

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

Order Instituting Rulemaking to Revise)	
and Clarify Commission Regulations)	R.08-11-005
Relating to the Safety of Electric Utility)	(Filed November 6, 2008)
and Communications Infrastructure)	
Provider Facilities.)	
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**OPENING BRIEF OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Nancy Saracino, General Counsel
Anthony Ivancovich, Assistant General Counsel
Andrew Ulmer, Senior Counsel
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
151 Blue Ravine Road
Folsom California 95630
Tel. (916) 608-7209
Fax. (916) 608-7296
Email: aulmer@caiso.com

Jeffrey P. Gray
DAVIS WRIGHT TREMAINE LLP
Suite 800
505 Montgomery Street
San Francisco, CA 94111-6533
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

Attorneys for California Independent
System Operator Corporation

Dated: September 3, 2010

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OF THE STATE OF CALIFORNIA**

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Pursuant to the May 7, 2010 ruling of Administrative Law Judge Timothy Kenney, the California Independent System Operator Corporation (“ISO”) submits this opening brief on the limited issue of the proposed rule change to California Public Utilities Commission (“Commission”) General Order 165 set forth in the August 13, 2010 workshop report (“Workshop Report”). The proposed rule change to General Order 165 would require utilities to prepare and follow procedures for conducting inspections and maintenance activities for transmission lines and maintain records of inspection and maintenance activities.¹ For the reasons discussed below, the ISO does not oppose the adoption of this proposed change to General Order 165.

During Phase 1 of this proceeding, the ISO filed comments explaining the ISO’s role in maintaining and inspecting electric transmission facilities under its operational control.² As the ISO described, its maintenance and inspection program includes performance standards to ensure high quality, safe, and reliable electric service. The standards adopted by the ISO are set forth in

¹ This issue falls under the common briefing outline topic of electric transmission issues.

² See Reply Comments of the ISO filed in Rulemaking 08-11-005 on April 8, 2009. Public Utilities Code §348 requires the ISO to adopt inspection, maintenance, repair, and replacement standards for the transmission facilities under its operational control.

Appendix C of the Transmission Control Agreement that has been approved by the Federal Energy Regulatory Commission and is part of the ISO's tariff.

As part of phase 2 of this proceeding, the Commission is examining whether inspection and maintenance requirements should apply to electric transmission facilities.³ The September 22, 2009 ruling of Administrative Law Judge Timothy Kenney provides that Phase 2 of this proceeding "may consider safety-related regulations for electric transmission facilities, provided such regulations do not conflict with" the FERC-jurisdictional contracts and standards that govern electric transmission facilities under the ISO's operational control.⁴

The ISO participated in workshops during April 2010 to present an overview of ISO transmission maintenance standards. These standards consist of six main elements, including the Transmission Maintenance Coordination Committee, participating transmission owners' maintenance practices adopted by the ISO, a standard maintenance reporting system, availability measures, annual maintenance reviews conducted by the ISO, and the authority to conduct reviews for cause and investigations. The ISO believes the workshops provided a good means to share information and address issues related to inspection and maintenance of electric transmission facilities in California. The ISO wishes to acknowledge the professionalism and diligence of the workshop facilitators and all participants.

As reflected in the Workshop Report, workshop participants propose that the Commission amend General Order 165 to encompass transmission facilities by including the following language:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

³ Decision 09-08-029, mimeo at 10-11; *see also* September 22, 2009 ruling of Administrative Law Judge Timothy Kenney ("ALJ Ruling") at 3, 5.

⁴ *See* ALJ Ruling at 4-5.

Each utility shall maintain records of inspection and maintenance activities. Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a).⁵

The ISO believes the above proposed changes to General Order 165 do not conflict with the Transmission Control Agreement or the ISO's transmission maintenance standards that govern electric transmission facilities under the ISO's operational control.

Respectfully submitted,

Nancy Saracino, General Counsel
Anthony Ivancovich, Assistant General Counsel
Andrew Ulmer, Senior Counsel
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
151 Blue Ravine Road
Folsom California 95630
Tel. (916) 608-7209
Fax. (916) 608-7296
Email: aulmer@caiso.com

/s/ Jeffrey P. Gray
Jeffrey P. Gray
DAVIS WRIGHT TREMAINE LLP
Suite 800
505 Montgomery Street
San Francisco, CA 94111-6533
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

Attorneys for California Independent
System Operator Corporation

Dated: September 3, 2010

⁵ Workshop Report, at Appendix A, A-41 and A-46.

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, over eighteen years of age, and not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111.

On September 3, 2010, I caused the following to be served:

OPENING BRIEF OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

enclosed in a sealed envelope, by first class mail on the parties listed as “Parties” and “State Service” on the attached service list R.08-11-005 who have not provided an electronic mail address, and via electronic mail to all parties on the service list who have provided the Commission with an electronic mail address.

Executed on September 3, 2010 at San Francisco, California.

/s/ Judy Pau
Judy Pau

VIA U.S. MAIL

Commissioner Timothy A. Simon California Public Utilities Commssion 505 Van Ness Ave San Francisco, CA 94102	Administrative Law Judge Timothy Kenney California Public Utilities Commssion 505 Van Ness Ave San Francisco, CA 94102
William P. Adams Adams Electricity Saftey Consulting 716 Bret Ave Rohnert Park, CA 94928	

VIA E-MAIL

nbingle@osmose.com; myates@wecc.biz; chilen@nvenenergy.com;
skuhn@counsel.lacounty.gov; Oscar.Alvarez@ladwp.com; Shanise.Black@ladwp.com;
lionmeyer@gmail.com; jesus.g.roman@verizon.com; robert.f.lemoine@sce.com;
dj0conklin@earthlink.net; KMelville@SemptraUtilities.com;
michael.bagley1@verizonwireless.com; jon.dohm@crowncastle.com;
facilitiesmanagement@cox.net; cwl@cpuc.ca.gov; kjl@cpuc.ca.gov; nsuetake@turn.org;

bfinkelstein@turn.org; Kristin.L.Jacobson@sprint.com; lhj2@pge.com;
nelsonya.causby@att.com; pacasciato@gmail.com; jarmstrong@goodinmacbride.com;
mgo@goodinmacbride.com; smalllecs@cwclaw.com; deyoung@caltel.org; O'Neill,
Edward; Whang, Jane; Gray, Jeffrey; Toller, Suzanne; larry.abernathy@davey.com;
john_gutierrez@cable.comcast.com; anitaffrice@earthlink.net; lmb@wblaw.net;
bats3@cruzio.com; bmcc@mccarthy.com; rdelsman@nextgenetworks.net;
cjhashimoto@tid.org; steve@cutility.com; jsanders@caiso.com; lkm4@ibew1245.com;
Charlie.Born@frontiercorp.com; ernylee.chamlee@fire.ca.gov;
mclaughlin@braunlegal.com; wynne@braunlegal.com; Jerome@calcable.org;
jjg@eslawfirm.com; kmills@cfbf.com; scohn@smud.org; jsadler@osmose.com;
tciardella@nvenery.com; mrw@mrwassoc.com; bob.ritter@crowncastle.com;
Nick.limberopoulos@crowncastle.com; mike.roden@att.com;
Matt.Pawlowski@NextEraEnergy.com; Kevin.Saville@frontiercorp.com;
Marjorie.Herlth@Qwest.com; jordan.white@pacificcorp.com; jcole@osmose.com;
lsheehan@ceo.lacounty.gov; daryl.buckley@ladwp.com; stanton.snyder@ladwp.com;
MThorp@SempraUtilities.com; jtodd@fire.lacounty.gov; craig.hunter@wilsonelser.com;
jacque.lopez@verizon.com; lorraine.kocen@verizon.com; steve.ford@sce.com;
case.admin@sce.com; james.lehrer@sce.com; NQuan@gswater.com;
sdunn@dpw.lacounty.gov; scaine@cainelaw.com; ddowney@nctimes.com;
jwmitchell@mbartek.com; ATrial@SempraUtilities.com; esther.northrup@cox.com;
LEarl@SempraUtilities.com; LUrlick@SempraUtilities.com;
JPacheco@SempraUtilities.com; schristianson@tosdalsmith.com;
liddell@energyattorney.com; Blain@tbmlawyers.com; DDohren@SempraUtilities.com;
GWalters@SempraUtilities.com; RGiles@SempraUtilities.com;
geoffspreter@amslawoffice.com; bcarnahan@scppa.org; mswlegal@aol.com;
lindab@stcg.net; bwilde@creatint.com; elaine.duncan@verizon.com;
william.sanders@sfgov.org; jhendry@sfgov.org; marcel@turn.org;
mmitchell@aspenerg.com; rcosta@turn.org; steve.bowen@bowenlawgroup.com;
bhc4@pge.com; ELK3@pge.com; fassil.t.fenikile@att.com; gwen.johnson@att.com;
keith.krom@att.com; ldri@pge.com; margaret.dillon@att.com; michelle.choo@att.com;
peter.hayes@att.com; rachel.birkey@ogc.usda.gov; CPUCCases@pge.com;
rdj@att.com; MSL7@pge.com; thomas.selhorst@att.com; info@tobiaslo.com;
gblack@cwclaw.com; mschreiber@cwclaw.com; Davidson, Josh; Carbone, Maria;
irene@igc.org; hiliary@newsdata.com; regrelcpuccases@pge.com;
robin.harrington@fire.ca.gov; amy.bartell@cityofpaloalto.org;
Grant.Kolling@cityofpaloalto.org; lex@consumercal.org; douglas.garrett@cox.com;
ferpello@newton.berkeley.edu; rw8914@att.com; mnelson@mccarthy.com;
sberlin@mccarthy.com; lmartin@pacwest.com; tomk@mid.org; joyw@mid.org;
bll@tid.org; gayatri@jbsenergy.com; scott.tomashefsky@ncpa.com;
blaising@braunlegal.com; lesla@calcable.org; abb@eslawfirm.com;
cbk@eslawfirm.com; lmh@eslawfirm.com; mcf@calcom.ws; dbrown3@smud.org;
californiadockets@pacificcorp.com; heide.caswell@pacificcorp.com;
Shannon.McWhinney@PacifiCorp.com; cindy.manheim@att.com;
Adam.Sherr@Qwest.com; MCS@cpuc.ca.gov; lee@cpuc.ca.gov; mdr@cpuc.ca.gov;
rst@cpuc.ca.gov; rgf@cpuc.ca.gov; bfs@cpuc.ca.gov; bds@cpuc.ca.gov;
cg2@cpuc.ca.gov; dkl@cpuc.ca.gov; edm@cpuc.ca.gov; eyc@cpuc.ca.gov;

hym@cpuc.ca.gov; jmh@cpuc.ca.gov; mg1@cpuc.ca.gov; ndw@cpuc.ca.gov;
psp@cpuc.ca.gov; pm2@cpuc.ca.gov; rae@cpuc.ca.gov; rim@cpuc.ca.gov;
rsm@cpuc.ca.gov; tim@cpuc.ca.gov; sbakk@parks.ca.gov



California Public
Utilities Commission

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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R0811005 - CPUC - OIR TO REVISE
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: AUGUST 26, 2010

Parties

NELSON G. BINGLE, III
OSMOSE UTILITIES SERVICES, INC.
215 GREENCASTLE ROAD
TYRONE, GA 30290
FOR: OSMOSE UTILITIES SERVICES, INC.

COORDINATING

CHRISTOPHER A. HILEN
ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
ADMINISTRATION
6100 NEIL ROAD
RENO, NV 89520
FOR: SIERRA PACIFIC POWER COMPANY

OSCAR A. ALVAREZ
REGULATORY STANDARDS AND COMPLIANCE
DIV.
LOS ANGELES DEPT. OF WATER AND POWER
WATER & POWER
111 N. HOPE STREET, ROOM 1246
340
LOS ANGELES, CA 90012
FOR: L.A. DEPARTMENT OF WATER AND POWER
DEPT OF WATER

STEVEN M. MEYER

MATTHEW YATES
LEGAL COUNSEL
WECC
615 ARAPEEN DRIVE, SUITE 210
SALT LAKE CITY, UT 84108
FOR: WESTERN ELECTRICITY

COUNCIL (WECC)

J. SCOTT KUHN
COUNTY OF LOS ANGELES
KENNETH HAHN HALL OF
500 W. TEMPLE STREET, RM 648
LOS ANGELES, CA 90012
FOR: LOS ANGELES COUNTY

SHANISE BLACK
DEPUTY CITY ATTORNEY, LEGAL
LOS ANGELES DEPARTMENT OF
111 NORTH HOPE STREET, ROOM
LOS ANGELES, CA 90012
FOR: CITY OF LOS ANGELES,
AND POWER

JESUS G. ROMAN

PSC TECHNOLOGY INCORPORATED
21839 SADDLE PEAK RD
CA501LB
TOPANGA, CA 90290
FOR: PSC TECHNOLOGY INCORPORATED

VERIZON CALIFORNIA INC.
112 LAKEVIEW CANYON ROAD,
THOUSAND OAKS, CA 91362
FOR: VERIZON CALIFORNIA

ROBERT F. LEMOINE
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON
ALLIANCE

DIANE CONKLIN
MUSSEY GRADE ROAD ALLIANCE
PO BOX 683
RAMONA, CA 92065
FOR: MUSSEY GRADE ROAD

KEITH MELVILLE
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL BAGLEY
VERIZON WIRELESS
15505 SAND CANYON AVENUE
IRVINE, CA 92612
FOR: VERIZON WIRELESS

JON DOHM
CROWN CASTLE USA, WEST AREA
SPECIALISTS LLC
510 CASTILLO STREET, SUITE 303
SANTA BARBARA, CA 93101
FOR: CALWA
SPECIALISTS,

JAMES E. BRITSCH
FACILITIES MANAGEMENT
1231 CRESTLINE DRIVE
SANTA BARBARA, CA 93105
FOR: FACILITIES MANAGEMENT
LLC.

CLEVELAND LEE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
LEGAL DIVISION
ROOM 5122
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

KIMBERLY LIPPI
CALIF PUBLIC UTILITIES
LEGAL DIVISION
ROOM 5001
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: CPSD

NINA SUETAKE
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

ROBERT FINKELSTEIN
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

KRISTIN L. JACOBSON
SPRINT NEXTEL
COMPANY
201 MISSION STREET, SUITE 1500
SAN FRANCISCO, CA 94105
FOR: SPRINT NEXTEL

LISE H. JORDAN, ESQ.
PACIFIC GAS AND ELECTRIC
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PG & E

NELSONYA CAUSBY
AT&T CALIFORNIA
525 MARKET ST., STE 2025
SAN FRANCISCO, CA 94105
FOR: AT&T CALIFORNIA AND NEW CINGULAR
CALIFORNIA/TW
WIRELESS PCS, LLC
LLC/TIME WARNER

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: CTIA-THE WIRELESS ASSOCIATION

PATRICK M. ROSVALL
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
500
FOR: SMALL LECS, SUREWEST TELEPHONE

EDWARD O'NEILL
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
800
SAN FRANCISCO, CA 94111-6533
FOR: COXCOM, INC./COX CALIFORNIA TELCOM
CALIFORNIA, INC.
LLC

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
800
SAN FRANCISCO, CA 94111-6533
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR

LARRY ABERNATHY
DAVEY TREE SURGERY COMPANY
PO BOX 5015
LIVERMORE, CA 94551
FOR: DAVEY TREE SURGERY COMPANY
COMMUNICATIONS, INC.

ANITA TAFF-RICE

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107
FOR: COMCAST PHONE OF
TELECOM OF CALIFORNIA,
CABLE

MARLO A. GO
GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: PACIFICORP

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL
50 CALIFORNIA STREET, SUITE
SAN FRANCISCO, CA 94111
FOR: CALTEL

JANE J. WHANG
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE
SAN FRANCISCO, CA 94111-6533
FOR: NEXTG NETWORKS OF

SUZANNE TOLLER
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE
SAN FRANCISCO, CA 94111-6533
FOR: SUNESYS, LLC

JOHN GUTIERREZ
DRECTOR, GOVERNMENT AFFAIRS
COMCAST
3055 COMCAST PLACE
LIVERMORE, CA 94551-9559
FOR: COMCAST CABLE

LEON M. BLOOMFIELD

EXTENET SYSTEMS, LLC
1547 PALOS VERDES MALL, NO. 298
1620
WALNUT CREEK, CA 94597
FOR: EXTENET SYSTEMS (CALIFORNIA) LLC

WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE
OAKLAND, CA 94612
FOR: T-MOBILE

WILLIAM P. ADAMS
ADAMS ELECTRICAL SAFETY CONSULTING
716 BRETT AVENUE
ROHNERT PARK, CA 94928-4012
FOR: ADAMS ELECTRICAL SAFETY CONSULTING
CONSERVANCY

KEVIN COLLINS
LOMPICO WATERSHED CONSERVANCY
PO BOX 99
FELTON, CA 95018
FOR: LOMPICO WATERSHED

BARRY F. MCCARTHY
MCCARTHY & BERLIN, LLP
INC
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113
FOR: NORTHERN CALIFORNIA POWER AGENCY
CALIFORNIA, INC.

ROBERT L. DELSMAN
NEXTG NETWORKS OF CALIFORNIA,
2216 OTOOLE AVENUE
SAN JOSE, CA 95131
FOR: NEXTG NETWORKS OF

CASEY HASHIMOTO
TURLOCK IRRIGATION DISTRICT
333 CANAL DRIVE
STE.190
TURLOCK, CA 95380
FOR: TURLOCK IRRIGATION DISTRICT
INC

STEPHEN R. CIESLEWICZ
CN UTILITY CONSULTING, INC
120 PLEASANT HILL AVE. NORTH,
SEBASTOPOL, CA 95472
FOR: CN UTILITY CONSULTING,

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENT SYSTEM
OPERATOR CORPORATION

LANDIS MARTTILA
IBEW 1245
30 ORANGE TREE CIRCLE
VACAVILLE, CA 95687
FOR: IBEW

CHARLIE BORN
FRONTIER COMMUNICATIONS
PREVENTION ENGINEER
PO BOX 340
PROTECTION
ELK GROVE, CA 95759
FOR: FRONTIER COMMUNICATIONS
FORESTRY

ERNYLEE CHAMLEE
CHIEF, WILDLAND FIRE
CAL DEP OF FOREST AND FIRE
1131 S STREET
SACRAMENTO, CA 95811
FOR: CALIFORNIA DEPARTMENT OF
AND FIRE PROTECTION

BRUCE MCLAUGHLIN
BRAUN & BLAISING MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
P.C.

JUSTIN C. WYNNE
ATTORNEY AT LAW
BRAUN BLAISING MCLAUGHLIN,

SACRAMENTO, CA 95814
FOR: CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATIONS
UTILITIES

915 L STREET, SUITE 1270
SACRAMENTO, CA 95814
FOR: CALIFORNIA MUNICIPAL
ASSOCIATION

JEROME F. CANDELARIA
CALIFORNIA CABLE TV ASSOCIATION
1001 K STREET, 2ND FLOOR
LLP
SACRAMENTO, CA 95814-3832
400
FOR: CCTA - CALIFORNIA CABLE &
TELECOMMUNICATIONS ASSOCIATION

JEDEDIAH J. GIBSON
ATTORNEY
ELLISON, SCHNEIDER & HARRIS
2600 CAPITOL AVENUE, SUITE
SACRAMENTO, CA 95816-5905
FOR: SIERRA PACIFIC POWER

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
DISTRICT
2300 RIVER PLAZA DRIVE
15830
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

STEVEN M. COHN
ASSISTANT GENERAL COUNSEL
SACRAMENTO MUNICIPAL UTILITY
6201 S ST., M.S. B406; PO BOX
SACRAMENTO, CA 95852-1830
FOR: SMUD

Information Only

JEREMY SADLER
EMAIL ONLY
EMAIL ONLY, CA 00000

TARYN CIARDELLA
SR. LEGAL SECRETARY
NV ENERGY
EMAIL ONLY
EMAIL ONLY, NV 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: MRW & ASSOCIATES, INC

BOB RITTER
CROWN CASTLE USA, INC.
2000 CORPORATE DRIVE
CANONSBURG, PA 15317

NICK LIMBEROPOULOS
CROWN CASTLE
2000 CORPORATE DRIVE
LLC
CANONSBURG, PA 15317
1C138

MIKE RODEN
EXECUTIVE DIR-REGULATORY
CINGULAR WIRELESS SERVICES,
1057 LENOX PARK BLVD RM -
ATLANTA, GA 30319

MATT PAWLOWSKI
NEXTERA ENERGY RESOURCES
RELIABILITY & COMPLIANCE GROUP
700 UNIVERSE BLVD.

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
FRONTIER COMMUNICATIONS
2378 WILSHIRE BOULEVARD

JUNO BEACH, FL 33408-2683

MOUND, MN 55364
FOR: FRONTIER COMMUNICATIONS

MARJORIE HERLTH
REGIONAL DIRECTOR, PUBLIC POLICY
QWEST COMMUNICATIONS CORPORATION
1801 CALIFORNIA ST., 10TH FL.
320
DENVER, CO 80202

JORDAN A. WHITE
SENIOR ATTORNEY
PACIFICORP
1407 W. NORTH TEMPLE, SUITE
SALT LAKE CITY, UT 84116

JAMES COLE
OSMOSE UTILITIES SERVICES, INC.
4862 S PURPLE SAGE DRIVE
723
CHANDLER, AZ 85248

LARI SHEEHAN
COUNTY OF LOS ANGELES
500 W. TEMPLE STREET, ROOM
LOS ANGELES, CA 90012

DARYL A. BUCKLEY
ELECTRICAL SERVICE MANAGER
DIV.
LOS ANGELES DEPT OF WATER AND POWER
111 N. HOPE STREET, ROOM 856
LOS ANGELES, CA 90012-2694

STANTON J. SNYDER, ESQ.
DEPUTY CITY ATTORNEY, LEGAL
DEPARTMENT OF WATER & POWER
111 N. HOPE STREET, ROOM 340
LOS ANGELES, CA 90012-2694
FOR: CITY OF LOS ANGELES,

DEPT OF WATER

AND POWER

MICHAEL R. THORP
SEMPRA ENERGY
555 W. 5TH STREET
DEPARTMENT
LOS ANGELES, CA 90013-1011
FOR: SAN DEIGO GAS & ELECTRIC COMPANY

JOHN R. TODD
PREVENTION SERVICES BUREAU
COUNTY OF LOS ANGELES FIRE
1320 N. EASTERN AVENUE
LOS ANGELES, CA 90063-3294

CRAIG HUNTER
ATTORNEY AT LAW
WILSON ELSEER MOSKOWITZ EDELMAN & DICKER
CA501LB
555 S. FLOWER STREET, SUITE 2900
LOS ANGELES, CA 90071-2407

JACQUE LOPEZ
VERIZON CALIFORNIA INC
112 LAKEVIEW CANYON ROAD,
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
SENIOR STAFF CONSULTANT
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD, MC 501LS
THOUSAND OAKS, CA 91362

STEVE FORD
MANAGER, CONSTRUCTION METHODS
CHINO OFFICE BUILDING
14005 S. BENSON AVE.,
CHINO, CA 91710-7026
FOR: CONSTRUCTION METHODS

CASE ADMINISTRATION
LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY

JAMES LEHRER
SOUTHERN CALIFORNIA EDISON
LAW DEPARTMENT

2244 WALNUT GROVE AVE., ROOM 370
ROSEMEAD, CA 91770

2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

NGUYEN QUAN
BEAR VALLEY ELECTRIC SERVICE
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773

STEVE M. DUNN
DEPARTMENT OF PUBLIC WORKS
COUNTY OF LOS ANGELES
PO BOX 1460
ALHAMBRA, CA 91802-1460

SHAWN CAINE
LAW OFFICE OF SHAWN CAINE
1125 CAMINO DEL MAR, SUITE D
DEL MAR, CA 92014

DAVE DOWNEY
NORTH COUNTY TIMES
207 E. PENNSYLVANIA AVENUE
ESCONDIDO, CA 92025

JOSEPH W. MITCHELL, PH. D.
M-BAR TECHNOLOGIES AND CONSULTING, LLC
COMPANY
19412 KIMBALL VALLEY RD
RAMONA, CA 92065

ALLEN K. TRIAL
SAN DIEGO GAS & ELECTRIC

101 ASH STREET, HQ-12B
SAN DIEGO, CA 92101

ESTHER NORTHRUP
COX COMMUNICATIONS
COMPANY
350 10TH AVENUE, SUITE 600
SAN DIEGO, CA 92101

LAURA M. EARL
SAN DIEGO GAS & ELECTRIC

101 ASH STREET, HQ-12
SAN DIEGO, CA 92101

LISA URICK
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12B
SAN DIEGO, CA 92101

COMPANY

JOHN A. PACHECO
SEMPRA ENERGY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101-3017
FOR: SAN DIEGO GAS & ELECTRIC

STEVE CHRISTIANSON
TOSDAL SMITH STEINER & WAX
401 WEST A STREET, SUITE 320
SAN DIEGO, CA 92101-7911

DON LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

REBECCA BLAIN
THORSNES, BARTOLOTTA & MCGUIRE
COMPANY
2550 FIFTH AVENUE, 11TH FLOOR
CP51D
SAN DIEGO, CA 92103

DAVID DOHREN
SAN DIEGO GAS & ELECTRIC

8316 CENTURY PARK COURT,
SAN DIEGO, CA 92123

GREGORY L. WALTERS
SAN DIEGO GAS & ELECTRIC COMPANY
COMPANY

REBECCA GILES
SAN DIEGO GAS AND ELECTRIC

8316 CENTURY PARK COURT
CP32D
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC
ELECTRIC COMPANY

8330 CENTURY PARK COURT -
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS AND

THE LAW OFFICES OF ALEXANDER M. SCHACK
16870 WEST BERNARDO DRIVE, SUITE 400
SAN DIEGO, CA 92127

JUSTIN CASHMER
VERIZON CALIFORNIA INC.
11 S. 4TH ST.
REDLANDS, CA 92373

BILL D. CARNAHAN
EXECUTIVE DIRECTOR
DIRECTOR, PUBLIC UTILITIES DEPARTMENT
3900 MAIN STREET
RIVERSIDE, CA 92522-0600

MITCHELL S. WAGNER
24641 WASHINGTON AVE
MURRIETA, CA 92562

LINDA BURTON
SIERRA TELEPHONE COMPANY, INC.
PO BOX 219
LLC
OAKHURST, CA 93644-0219
FOR: SIERRA TELEPHONE COMPANY, INC.

WILLIAM A.G. WILDE
PRESIDENT
CREATIVE INTERCONNECT COM.
555 OLD COUNTY RD., SUITE 100
SAN CARLOS, CA 94070

ELAINE M. DUNCAN
VERIZON CALIFORNIA, INC.
711 VAN NESS AVENUE, SUITE 300
FRANCISCO
SAN FRANCISCO, CA 94102
PLACE, RM. 234
FOR: VERIZON CALIFORNIA INC.

WILLIAM K. SANDERS
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN
1 DR. CARLTON B. GOODLETT
SAN FRANCISCO, CA 94102-4682

JAMES HENDRY
UTILITIES SPECIALIST
SAN FRANCISCO PUBLIC UTILITIES COMM.
1155 MARKET STREET, FOURTH FLOOR
SAN FRANCISCO, CA 94103

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

MARISA MITCHELL
ENVIRONMENTAL SCIENTIST
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935
SAN FRANCISCO, CA 94104

REGINA COSTA
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

STEPHEN P. BOWEN
ATTORNEY AT LAW
COMPANY
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 742
SAN FRANCISCO, CA 94104

BARBARA H. CLEMENT
PACIFIC GAS AND ELECTRIC
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PG&E

ERROL KISSINGER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET; MC B10A
SAN FRANCISCO, CA 94105

FASSIL FENIKILE
DIRECTOR-REGULATORY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

GWEN JOHNSON
AT&T CALIFORNIA
525 MARKET STREET, STE 1927
SAN FRANCISCO, CA 94105

KEITH KROM
GENERAL ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, SUITE 1904
SAN FRANCISCO, CA 94105

LAUREN ROHDE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
COMPANY
SAN FRANCISCO, CA 94105
NO. 15

MARGARET M. DILLON
ASSOCIATE DIRECTOR
PACIFIC BELL TELEPHONE

525 MARKET STREET, 18TH FL.,

SAN FRANCISCO, CA 94105

MICHELLE CHOO
AT&T CALIFORNIA
COMPANY
525 MARKET STREET, 20TH FLOOR
SAN FRANCISCO, CA 94105

PETER M. HAYES
PACIFIC BELL TELEPHONE

525 MARKET STREET, RM 1919
SAN FRANCISCO, CA 94105

RACHEL A. BIRKEY
OFFICE OF THE GENERAL COUNSEL
COMPANY
U.S. DEPT. OF AGRICULTURE
BOX 7442
33 NEW MONTGOMERY ST., 17TH FLOOR
SAN FRANCISCO, CA 94105

REGULATORY FILE ROOM
PACIFIC GAS AND ELECTRIC

77 BEALE STREET, B30A / PO

SAN FRANCISCO, CA 94105

ROSS JOHNSON
AREA MGR - REGULATORY
COMPANY
AT&T CALIFORNIA
525 MARKET STREET, 19TH FL, RM 33
SAN FRANCISCO, CA 94105

SANDY LAMBOY
PACIFIC GAS AND ELECTRIC

77 BEALE STREET, MC B13L
SAN FRANCISCO, CA 94105

THOMAS SELHORST
SENIOR PARALEGAL
AT&T CALIFORNIA
525 MARKET STREET, 20TH FLR, RM 2023
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

E. GARTH BLACK

MARK P. SCHREIBER

COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
FLOOR
SAN FRANCISCO, CA 94111
FOR: SUREWEST TELEPHONE

COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH
SAN FRANCISCO, CA 94111

JOSH DAVIDSON
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
800
SAN FRANCISCO, CA 94111-6533

MARIA CARBONE
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE
SAN FRANCISCO, CA 94111-6533

IRENE K. MOOSEN
ATTORNEY AT LAW
53 SANTA YNEZ AVENUE
303
SAN FRANCISCO, CA 94112

HILARY CORRIGAN
CALIFORNIA ENERGY MARKETS
425 DIVISADERO STREET, SUITE
SAN FRANCISCO, CA 94117-2242

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
PROTECTION
SAN FRANCISCO, CA 94177

ROBIN HARRINGTON
STAFF COUNSEL
CAL.DEPT OF FORESTRY AND FIRE
PO BOX 944246
SACRAMENTO, CA 94244-2460

AMY BARTELL
CITY OF PALO ALTO
250 HAMILTON AVENUE, PO BOX 10250
10250
PALO ALTO, CA 94303

GRANT KOLLING
CITY OF PALO ALTO
250 HAMILTON AVENUE, PO BOX
PALO ALTO, CA 94303

ALEXIS K. WODTKE
STAFF ATTORNEY
CONSUMER FEDERATION OF CALIFORNIA
590
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94402

GARRY J.D. HUBERT
HUBERT & YASUTAKE
1320 WILLOW PASS ROAD, SUITE
CONCORD, CA 94520

DOUGLAS GARRETT
COX COMMUNICATIONS
BERKELEY
2200 POWELL STREET, STE. 1035
ENGINEERING
EMERYVILLE, CA 94608

CARLOS FERNANDEZ-PELLO
UNIVERSITY OF CALIFORNIA
DEPARTMENT OF MECHANICAL
6105 ETCHEVERRY HALL
BERKELEY, CA 94720-1740

ROBERT WOLFE
AT&T CALIFORNIA
310 MARTIN AVENUE, ROOM 100A
SUITE 501

MICHAEL G. NELSON, ESQ.
MACCARTHY & BERLIN, LLP
100 W. SAN FERNANDO STREET,

SANTA CLARA, CA 95050

SAN JOSE, CA 95113

SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 W SAN FERNANDO ST., STE 501
SAN JOSE, CA 95113

LYNNE MARTINEZ
DIRECTOR GOVERNMENT AFFAIRS
PAC-WEST TELECOMM, INC.
4210 CORONADO AVE.
STOCKTON, CA 95204

THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95352

JOY A. WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

BRIAN LAFOLLETTE
TURLOCK IRRIGATION DISTRICT
PO BOX 949
333 EAST CANAL DRIVE
TURLOCK, CA 95381-0949

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

SCOTT TOMASHEFSKY
NORTHERN CALIFORNIA POWER AGENCY
P.C.
651 COMMERCE DRIVE
ROSEVILLE, CA 95678

SCOTT BLAISING
BRAUN BLAISING MCLAUGHLIN,
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

LESLA LEHTONEN
VP LEGAL AND REGULATORY AFFAIRS
LLP
CALIFORNIA CABLE & TELECOM ASSOCIATION
400
1001 K STREET, 2ND FLOOR
SACRAMENTO, CA 95814-3832

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS
2600 CAPITOL AVENUE, SUITE
SACRAMENTO, CA 95816-5905

CHASE B. KAPPEL
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
LLP
SACRAMENTO, CA 95816-5905
400

LYNN HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS,
2600 CAPITOL AVENUE, SUITE
SACRAMENTO, CA 95816-5905

MARGARET FELTS
PRESIDENT
DISTRICT
CALIFORNIA COMMUNICATIONS ASSN
BOX 15830
1321 HOWE AVE. SUITE 202
SACRAMENTO, CA 95825

DAVID L. BROWN, P.E.
SACRAMENTO MUNICIPAL UTILITY
6201 S ST., M.S. D-104; PO
SACRAMENTO, CA 95852-1830

CATHIE ALLEN
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
SUITE 1500
PORTLAND, OR 97232

HEIDE CASWELL
PACIFICORP
825 NE MULTNOMAH STREET,

PORTLAND, OR 97232

SHANNON M. MCWHINNEY
PACIFICORP
825 NE MULTNOMAH ST., STE. 1800
LLC
PORTLAND, OR 97232

CYNTHIA MANHEIM
GENERAL ATTORNEY
CINGULAR WIRELESS SERVICES,

16331 NE 72ND WAY, ROOM RTC 1
REDMOND, WA 98052

ADAM L. SHERR
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, ROOM 1506
SEATTLE, WA 98191
FOR: QWEST COMMUNICATIONS CORP.

State Service

MELISSA SLAWSON, ESQ
CALIFORNIA PUBLIC UTILITIES COMMISSION
COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CYNTHIA LEE
CALIF PUBLIC UTILITIES

SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

MICHAEL ROBERTSON
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RAFFY STEPANIAN
CALIF PUBLIC UTILITIES

SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RAYMOND G. FUGERE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
SAFETY & RELIABILITY BRANCH
PROGRAMS BRA
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

BREWSTER FONG
CALIF PUBLIC UTILITIES

ENERGY PRICING AND CUSTOMER

ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
ENERGY DIVISION
AREA 4-A

CHRISTOPHER MYERS
CALIF PUBLIC UTILITIES

COMMUNICATIONS POLICY BRANCH
ROOM 4209

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

DAVID K. LEE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ED MOLDAVSKY
CALIF PUBLIC UTILITIES
LEGAL DIVISION
ROOM 5037
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ERIC CHIANG
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES
LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL GREER
CALIF PUBLIC UTILITIES
COMMUNICATIONS POLICY BRANCH
ROOM 4211
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE WALES
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
LEGAL DIVISION
ROOM 5141
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES
EXECUTIVE DIVISION
ROOM 5306
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PEJMAN MOSHFEGH
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT ELLIOTT
CALIF PUBLIC UTILITIES
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT MASON
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
LEGAL DIVISION
ROOM 5031
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SCOTT MOSBAUGH
CALIF PUBLIC UTILITIES
EXECUTIVE DIVISION
ROOM 5207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY KENNEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5015
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEPHEN BAKKEN
CALIFORNIA STATE PARKS
1416 9TH STREET
SACRAMENTO, CA 95814