that have entered into a PPA prior to March 31, 1997, and specifies that the outage coordination is subject to the existing PPA.

There is no justification for exempting new QFs and QFs with new PPAs or extensions to PPAs from the provisions of the CAISO Tariff or for the Commission's creation of any new RMTG contracts. Given that the prospective parties to new contracts are fully aware of the CAISO's requirements, there is no reason for the new contracts to be inconsistent with the CAISO's requirements, and the QFs should have the direct contractual relationship with the CAISO through the QF-PGA (or PGA). The development of the *pro forma* QF-PGA has been the subject of extensive proceedings before the Federal Energy Regulatory Commission ("FERC"), in which FERC has in many cases *directed* the CAISO to adopt provisions advocated by representatives of the QF community. Having specifically tailored the QF-PGA to the needs of QFs, the CAISO feels strongly that it should serve as the standard vehicle for establishing the relationship between the CAISO and all QFs not grandfathered under a pre-existing PPA. (Tr. at 4103:11-15; 4116:17-20.) Accordingly, the CAISO requests that the Commission specify that new QF PPAs, or any extension of an existing QF PPA, be drafted in a manner consistent with the CAISO Tariff and require the QF to enter into a PGA or QF-PGA and comply with all applicable CAISO operating and scheduling protocols. (Tr. at 4116:17-20.)

The CAISO also requests that the Commission make clear that any new contracts established for QFs are not RMTG contracts and *are* "subject to competition." In doing so, the Commission would facilitate the CAISO's efficient and reliable operation of the transmission grid, given the CAISO must dispatch resources to accommodate RMTG Energy, which may increase costs to consumers and, to the extent such resources are located in generation pockets, may effect system reliability.

II. QFs PROPOSING TO INTERCONNECT OR MODIFY AN EXISTING FACILITY INTERCONNECTED DIRECTLY TO THE CAISO CONTROLLED GRID SHOULD BE SUBJECT TO THE CAISO'S INTERCONNECTION PROCESS

It is the CAISO's position that QFs that are or will be interconnected directly to the CAISO Controlled Grid should be required to comply with the CAISO's interconnection process. (Tr. at 4103:1-15; 4119:18-28; 4120:2-17; 4131:4-9.) The CAISO believes that Rule 21 interconnections should continue to be limited to generation resources interconnected to the distribution system owned and controlled by one of the IOUs. The CAISO has a standard interconnection process that provides consistent, non-discriminatory access to the transmission system comprising the CAISO Controlled Grid applicable to all Generators. Included in that interconnection process is a queuing process that ensures fair and timely treatment of all requests for new interconnections or modifications affecting an existing interconnection. It would be disruptive to this standardized, non-discriminatory transmission system interconnection process for the Commission to establish a different set of rules for the interconnection of QFs to the transmission system (or for modifications to existing QF projects that would have an effect on a QF's interconnection to the transmission system). (Tr. at 4113:24-28; 4114:1-4; 4120:6-17.)

Moreover, a basic feature of the CAISO interconnection process is the production of reliability studies to ensure that reliability upgrades required for a new interconnection to the transmission system are properly identified and associated with the project that has caused the need for such upgrades. There have been, and will continue to be, instances where a single interconnection project may impact the reliability of more than one IOU's

portion of the interconnected grid. The CAISO's interconnection process ensures that the overall impacts are assessed. As a result, the reliability studies conducted pursuant to the CAISO's interconnection process are necessary for all transmission level interconnections, and it is simply not possible for an IOU to accommodate QF interconnections to the CAISO Controlled Grid without CAISO participation. (Tr. at 4121:13-25.) Thus, the Commission should require QFs seeking to interconnect or modify a facility interconnected at the transmission level directly to the CAISO Controlled Grid to comply with the CAISO's interconnection process.

Such Commission clarification in this regard is fully consistent with state law. AB 1890 transferred responsibility for ensuring grid reliability from the IOUs and the Commission to the CAISO. California Public Utilities Code § 345 states that "[t]he Independent System Operator shall ensure efficient use and reliable operation of the transmission grid consistent with achievement of planning and operating reserve criteria no less stringent than those established by the Western Systems Coordinating Council and the North American Electric Reliability Council." Further, California Public Utilities Code § 334 provides explicitly that "[t]he proposed restructuring of the electric industry would transfer responsibility for ensuring short- and long- term reliability away from electric utilities and regulatory bodies to the Independent System Operator" In contrast, the CAISO has no position regarding the Commission's rules for interconnections to a utility's distribution system, and the CAISO Tariff acknowledges that such interconnections are the province of the utilities and the Commission.

III. THE CAISO'S PROPOSAL TO ESTABLISH A DAY-AHEAD ENERGY MARKET UPON IMPLEMENTATION OF ITS MRTU TARIFF WILL LIKELY RESULT IN ALL ELECTRIC UTILITIES IN THE CAISO CONTROL AREA MEETING THE REQUIREMENTS OF PURPA SECTION 210(m)(1)(A)

On January 19, 2006, FERC issued a Notice of Proposed Rulemaking⁷ to determine amendments FERC should make to its regulation governing small power production and cogeneration in response to Section 1253 of the Energy Policy Act of 2005, which added Section 210(m) to PURPA. Specifically, PURPA Section 210(m) provides for termination of an electric utility's obligation to purchase energy and capacity from QFs if FERC finds that certain conditions are met. The NOPR proposes a framework for FERC's determination of whether electric utilities will be exempt from the PURPA mandatory purchase obligation as otherwise provided in PURPA Section 210. Among other things, FERC proposes to find that electric utilities that are members of specified independent system operators ("ISOs") and regional transmission organizations ("RTOs") meet the criteria under Section 210(m) for exemption from the mandatory purchase obligation.

Subsection 210(m) terminates the mandatory purchase and sale requirements of Section 210 of PURPA upon findings by FERC that a QF has nondiscriminatory access to: (A) independently administered, auction based day-ahead and real-time wholesale markets *and* wholesale markets for long-term sales of capacity and energy; *or* (B) transmission and interconnection services provided by a FERC-approved regional transmission entity administered through a tariff that ensures nondiscriminatory treatment *and* competitive wholesale markets for long-term, short-term and real-time sales; *or* (C) comparable competitive wholesale markets. Once FERC makes such findings,

⁷ Noticed in the Federal Register on January 27, 2006, at 71 Fed. Reg. 4532-01 (2006).

electric utilities will not be obligated to enter into a new contract or otherwise be obligated to purchase energy from a QF.

In the NOPR, FERC interprets Section 210(m)(1)(A) to apply in regions in which ISOs and RTOs administer day-ahead and real-time markets, and bilateral long-term contracts for the sale of capacity and electric energy are available to participants/QFs in these markets. NOPR at P 22. FERC proposes to find that the Midwest ISO, PJM, ISO-NE, and NYISO satisfy the requirements of Section 210(m)(1)(A). *Id.* In conjunction with this proposed finding, FERC states in the NOPR: “While Southwest Power Pool, Inc. (SPP) and the California Independent System Operator Corporation (Cal ISO), respectively are a Commission-approved RTO and ISO, they do not satisfy the requirements of Section 210(m)(1)(A) because neither has day-ahead markets.” NOPR at P 22, fn. 15.

While the NOPR is correct that the CAISO currently does not operate a day-ahead energy market, the CAISO is proposing to establish such a market upon the implementation of its Market Redesign and Technology Upgrade (“MRTU”) Tariff. (Tr. at 4106:8-19.) The CAISO filed its proposed MRTU Tariff on February 9, 2006, in FERC Docket No. ER06-615, and requested an effective date of November 1, 2007. The MRTU Tariff provides for operation of a “Day-Ahead Market,” in which Scheduling Coordinators can submit bids for energy and other services into a market that is closed in advance of the trading day. *See* MRTU Tariff, Section 31. With the addition of its proposed Day-Ahead Market, the CAISO believes that it would satisfy all of the requirements under Section 210(m)(1)(A). (Tr. at 4126:18-28; 4127:1-2.) The CAISO anticipates that FERC will be able to issue a finding that, as of the effective date of the

Day-Ahead Market provisions of the CAISO's MRTU Tariff, all electric utilities that are members of the CAISO will meet the requirements of Section 210(m)(1)(A), and thus result in QFs being subject to the CAISO's Tariff. In anticipation and in advance of this result, the CAISO urges the Commission to exercise its jurisdiction over QFs prior to the termination of the mandatory purchase and sale requirements and any residual jurisdiction it may have over QFs after termination of the mandatory purchase and sale requirements, to remove the RMTG status of QF Energy sales and to require QFs interconnecting or interconnected directly to the CAISO Controlled Grid to comply with the CAISO's interconnection process.

IV. CONCLUSION

The CAISO respectfully requests that, in developing its long-term policies for QFs with expiring QF contracts, the Commission recognize that creating discrepancies in the treatment of Generators interconnected to and making use of the CAISO Controlled Grid undermines the ability of the CAISO to operate the transmission grid reliably and efficiently. QFs must be treated similarly to other Generators with facilities in the CAISO Control Area and, in particular, the Commission should specify that (1) new QFs and QFs executing new PPAs or extensions to PPAs will not be exempted from CAISO

Tariff requirements and (2) QFs seeking to interconnect or modify an existing facility interconnected at the transmission level directly to the CAISO Controlled Grid in order to export energy should be required to comply with the CAISO's interconnection process.

Respectfully submitted,

A handwritten signature in cursive script that reads "Stacie L. Ford". The signature is written in black ink and is positioned above a horizontal line.

Charles F. Robinson, 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

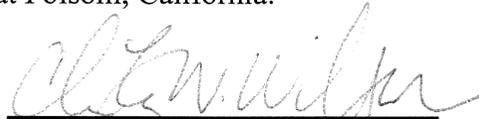
Attorneys for
California Independent System Operator

Dated: March 3, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, an Opening Brief of the California Independent System Operator Corporation in Docket Nos. R.04-04-003 & R.04-04-025.

Executed on March 3, 2006, at Folsom, California.

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

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 abb@eslawfirm.com	ALEXANDRE B. MAKLER alexm@calpine.com	ANDREW J. VAN HORN andy.vanhorn@vhcenergy.com	ALISA NOCHOMOVITZ anochomovitz@whitecase.com
ALAN NOGEE anogee@ucsusa.org	ANN L. TROWBRIDGE atrowbridge@downeybrand.com	ANDREW ULMER aulmer@water.ca.gov	Amy C. Yip-Kikugawa ayk@cpuc.ca.gov
BRIAN T. CRAGG bcragg@gmsr.com	BERJ K. PARSEGHIAN berj.parseghian@sce.com	WILLIAM B. MARCUS bill@jbsenergy.com.	BARRY LOVELL bjl@bry.com
BRADLEY MEISTER bmeister@energy.state.ca.us	WILLIAM E. POWERS bpowers@powersengineering.com	BARBARA R. BARKOVICH brbarkovich@earthlink.net	BRIAN THEAKER brian.theaker@williams.com
BRIAN HANEY brianhaney@useconsulting.com	WILLIAM P. SHORT bshort@ridgewoodpower.com	Steve Linsey car@cpuc.ca.gov	CARLO ZORZOLI carlo.zorzoli@enel.it
CASE ADMINISTRATION case.admin@sce.com	cem@newsdata.com	CENTRAL FILES centralfiles@semprautilities.com	CHRIS KING chris@emeter.com
CHRISTOPHER HILEN chrishilen@dwt.com	CHRISTOPHER J. MAYER chrism@mid.org	LAW DEPARTMENT FILE ROOM cpuccases@pge.com	CAROL A. SMOOTS csmoots@perkinscoie.com
CURTIS KEBLER curtis.kebler@gs.com	DAVID SAUL david.saul@solel.com	DAN L. CARROLL dcarroll@downeybrand.com	DANIEL V. GULINO dgulino@ridgewoodpower.com
DAVID L. HUARD dhuard@manatt.com	DIANE I. FELLMAN diane_fellman@fpl.com	CHRIS ANN DICKERSON, PHD dickerson06@fscgroup.com	Donna J. Hines djh@cpuc.ca.gov
DOUGLAS K. KERNER dkk@eslawfirm.com	Don Schultz dks@cpuc.ca.gov	DOUG DAVIE dougdpucmail@yahoo.com	DAVID REYNOLDS dreynolds@aspensys.com
DEVRA WANG dwang@nrdc.org	DON WOOD dwood8@cox.net	DONALD SCHOENBECK dws@r-c-s-inc.com	ERIC LARSEN e.larsen@rcmbiothane.com
EDWARD C. REMEDIOS ecrem@ix.netcom.com	J.A. SAVAGE editorial@californiaenergycircuit.net	EVELYN KAHL ek@a-klaw.com	ED LUCHA ell5@pge.com
EDWARD J TIEDEMANN etiedemann@kmtg.com	EDWARD V. KURZ evk1@pge.com	ERIC YUSSMAN eyussman@knowledgeinenergy.com	KAREN TERRANOVA filings@a-klaw.com
MATTHEW FREEDMAN freedman@turn.org	JOHN C. GABRIELLI gabriellicaw@sbcglobal.net	GARY L. ALLEN gary.allen@sce.com	GEORGETTA J. BAKER gbaker@sempra.com
Robert Kinosian gig@cpuc.ca.gov	GREGG MORRIS gmorris@emf.net	GRANT A. ROSENBLUM grosenblum@caiso.com	GRACE LIVINGSTON-NUNLEY gxl2@pge.com
HOWARD W. CHOY hchoy@isd.co.la.ca.us	ANDREW HOERNER hoerner@redefiningprogress.org	RICHARD D. ELY hydro@davis.com	IRENE M. STILLINGS irene.stillings@sdenenergy.org
ERIC J. ISKEN j.eric.isken@sce.com	JOHN E. GREENHALGH jack@jackgreenhalgh.com	JACK PIGOTT jackp@calpine.com	JANET COMBS janet.combs@sce.com
JOSEPH B. WILLIAMS jwilliams@mwe.com	JEFFREY P. GRAY jeffgray@dwt.com	E. JESUS ARREDONDO jesus.arredondo@nrgenergy.com	JOHN GALLOWAY jgalloway@ucsusa.org
JANET DOYLE jheckdoyle@aol.com	JAMES ROSS jimross@r-c-s-inc.com	JOSEPH M. KARP jkarp@whitecase.com	JOSEPH KLOBERDANZ jkloberdanz@semprautilities.com
JOHN W. LESLIE jleslie@luce.com	JIM MCARTHUR jmcarthur@elkhills.com	Julie Halligan jmh@cpuc.ca.gov	JOY A. WARREN joyw@mid.org

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

JANINE L. SCANCARELLI
jscancarelli@flk.com

JOY C. YAMAGATA
jyamagata@semprautilities.com

KENNETH E. ABREU
k.abreu@sbcglobal.net

KAREN LINDH
karen@klindh.com

KATHERINE RYZHAYA
karp@pge.com

KAREN BOWEN
kbowen@whitecase.com

Karen A. Degannes
kdg@cpuc.ca.gov

KEVIN WOODRUFF
kdw@woodruff-expert-services.com

KEITH W. MELVILLE
kmelville@sempra.com

Karen P. Paull
kpp@cpuc.ca.gov

KRIS G. CHISHOLM
kris.chisholm@eob.ca.gov

LYNNE BROWN
l_brown123@hotmail.com

LOS ANGELES DOCKET OFFICE
LAadocket@cpuc.ca.gov

LAURA GENAO
laura.genao@sce.com

DONALD C. LIDDELL, P.C.
liddell@energyattorney.com

LIZBETH MCDANNELL
lizbeth.mcdannel@sce.com

MARY A. GANDESBERY
magq@pge.com

Marion Peleo
map@cpuc.ca.gov

MARK J. SMITH
mark_j_smith@fpl.com

TANDY MCMANNES
mcmannes@aol.com

MARGARET D. BROWN
mdbk@pge.com

MARC D. JOSEPH
mdjoseph@adamsbroadwell.com

MAURICE CAMPBELL
mecsoft@pacbell.net

MARC KOLB
mekd@pge.com

MICHEL PETER FLORIO
mflorio@turn.org

MICHAEL J. GIBBS
mgibbs@icfconsulting.com

MARK HARRER
mharrer@sbcglobal.net

MICHAEL A. BACKSTROM
michael.backstrom@sce.com

MICHAEL E. BOYD
michaelboyd@sbcglobal.net

MIKE MCCORMICK
mike@climateregistry.org

MICHAEL JASKE
mjaske@energy.state.ca.us

MAUREEN LENNON
mlennon@whitecase.com

MARY ANN MILLER
mmiller@energy.state.ca.us

MICHAEL ALCANTAR
mpa@a-klaw.com

MARK R. HUFFMAN
mrh2@pge.com

DAVID HOWARTH
mrw@mrwassoc.com

WILLIAM A. MONSEN
mrw@mrwassoc.com

mrw@mrwassoc.com

mrw@mrwassoc.com

Merideth Sterkel
mts@cpuc.ca.gov

MICHAEL A. YUFFEE
myuffee@mwe.com

Noel Obiora
nao@cpuc.ca.gov

NINA BUBNOVA
nbb2@pge.com

NORA SHERIFF
nes@a-klaw.com

NANCY RADER
nrader@calwea.org

PATRICK MCDONNELL
pcmcdonnell@earthlink.net

JANIS C. PEPPER
pepper@cleanpowermarkets.com

Phillipe Auclair
pha@cpuc.ca.gov

PETER W. HANSCHEN
phansch@mofo.com

W. PHILLIP REESE
phil@reesechambers.com

PATRICK HOLLEY
pholley@covantaenergy.com

PAUL C. LACOURCIERE
placourciere@thelenreid.com

Peter Lai
ppl@cpuc.ca.gov

RANDALL W. KEEN
pucservice@manatt.com

SHAWN SMALLWOOD, PH.D.
puma@davis.com

ALAN PURVES
purves@grslc.net

RALPH E. DENNIS
ralph.dennis@constellation.com

REN ORENS
ren@ethree.com

ANNE FALCON
rfp@eesconsulting.com

RICK NOGER
rick_noger@praxair.com

RICHARD LAUCKHART
rlauckhart@henwoodenergy.com

Robert L. Strauss
rls@cpuc.ca.gov

RICHARD MCCANN
rmccann@umich.edu

Regina DeAngelis
rmd@cpuc.ca.gov

ROBERT B. GEX
robertgex@dwt.com

ROGER BERLINER
roger@berlinerlawpllc.com

RASHA PRINCE
rprince@semprautilities.com

ROD AOKI
rsa@a-klaw.com

REED V. SCHMIDT
rschmidt@bartlewells.com

ROBERT SHAPIRO
rshapiro@chadbourne.com

SAM HITZ
sam@climateregistry.org

ROBERT SARVEY
sarveybob@aol.com

SHIRLEY WOO
saw0@pge.com

Susannah Churchill
sc1@cpuc.ca.gov

SCOTT J. ANDERS
scottanders@sandiego.edu

Shannon Eddy
sed@cpuc.ca.gov

RICHARD M. ESTEVES
sesco@optonline.net

STACIE FORD
sford@caiso.com

Sudheer Gokhale
skg@cpuc.ca.gov

Sepideh Khosrowjah
skh@cpuc.ca.gov

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

STEVEN A. LEFTON
slefton@aptcheng.com

SNULLER PRICE
snuller@ethree.com

STEVEN S. SCHLEIMER
sschleimer@calpine.com

SARA STECK MYERS
ssmyers@att.net

STEVEN F. GREENWALD
stevegreenwald@dwt.com

STEVEN KELLY
steven@iepa.com

STEVEN A. GREENBERG
steveng@destrategies.com

Traci Bone
tbo@cpuc.ca.gov

Theresa Cho
tcx@cpuc.ca.gov

Terrie D. Prosper
tdp@cpuc.ca.gov

TIM HEMIG
tim.hemig@nrgenergy.com

TOM BEACH
tomb@crossborderenergy.com

TOM SKUPNJAK
toms@i-cpg.com

TORY S. WEBER
tory.weber@sce.com

VALERIE J. WINN
vjw3@pge.com

VIKKI WOOD
vwood@smud.org

WILLIAM H. BOOTH
wbooth@booth-law.com

BARBARA GEORGE
wem@gc.org

JAMES WOODRUFF
woodrujb@sce.com

Wade McCartney
wsm@cpuc.ca.gov

WILLIAM W. WESTERFIELD III
wwesterfield@stoel.com

ANAN H. SOKKER
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20004