

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

Application of Pacific Gas and Electric Company for Authority to Implement Default CPP Rate Options For Large Customers.

Application 05-01-016
(Filed January 20, 2005)

Application of San Diego Gas & Electric Company (U902-E) for Adoption of a 2005 Default Critical Peak Pricing Structure for Commercial and Industrial Customers with Peak Demands Exceeding 300 kW.

Application 05-01-017
(Filed January 20, 2005)

Southern California Edison Company's (U338-E) Application for Approval of Rate Design Proposals for Large Customers.

Application 05-01-018
(Filed January 20, 2005)

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

Charles F. Robinson, General Counsel
Sidney L. Mannheim, Senior Regulatory Counsel
Grant A. Rosenblum, Regulatory Counsel
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-351-4400
Facsimile: 916-351-2350

Attorneys for the
California Independent System Operator

Dated: March 14, 2005

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In accordance with Rule 75 of the Commission's Rules of Practice and Procedure, and the Assigned Commissioner's Ruling Establishing Scope, Schedule and Procedures for Proceeding, dated March 11, 2005, the California Independent System Operator ("CAISO") respectfully submits its opening brief in the above-captioned consolidated proceeding.

I. INTRODUCTION

On January 20, 2005, Southern California Edison Company ("SCE"), Pacific Gas and Electric Company ("PG&E") and San Diego Gas & Electric Company ("SDG&E") (collectively "Investor Owned Utilities" or "IOUs") submitted applications in compliance with the *Assigned Commissioner and Administrative Law Judge's Ruling Directing the Filing of Rate Design Proposals for Large Customers*, issued on December 8, 2004, in Rulemaking 02-06-001 ("ACR"). The ACR was motivated by the salutary desire to proactively address a potential

1 deficiency in generating capacity to meet summer 2005 peak electricity demand, especially in
2 Southern California. In an effort to mitigate the anticipated supply/demand imbalance, the ACR
3 directed the IOUs to (1) develop a new default rate for customers over 200 kW that provides a
4 critical peak price (“CPP”) signal distinct from the generic time of use rate schedule and (2)
5 move existing non-firm and interruptible rate customers onto the new CPP rate and concurrently
6 enroll them in an “optional program like PG&E’s proposed 2005 E-BIP.” (ACR at 2-3 and 8.)
7

8 The CAISO’s interest and testimony in this consolidated proceeding has been narrowly
9 focused on issues that have the potential to impact grid reliability for summer 2005. Consistent
10 with this interest and the CAISO’s testimony, CAISO’s advocates the following:

- 11 • The Commission adopt the IOUs’ recommendation to limit any application of the
12 CPP rate to customers who do not currently participate, or enroll to participate, in an
13 interruptible load program for summer 2005. Preserving the efficacy of existing
14 interruptible programs for this summer is critical.
- 15 • The Commission should reopen and expand existing non-firm, interruptible
16 programs. The Commission should focus on the most effective means of obtaining
17 additional demand response in the short time prior to summer 2005.
- 18 • Should CPP rates be implemented, the Commission should adopt the CAISO “Alert
19 Notice” as an acceptable trigger for the CPP events.
- 20 • Should CPP rates be implemented, the Commission should adopt a peak period
21 definition of 4 hours that runs from 2:00 p.m. to 6:00 p.m. to coincide with the
22 CAISO system peak.

23 **II. EXISTING INTERRUPTIBLE PROGRAMS SHOULD BE MAINTAINED**
24 **AND EXPANDED FOR SUMMER 2005**

25 The CAISO concurs with the Commission’s “substantial concern” that capacity margins
in California will be tight for summer 2005. The CAISO is currently preparing its assessment of

1 the forecasted peak electricity supply and demand levels for the CAISO Control Area for the
2 summer of 2005. Notwithstanding the absence of any final outcomes of its assessment, the
3 CAISO anticipates results generally consistent with the conclusions reached by the California
4 Energy Action Plan report, entitled California's Energy Situation Summer 2005, issued on
5 February 22, 2005. That report found, after adjusting for high probability capacity additions and
6 retirements, that an additional 1966 MW of capacity is needed in Southern California in 2005 to
7 satisfy operating reserves under normal operating conditions and a 1-in-10 year weather forecast.
8 (Exhibit 216 at 3:8-10.) Demand growth and retirements are anticipated to exacerbate the
9 capacity deficiency in subsequent years in Southern California. Capacity in Northern California
10 was deemed adequate for 2005, but the Energy Action Plan report concluded that actions remain
11 necessary for Northern California to address increasingly tight margins that turn into a projected
12 shortfall for 2008.

14 Given such a clear need for action, the CAISO commends President Peevey and ALJ
15 Cooke for proactively directing the IOUs to address the State's capacity needs through demand-
16 side programs. However, the promise of additional customer demand response from new
17 programs must be balanced with the certainty and reliability of existing interruptible programs.
18 The CAISO agrees with SCE, PG&E and SDG&E as well as virtually all stakeholders that
19 balancing these interests leads to the conclusion that existing non-firm and interruptible
20 customers should remain on their current rate schedules and not be required to convert to
21 relatively untested programs, such as the E-BIP program referenced in the ACR. (See, e.g.,
22 Exhibit 1 at 1-9:23-1-10:8; Exhibit 5 at 22:4-7.)

24 A corollary to preserving the existing, proven demand response programs for Summer
25 2005 is to expand and reopen such programs to promote reliability. The CAISO urges the

1 Commission to permit the IOUs to reopen and expand their traditional interruptible programs as
2 the most effective way to achieve increases in responsive demand for summer 2005. The
3 inability to timely market new programs and educate customers favors a policy that emphasizes
4 existing programs. Thus, the CAISO believes the Commission should focus on reopening and
5 expanding existing programs as the most realistic approach to obtaining incremental benefits
6 from demand response for Summer 2005. (Exhibit 215 at 5:24-6:16.)

7
8 **III. AN ALERT NOTICE CONSTITUTES AN APPROPRIATE TRIGGER
FOR THE CPP RATE**

9 An CAISO declared Alert Notice constitutes an appropriate triggering mechanism for a
10 CPP event. An Alert Notice is primarily focused on the day-ahead time frame. If the CAISO
11 determines that Operating Reserves are forecasted to be less than the required amount, then an
12 Alert Notice will be issued after the close of the Day-Ahead Market, which closes at 1:00 p.m.
13 PST (on the day ahead of the subject Trade Day). The CAISO Dispatch Protocol, Section DP
14 10.1.1, "System alert" describes the Alert Notices as:

15
16 "A Noticed Issued by the ISO when the operating requirements of the ISO
17 Controlled Grid are marginal because of Demand exceeding forecast, loss of major
18 Generation or loss of transmission capacity that has curtailed imports into the ISO
Control Area, or if the Day Ahead Market is short on scheduled Energy and
Ancillary Services for the ISO Control Area."

19 Although an Alert Notice may be declared at any time there is a significant loss of generating or
20 transmission resources, or when there is a forecast demand exceeding current resources known to
21 be available in the market, Alert Notice are predominantly issued following the Day-Ahead
22 Market. (Exhibit 215 at 7:18-8:10.) For the year 2000, 22 of 26 Alerts were issued in the day-
23 ahead timeframe for shortfalls anticipated to occur the next day. (Exhibit 226.)

24 The CAISO does not believe that its ability to issue Alert Notices at times other than for
25 the following day will result in confusion or otherwise hamper the efficient implementation of

the CPP program. Alert Notices expressly include a “start” time and an “ending” time. Thus, customers will have the ability to clearly differentiate between day-of Alerts and next day Alerts as well as Alerts that do not implicate the relevant CPP period.

The CAISO recognizes, however, that it may be necessary to issue Alert Notices on a regional, not system-wide, basis. The CAISO has already adopted procedures to call “Regional Reserve” emergency on a zonal basis if Operating Reserves in a particular zone are, or are forecast to be, below appropriate requirements. (Exhibit 215 at 6:25-7:4.)

IV. THE PEAK PERIOD MAY BE SET FOR FOUR HOURS PER DAY

The fundamental goal of CPP is to reduce or flatten out the peak usage. In its rebuttal testimony, the CAISO agreed that SDG&E’s CPP event period of seven hours and SCE’s CPP event period of six hours are unnecessarily long to achieve their goal of mitigating system peak usage. (Exhibit 216 at 2:2-7; see also, Exhibit 220 at 4:22-23.) The CAISO’s system summer coincident peak generally occurs during hour ending 5:00 p.m. The duration the CPP should apply on either side of this peak depends on the shape of the system load curve. Generally, the flatter the load curve, the longer any demand curtailment would have to apply to obtain the anticipated reliability benefits. The opposite is also true. Based on the CAISO’s typical daily load curve, a four-hour period from 2:00 p.m. to 6:00 p.m. will target the most critical period and therefore produce the greatest reliability benefit. (Exhibit 216 at 2:22-25.)

The fact that the IOUs’ service territories may peak at different times of the day does not change the CAISO’s conclusion. Timing the precise peak of individual load serving entities is not as critical as maximizing the willingness and ability of customers to respond to the CPP incentives. Many eligible customers may have facilities in more than one IOU service territory. Varying program parameters will discourage participation and/or unnecessarily increase

administrative costs associated with customer compliance. As noted, by focusing on a system load curve, the benefits of program uniformity can be achieved while satisfying the goal of enhancing reliability by reducing peak usage.

The CAISO also disagrees with certain of the reasons articulated by SCE for its selection of the CPP period. SCE states a “concern regarding peak shifting,” such that “if costing periods are defined too narrowly, they may induce a sufficient reduction that our peaks shift to an adjacent hour.” (Exhibit 16.) There are two responses to SCE’s stated peak shifting concern. First, the fact that the peak may have shifted is not inconsistent with the goal of CPP or enhancing system reliability. The significant issue – from both a resource cost and reliability perspective - is whether the peak quantity is reduced. Although the CAISO has not performed any quantitative analysis to demonstrate the point, it can be reasonably assumed that by moving CPP load to a time period which traditionally does not experience the peak load associated with air conditioning usage, the overall peak, whenever it occurs, will be less than prior to implementation of CPP. Second, SCE data confirms that the probability of peak shifting is highly remote. SCE notes that the average change in load between its peak hour of 3-4 p.m. and non-peak hour of 1-2 p.m. during the ten highest load days in each of several years was approximately 600 to 700 MW. Therefore, for the peak to shift to the 1-2 p.m. period, for example, the amount of load migration attributable to CPP would have to be greater than 600 – 700 MW. Even the most optimistic proponent of CPP would not anticipate that significant a level of peak load reduction or migration.

SCE also rejects a more restricted CPP period because “[a] significant number of critical ISO events occur [sic] outside of what is being proposed as peak hours.” (Exhibit 16.) The CAISO does not believe this characterization tells a complete story. For the period 2002 – 2004

1 all "stage" emergencies¹ commenced at or during the CAISO's proposed CPP period, and for
2 1999, three of four stage emergencies commenced during the proposed CPP period. Only in
3 1998 was a material number of the stage emergencies declared prior to the proposed CPP period.
4 Accordingly, the CAISO believes a 2:00 to 6:00 p.m. CPP period would accurately capture the
5 time-period most susceptible to operating reserve shortfalls.

6 **V. CONCLUSION**

7
8 The CAISO respectfully requests that the Commission adopt CPP tariffs for the IOUs
9 consistent with the foregoing.

10
11 March 14, 2005

Respectfully Submitted:

12 By: 
13 Grant A. Rosenblum
14 Attorney for
California Independent System Operator

15 Charles F. Robinson, General Counsel
16 Sidney M. Davies, Senior Regulatory Counsel
17 Grant A. Rosenblum, Regulatory Counsel
California Independent System Operator
18 151 Blue Ravine Road
Folsom, CA 95630
19 Telephone: 916-351-4400
Facsimile: 916-351-2350

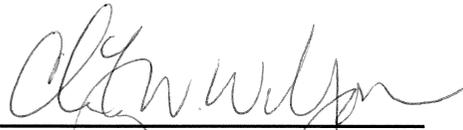
20 Attorneys for
California Independent System Operator

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25 ¹ Stage emergencies are declared by the CAISO "any time it is clear that an Operating Reserve shortfall (less than MORC minimum) is unavoidable or, when in real-time operations, the Operating Reserve is forecast to be less than minimum after utilizing available resources." (Exhibit 16, Attachment 1.)

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic mail, a copy of the foregoing Opening Brief of the California Independent System Operator Corporation to each party in Docket Nos. A.05-01-016, A.05-01-017 and A.05-01-018.

Executed on March 14, 2005 at Folsom, California.

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

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

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

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

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

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

DOUGLASS & LIDDELL
GREGORY KLATT
411 E. HUNTINGTON DR., STE. 107-356
ARCADIA, CA 91007

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

SOUTHERN CALIFORNIA EDISON COMPANY
BRUCE A. REED
2244 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD, CA 91770

SAN DIEGO GAS & ELECTRIC
KELLY M. MORTON
101 ASH STREET H-213
SAN DIEGO, CA 92101-3017

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

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

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

CALIF PUBLIC UTILITIES COMMISSION
James E. Scarff
505 VAN NESS AVENUE
ROOM 5121
SAN FRANCISCO, CA 94102-3214

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

PILLSBURY WINTHROP LLP
MICHAEL S. HINDUS
50 FREMONT STREET
SAN FRANCISCO, CA 94105

ANDERSON & POOLE
EDWARD G. POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108

GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
BRIAN T. CRAGG
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
JAMES D. SQUERI
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

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

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

PACIFIC GAS AND ELECTRIC COMPANY
SHIRLEY WOO
PO BOX 7442
SAN FRANCISCO, CA 94120

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

MORRISON & FOERSTER, LLP
PETER W. HANSCHEN
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596-8130

ECONOMIC SCIENCES CORPORATION
BILL F. ROBERTS
1516 LEROY AVENUE
BERKELEY, CA 94708

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

CALIFORNIA LEAGUE OF FOOD PROCESSORS
ED YATES
980 NINTH STREET, SUITE 230
SACRAMENTO, CA 95814

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

FELLON-MCCORD & ASSOCIATES
ERIC YUSSMAN
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE, KY 40223

FELLON-MCCORD & ASSOCIATES
RALPH DENNIS
9960 CORPORATE CAMPUS DRIVE, SUITE 2000
LOUISVILLE, KY 40223

LANDIS+GYR INC.
ELLIE A. DOYLE
2800 DUNCAN ROAD
LAFAYETTE, IN 47904

WALT-MART STORES, INC.
ANGELA S. BEEHLER
2001 SE 10TH STREET
SAM WALTON DEVELOPMENT COMPLEX
BENTONVILLE, AR 72716

ENERGY MANAGEMENT SERVICES
KEVIN J. SIMONSEN
646 EAST THIRD AVENUE
DURANGO, CO 81301

APS ENERGY SERVICES
JOHN STERLING
400 E VAN BUREN ST., SUITE 750
PHOENIX, AZ 85004

THE GAS COMPANY
CHRISTOPHER T. GOFF
555 W. FIFTH ST., ML GT22E3
LOS ANGELES, CA 90013-1040

LOS ANGELES UNIFIED SCHOOL DISTRICT
ANDREW S. CHEUNG
333 S. BEAUDRY AVE., 20TH FLOOR
LOS ANGELES, CA 90017

WILLIAMS POWER COMPANY, INC.
ROGER PELOTE
12736 CALIFA STREET
VALLEY VILLAGE, CA 91602

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

SOUTHERN CALIFORNIA EDISON COMPANY
JENNIFER R. HASBROUCK
2244 WALNUT GROVE AVENUE, ROOM 345
PO BOX 800
ROSEMEAD, CA 91770

SOUTHERN CALIFORNIA EDISON COMPANY
MERAJ RIZVI
2244 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD, CA 91770

MICHAEL D. BRIGGS
PO BOX 1758
LAJOLLA, CA 92038-1758

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

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

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

SAN DIEGO GAS & ELECTRIC COMPANY
CHRISTOPHER BING
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123

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

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

UTILITY SAVINGS & REFUND, LLC
CHARLES R. TOCA
1100 QUAIL, SUITE 217
NEWPORT BEACH, CA 92660

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

RENEE H. GUILD
2481 PORTERFIELD COURT
MOUNTAIN VIEW, CA 94040

SAN FRANCISCO BAY AREA RAPID TRANSIT
CONNIE B. LLOYD
PO BOX 12688
MSQ-3
OAKLAND, CA 94060

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

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

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

PILLSBURY WINTHROP LLP
CATHERINE A. WATKINS
50 FREMONT STREET
SAN FRANCISCO, CA 94105-2228

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110

PACIFIC GAS AND ELECTRIC COMPANY
JUNE RUCKMAN
PO BOX 770000, MAIL CODE B8R
SAN FRANCISCO, CA 94177

PACIFIC GAS AND ELECTRIC COMPANY
SHIRLEY FREDERICKSON
PO BOX 770000, MAIL CODE B8R
SAN FRANCISCO, CA 94177

SPURR
MICHAEL ROCHMAN
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520

SIEMENS BUILDING TECHNOLOGIES, INC.
ALEX RAMOS
25821 INDUSTRIAL BLVD., STE. 300
HAYWARD, CA 94545

MACH ENERGY
DALE MURDOCK
1801 N. CALIFORNIA BLVD., STE. 103
WALNUT CREEK, CA 94596

SAN FRANCISCO BAY AREA RAPID TRANSIT
CONNIE B. LOYD
PO BOX 12688 MSQ 3
OAKLAND, CA 94604-2688

SAN FRANCISCO BY AREA RAPID TRANSIT DIST
MARCO GOMEZ
300 LAKESIDE DRIVE, 23RD FLOOR
OAKLAND, CA 94607

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

DAVID MARCUS
PO BOX 1287
BERKELEY, CA 94701

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

CLYDE S. MURLEY
600 SAN CARLOS AVENUE
ALBANY, CA 94706

LAWRENCE BERKELEY NATIONAL LABORATORY
NICOLE HOPPER
ONE CYCLOTRON RD, MS 90-4000
BERKELEY, CA 94720

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

MANUFACTURES COUNCIL OF THE CENTRAL VALL
JAN MARIE ENNENGA
PO BOX 1564
MODESTO, CA 95353

BOYD WILSON
3821 CROWELL ROAD, 234
TURLOCK, CA 95382

BARKOVICH & YAP, INC.
BARBARA R. BARKOVICH
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

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

M. CUBED
RICHARD MCCANN
2655 PORTAGE BAY, SUITE 3
DAVIS, CA 95616

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

BRAUN & BLAISING, P.C.
SCOTT BLAISING
8980 MOONEY ROAD
ELK GROVE, CA 95624

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

CALIFORNIA INDEPENDENT SYSTEM OPERATOR
GRANT A. ROSENBLUM
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

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

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

CALIFORNIA ATTRACTION AND PARKS ASSN.
JOHN ROBINSON
1011 10TH STREET, SUITE 150
SACRAMENTO, CA 95814

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

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

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

COSTCO WHOLESALE CORPORATION
JANET BENISH
999 LAKE DRIVE
ISSAQUAH, WA 98028

JACKSON W. MUELLER, JR.
12450 235TH PLACE NE
REDMOND, WA 98053

CALIF PUBLIC UTILITIES COMMISSION
James Loewen
320 WEST 4TH STREET SUITE 500
NATURAL GAS, ENERGY EFFICIENCY AND RESOURCE
ADVISORY
LOS ANGELES, CA 90013

CALIF PUBLIC UTILITIES COMMISSION
Maxine Harrison
320 WEST 4TH STREET SUITE 500
EXECUTIVE DIVISION
LOS ANGELES, CA 90013

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

CALIF PUBLIC UTILITIES COMMISSION
Bruce Kaneshiro
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

CALIF PUBLIC UTILITIES COMMISSION
Jonathan J Reiger
505 VAN NESS AVENUE
ROOM 5130
SAN FRANCISCO, CA 94102-3214

CALIF PUBLIC UTILITIES COMMISSION
Michelle Cooke
505 VAN NESS AVENUE
ROOM 5006
SAN FRANCISCO, CA 94102-3214

CALIF PUBLIC UTILITIES COMMISSION
Scarlett Liang-Uejio
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214

CALIF PUBLIC UTILITIES COMMISSION
Steven C Ross
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214

CALIFORNIA ENERGY COMMISSION
DAVID HUNGERFORD
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

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

CALIFORNIA ENERGY COMMISSION
JOHN SUGAR
1516 9TH STREET, MS 42
ENERGY EFFICIENCY & DEMAND ANAL DIVISIO
SACRAMENTO, CA 95814

CALIFORNIA ENERGY COMMISSION
MIKE JASKE
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

DEPARTMENT OF GENERAL SERVICES
MIKE LANGLEY
1102 Q STREET, STE 5100
SACRAMENTO, CA 95814

CALIFORNIA ENERGY COMMISSION
MIKE MESSENGER
1516 9TH STREET, MS-28
SACRAMENTO, CA 95814