

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

Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program.

Rulemaking 11-05-005  
(Filed May 5, 2011)

**JOINT COMMENTS OF THE INDEPENDENT ENERGY  
PRODUCERS ASSOCIATION, CALIFORNIA WIND ENERGY  
ASSOCIATION, AND LARGE-SCALE SOLAR ASSOCIATION ON  
HIGH-PRIORITY ISSUES**

Joseph M. Karp  
Thomas W. Solomon  
Winston & Strawn LLP  
101 California Street, 39th Floor  
San Francisco, California 94111-5894  
Telephone: (415) 591-1000  
Facsimile: (415) 591-1400  
Email: [jkarp@winston.com](mailto:jkarp@winston.com)  
[tsolomon@winston.com](mailto:tsolomon@winston.com)

*Attorneys for the California Wind Energy  
Association*

Kristin Burford, Policy Director  
Large-scale Solar Association  
2501 Portola Way  
Sacramento, CA 95818  
Phone: (916) 599-8633  
Fax: (916) 307-5176  
Email: [kristin@consciousventuresgroup.com](mailto:kristin@consciousventuresgroup.com)

*For the Large-scale Solar Association*

Date: May 31, 2011

GOODIN, MACBRIDE, SQUERI,  
DAY & LAMPREY, LLP  
Brian T. Cragg  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Telephone: (415) 392-7900  
Facsimile: (415) 398-4321  
Email: [bcragg@goodinmacbride.com](mailto:bcragg@goodinmacbride.com)

*Attorneys for the Independent Energy Producers  
Association*

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The *Administrative Law Judge's Ruling Setting Prehearing Conference* issued on May 23, 2011, invites parties to present their preliminary views on the highest priority topics to be addressed in the initial months of this proceeding. The Independent Energy Producers Association (IEP), the California Wind Energy Association (CalWEA), and the Large-scale Solar Association (LSA) respond to this invitation with these comments.

In the view of IEP, CalWEA, and LSA, the Commission's efforts over the next few months should be focused on ensuring that California is in a position to take advantage of various federal government programs that are designed to stimulate investment in renewable energy resources. In particular, the period for establishing eligibility for payments in lieu of tax credits, or the cash grant option, expires at the end of 2011. To be eligible for this benefit, a project's sponsors must have commenced physical work of a significant nature or have spent 5% of the expected total cost of the project before January 1, 2012. The cash grant option is a significant, federally sponsored benefit that will enable a developer to submit a lower bid in a

competitive solicitation (or in bilateral negotiations), resulting in benefits to California ratepayers for the duration of the project's power purchase agreement (PPA) (up to 25 years).

For California to be in position to take advantage of these federal programs, the investor-owned utilities (IOUs) must have reasonable assurance that any obligations they enter into in 2011 will result in energy purchases that count toward their renewable energy procurement obligations under the new Renewables Portfolio Standard (RPS) legislation, referred to by its bill number, SB1X 2.<sup>1</sup> The IOUs must also receive the Commission's prompt approval of the PPAs they enter into with the owners or operators of generating facilities that can qualify for the significant federal incentives.

Similarly, energy producers must have assurance that their PPAs will be promptly reviewed and, if appropriate, approved. Even under an optimistic schedule, to maintain eligibility for the tax cash grant, energy project developers may have to make significant expenditures before the end of 2011, and accept risk for that investment, while they await the Commission's approval of their PPAs.

To be clear, it is not assured that the projects selected through the utilities' Requests for Offers (RFOs) will (1) successfully negotiate PPAs by year's end, (2) receive the Commission's approval for the PPAs, or (3) qualify for the federal cash grant. What is certain, however, is that if the Commission does **not** plan to act expeditiously to resolve certain high-priority issues and to review the PPAs that might qualify for the cash grants, California will lose the significant financial benefits the federal program offers.

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<sup>1</sup> SB1X 2 was passed by the Legislature and signed by the Governor, but because it was enacted as part of a special session, it will not become effective until the 91st day after the special session is adjourned. Cal. Const. art. IV, § 8(c)(1). It is certain that SB1X 2 will become law with the passing of time, and the Commission should not delay its implementation of the legislation until it becomes effective.

For that reason, IEP, CalWEA, and LSA respectfully urge the Commission to give priority to and act expeditiously on two key issues:

- Targets and Compliance Obligations
- Eligible Products

IEP, CalWEA, and LSA note that these two issues include most of the more detailed Tier 1 issues identified in the Joint Parties' Comments submitted concurrently with these comments, and IEP, CalWEA, and LSA are also among the Joint Parties. This agreement among a variety of parties with differing interests emphasizes the point that resolution of these two issues is critically important to the commercial transactions needed for timely and cost-effective attainment of the 33% RPS goal. These two issues should be scheduled for a final decision at the Commission's business meeting on September 22, 2011. Meanwhile, in parallel, the Commission can and should proceed to address the other issues relevant to implementing SB1X 2, with a goal of deciding any other Tier 1 issues no later than Spring 2012 and the remaining Tier 2 and Tier 3 issues in mid-2012 (with another decision scheduled for December 2012, if necessary). If adopted, IEP, CalWEA, and LSA's joint proposal will resolve the critical issues needed to maximize the opportunity for California to benefit from federal renewable incentive programs, and the Commission will complete this rulemaking and its role in the implementation of SB1X 2 within 18 months.

#### **I. TARGETS AND COMPLIANCE OBLIGATIONS**

The fundamental requirement of the state's RPS program is that retail sellers are to procure specified amounts of energy from eligible renewable generation facilities. For the IOUs and other retail sellers to act on that requirement, however, the Commission must clearly define the elements of that requirement. Because SB1X 2 modifies the RPS targets and the retail

sellers' compliance obligations, the first step in implementing SB1X 2 is for the Commission to clarify its expectations about how the IOUs will meet their compliance obligations and achieve the targets of the legislation.

Section 20 of SB1X 2 sets forth a new Public Utilities Code section 399.15 that establishes new interim goals for three compliance periods ending at the end of 2013, 2016, and 2020, and section 22 of SB1X 2 adds Public Utilities Code section 399.16, which establishes portfolio content requirements for these compliance periods. The Commission must establish the quantity of eligible renewable energy each retail seller must procure for each compliance period. Although the legislation gives the Commission until January 1, 2012, to complete this process, for the reasons stated above IEP, CalWEA, and LSA respectfully urge the Commission to give this task high priority, so that the IOUs can begin to make rational procurement decisions and plans.

The initial compliance period of SB1X 2 begins January 1, 2011, and much of the renewable energy procured during this first compliance period will be the result of procurement under the previous RPS statutory framework. For that reason, the Commission must clarify how the renewable energy procured under the existing RPS statute fits into the framework of the new RPS legislation. These transitional issues directly affect how the IOUs will meet their compliance obligations and achieve the targets for each compliance period.

## **II. ELIGIBLE PRODUCTS**

Although the Energy Commission continues to have the responsibility of certifying that renewable generating facilities are eligible resources, the CPUC plays the crucial role of clarifying which "eligible renewable energy resource electricity products" fall into each of the three portfolio content categories described in Public Utilities Code section 399.16, added by section 22 of SB1X 2. Because the content of the IOUs' procurement portfolio is subject to

strict limits for each compliance period, the IOUs must understand which potential transactions fall into each category before they can proceed to procure the resources needed to meet the portfolio content requirements.

In addition, section 16 of SB1X 2 requires the Commission to adopt rules that allow retail sellers to carry over excess procurement from one compliance period to another. This “banking” provision can be an important element of the IOUs’ strategy for meeting the targets for each compliance period. The legislation allows the accumulation of excess procurement to begin as of January 1, 2011, so banking could be a significant component of the IOUs’ approach to meeting the target for the first compliance period. Again, the Commission needs to establish clear rules on the use of banking, including rules regarding the use of existing banked procurement, so that the IOUs will know how much additional procurement is needed to meet the goals of the first procurement period and beyond.

### **III. PROPOSED SCHEDULE**

Because eligibility for the tax cash grants must be established by the end of this year, these issues require the Commission’s attention on an expedited basis if California is to have any ability to take advantage of these incentives before they expire. IEP, CalWEA, and LSA propose the following schedule for the consideration and resolution of these two key issues.

June 13	Prehearing Conference
June 24	Parties submit proposals on targets and products
July 5	All-day workshop on targets and products
July 15	Comments on proposals on targets and products
August 22	Proposed Decision issued
September 22	Commission Decision

This schedule is ambitious but not impossible. The target date for a Commission

Decision, September 22, is designed to make it possible (under an admittedly tight schedule) for the IOUs to submit the PPAs of any projects that might qualify for the tax cash grants for the Commission's approval and for the Commission to render its decision on the PPAs by December 15, the last Commission business meeting under the current schedule.

IEP, CalWEA, and LSA recognize that this proposed schedule puts considerable pressure on the Commission and other parties to act quickly on the two key issues. IEP, CalWEA, and LSA do not intend to foreclose action on other urgent issues, but the prospect of securing millions of dollars of future benefits for California's electric ratepayers justifies the effort required to act on these two crucial issues on the proposed schedule.

CalWEA and LSA have authorized IEP to sign these comments on their behalf.

Respectfully submitted this 31st day of May, 2011 at San Francisco, California.

GOODIN, MACBRIDE, SQUERI,  
DAY & LAMPREY, LLP  
Brian T. Cragg  
505 Sansome Street, Suite 900  
San Francisco, California 94111  
Telephone: (415) 392-7900  
Facsimile: (415) 398-4321

By /s/ Brian T. Cragg  
Brian T. Cragg

Attorneys for the Independent Energy  
Producers Association

**CERTIFICATE OF SERVICE**

I, Melinda LaJaunie, certify that I have on this 31st day of May 2011 caused a copy of the foregoing

**JOINT COMMENTS OF THE INDEPENDENT ENERGY PRODUCERS ASSOCIATION, CALIFORNIA WIND ENERGY ASSOCIATION, AND LARGE-SCALE SOLAR ASSOCIATION ON HIGH-PRIORITY ISSUES**

to be served on all known parties to R.11-05-005 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

Commissioner Mark Ferron  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

ALJ Anne E. Simon  
California Public Utilities Commission  
State Building, Room 5107  
505 Van Ness Avenue  
San Francisco, CA 94102

ALJ Burton Mattson  
California Public Utilities Commission  
State Building, Room 5104  
505 Van Ness Avenue  
San Francisco, CA 94102

ALJ Regina DeAngelis  
California Public Utilities Commission  
State Building, Room 5105  
505 Van Ness Avenue  
San Francisco, CA 94102

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 31st day of May 2011 at San Francisco, California.

/s/ Melinda LaJaunie  
Melinda LaJaunie

## Service List – R.11-05-005 (Updated May 31, 2011)

ANDREW B. BROWN  
abb@eslawfirm.com

JASON ABIECUNAS  
abiecunasjp@bv.com

ADAM BROWNING  
abrowning@votesolar.org

ARI CITRIN  
acitrin@prosoliana.com

ANNE GILLETTE  
AEG@cpuc.ca.gov

Anne E. Simon  
aes@cpuc.ca.gov

ALEX KANG  
alex.kang@itron.com

ALEX MARTIN  
amartin@nextlight.com

AMBER RIESENHUBER  
amber@iepa.com

AARON RENFRO  
AMRO@pge.com

AIMEE M. SMITH  
AMSmith@SempraUtilities.com

ANDERS GLADER  
anders.glader@elpower.com

ANDRE DEVLBISS  
andre.devilbiss@recurrentenergy.com

ANDREA MORRISON  
andrea.morrison@directenergy.com

ANDREW LUSCZ  
Andrew.Luszcz@GlacialEnergy.com

ANDREW J. VAN HORN  
andy.vanhorn@vhcenergy.com

ANGELA GREGORY  
angela.gregory@DirectEnergy.com

ART RIVERA  
artrivera@comcast.net

Andrew Schwartz  
as2@cpuc.ca.gov

ALYSSA T. KOO  
atk4@pge.com

ANN L. TROWBRIDGE  
atrowbridge@daycartermurphy.com

AUSTIN M. YANG  
austin.yang@sfgov.org

ANUPAMA VEGE  
avege@firstwind.com

MATTHEW BARMACK  
barmackm@calpine.com

BRIAN T. CRAGG  
bcragg@goodinmacbride.com

BARRY H. EPSTEIN  
bepstein@fablaw.com

RYAN BERNARDO  
bernardo@braunlegal.com

BETH VAUGHAN  
beth@beth411.com

WILLIAM S. KAMMERER  
bill@fitcoalition.com

BRUNO JEIDER  
BJeider@ci.burbank.ca.us

BRIAN K. CHERRY  
bkc7@pge.com

SCOTT BLAISING  
blaising@braunlegal.com

ROBERT B. GEX  
bobgex@dwt.com

BARBARA R. BARKOVICH  
brbarkovich@earthlink.net

BRIAN PRUSNEK  
Brian.Prusnek@sce.com

BRIAN THEAKER  
brian.theaker@nrgenergy.com

BRYAN SCHWEICKERT  
bryan.schweickert@ladwp.com

BRIAN S. BIERING  
bsb@eslawfirm.com

Burton Mattson  
bwm@cpuc.ca.gov

BETH SCHOSHINSKI  
BXSZ@pge.com

CHRISTIAN MENTZEL  
c.mentzel@cleanenergymaui.com

CARRIE A. DOWNEY  
cadowney@cadowneylaw.com

CASE ADMINISTRATION  
case.admin@sce.com

TIMOTHY CASTILLE  
castille@landsenergy.com

CATHIE ALLEN  
cathie.allen@pacificorp.com

CATHY A. KARLSTAD  
cathy.karlstad@sce.com

CHARLES J. BLACK  
CBlack@riversideca.gov

CINDY L. CASSELMAN  
ccasselman@pilotpowergroup.com

CHARLES CHANG  
cchang@cityofpasadena.net

CAITLIN COLLINS LIOTIRIS  
ccollins@Energystrat.com

HILARY CORRIGAN  
cem@newsdata.com

NOBLE AMERICAS ENERGY  
SOLUTIONS LLC  
CentralFiles@SempraUtilities.com

CENTRAL FILES  
CentralFiles@SempraUtilities.com

CHAD CHAHBAZI  
chad@cenergypower.com

MICHAEL CHESTONE  
chestonem@sharpsec.com

CHRISTOPHER A. HILEN  
chilen@sppc.com

CHRIS LEVERIZA  
chris.leveriza@glacialenergy.vi

CHRIS KING  
chris@emeter.com

Candace Morey  
cjm@cpuc.ca.gov

CURTIS KEBLER  
CKebler@SempraGeneration.com

CLARE LAUFENBER GALLARDO  
claufenb@energy.state.ca.us

CONSTANCE LENI  
cleni@energy.state.ca.us

Chloe Lukins  
clu@cpuc.ca.gov

CLYDE MURLEY  
clyde.murley@comcast.net

CAROLYN KEHREIN  
cmkehrein@ems-ca.com

CORY M. MASON  
cmmw@pge.com

CHERYL LEE  
CNL@cpuc.ca.gov

ERIC OSBORN  
cpacc@calpine.com

CHERYL PONDS  
cponds@ci.chula-vista.ca.us

## Service List – R.11-05-005 (Updated May 31, 2011)

CALIFORNIA PACIFIC ELECTRIC  
COMPANY, LLC  
cpuc@liberty-energy.com

REGULATORY FILE ROOM  
CPUCcases@pge.com

DOCKET COORDINATOR  
cpucdockets@keysandfox.com

ERIN RANSLOW  
cpucrulings@navigantconsulting.com

CHARLES R. MIDDLEKAUFF  
CRMd@pge.com

CARL STEEN  
csteen@bakerlaw.com

CATHY S. WOOLLUMS  
cswoollums@midamerican.com

Christopher Danforth  
ctd@cpuc.ca.gov

CHRISTOPHER T. ELLISON  
cte@eslawfirm.com

CYNTHIA WOOTEN  
cwooten@lumenxconsulting.com

CYNTHIA A. BRADY  
cynthia.brady@constellation.com

CYNTHIA FONNER BRADY  
cynthia.brady@constellation.com

DIANE MOSS  
d.moss@renewables100.org

DANIEL A. KING  
DAKing@SempraGeneration.com

DAN ADLER  
Dan.adler@calcef.org

DANIELLE OSBORN-MILLS  
danielle@ceert.org

DAVID OLIVER  
david.oliver@navigantconsulting.com

DAVID A. BISCHSEL  
davidb@cwo.com

DAVID E. MORSE  
davidmorse9@gmail.com

DAVID OLIVARES  
davidol@mid.org

DEE ANNA BODINE  
DBodine@LibertyPowerCorp.com

DAVID PECK  
DBP@cpuc.ca.gov

David Peck  
dbp@cpuc.ca.gov

DAVID R. BRANCHCOMB  
dbranchcomb@spi-ind.com

DAN L. CARROLL  
dcarroll@downeybrand.com

DOUGLAS E. COVER  
dcover@esassoc.com

DOUG DAVIE  
ddavie@wellhead.com

DENNIS W. DE CUIR  
dennis@ddecuir.com

DEREK DENNISTON  
Derek@AltaPowerGroup.com

DOUGLAS M. GRANDY, P.E.  
dgrandy@caonsitegen.com

DANIEL V. GULINO  
dgulino@ridgewoodpower.com

DAVID L. HUARD  
dhuard@manatt.com

DIANE I. FELLMAN  
Diane.Fellman@nrgenergy.com

WILLIAM F. DIETRICH  
dietrichlaw2@earthlink.net

WILLIAM DIETRICH  
dietrichlaw2@earthlink.net

DANIEL JURIJEW  
djurijew@capitalpower.com

DOUGLAS K. KERNER  
dkk@eslawfirm.com

DESPINA NIEHAUS  
DNiehaus@SempraUtilities.com

JAMES L. BYARD PH.D.  
DocToxics@aol.com

DAVID ORTH  
dorth@krcd.org

Dorothy Duda  
dot@cpuc.ca.gov

DOUGLAS MCPHERSON  
Douglas@Idealab.com

DANIEL W. DOUGLASS  
douglass@energyattorney.com

DIANA SANCHEZ  
dsanchez@daycartermurphy.com

DAVID SAUL  
dsaul@pacificsolar.net

DANIELLE MATTHEWS SEPERAS  
dseperas@calpine.com

DAVID TOWNLEY  
dtownley@infiniacorp.com

DAVID VIDAVER  
dvidaver@energy.state.ca.us

DAWN WEISZ  
dweisz@co.marin.ca.us

DONALD SCHOENBECK  
dws@r-c-s-inc.com

DAVIS WRIGHT TREMAINE, LLC  
dwtcpucdockets@dwt.com

ED CHIANG  
echiang@elementmarkets.com

EDWARD A. MAINLAND  
ed.mainland@sierraclub.org

ED SMELOFF  
ed.smeloff@sunpowercorp.com

SHANNON EDDY  
eddyconsulting@gmail.com

EDWARD W. O'NEILL  
edwardoneill@dwt.com

ELIZABETH HADLEY  
ehadley@reupower.com

ELIZABETH WRIGHT  
ej\_wright@oxy.com

EVELYN KAHL  
ek@a-klaw.com

ED LUCHA  
ELL5@pge.com

EDWARD VINE  
elvine@lbl.gov

ELENA MELLO  
emello@sppc.com

MICHAEL MAZUR  
Energy@3PhasesRenewables.com

ELIZABETH RASMUSSEN  
erasmussen@marinenergyauthority.org

CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
e-recipient@caiso.com

CALIFORNIA ISO  
e-recipient@caiso.com

ERIC CHERNISS  
eric.cherniss@gmail.com

## Service List – R.11-05-005 (Updated May 31, 2011)

ERIK STUEBE Eriks@ecoplexus.com	HAROLD M. ROMANOWITZ hal@rwitz.net	J. COURTNEY OLIVE jcolive@bpa.gov
ERIN GRIZARD Erin.Grizard@BloomEnergy.com	KELLIE M. HANIGAN hanigan@encous.com	JEANNE M. SOLE jeanne.sole@sfgov.org
ELAINE SISON-LEBRILLA esison@smud.org	HARRY SINGH harry.singh@gs.com	JEFF HIRSCH Jeff.Hirsch@DOE2.com
TERRY FARRELLY farrellytc@earthlink.net	HOLLY B. CRONIN hcronin@water.ca.gov	JEFF NEWMAN Jeff.Newman@bth.ca.gov
FRANK DE ROSA fderosa@nextlight.com	HIMANSHU PANDEY HPandey@ci.burbank.ca.us	JEFFREY P. GRAY jeffgray@dwt.com
FREEMAN S. HALL fhall@solarelectricsolutions.com	HEATHER RAITT hrait@energy.state.ca.us	JENINE SCHENK jenine.schenk@apses.com
KAREN TERRANOVA filings@a-klaw.com	HANNON RASOOL HRasool@SempraUtilities.com	JENNIFER BARNES Jennifer.Barnes@Navigantconsulting.com
FREDERICK M. ORTLIEB fortlieb@sandiego.gov	CAROL J. HURLOCK hurlock@water.ca.gov	Julie A. Fitch jf2@cpuc.ca.gov
AMY FREES freesa@thirdplanetwind.com	HUGH YAO HYao@SempraUtilities.com	JOE GRECO jgreco@terra-genpower.com
FRED W. NOBLE fwnoble@WintecEnergy.com	INGER GOODMAN igoodman@commerceenergy.com	JIM HOWELL jim.howell@recurrentenergy.com
FRED G. YANNEY fyanney@fulbright.com	IAN MCGOWAN imcgowan@3DegreesInc.com	JIM METROPULOS jim.metropulos@sierraclub.org
ANGELINA GALITEVA galiteva@aol.com	MIGNON MARKS info@calseia.org	JAMES P. WHITE jim_p_white@transcanada.com
GREG BASS gbass@noblesolutions.com	JEFF COX j.miles.cox@sbcglobal.net	JEDEDIAH J. GIBSON jig@eslawfirm.com
GURCHARAN BAWA gbawa@cityofpasadena.net	Joseph A. Abhulimen jaa@cpuc.ca.gov	JOSEPH M. KARP jkarp@winston.com
GEORGE WILTSEE george.wiltsee@sce.com	JACK MCNAMARA jackmack@suesec.com	JACQUELINE KEPKE jkepke@ch2m.com
GEOREG GISEL ggisel@indenergysolutions.com	JIM STACK, PH.D. James.Stack@CityofPaloAlto.org	JOHN KERN jkern@bluestarenergy.com
GLORIA BRITTON GloriaB@anzaelectric.org	JANET M. GAGNON janet.gagnon@solarworldusa.com	JASON B. KEYES jkeyes@keyesandfox.com
GREGG MORRIS gmorris@emf.net	JANICE LIN janice@strategenconsulting.com	JANIS LEHMAN JLehman@anaheim.net
CAMILLE A. GOULET GouletCA@email.laccd.edu	L. JAN REID janreid@coastecon.com	JOHN W. LESLIE, ESQ. jleslie@luce.com
GABE PETLIN gpetlin@3degreesinc.com	JEANNE B. ARMSTRONG jarmstrong@goodinmacbride.com	Jason Simon jls@cpuc.ca.gov
Gretchen T. Dumas gtd@cpuc.ca.gov	JASON YAN jay2@pge.com	JANE E. LUCKHARDT jluckhardt@downeybrand.com
GERALD T. ROBINSON gtrobinson@lbl.gov	JOHN CASADONT JCasadont@BlueStarEnergy.com	Jaclyn Marks jm3@cpuc.ca.gov
GRACE LIVINGSTON-NUNLEY GXL2@pge.com	JENNIFER CHAMBERLIN JChamberlin@LSPower.com	

## Service List – R.11-05-005 (Updated May 31, 2011)

JAN MCFARLAND  
jmcfarland@treasurer.ca.gov

JAMES MCMAHON  
jmcmahon@8760energy.com

Julie Halligan  
jmh@cpuc.ca.gov

JOHN NIMMONS  
jna@speakeasy.org

JESSICA NELSON  
jnelson@psrec.coop

JODY LONDON  
jody\_london\_consulting@earthlink.net

JOSEPH LANGENBERG  
Joe.Langenberg@gmail.com

JOHN DEWEY  
john@deweygroup.com

JOHN DUNN  
john\_dunn@transcanada.com

JOHN R. REDDING  
johnredding@earthlink.net

JOHN M. SPILMAN  
johnspilman@netzero.net

JONATHAN JACOBS  
jon.jacobs@paconsulting.com

JONI A. TEMPLETON  
Joni.Templeton@sce.com

JORDAN A. WHITE  
jordan.white@pacificcorp.com

JOY A. WARREN  
joyw@mid.org

Jordan Parrillo  
jp6@cpuc.ca.gov

JAN PEPPER  
jpepper@svpower.com

JENNIFER PIERCE  
jpierce@semprautilities.com

JOHN PITTS  
jpittsjr@pcgconsultants.com

JP ROSS  
jpross@sungevity.com

JASON PAYNE  
jrobertpayne@gmail.com

JUDITH SANDERS  
jsanders@caiso.com

JUDITH SANDERS  
jsanders@caiso.com

JANINE L. SCANCARELLI  
jscancarelli@crowell.com

JOHN PAPPAS  
jsp5@pge.com

JULIANNE SPEARS  
jspears@orrick.com

JAMES D. SQUERI  
jsqueri@goodinmacbride.com

JACK STODDARD  
jstoddard@manatt.com

JUDY PAU  
judypau@dwt.com

JULIETTE ANTHONY  
juliette7@aol.com

JAMES WEIL  
jweil@aglet.org

JAMES B. WOODRUFF  
jwoodruff@nextlight.com

JIM WOODWARD  
jwoodwar@energy.state.ca.us

Jonathan J. Reiger  
jzr@cpuc.ca.gov

Karin M. Hieta  
kar@cpuc.ca.gov

KAREN KOCHONIES  
Karen.Kochonies@MorganStanley.com

KAREN LINDH  
karen@klindh.com

KEVIN BOUDREAU  
kb@EnerCalUSA.com

KENNETH J. DEREMER  
KDeremer@SempraUtilities.com

KEITH MCCREA  
keith.mccrea@sablaw.com

KEITH WHITE  
keithwhite@earthlink.net

KELLY CAUVEL  
kelly.cauvel@build-laccd.org

KENNY SWAIN  
kenneth.swain@navigantconsulting.com

KERRY EDEN  
kerry.eden@ci.corona.ca.us

KERRY HATTEVIK  
kerry.hattevik@nexteraenergy.com

KEVIN T. FOX  
kfox@keyesandfox.com

KELLY FRANCONI  
KFranconi@energystrat.com

KELLY GIDDENS  
kgiddens@orrick.com

Ke Hao Ouyang  
kho@cpuc.ca.gov

KEVIN J. SIMONSEN  
kjsimonsen@ems-ca.com

GREGORY S.G. KLATT  
klatt@energyattorney.com

KAREN NORENE MILLS  
kmills@cxbf.com

KAREN N. MILLS  
kmills@cxbf.com

AVIS KOWALEWSKI  
kowalewskia@calpine.com

KRISTIN BURFORD  
kristin.b.burford@gmail.com

KEITH SWITZER  
kswitzer@gswater.com

SOCAL WATER/BEAR VALLEY  
ELECTRIC  
kswitzer@gswater.com

ROGER KROPKE  
kswitzer@scwater.com

KRYSTYN TENDY  
ktendy@chadbourne.com

Keith D White  
kwh@cpuc.ca.gov

KATE ZOCCHETTI  
kzocchet@energy.state.ca.us

LAURA I. GENAO  
Laura.Genao@sce.com

LAURIE MAZER  
Laurie.Mazer@bp.com

LISA A. COTTLE  
lcottle@winston.com

LAUREN ROHDE  
ldri@pge.com

LEONARD LEICHNITZ  
leichnetz@lumospower.com

LEILANI JOHNSON KOWAL  
leilani.johnson@ladwp.com

LORRAINE GONZALES  
lgonzale@energy.state.ca.us

## Service List – R.11-05-005 (Updated May 31, 2011)

DONALD C. LIDDELL  
liddell@energyattorney.com

LINDA FISCHER  
lindaf@mid.org

LYNN M. HAUG  
lmh@eslawfirm.com

LILY M. MITCHELL  
lmitchell@hanmor.com

LAURIE PARK  
lpark@navigantconsulting.com

LESLIE E. SHERMAN  
lsherman@orrick.com

LEE TERRY  
lterry@water.ca.gov

LUKE DUNNINGTON  
luke.dunnington@recurrentenergy.com

LON W. HOUSE, PH.D  
lwhouse@innercite.com

LAURA WISLAND  
lwisland@ucsusa.org

LYNN M. ALEXANDER  
lynn@lmaconsulting.com

MARK STOUT  
m.stout@meridianenergyusa.com

MARCEL HAWIGER  
marcel@turn.org

MARCIE MILNER  
marcie.milner@shell.com

MARK THOMPSON  
mark.thompson@powerex.com

MARK ETHERTON  
mark@pdsplc.com

MARK FUMIA  
markfumia@dwt.com

MARTIN HOMEC  
martinhomec@gmail.com

MARY C. HOFFMAN  
mary@solutionsforutilities.com

TIM MASON  
masont@bv.com

MATT MILLER  
matt.miller@recurrentenergy.com

MATTHEW FREEDMAN  
matthew@turn.org

MICHAEL BOCCADORO  
mboccadoro@dolphingroup.org

Michael Colvin  
mc3@cpuc.ca.gov

MIKE CAMPBELL  
mcampbell@sfwater.org

MICHAEL E. CARBOY  
mcarboy@signalhill.com

MARK CHEDIAK  
mchediak@bloomberg.net

BRUCE MCLAUGHLIN  
mclaughlin@braunlegal.com

MEGAN COX  
mcox@calplg.com

MARCUS V. DA CUNHA  
mdacunha@ecoplexus.com

MICHAEL DAY  
mday@goodinmacbride.com

MICHAEL DEANGELIS  
mdeange@smud.org

MICHAEL DEANGELIS  
mdeange@smud.org

MARC D. JOSEPH  
mdjoseph@adamsbroadwell.com

MEREDITH LAMEY  
meredith\_lamey@transcanada.com

MARK FRAZEE  
mfrazee@anaheim.net

MICHAEL P. GINSBURG  
mginsburg@orrick.com

GRADY MATHAI-JACKSON  
MGML@pge.com

MICHAEL WHEELER  
michael.wheeler@recurrentenergy.com

MICHAEL E. BOYD  
michaelboyd@sbcglobal.net

Matthew Deal  
mjd@cpuc.ca.gov

MIKE JENSEN  
mjensen@mercedid.org

Mary Jo Stueve  
mjs@cpuc.ca.gov

MADOLON A. KUCHERA  
mkuchera@bluestarenergy.com

MICHAEL MAZUR  
mmazur@3PhasesRenewables.com

MAGGIE CHAN  
MMCL@pge.com

MOHAN NIROULA  
mniroula@water.ca.gov

MARJORIE OXSEN  
moxsen@calpine.com

MICHAEL ALCANTAR  
mpa@a-klaw.com

MELISSA P. MARTIN  
mpf@stateside.com

Marcelo Poirier  
mpo@cpuc.ca.gov

COOL EARTH SOLAR  
mpr-ca@coolearthsolar.com

MARC PRYOR  
mpryor@energy.state.ca.us

MANUEL RAMIREZ  
mramirez@sfwater.org

MARK HUFFMAN  
mrh2@pge.com

Mark R. Loy  
mrl@cpuc.ca.gov

MRW & ASSOCIATES, LLC  
mrw@mrwassoc.com

MANDIP KAUR SAMRA  
msamra@anaheim.net

MATTHEW TISDALE  
MWT@cpuc.ca.gov

NANCY NORRIS  
Nancy.Norris@powerex.com

Noel Obiora  
nao@cpuc.ca.gov

ROSS BUCKENHAM  
nblack@calbioenergy.com

NEAL DE SNOO  
ndesnoo@ci.berkeley.ca.us

NEDRA YOUNG  
nedrayoung@gmail.com

NELLIE TONG  
nellie.tong@us.kema.com

NORA SHERIFF  
nes@a-klaw.com

NICHOLE FABRI ZANDOLI  
nicole.fabri@clearenergybrokerage.com

Nilgun Atamturk  
nil@cpuc.ca.gov

Nika Rogers  
nlr@cpuc.ca.gov

## Service List – R.11-05-005 (Updated May 31, 2011)

NORMAN J. FURUTA  
norman.furuta@navy.mil

NORMAN A. PEDERSEN  
npedersen@hanmor.com

NGUYEN QUAN  
nquan@gswater.com

NANCY RADER  
nrader@calwea.org

NIELS KJELLUND  
nxk2@pge.com

OBADIAH BARTHOLOMY  
obartho@smud.org

PATRICK VANBEEK  
patrick.vanbeek@commercialenergy.net

PATRICK VAN BEEK  
Patrick.VanBeek@CommercialEnergy.net

PAUL FENN  
paulfenn@local.org

PANAMA BARTHOLOMY  
pbarthol@energy.state.ca.us

PETER BLOOD  
pblood@columbiaenergypartners.com

PAMELA DOUGHMAN  
pdoughma@energy.state.ca.us

PETER EICHLER  
peter.eichler@libertywater.com

PETER T. PEARSON  
peter.pearson@bvcs.com

PETER MORITZBURKE  
pfmoritzburke@gmail.com

PETER W. HANSCHEN  
phansch@mofo.com

PHILLIP REESE  
phil@reesechambers.com

RYAN PLETKA  
pletkarj@bv.com

PAUL D. MAXWELL  
pmaxwell@navigantconsulting.com

Paul Douglas  
psd@cpuc.ca.gov

POLLY SHAW  
pshaw@suntechamerica.com

PAUL DELANEY  
pssed@adelphia.net

G. PATRICK STONER  
pstoner@lgc.org

RICHARD W. RAUSHENBUSH  
r.raushenbush@comcast.net

RAFI HASSAN  
rafi.hassan@sig.com

JOHN DUTCHER  
Ralf1241a@cs.com

RAMONA GONZALEZ  
ramonag@ebmud.com

RANDY HOWARD  
randy.howard@ladwp.com

HANS ISERN  
reg@silveradopower.com

CASE COORDINATION  
RegRelCPUCCases@pge.com

RECURRENT ENERGY, INC.  
regulatory.affairs@recurrentenergy.com

SILVERADO POWER LLC  
regulatory@silveradopower.com

ARNO HARRIS  
regulatory\_affairs@recurrentenergy.com

RENEE H. GUILD  
renee@gem-corp.com

RANDALL W. HARDY  
rhardy@hardyenergy.com

RICHARD F. CHANDLER  
richard.chandler@bp.com

RICK A. LIND  
rick@sierraecos.com

RICK C. NOGER  
rick\_noger@praxair.com

ROBERT J. GILLESKIE  
rjgilleskie@san.rr.com

RANDALL W. KEEN  
rkeen@manatt.com

RONALD MOORE  
rkmoore@gswater.com

Raj Naidu  
rkn@cpuc.ca.gov

RICHARD MCCANN  
rmccann@umich.edu

Regina DeAngelis  
rmd@cpuc.ca.gov

ROSS A. MILLER  
rmiller@energy.state.ca.us

Rahmon Momoh  
rmm@cpuc.ca.gov

RONALD M. CERNIGLIA  
ron.cerniglia@directenergy.com

RHONE RESCH  
rresch@seia.org

ROB ROTH  
roth@smud.org

REED V. SCHMIDT  
rschmidt@bartlewells.com

ROBIN J. WALTHER  
rwalther@pacbell.net

RYAN HEIDARI  
ryan.heidari@endimensions.com

SUNCHETH BHAT  
S2B9@pge.com

SAEED FARROKHPAY  
saeed.farrokhpay@ferc.gov

KENNETH SAHM WHITE  
sahm@fitcoalition.com

SAM MASLIN  
sam.maslin@recurrentenergy.com

SARA BIRMINGHAM  
sara@solaralliance.org

ANNIE STANGE  
sas@a-klaw.com

C. SUSIE BERLIN  
sberlin@mccarthyllaw.com

SETH D. HILTON  
sdhilton@stoel.com

SEAN P. BEATTY  
sean.beatty@genon.com

SEAN GALLAGHER  
seang@kroadpower.com

SHAUN HALVERSON  
SEHC@pge.com

SAMANTHA G. POTTENGER  
sgp@eslawfirm.com

Mitchell Shapson  
sha@cpuc.ca.gov

SHANI KLEINHAUS  
shani@scvas.org

SCOTT HARDING  
sharding@iidenergy.com

STANDISH O'GRADY  
sho@ogrady.us

## Service List – R.11-05-005 (Updated May 31, 2011)

SUZY HONG  
shong@goodinmacbride.com

SIOBHAN DOHERTY  
siobhan.doherty@frv.com

SARA KAMINS  
SMK@cpuc.ca.gov

STEVEN C. NELSON  
SNelson@Sempra.com

SNULLER PRICE  
snuller@ethree.com

SHERIDAN J. PAUKER  
spauker@wsgr.com

SHAUN PILLOTT  
spillott@capitalpower.com

Sarah R. Thomas  
srt@cpuc.ca.gov

SARA STECK MYERS  
ssmyers@att.net

SKY STANFIELD  
sstanfield@keyesandfox.com

STEPHANIE C. CHEN  
StephanieC@greenlining.org

STEPHEN BURNAGE  
stephen.burnage@gmail.com

STEVE BRINK  
steveb@cwo.com

STEVEN F. GREENWALD  
stevegreenwald@dwt.com

STEVEN KELLY  
steven@iepa.com

SUE MARA  
sue.mara@rtoadvisors.com

SUSAN MUNVES  
susan.munves@smgov.net

Sean A. Simon  
svn@cpuc.ca.gov

TAM HUNT  
tam.hunt@gmail.com

TASHIANA WANGLER  
Tashiana.Wangler@PacifiCorp.com

Traci Bone  
tbo@cpuc.ca.gov

ANTHONY BRUNELLO  
tbrunello@calstrat.com

THERESA BURKE  
tburke@swater.org

THADEUS B. CULLEY  
tculley@keyesandfox.com

THOMAS R. DARTON  
tdarton@pilotpowergroup.com

TREVOR DILLARD  
tdillard@sppc.com

TED KO  
ted@fitcoalition.com

TOM FAUST  
tfaust@redwoodrenewables.com

TOM HALL  
thall@laccd.edu

THOMAS HOBSON  
thomase.hobson@ge.com

THOMAS CORR  
thomaspcorr@gmail.com

TIFFANY K. ROBERTS  
Tiffany.Roberts@lao.ca.gov

TIM ROSENFELD  
tim@marinemt.org

TIMEA ZENTAI  
timea.Zentai@navigantconsulting.com

TODD JAFFE  
tjaffe@energybusinessconsultants.com

TIM LINDL  
tjl@a-klaw.com

TARA S. KAUSHIK  
tkaushik@manatt.com

TIM LOCASIO  
tlocasio@libertypowercorp.com

TOBIN RICHARDSON  
tobinjmr@sbcglobal.net

TODD EDMISTER  
todd.edmister@bingham.com

TODD JOHANSEN  
todd.johansen@recurrentenergy.com

THOMAS ELGIE  
Tom.Elgie@powerex.com

THOMAS J. VICTORINE  
tom\_victorine@sjwater.com

R. THOMAS BEACH  
tomb@crossborderenergy.com

TRACY PHILLIPS  
TPhillips@TigerNaturalGas.com

TOM POMALES  
tpomales@arb.ca.gov

TED HOWARD  
TRH@cpuc.ca.gov

THEODORE E. ROBERTS  
TRoberts@SempraUtilities.com

THOMAS W. SOLOMON  
tsolomon@winston.com

TIMOTHY N. TUTT  
ttutt@smud.org

EMILIO E. VARANINI, III  
varanini@sbcglobal.net

VIDHYA PRABHAKARAN  
vidhyaprabhakaran@dwt.com

VALERIE J. WINN  
vjw3@pge.com

VALERIE PUFFER  
vpuffer@gwpenenergy.com

VENKAT SURAVARAPU  
vsuravarapu@cera.com

VIKKI WOOD  
vwood@smud.org

BILLY BLATTNER  
WBlattner@SempraUtilities.com

WILLIAM H. BOOTH  
wbooth@booth-law.com

BARBARA GEORGE  
wem@igc.org

BRAD WETSTONE  
wetstone@alamedamp.com

WILLIAM N. BRIEGER  
Will.Brieger@doj.ca.gov

WILL PLAXICO  
wplaxico@axiopower.com

WILLIAM W. WESTERFIELD III  
wwester@smud.org

YAREK LEHR  
ylehr@ci.azusa.ca.us

Yuliya Shmidt  
ys2@cpuc.ca.gov

MICHAEL MEACHAM  
ENVIRONMENTAL RESOURCE  
MANAGER  
CITY OF CHULA VISTA  
276 FOURTH AVENUE  
CHULA VISTA, CA 91910

**Service List – R.11-05-005  
(Updated May 31, 2011)**

MORGAN HANSEN  
MORGAN STANLEY - COMMODITIES  
2000 WESTCHESTER AVE., 1ST  
FLOOR  
PURCHASE, NY 10577

SAMARA M. RASSI  
REGULATORY AFFAIRS ANALYST  
FELLON-MCCORD & ASSOCIATES  
10200 FOREST GREEN BLVD., STE.  
501  
LOUISVILLE, KY 40223-5183

COMMERCE ENERGY, INC.  
5251 WESTHEIMER RD., STE. 1000  
HOUSTON, TX 77056-5414

3 PHASES RENEWABLES LLC  
2100 SEPULVEDA BLVD, SUITE 37  
MANHATTAN BEACH, CA 90266

HARVEY M. EDER  
PUBLIC SOLAR POWER COALITION  
1218 12TH STREET, NO. 25  
SANTA MONICA, CA 90401

SOLAR SEMICONDUCTOR INC.  
1292 KIFER ROAD, SUITE 808  
SUNNYVALE, CA 94086

TONY CHEN  
SR. MANGER, BUSINESS DEVEL.  
COOL EARTH SOLAR  
4659 LAS POSITAS RD., STE. 94551  
LIVERMORE, CA 94551

MOUNTAIN UTILITIES  
PO BOX 1  
KIRKWOOD, CA 95646

PUC/X129114.v1