

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

Order Instituting Rulemaking to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development	R.01-10-24
---	------------

**REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON THE PROPOSED DECISION OF ALJ WALWYN AND THE
ALTERNATE PROPOSED DECISION OF PRESIDENT PEEVEY**

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

Dated: December 15, 2003

TABLE OF CONTENTS

I. REPLY COMMENTS	2
A. THE ISO IS COMMITTED TO MAKING A FILING TO IMPLEMENT RESOURCE ADEQUACY REQUIREMENTS THROUGHOUT THE ISO CONTROL AREA THAT ARE CONSISTENT WITH THE RESOURCE ADEQUACY REQUIREMENTS APPROVED BY THE CPUC.....	2
B. WAITING UNTIL 2007 OR 2008 TO FULLY IMPLEMENT THE RESERVE REQUIREMENT IS RISKY AND UNWARRANTED.....	4
C. THERE ARE NO COMPELLING REASONS TO ADOPT A 15% RESERVE REQUIREMENT	6
D. A REQUIREMENT THAT UTILITIES PROCURE 100% OF THEIR CAPACITY REQUIREMENTS BY THE MONTH AHEAD IS APPROPRIATE.....	9
II. CONCLUSION	12

TABLE OF AUTHORITIES

CPUC Rules

California Public Utilities Commission Rule 77.6.....2

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

Order Instituting Rulemaking To Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development	R.01-10-024
---	-------------

**REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION ON THE PROPOSED DECISION OF ALJ
WALWYN AND THE ALTERNATE PROPOSED DECISION OF PRESIDENT
PEEVEY**

In accordance with California Public Utilities Commission Rule 77.6, the California Independent System Operator Corporation ("ISO") respectfully submits these Reply Comments on the Proposed Decision of ALJ Walwyn ("Proposed Decision") and the Proposed Alternate Decision of Commissioner Peevey ("Peevey Alternate") in the captioned proceeding. The ISO's Reply Comments respond to the opening comments filed by the following parties: San Diego Gas & Electric Company ("SDG & E"); Pacific Gas & Electric Company ("PG & E"); Southern California Edison Company ("SCE"); the California Energy Commission ("CEC"); and The Utility Reform Network ("TURN"). In particular, the ISO rebuts these parties' arguments opposing certain Findings of Fact and Conclusions of Law in the Peevey Alternate.¹ The ISO submits that the Peevey Alternate should be adopted because, compared to the Proposed Decision and

¹ In its Comments on the Proposed Decision of ALJ Walwyn and the Alternate Proposed Decision of Commissioner Peevey filed on December 8, 2003 in the captioned proceeding ("December 8 Comments"), the ISO anticipated and addressed many of the arguments that parties have made in their opening comments. The ISO also addressed certain of these issues in its Comments on the Alternate Proposed Decision of Commissioner Lynch filed on December 11, 2003 ("December 11 Comments") The ISO will not repeat the arguments contained in its previously filed comments except where necessary to summarize and/or clarify the ISO's position or emphasize an important point

the Lynch Alternate, the Peevey Alternate provides the most comprehensive and effective framework for ensuring resource adequacy in California.

I. REPLY COMMENTS

A. The ISO Is Committed To Making A Filing To Implement Resource Adequacy Requirements Throughout The ISO Control Area That Are Consistent With The Resource Adequacy Requirements Approved By The CPUC

The utilities support the goal enunciated in the Peevey Alternate that the resource adequacy requirement adopted by the CPUC should apply to all load serving entities (“LSEs) in California.² The utilities state, appropriately, that an effective resource adequacy requirement must apply to all LSEs in the ISO Control Area in order to prevent “free riding” by LSEs that are not subject to the CPUC’s jurisdiction.³ The utilities recognize that ISO-enforced, FERC-approved tariff requirements are necessary to ensure that all LSE’s in the ISO Control Area are subject to a resource adequacy requirement. However, the utilities are concerned that the (1) the ISO may not impose the same standards on all LSEs (*i.e.*, the CPUC-approved standards will apply to the utilities and some different set of standards will apply to non-CPUC regulated LSEs), (2) resource adequacy standards may not be effective for all LSEs beginning at the same time, and (3) the ISO may not enforce the standards equally for all LSEs.⁴ The utilities believe that the same standards should apply to all LSEs, and such standards should become effective for all LSEs at the same time. Thus, the utilities request that the CPUC state that it will

² Comments of Pacific Gas and Electric Company On Proposed Alternate Decision of President Peevey at 6 (“PG & E Comments”), Southern California Edison Company’s Comments on the Proposed Alternate Decision of President Peevey at 9 (“SCE Comments”).

³ PG & E Comments at 6, SCE Comments at 9

⁴ PG & E Comments at 6-7; SCE Comments at 10

not require the utilities to meet any new reserve requirement until and unless the ISO makes the same requirements applicable to all LSEs.⁵

The ISO generally agrees with the utilities that any resource adequacy requirement should be consistently applied to all LSEs in the ISO Control Area. This is necessary, *inter alia*, so that reporting requirements can be standardized. As soon as practicable after the CPUC issues a final decision on all of the resource adequacy issues in this proceeding (including rulings on the issues set for discussion in the workshop), the ISO will put together detailed resource adequacy requirements applicable to all LSEs in the ISO Control Area that are based on the standards approved by the CPUC. The ISO will then circulate these resource adequacy requirements to stakeholders, hold meetings with stakeholders and seek stakeholder input on such resource adequacy requirements that may be reflected in a FERC filing. The ISO's intent will be to develop a final set of resource adequacy requirements applicable to all LSEs. Following the stakeholder process, ISO management will take to the ISO Board of Directors a proposal to implement consistent resource adequacy requirements throughout the ISO Control Area. The ISO would then file any Board-approved proposal with FERC. Assuming that the CPUC issues a final order early in the first quarter of 2004, the ISO would aim to make the aforementioned FERC filing by the end of the second quarter of 2004.

The ISO urges the CPUC to act now and not delay approving resource adequacy requirements for the utilities. The utilities account for approximately 85% of the load in the ISO Control Area. Concern about possible differences in resource adequacy requirements among all LSEs provides no justification for a failure by the CPUC to impose the requirements that are needed for the utilities to meet their obligation to serve

⁵ PG & E Comments at 7-8, SCE Comments at 10.

load. As indicated above, the ISO strongly supports consistent requirements for all LSEs and will do what it can to provide for such consistent requirements. In particular, the ISO's intent is to act expeditiously and seek FERC approval of resource adequacy requirements for all LSEs that are consistent with the resource adequacy requirements approved by the CPUC.

B. Waiting Until 2007 Or 2008 To Fully Implement The Reserve Requirement Is Risky And Unwarranted

Several parties object to the Conclusion in the Peevey Alternate that the reserve requirement should be made effective January 1, 2005. For example, although TURN prefers that the reserve requirement not be implemented until 2008, TURN finds the Proposed Decision's recommendation of a January 1, 2007 implementation date to be acceptable.⁶ SCE supports the three-year phase-in period, an effective date of January 1, 2007, recommended in the Proposed Decision.⁷ PG & E contends that the reserve requirement ought to be phased in over a four-year period to be fully effective by January 1, 2008.⁸ The primary arguments in support of a longer phase-in period are as follows: (1) a January 1, 2005 implementation date will result in the utilities competing with each other over a short period of time to procure substantial amounts of capacity, thereby driving up prices considerably; and (2) because there currently is a surplus, there is no need to "lock-up" capacity starting January 1, 2005.

The ISO recognizes that, if the CPUC requires the utilities to meet the reserve requirement by January 1, 2005 (as proposed in the Alternate), and the ISO makes a

⁶ Comments of the Utility Reform Network On The Proposed Decision Of ALJ Walwyn And The Alternate Decision Of Commissioner Peevey Regarding Short-Term And Long-Term Utility Procurement Plans For 2004 And Beyond at 13-14 ("TURN Comments")

⁷ SCE Comments at 9.

⁸ Comments of Pacific Gas and Electric Company On Proposed Decision of Administrative Law Judge Walwyn at 11 ("PG & E Comments on the PD")

filing at FERC in the middle of 2004 to implement a resource adequacy requirement on a Control Area-wide basis, there will be a limited amount of time available for many LSEs to satisfy the reserve requirement. That fact may support the CPUC moving back the January 1, 2005 effective date for the reserve requirement. If the CPUC does decide to move back the effective date for full implementation of the reserve requirement, the ISO strongly believes that the reserve requirement should be fully implemented “sooner” rather than “later.” Importantly, the CPUC should not adopt the phase-in dates recommended in the Proposed Decision and the Lynch Alternate. These decisions implement the reserve requirement too far into the future and could subject California ratepayers to increased costs and, possibly, curtailments if the resource base deteriorates or there is a significant increase in peak demand.

The parties seeking to defer implementation of the reserve requirement acknowledge that there is a surplus of cheap energy today. Thus, conditions are favorable for negotiating long-term capacity deals now. Conditions may not be so favorable in the future. Further, claims that competition between the utilities for capacity will drive up costs significantly are mere speculation at this time. Given that there currently is a supply surplus, and the utilities only need to procure a limited amount of additional capacity to meet the reserve requirement, it is not certain that any “bidding war” will result. In any event, as the ISO indicated in its December 8 Comments, if there is evidence that the suppliers are exercising market power, the utilities can always come back to the CPUC and request that the effective date of the reserve requirement be pushed back.

The claims that there is no need to “lock up” capacity now because of the existing supply surplus are short-sighted. As the ISO indicated in its December 8 Comments, the ISO’s most recent Five-Year Assessment shows that there could be a shortage of capacity as early as next summer under adverse conditions. Even under base conditions for resources, there could be a supply shortage in 2008 if there is high peak demand.

Further, the fact that there is excess capacity now does not mean that there will be excess capacity in 2005. Indeed, the Five-Year Assessment shows the supply-demand balance getting narrower and narrower between 2004 and 2008. The Five-Year Assessment does not even take into account the recent “mothballing” of approximately 1,400 MW of capacity (and the potential for “mothballing” an additional 3-4,000 MW). The Five-Year Assessment also recognizes the risk that nearly 4,000 MW of capacity could retire over the next several years. The potential for the “mothballing” and/or retirement of additional units is very real and cannot be ignored. This could create a capacity shortage in the near future if such capacity is not “locked-up.”

Finally, parties ignore the fact that even if there is a capacity surplus, that capacity may not be available to serve California load if it is not “locked-up” to serve California load. A single bad hydro year could turn a capacity surplus into a capacity deficit, and problems could arise if the remaining capacity is not “locked-up” to serve load in California.

C. There Are No Compelling Reasons To Adopt A 15% Reserve Requirement

TURN and PG & E support a 15% reserve requirement and argue that a 17% reserve requirement is excessive. TURN Comments at 12-13; PG & E Comments at 3-5. The CEC suggests that a 15% reserve requirement is appropriate as an interim measure

until a more comprehensive study is undertaken. CEC Comments at 12-13. The primary arguments against a 17% reserve level are (1) no independent analysis was undertaken showing that a 17% reserve level is needed to meet a standard of one-day-in-ten-year loss of load probability (“LOLP”), and (2) a 17% percent reserve requirement would increase costs without providing an equal amount of benefit

The ISO notes that no independent, comprehensive, proper and fully evaluated study was undertaken to demonstrate unequivocally that a 15% reserve requirement produces a one-day-in-ten-year LOLP. The Proposed Decision states that a 15% reserve requirement exceeds planning standards of a one-day-in-ten-year loss of load. Proposed Decision at 22. This conclusion was reached based on the simulations performed under a Henwood RiskSym production simulation model submitted by PG & E. *Id.*, citing PG & E Post-Hearing Brief at 33. However, the Proposed Decision ignores the fact that SCE submitted simulations using the Henwood RiskSym model that produced a 17% reserve margin based on a one-day-in-ten-year LOLP. Exhibit SCE-L-1, Minick at page, 3, line 11 through page 4, line 14, Laukert, page 27, line 17 through page 32, line 5 (April 15, 2003). Thus, the Henwood model that the ALJ relied on in support of her conclusion that a 15% reserve requirement is appropriate also produced a 17% reserve requirement (for SCE) based on a one-day-in-ten LOLP. Nowhere does the ALJ acknowledge the 17% reserve level generated by the Henwood RiskSym model submitted by SCE, let alone attempt to differentiate the two Henwood analyses. Under these circumstances, there is no reasonable evidentiary basis for concluding that a 15% reserve level is more appropriate than a 17% reserve level, especially given that both reserve levels were

generated by the same RiskSym model. Any finding that a 15% reserve level is the “correct” level would be arbitrary and capricious.

Moreover, neither of these Henwood RiskSym studies were really evaluated in this proceeding. In particular, the input assumptions and data were not tested. The ISO submits that, under these circumstances, the Henwood RiskSym study relied on by the ALJ does not – and cannot serve as a reasonable basis to approve a 15% reserve requirement. The ISO notes that, although the CEC supports a 15% reserve requirement on an interim basis, the CEC believes that such value should be replaced with a permanent value upon “completion of appropriate studies and policy review.” CEC Comments at 13. Thus, it appears that even the CEC does not believe that the Henwood study submitted by PG &E – and relied on by the ALJ – constitutes an adequate basis upon which to develop a permanent reserve requirement level.

The most work and analysis regarding the appropriate level of any reserve requirement has been undertaken by the California Power Authority (“CPA”) as part of the CPA’s rulemaking in Docket No. 2002-07-01, and the CPA supports a 17% reserve requirement. Further, other independent system operators utilize a reserve margin of at least 17%. Under these circumstances, unless some party can clearly demonstrate by empirical evidence that 15% is the correct level for a reserve requirement, the CPUC should approve a 17% reserve requirement. No party in this proceeding has made a convincing showing that a 15% reserve level is adequate.

Finally, the CPUC should reject the argument that an additional 2% reserve requirement will place undue costs on ratepayers. As indicated in the ISO’s December 8 Comments, capacity is cheap. December 8 Comments at 10. Further, a 2% reserve is

equivalent to the load in the San Francisco Peninsula. *Id.* at 6. It is unreasonable to subject this amount of load to potential excessive spot market prices or, worse yet, curtailment due to a lack of available supply. The ISO submits that obtaining “insurance” for this amount of load is prudent given the events of the past.

D. A Requirement That Utilities Procure 100% Of Their Capacity Requirements By The Month Ahead Is Appropriate

PG & E alleges that the requirement that utilities procure 90% of their capacity requirements a year in advance and 100% of their requirements a month ahead is unnecessary, will result in a waste of money, and will preclude the utilities from buying capacity on a short-term basis when it is advantageous to do so.⁹ For example, PG & E states that the 100% month ahead requirement will eliminate opportunities to save money by importing low cost economy power from the Pacific Northwest. *Id.* at 8. PG & E also questions the finding in the Peevey Alternate (p.23) that a month-ahead requirement “may result in downward pressure on energy prices in the short-term markets.”¹⁰

The ISO is disappointed by the level of resistance to a requirement that utilities procure sufficient capacity to meet their peak load plus the applicable planning reserve in the forward markets, at least one month ahead of time, rather than relying on spot market purchases and hoping there will be sufficient supplies at the last minute when few alternative options may be available. See tr. (Sheffrin) at 4423: 22-28; 4425: 8-12; 4426: 10-15; 4471: 8-13. If the CPUC heeds PG & E’s recommendation, progress towards forward procurement of capacity resources by the utilities will not be sufficiently advanced. Utilities should be required to procure, and to demonstrate that they have

⁹ PG & E Comments at 2-3, 8-9

¹⁰ *Id.*

procured, sufficient resources to meet 100% of their monthly peak load plus the applicable planning reserve one month ahead of time.

As explained in the ISO's December 8 Comments (pp. 11-12), this approach provides the utilities a large degree of flexibility to firm up their capacity commitments when market conditions are optimal, while ensuring that surplus supplies, to the extent they exist, are committed to California and are not diverted elsewhere or available only at very high prices due to adverse conditions such as a West-wide heat wave. Moreover, the month-ahead requirement would ensure that, if there are problems looming, the CPUC, the ISO and the utilities would have a month to attempt to line up additional supplies or encourage conservation rather than addressing a potential short fall at the last minute in a crisis mode. See December 8 Comments at 11.

The level of resistance to an obligation on the part of the utilities to line up sufficient capacity to meet their needs in the forward markets is unwarranted. Ultimately, the utilities must procure sufficient resources to meet the needs of their customers be it in forward markets or in the ISO's markets. When purchases are made at the last minute, the range of options available to meet unforeseen circumstances is substantially more narrow than if purchases are made ahead of time. See tr. (Sheffrin) at 4423: 22-28; 4425: 8-12; 4426: 10-15; 4471: 8-13.

PG & E has not provided a credible explanation as to why it is better to risk last minute purchases of needed capacity rather than to proceed with an orderly procurement of needed resources in advance of the day-ahead and real-time time frames. There is no basis to PG & E's claim that a monthly obligation will prevent PG & E from procuring economy energy from the Pacific Northwest. PG & E is confusing capacity with energy.

The month ahead obligation is a capacity obligation only; the utilities are not being required to procure 100% of their expected energy needs a month in advance. Thus, to the extent energy from the Pacific Northwest is available after the month ahead and is cheaper than the energy the utilities can purchase under their capacity contracts, they are free to purchase such energy and save money for their ratepayers.

The ISO also agrees with the conclusion in the Alternate that the existence of a month ahead obligation will place downward pressures on prices in the short-term markets. PG & E's objection to this conclusion defies logic. With a reserve requirement of 17 percent in place, suppliers with capacity contracts will essentially be required to make available 117% of the utilities' energy needs (at some point after the month ahead), but the utilities will only need to purchase 100% of their energy requirements (plus approximately seven percent operating reserves).¹¹ Basic laws of supply and demand indicate that there will be downward pressures on prices under such conditions, *i.e.*, where supply exceeds demand. Another way of looking at this situation is that capacity contracts may have a stated price at which the utilities can purchase energy under the contract. To the extent 100% of the utilities' capacity requirements are covered via capacity contracts, the utilities will not purchase energy at prices above those specified in the capacity contracts; they will only purchase energy at prices below the prices in the capacity contracts. This necessarily places downward pressures on energy prices; otherwise, competing suppliers will be unable to make any sales.

In sum, a resource adequacy regime is meaningless without some requirement that the utilities procure in the forward markets sufficient capacity to meet their customers'

¹¹ The planning reserve establishes a margin over and above operating reserves to cover peak load uncertainties and other contingencies. See CEC Comments at 11.

needs. This is because any target reserve level (regardless of how high or how low) can easily be “met” if utilities are simply allowed to assume that resources will be available to meet their needs in the spot market.

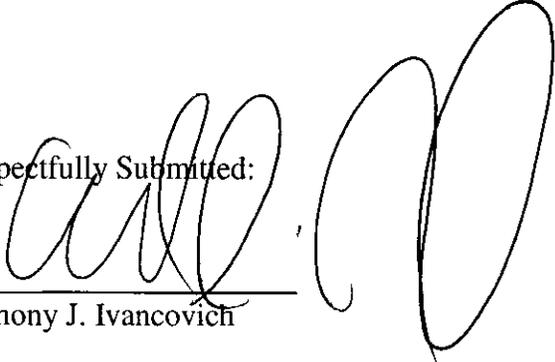
The ISO urges the CPUC to adopt a monthly reliability obligation whereby utilities are required to show that they have procured sufficient capacity to meet 100% of their projected peak load plus the applicable planning reserve. This approach is a very reasonable middle ground. On the one hand, it does not unduly limit the ability of utilities to use short-term capacity purchases, and it allows utilities to procure resources for their customers when market conditions are optimal. On the other hand, it precludes the utilities from placing reliable cost-effective service to load at risk by waiting until the last minute to procure the resources needed to serve their customers’ load.

II. CONCLUSION

Wherefore, for the foregoing reasons, and the reasons set forth in the ISO’s December 8 Comments and December 11 Comments, the ISO requests that the CPUC approve the Peevey Alternate (along with the limited modifications thereto identified in the ISO’s December 8 Comments).

December 15, 2003

Respectfully Submitted:

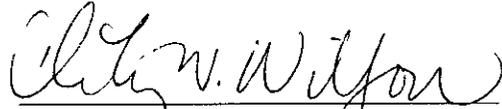
By: 
Anthony J. Ivancovich

Attorney for the
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630
Telephone: 916-608-7135
Facsimile: 916-608-7296

PROOF OF SERVICE

I hereby certify that on December 15, 2003 I served, by electronic and U.S. mail, Reply Comments of The California Independent System Operator Corporation on the Proposed Decision of ALJ Walwyn and the Alternate Proposed Decision of President Peevey in Docket # R. 01-10-024.

DATED at Folsom, California on December 15, 2003

A handwritten signature in cursive script, appearing to read "Charly N. Wilson". The signature is written in black ink and is positioned above a horizontal line.

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

DANIEL V GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450

WILLIAM P SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450

TYSON SLOCUM
RESEARCH DIRECTOR
CRITICAL MASS ENERGY/ENVIRONMENTAL
PRG
215 PENNSYLVANIA AVE, SE
WASHINGTON, DC 20003

KEITH R MCCREA
SUTHERLAND, ASBILL & BRENNAN LLP
1275 PENNSYLVANIA AVE , N W , STE 800
WASHINGTON, DC 20004-2415

ROGER A BERLINER
MANATT, PHELPS & PHILLIPS, LLP
1501 M STREET, NW, SUITE 700
WASHINGTON, DC 20005

PETER GLASER
SHOOK, HARDY & BACON, L L P
600 14TH STREET, NW, SUITE 800
WASHINGTON, DC 20005-2004

MARTIN PROCTOR
CONSTELLATION POWER SOURCE
111 MARKET PLACE, SUITE 500
BALTIMORE, MD 21202

EDWARD SULLIVAN
SENIOR COUNSEL
PEABODY HOLDING COMPANY, INC
701 MARKET STREET
ST LOUIS, MO 63101-1826

LOUIS DENETSOSIE
ATTORNEY GENERAL
NAVAJO NATION DEPARTMENT OF JUSTICE
PO DRAWER 2010
WINDOW ROCK, AZ 86515

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

RICHARD A SHORTZ, ESQUIRE
MORGAN, LEWIS & BOCKIUS LLP
300 SOUTH GRAND AVE , 22ND FLOOR
LOS ANGELES, CA 90071-3132

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

THOMAS D O'CONNOR
ATTORNEY AT LAW
O'CONNOR CONSULTING SERVICES, INC
5427 FENWOOD AVENUE
WOODLAND HILLS, CA 91367

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

CURTIS KEBLER
DIRECTOR, ASSET COMMERCIALIZATION
RELIANT ENERGY
8996 ETIWANDA AVENUE
RANCHO CUCAMONGA, CA 91739

BETH A FOX
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM 535
ROSEMEAD, CA 91770

JAMES WOODRUFF
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, SUITE 342
ROSEMEAD, CA 91770

RICHARD H HERTZBERG
ENPEX CORPORATION
1329 STRATFORD COURT
DEL MAR, CA 92014

JEFFREY M PARROTT
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ 13
SAN DIEGO, CA 92064

DAVID KATES
NEVADA HYDRO COMPANY
2416 CADES WAY
VISTA, CA 92083

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

KELLY M MORTON
ATTORNEY AT LAW
SEMPRA ENERGY
101 W ASH STREET, HQ13
SAN DIEGO, CA 92101

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

MICHAEL C TIERNEY
ATTORNEY AT LAW
PALOMAR ENERGY
101 ASH STREET
SAN DIEGO, CA 92109

BILL POWERS
WORKING GROUP
BORDER POWER PLANT
4452 PARK BLVD , SUITE 209
SAN DIEGO, CA 92116

MARK J SKOWRONSKI
DUKE SOLAR
3501 JAMBOREE ROAD, SUITE 606
NEWPORT BEACH, CA 92660

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

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

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

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

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

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

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

THERESA MUELLER
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
1 DR CARLTON B GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

MARK SAVAGE
ATTORNEY AT LAW
CONSUMERS UNION OF U S , INC
1535 MISSION STREET
SAN FRANCISCO, CA 94103

JODY LONDON
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, 10TH FLOOR
SAN FRANCISCO, CA 94104

EVELYN C LEE
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, 31ST FLOOR
SAN FRANCISCO, CA 94105

JEANNE MC KINNEY
ATTORNEY AT LAW
THELEN, REID & PRIEST
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105

MARY A GANDESBERY
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE STREET
B30A-2486
SAN FRANCISCO, CA 94105

PAUL C LACOURCIERE
ATTORNEY AT LAW
THELEN REID & PRIEST LLP
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105

PETER WEINER
PAUL HASTINGS JANOFSKY WALKER LLP
55 SECOND STREET, 24TH FLOOR
SAN FRANCISCO, CA 94105

SHERYL CARTER
DIRECTOR
NATURAL RESOURCES DEFENSE COUNCIL
71 STEVENSON STREET, STE 1825
SAN FRANCISCO, CA 94105

BRIAN T CRAGG
ATTORNEY AT LAW
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

ENOCH H CHANG
ATTORNEY AT LAW
WHITE & CASE LLP
THREE EMBARCADERO CENTER, SUITE 2100
SAN FRANCISCO, CA 94111

JOE KARP
ATTORNEY AT LAW
WHITE & CASE, LLP
3 EMBARCADERO CENTER, SUITE 2210
SAN FRANCISCO, CA 94111

JOHN ROSENBAUM
WHITE & CASE LLP
THREE EMBARCADERO CENTER, SUITE 2200
SAN FRANCISCO, CA 94111

MARK FOGELMAN
ATTORNEY AT LAW
STEEFEL, LEVITT & WEISS, P C
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

STEVEN F GREENWALD
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111

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

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

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

JOHN WHITTING BOGY
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120

MARK R HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120

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

ANDREW J SKAFF
ATTORNEY AT LAW
LAW OFFICE OF ANDREW J SKAFF
220 THE KNOLL
ORINDA, CA 94563

JOSEPH M PAUL
DYNEGY MARKETING & TRADE
5976 WEST LAS POSITAS BLVD
PLEASANTON, CA 94588

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

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

SETH HILTON
ATTORNEY AT LAW
MORRISON & FOERSTER LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596-8130

PAUL FENN
LOCAL POWER
4281 PIEDMONT AVENUE
OAKLAND, CA 94611

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

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

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

CHRIS KING
EXECUTIVE DIRECTOR
AMERICAN ENERGY INSTITUTE
842 OXFORD ST
BERKELEY, CA 94707

NANCY RADER
EXECUTIVE DIRECTOR
CALIFORNIA WIND ENERGY ASSOCIATION
1198 KEITH AVENUE
BERKELEY, CA 94708

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

REBEKAH COLLINS
MARIN CLEAN ALTERNATIVE ENERGY NOW
141 BOLINAS ROAD
FAIRFAX, CA 94930

MICHAEL GREEN
THE PACIFIC LUMBER COMPANY
PO BOX 37
SCOTIA, CA 95565

MICHAEL THEROUX
THEROUX ENVIRONMENTAL
PO BOX 7838
AUBURN, CA 95604

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

JOHN PACHECO
CERS
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE, ROOM 120
SACRAMENTO, CA 95821

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

THOMAS TANTON
4390 INDIAN CREEK ROAD
LINCOLN, CA 95648

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

DOUGLAS K KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

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

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

ROBERT P HOFFMAN
PAUL HASTINGS JANOFFSKY & WALKER LLP
1127 11TH STREET, SUITE 905
SACRAMENTO, CA 95814

STEVE PONDER
FPL ENERGY, INC , LLC
980 NINTH STREET, 16TH FLOOR
SACRAMENTO, CA 95814

ANN L TROWBRIDGE
ATTORNEY AT LAW
DOWNEY, BRAND, SEYMOUR & ROHWER
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-4686

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

DONALD BROOKHYSER, ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 S W 5TH AVENUE, SUITE 1750
PORTLAND, OR 97201

MICHAEL P ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201

JAMES PAINE, ATTORNEY AT LAW
STOEL RIVES, LLP
900 SW 5TH AVE STE 2600
PORTLAND, OR 97204-1268

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

CHUCK GILFOY
TRANSALTA ENERGY MARKETING US
4609 N W ASHLEY HEIGHTS DRIVE
VANCOUVER, WA 98685

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

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

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

Christne M Walwyn
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5117
SAN FRANCISCO, CA 94102-3214

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

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

David M Gamson
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION, ROOM 5214
SAN FRANCISCO, CA 94102-3214

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

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

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

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

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

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

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

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5101
SAN FRANCISCO, CA 94102-3214

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

Kayode Kajopaiye
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRIC INDUSTRY & FINANCE
AREA 4-A
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

Laura L Krannawitter
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ELECTRICITY RESOURCES AND PRICING
BRANCH, ROOM 4101
SAN FRANCISCO, CA 94102-3214

Laurence Chaset
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
LEGAL DIVISION, ROOM 5131
SAN FRANCISCO, CA 94102-3214

Lisa Paulo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
PUBLIC PROGRAMS BRANCH
AREA 3-E
SAN FRANCISCO, CA 94102-3214

Manuel Ramirez
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION
AREA 4-A
SAN FRANCISCO, CA 94102-3214

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

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

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

Peter V Allen
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5022
SAN FRANCISCO, CA 94102-3214

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

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

Robert Kinoshian
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION, ROOM 4205
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

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

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

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

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

Anne W. Prema
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
ELECTRIC INDUSTRY & FINANCE
SACRAMENTO, CA 95814

ROSS MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-20
SACRAMENTO, CA 95184

JAMES MCMAHON
SENIOR ENGAGEMENT MANAGER
NAVIGANT CONSULTING, INC
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

CHIEF COUNSEL'S OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 14
SACRAMENTO, CA 95814

Alan Lofaso
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

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814

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

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
ELECTRICITY RESOURCES AND PRICING
BRANCH
SACRAMENTO, CA 95814

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814

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

KIP LIPPER
SENATOR BYRON SHER
STATE CAPITOL, ROOM 2082
SACRAMENTO, CA 95814

MARSHALL D CLARK
ENERGY SERVICES & POLICY
DEPARTMENT OF GENERAL SERVICES
717 K STREET, SUITE 409
SACRAMENTO, CA 95814

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

RUBEN TAVARES
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 95814

TARA M DUNN
901 P STREET, SUITE 142A
SACRAMENTO, CA 95814

WADE MCCARTNEY
REGULATORY ANALYST IV
PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
ENERGY DIVISION
SACRAMENTO, CA 95814

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

GLORIA BELL
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE, SUITE 120
SACRAMENTO, CA 95821

JEANNIE S LEE
CERS
CALIFORNIA DEPARTMENT OF WATER
RESOURCES
3310 EL CAMINO AVENUE, ROOM 120
SACRAMENTO, CA 95821