

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

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R.18-10-007

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON
GUIDANCE PROPOSED DECISION ON 2019 WILDFIRE MITIGATION PLANS
SUBMITTED PURSUANT TO SENATE BILL 901**

PATRICIA CIRUCCI
RUSSELL A. ARCHER
MARGARITA GEVONDYAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2865
E-mail: Russell.Archer@sce.com

Dated: **May 28, 2019**

**SOUTHERN CALIFORNIA EDISON COMPANY'S REPLY COMMENTS ON GUIDANCE DECISION
ON 2019 WILDFIRE MITIGATION PLANS SUBMITTED PURSUANT TO SENATE BILL 901**

TABLE OF CONTENTS

Section		Page
5.	Meaning of Commission Approval.....	1
6.	Metrics, Monitoring and Reporting Requirements of all WMP Filers	2
7.	Evaluation of Current Inspection Plans	3
8.	Integration of GRC Process with WMP Review	3
9.	Off Ramps	4
10.	Future WMPs	4
11.	Other Issues.....	5

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 14.3, Southern California Edison Company (SCE) respectfully submits these Reply Comments on the Guidance Proposed Decision (Guidance PD). These Reply Comments respond to the Opening Comments submitted by The Utility Reform Network (TURN), Pacific Gas and Electric Company (PG&E), Energy Users and Producers Coalition (EPUC), California Large Energy Consumers Association (CLECA), Ruth Henricks (Ms. Henricks), Green Power Institute (GPI), Small Business Utilities Advocates (SBUA), Protect our Communities (POC), and the Rural County Representatives of California (RCRC).¹

5. Meaning of Commission Approval

Several parties² support the Guidance’s incorrect determination that plan approval “narrowly”³ means only that the utilities have successfully “listed” the 19 statutory requirements set forth in SB 901. SCE urges the Commission to instead adopt a common-sense interpretation of the statute, as set forth at length in its Opening Comments and in the utilities’ legal briefing in this proceeding. In short, Commission approval of a WMP should mean that the particular scope and programs activities set forth in the plan are authorized and approved, that substantial compliance with those approved programs and activities should indicate that the utility was operating its system prudently, and also that such compliance should inform a future cost recovery reasonableness review.

If the Commission declines to adopt such a straightforward interpretation, however, and instead elects to kick the regulatory-certainty can down the road (in some cases for several years), it should at least adopt PG&E’s sensible proposal to allow the costs the utilities incur to comply with the approved plans to be recovered on an interim basis (subject to refund).⁴ This would have the additional benefit of

¹ SCE does not agree with certain comments made by parties not addressed herein and SCE’s silence on any particular matter should not be construed or interpreted as assent or acceptance.

² See, e.g., Opening Comments of CLECA, EPUC, POC, GPI, SBUA, and Ms. Henricks.

³ See EPUC Opening Comments at p. 3 (citing with approval the Guidance PD’s endorsement of EPUC’s self-described proposed standard of “narrowly limit[ed] ... scope of [Commission] approval of the Plans to determining whether they contain the statutorily required elements.”)

⁴ See PG&E Opening Comments at pp. 4-6; see also Pacificorp Opening Comments at pp. 2-5.

providing some measure of inter-generational rate equity, as current customers would pay the costs of current programs and activities that directly benefit them now, instead of delaying the recovery of those significant costs to be paid for in the future by (potentially) different customers.

6. Metrics, Monitoring and Reporting Requirements of all WMP Filers

In GPI's Opening Comments, it noted that future WMPS should include "*both* activity-based and performance-based metrics" ⁵ GPI is absolutely correct when it states:

It has to be understood that the question of how to measure the effectiveness of a utility's WMP is difficult to answer in no small part because the events that are being mitigated against in the plans, wildfires, are stochastic events. This means that prevention and mitigation measures in one year might not demonstrate their effectiveness until several years down the road, when an initiating event occurs. In addition, it is extremely difficult to point to events that do not happen, because effective measures were not taken. Sophisticated analysis will be required.⁶

SCE's Opening Comments echoed this irrefutably correct point in several places,⁷ and SCE urges the Commission to make SCE's corresponding proposed changes to the Guidance PD's language to recognize this reality.⁸

SBUA's assertion that the Commission should in this proceeding adopt the "hard-to-reach customers" definition that it endorsed in D.18-05-041 should not be accepted. That Decision, which acknowledged that "[t]he Commission has grappled with defining hard-to-reach, or the closely related and often interchangeably used term 'underserved,' since as early as the late 1990's,"⁹ was specific to energy efficiency programs, and was unrelated to wildfire risk mitigation. "Hard-to-reach" customers for wildfire mitigation purposes may be very different than "hard-to-reach" customers for energy

⁵ GPI Opening Comments at p. 3 (emphasis added).

⁶ GPI Opening Comments at p. 3. *See also* GPI Opening Comments at pp. 6-7: "The ultimate test for the WMPs is whether California's electrical infrastructure can be upgraded and operated in ways that materially reduce the number of fires This task is especially challenging in the face of climate change ... and population growth and migration, which are putting more people at risk in the event of fires that do occur."

⁷ *See, e.g.*, SCE Opening Comments on SCE PD at p. 10 and SCE Opening Comments on Guidance PD at pp. 5-6.

⁸ *See, e.g.*, SCE Opening Comments on Guidance PD at Appendix A (proposed change to Conclusion of Law 4) and SCE Opening Comments on SCE PD at Appendix A (proposed change to Conclusion of Law 3).

⁹ D.18-05-041 at p. 44.

efficiency programs, and the Commission should carefully consider the implications of conflating the two definitions.

POC's proposal that the utilities' 2019 WMPs should include the contemplated prospective outcome-based effectiveness-measuring metrics is plainly infeasible. Moreover, SCE and the other utilities are already tracking much of this "valuable data for the 2019 fire season,"¹⁰ and therefore POC's concern that it will be "lost" is largely unwarranted.

7. Evaluation of Current Inspection Plans

As set forth in SCE's Opening Comments, the Guidance PD should be amended so as not to impose additional inspection-related reporting requirements that extend far beyond the well-established existing standards in the Commission's General Orders. Although its comments are not entirely clear, it appears that TURN's suggested language changes to Ordering Paragraph 8 would *further* expand those requirements beyond the Guidance PD's language. The Commission should reject that suggestion. If the Commission wishes to consider additional inspection-related reporting requirements, it should do so through a deliberative process specifically focused on inspection-related issues, not based on a seven-month expedited proceeding designed to consider much broader, holistic wildfire mitigation plans. Finally, POC's proposal to "require the utilities to use employees for patrol inspection" instead of contractors, as well as to increase inspections from "annually to monthly" is unwarranted and far beyond the scope of this proceeding.¹¹

8. Integration of GRC Process with WMP Review

GPI states that "the various underlying elements from which the MAVF or any other figure of merit is derived should also be made explicit in the directive" and proposes modified language accordingly.¹² GPI's proposal is consistent with SCE's position in its Opening Comments that "as risk

¹⁰ POC Opening Comments at p. 5.

¹¹ POC Opening Comments at p. 7.

¹² GPI Opening Comments on Guidance PD at p. 4.

analyses are modified or refined to drive WMP activities and programs, SCE will share the changes transparently in subsequent filings.”¹³ SCE is not opposed to GPI’s request for additional transparency regarding MAVF underlying details. However, SCE reiterates that the S-MAP settlement requires use of MAVF methodology starting in the 2021 RAMP report and also includes a cost criteria threshold.¹⁴ Where future WMP requirements are based on S-MAP requirements, these WMP requirements should also be informed by S-MAP timing horizons and agreed-upon cost criteria thresholds.

9. Off Ramps

RCRC states that “[a]ny process that would allow an IOU to potentially discontinue a mitigation measure must be weighed with a replacement action in order to comply with their WMP and the intent of Senate Bill 901.”¹⁵ While SCE does not agree that “replacement actions” will always be necessary, RCRC’s proposal is directionally consistent with SCE’s position in its Opening Comments, namely that utilities must be afforded the flexibility to improve and modify programs that are working, and not just discontinue programs that aren’t.¹⁶

10. Future WMPs

GPI asserts that for future WMPs “the utilities also need to consider the risks to their systems of wildfires that are initiated by causes not related to the electricity system” and “that the utilities need to devote more time and effort in their risk analyses in future WMPs to matters of system resilience, protection, and restoration in the event that wildfires [including those not associated with utility infrastructure] do occur.”¹⁷ SCE agrees with the general premise underlying GPI’s comments: The vast majority of California wildfires are completely unconnected to utility infrastructure, all wildfires pose potentially serious public safety issues, and California as a society must comprehensively confront this

¹³ SCE Opening Comments on Guidance PD at p. 8.

¹⁴ SCE Opening Comments on Guidance PD at p. 8.

¹⁵ RCRC Opening Comments on Guidance PD at p. 5.

¹⁶ See SCE Opening Comments on Guidance PD at pp. 9-10.

¹⁷ GPI Opening Comments at p. 5.

existential danger. That being said, the utilities can only realistically mitigate wildfire risk associated with the infrastructure that they own and operate, and expanding “risk analysis” requirements to events completely outside of the utilities’ control would add no value to the Commission’s existing risk-informed decision-making requirements used to assess proposed utility infrastructure investments.

SBUA and POC both argue that future WMP proceedings should include full-blown evidentiary hearings. That position is inconsistent with those same parties’ enthusiastic simultaneous endorsement of the Guidance PD’s extremely narrow, check-the-list definition of the “meaning of plan approval.”¹⁸ If the Commission appropriately revises that definition in future WMP proceedings to provide meaningful regulatory approval of the utilities’ scope of proposed wildfire mitigation programs and activities, SCE would welcome evidentiary hearings on any disputed issues of fact.

11. Other Issues

TURN uses the majority of its Opening Comments to argue that the Commission should consolidate the Section 8386(j) memorandum account (for pre-WMP-approval costs) and the Section 8386(e) memorandum account (for post-WMP-approval costs) to “reduce [the] opportunity for double recovery of costs.”¹⁹ Setting aside the unseemly implication that the utilities would attempt to “double recover” their costs (and the insinuation that the Commission would allow such a result), SCE does not object to the specific language TURN proposes to be added to the Guidance PD’s Conclusions of Law and Ordering Paragraphs on this issue, if the Commission concludes that consolidating the existing two accounts into one would be consistent with the explicit statutory directive to establish two.²⁰

¹⁸ See, e.g., POC Opening Comments at p. 4 (“POC agrees with the PD that approval of the WMPs merely means that the Plans contain the required statutory elements.”)

¹⁹ TURN Opening Comments at Subject Index of Proposed Changes.

²⁰ See also February 14, 2019 SCE Reply to Protest of TURN of Advice Letter 3936-E (establishing SCE’s Section 8386(j) memorandum account) at p. 4.

Respectfully submitted,

PATRICIA CIRUCCI
RUSSELL A. ARCHER
MARGARITA GEVONDYAN

/s/ Russell A. Archer

By: Russell A. Archer
Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2865
E-mail: Russell.Archer@sce.com

May 28, 2019

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

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R.18-10-007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON GUIDANCE PROPOSED DECISION ON 2019 WILDFIRE MITIGATION PLANS SUBMITTED PURSUANT TO SENATE BILL 901** on all parties identified on the attached service list(s) **R.18-10-007**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by U.S. Mail to the offices of the Assigned ALJ(s) or other addressee(s).

**ALJ Peter V. Allen
ALJ Sarah R. Thomas
California Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue
San Francisco, CA 94102**

Executed on **May 28, 2019**, at Rosemead, California.

/s/ Edith Leon

Edith Leon

Legal Administrative Assistant

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue

Post Office Box 800

Rosemead, California 91770



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R1810007 - CPUC - OIR TO IMPLEM
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: MAY 22, 2019

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

Parties

PETE SMITH
 CITIZENS TRANSMISSION LLC
 88 BLACK FALCON AVENUE, SUITE 342
 BOSTON, MA 02210
 FOR: CITIZENS TRANSMISSION LLC

ALI AMIRALI
 STARTRANS IO, LLC
 591 W. PUTNAM AVENUE
 GREENWICH, CT 06830
 FOR: STARTRANS IO, LLC

ROBERT L. MITCHELL
 TRANS-ELECT NTD PATH 15, LLC
 1850 CENTENNIAL PARK DRIVE, SUITE 480
 RESTON, VA 20191
 FOR: TRANS-ELECT NTD PATH 15, LLC

J. SCOTT KUHN
 COUNTY OF LOS ANGELES
 OFFICE OF THE COUNTY COUNSEL
 500 WEST TEMPLE STREET, STE 652
 LOS ANGELES, CA 90012-2713
 FOR: COUNTY OF LOS ANGELES

HANS LAETZ
 GENERAL MGR.
 ZUMA BEACH FM BROADCASTERS
 RADIO MALIBU 99.1 FM KBUU
 6402 SURFSIDE WAY
 MALIBU, CA 90265
 FOR: ZUMA BEACH FM EMERGENCY AND
 COMMUNITY BROADCASTERS, INC.

CHRISTI HOGIN
 COUNSEL
 BEST BEST & KRIEGER LLP
 1230 ROSECRANS AVE., STE. 110
 MANHATTAN BEACH, CA 90266
 FOR: CITY OF MALIBU

RUSSELL A. ARCHER
 SR. ATTORNEY
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE. / PO BOX 800
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KEITH SWITZER
 BEAR VALLEY ELECTRIC SERVICE
 630 EAST FOOTHILL BLVD.
 SAN DIMAS, CA 91773
 FOR: BEAR VALLEY ELECTRIC SERVICE, DIV
 OF GOLDEN STATE WATER COMPANY

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

MICHAEL J. AGURRE, ESQ.
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, SUITE 1050
SAN DIEGO, CA 92101
FOR: RUTH HENRICKS

KIRSTIE C. RAAGAS
REGULATORY COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32F
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

KELLEY WILLIAMS
COUNTY OF INYO
PO DRAWER N
INDEPENDENCE, CA 93526
FOR: COUNTY OF INYO

MATTHEW J. SANDERS
DEPUTY COUNTY COUNSEL
SAN MATEO COUNTY COUNSEL'S OFFICE
400 COUNTY CENTER, 6TH FL
REDWOOD CITY, CA 94063
FOR: PENINSULA CLEAN ENERGY AUTHORITY

RACHAEL E. KOSS
ATTORNEY
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES (CUE)

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5123
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: PUBLIC ADVOCATES OFFICE

CHRISTOPHER CLAY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: OFFICE OF THE SAFETY ADVOCATE (OSA)

WILLIAM ROSTOV
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL
1 DR CARLTON B. GOODLET PL. RM 234
SAN FRANCISCO, CA 94102-4682
FOR: CITY AND COUNTY OF SAN FRANCISCO

THOMAS LONG
LEGAL DIRECTOR
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO, CA 94103
FOR: TURN

IVAN R. JIMENEZ
REGULATORY ATTORNEY
SMALL BUSINESS UTILITY ADVOCATES
548 MARKET STREET, STE. 11200
SAN FRANCISCO, CA 94104
FOR: SMALL BUSINESS UTILITY ADVOCATES
(SBUA)

ALYSSA KOO
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
(PG&E)

NORA SHERIFF, ESQ.
COUNSEL
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, STE. 1700
SAN FRANCISCO, CA 94105
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION (CLECA)

EVELYN KAHL
ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, SUITE 1700
SAN FRANCISCO, CA 94105-3493
FOR: ENERGY PRODUCERS AND USERS
COALITION

DAVID J. MILLER
 AVP - SR. LEGAL COUNSEL
 AT&T SERVICES, INC.
 430 BUSH STREET, ROOM 310
 SAN FRANCISCO, CA 94108
 FOR: AT&T

LISA A. COTTLE
 ATTORNEY / PARTNER
 WINSTON & STRAWN LLP
 101 CALIFORNIA STREET, 34TH FL.
 SAN FRANCISCO, CA 94111
 FOR: HORIZON WEST TRANSMISSION, LLC
 (FORMERLY NEXTERA ENERGY TRANSMISSION
 WEST, LLC - NEET WEST)

MEGAN SOMOGYI
 ATTORNEY
 GOODIN, MACBRIDE, SQUERI & DAY, LLP
 505 SANSOME STREET, STE. 900
 SAN FRANCISCO, CA 94111
 FOR: CITY OF PLACERVILLE

MEGAN SOMOGYI
 ATTORNEY
 GOODIN, MACBRIDE, SQUERI & DAY, LLP
 505 SANSOME STREET, STE 900
 SAN FRANCISCO, CA 94111
 FOR: CITY OF SANTA ROSA

MEGAN SOMOGYI
 ATTORNEY
 GOODIN, MACBRIDE, SQUERI & DAY, LLP
 505 SANSOME STREET, STE. 900
 SAN FRANCISCO, CA 94111
 FOR: COUNTY OF MENDOCINO

MEGAN SOMOGYI
 ATTORNEY
 GOODIN, MACBRIDE, SQUERI, & DAY, LLP
 505 SANSOME ST., STE. 900
 SAN FRANCISCO, CA 94111
 FOR: COUNTY OF SONOMA

DAVID L. HUARD
 ATTORNEY
 MANATT, PHELPS & PHILLIPS, LLP
 ONE EMBARCADERO CENTER, 30TH FL.
 SAN FRANCISCO, CA 94111-3736
 FOR: CITY OF LAGUNA BEACH

IRENE K. MOOSEN
 ATTORNEY AT LAW
 LAW OFFICE OF IRENE K. MOOSEN
 53 SANTA YNEZ STREET
 SAN FRANCISCO, CA 94112
 FOR: LOCAL GOVERNMENT SUSTAINABLE
 ENERGY COALITION (LGSEC)

LENNEAL K. GARDNER
 TRANS BAY CABLE LLC
 ONE LETTERMAN DRIVE, C5-100
 SAN FRANCISCO, CA 94129
 FOR: TRANS BAY CABLE LLC

VALERIE PRYOR
 GEN. MGR.
 ALAMEDA COUNTY FLOOD CONTROL AND WATER
 100 NORTH CANYONS PARKWAY
 LIVERMORE, CA 94551
 FOR: ALAMEDA COUNTY FLOOD CONTROL AND
 WATER CONSERVATION DISTRICT, ZONE 7

JEFFERY RICHARD
 CHIEF DEPUTY COUNTY COUNSEL
 OFFICE OF THE NAPA COUNTY COUNSEL
 1195 THIRD ST, SUITE 301
 NAPA, CA 94559
 FOR: COUNTY OF NAPA

DOUGLAS E. COTY
 ATTORNEY
 BOLD, POLISNER, MADDOW, NELSON & JUDSON
 2125 OAK GROVE ROAD, SUITE 210
 WALNUT CREEK, CA 94598
 FOR: CONTRA COSTA WATER DISTRICT

ELIZABETH TAYLOR
 COUNSEL
 PROTECT OUR COMMUNITIES FOUNDATION
 1547 PALOS VERDES MALL, NO. 196
 WALNUT CREEK, CA 94598
 FOR: PROTECT OUR COMMUNITIES FOUNDATION

TIM LINDL
 PARTNER
 KEYES & FOX LLP
 436 14TH STREET, SUITE 1305
 OAKLAND, CA 94612
 FOR: SUNRUN INC.

GREGG MORRIS

SHANA LAZEROW

DIRECTOR
 THE GREEN POWER INSTITUTE
 2039 SHATTUCK AVE., SUITE. 402
 BERKELEY, CA 94704
 FOR: THE GREEN POWER INSTITUTE (GPI)

ATTORNEY
 COMMUNITIES FOR A BETTER ENVIRONMENT
 120 BROADWAY, SUITE 2
 RICHMOND, CA 94804
 FOR: CALIFORNIA ENVIRONMENTAL JUSTICE
 ALLIANCE (CEJA)

JASON HOPPIN
 COUNTY OF SANTA CRUZ
 ADMIN. OFFICE
 701 OCEAN STREET
 SANTA CRUZ, CA 95060
 FOR: COUNTY OF SANTA CRUZ

WILLIAM B. ABRAMS
 COMMUNITY ADVOCATE
 1519 BRANCH OWL PLACE
 SANTA ROSA, CA 95409
 FOR: WILLIAM B. ABRAMS

JUSTIN WYNNE
 ATTORNEY
 BRAUN BLAISING SMITH WYNNE, P.C.
 915 L STREET, STE. 1480
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA MUNICIPAL UTILITIES
 ASSOCIATION (CMUA)

STACI HEATON
 REGULATORY AFFAIRS ADVOCATE
 RURAL COUNTY REPRESENTATIVES OF CALIF.
 1215 K ST., STE. 1650
 SACRAMENTO, CA 95814
 FOR: RURAL COUNTY REPRESENTATIVES OF
 CALIFORNIA

JEROME F. CANDELARIA
 VP & COUNSEL, REGULATORY AFFAIRS
 CALIFORNIA CABLE AND TELECOMM. ASSN.
 1001 K STREET, 2ND FL.
 SACRAMENTO, CA 95814-3832
 FOR: CALIFORNIA CABLE AND
 TELECOMMUNICATIONS ASSOCIATION

LYNN HAUG
 ATTORNEY
 ELLISON SCHNEIDER HARRIS & DONLAN LLP
 2600 CAPITOL AVE., STE. 400
 SACRAMENTO, CA 95816
 FOR: EAST BAY MUNICIPAL UTILITY DISTRICT

RONALD LIEBERT
 ATTORNEY AT LAW
 ELLISON SCHNEIDER HARRIS & DONLAN LLP
 2600 CAPITOL AVENUE, STE. 400
 SACRAMENTO, CA 95816
 FOR: CALIFORNIA MANUFACTURERS &
 TECHNOLOGY ASSN. (CMTA)

JEDEDIAH J. GIBSON
 ATTORNEY
 ELLISON SCHNEIDER HARRIS & DONLAN LLP
 2600 CAPITOL AVENUE, SUITE 400
 SACRAMENTO, CA 95816-5931
 FOR: BEAR VALLEY ELECTRIC SERVICE
 (BVES) / LIBERTY UTILITIES (CALPECO
 ELECTRIC)

JOHN LARREA
 DIR - GOVN'T AFFAIRS
 CALIFORNIA LEAGUE OF FOOD PRODUCERS
 2485 NATOMAS PARK DRIVE, STE. 550
 SACRAMENTO, CA 95833
 FOR: CALIFORNIA LEAGUE OF FOOD PRODUCERS

KAREN NOREEN MILLS
 SR. ATTORNEY
 CALIFORNIA FARM BUREAU FEDERATION
 2300 RIVER PLAZA DRIVE
 SACRAMENTO, CA 95833
 FOR: CALIFORNIA FARM BUREAU FEDERATION

LAUREN GILL
 TOWN MGR.
 TOWN OF PARADISE
 5555 SKYWAY
 PARADISE, CA 95969
 FOR: TOWN OF PARADISE

DANIEL MARSH
 MGR - RATES & REGULATORY AFFAIRS
 LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
 933 ELOISE AVENUE
 SOUTH LAKE TAHOE, CA 96150
 FOR: LIBERTY UTILITIES (CALPECOELECTRIC)

CYNTHIA HANSEN MIFSUD
 ASSIST. GEN. COUNSEL

PACIFICORP
 825 NE MULTNOMAH ST., STE. 1800
 PORTLAND, OR 97232
 FOR: PACIFIC POWER, A DIV OF PACIFICORP

Information Only

CURT BARRY
 SR WRITER / EDITOR
 INSIDE WASHINGTON PUBLISHERS
 EMAIL ONLY
 EMAIL ONLY, CA 00000

KAVYA BALARAMAN
 STAFF WRITER / REPORTER
 CALIFORNIA ENERGY MARKETS
 EMAIL ONLY
 EMAIL ONLY, CA 00000

MEGHAN DEWEY
 MGR - EE POLICY / STRATEGY
 PACIFIC GAS AND ELECTRIC COMPANY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

MICHAEL BROWN
 CONSULTANT
 LAW OFFICE OF MICHAEL BROWN
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: SMALL BUSINESS UTILITY ADVOCATES
 (SBUA)

NICK WILLIAMS
 SENIOR DISTRESSED DEBT ANALYST
 REORG RESEARCH INC.
 EMAIL ONLY
 EMAIL ONLY, NY 00000

RACHEL A. GOLD, ESQ.
 CLIMATE CHG PROGRAM
 CALIFORNIA AIR RESOURCES BOARD
 EMAIL ONLY
 EMAIL ONLY, CA 00000

STEPHEN R. CIESLEWICZ
 UVM CONSULTANT
 EMAIL ONLY
 EMAIL ONLY, CA 00000

WADE A. GREENACRE
 CASE MGR.
 PACIFIC GAS AND ELECTRIC COMPANY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

CAMERON-DANIEL, P.C.
 EMAIL ONLY
 EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
 EMAIL ONLY
 EMAIL ONLY, CA 00000

CRAIG JUDSON MCBETH
 JUDSON INVESTMENTS LLC
 84 WEST PARK PLACE, 3RD FL.
 STAMFORD, CT 06901

CAROLINE V. BONE
 DEUTSCHE BANK SECURITIES, INC.
 60 WALL STREET
 NEW YORK, NY 10005

JONATHAN ARNOLD
 DEUTSCHE BANK
 60 WALL STREET
 NEW YORK, NY 10005

CONOR SKELDING
 REORG
 11 E 26TH STREET, 12TH FL.
 NEW YORK, NY 10010

JESSIE CROZIER
 LUMINUS MANAGEMENT
 1700 BROADWAY, 26TH FL.
 NEW YORK, NY 10019

DAVID NGUYEN
 ANALYST
 JEFFERIES LLC
 520 MADISON AVENUE
 NEW YORK, NY 10022

EDWIN GUYANDI
ANALYST
NEWTYN MANAGEMENT
405 PARK AVENUE, SUITE 1104
NEW YORK, NY 10022

GREGORY REISS
CENTENUS GLOBAL MANAGEMENT, LP
437 MADISON AVENUE, SUITE 19B
NEW YORK, NY 10022

MICHAEL KRAMER
DUCERA PARTNERS LLC
499 PARK AVENUE, 16TH FLOOR
NEW YORK, NY 10022

ALEJANDRO MENDEZ
MADISON AVENUE PARTNERS
150 EAST 58TH STREET, 14TH FLOOR
NEW YORK, NY 10155

ELI SAMAHA
MADISON AVENUE PARTNERS
150 E 58TH STREET, 14TH FLOOR
NEW YORK, NY 10155

DONALD R. ALLEN
FOUNDING PARTNER, COUNSEL
DUNCAN & ALLEN
1730 RHODE ISLAND AVENUE, NW, SUITE 700
WASHINGTON, DC 20036
FOR: CITIZENS TRANSMISSION LLC

AMANDA VANEGA
EQ RESEARCH LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC 27511

BLAKE ELDER
POLICY RESEARCH ANALYST
EQ RESEARCH LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC 27511

JEAN HAWLEY
TELECOMMUNICATIONS PARALEGAL
FRIEND, HUDAK & HARRIS, LLP
THREE RAVINIA DRIVE, STE. 1700
ATLANTA, GA 30346-2131

STEVEN GRECO
REGULATORY AFFAIRS ANALYST
HORIZON WEST TRANSMISSION, LLC
700 UNIVERSE BLVD
JUNO BEACH, FL 33407
FOR: (FORMERLY NEXTERA ENERGY
TRANSMISSION, LLC)

JIM ROSS
RCS, INC.
266 PENNINGTON LANE
CHESTERFIELD, MO 63005

TRACY C. DAVIS
SR. ATTORNEY
HORIZON WEST TRANSMISSION, LLC
5920 W. WILLIAM CANNON DR., BLDG. 2
AUSTIN, TX 78749
FOR: (FORMERLY NEXTERA ENERGY
TRANSMISSION, LLC)

SCOTT DUNBAR
ATTORNEY
KEYES & FOX LLP
1580 LINCOLN STREET, STE. 880
DENVER, CO 80203

TIMOTHY K. CLARK
PACIFICORP (ROCKY MOUNTAIN POWER)
1407 WEST NORTH TEMPLE, SUITE 320
SALT LAKE CITY, UT 84116

LON W. HOUSE, PH.D
WATER & ENERGY CONSULTING
10645 N. ORACLE RD., STE 121-216
ORO VALLEY, AZ 85737

JEFFERY A. WILLIAMS
SUPERINTENDENT - CODES & ORDINANCES
L.A. DEPT OF WATER & POWER
111 NORTH HOPE STREET, RM. 856
LOS ANGELES, CA 90012

BRYAN PENA

CHRISTOPHER MOORE

CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013

CALIF PUBLIC UTILITIES COMMISSION
BUSINESS AND COMMUNITY OUTREACH
320 West 4th Street Suite 500
Los Angeles, CA 90013

FADI DAYE
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: SED

JOAN WEBER
CALIF PUBLIC UTILITIES COMMISSION
OFFICE OF THE SAFETY ADVOCATE
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: OSA

JOCELINE PEREIRA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013

KOKO M. TOMASSIAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: SED

JOHN R. TODD
DEP. CHIEF-PREVENTION SVCS. BUREAU
COUNTY OF LOS ANGELES FIRE DEPT.
1320 N. EASTERN AVENUE, RM. 254
LOS ANGELES, CA 90063-3294
FOR: COUNTY OF LOS ANGELES

ANNMARIE LETT
COORDINATOR - RATES & REG AFFAIRS
LIBERTY UTILITIES (CALIFORNIA)
9750 WASHBURN ROAD
DOWNEY, CA 90241

SHARON YANG
DIR - LEGAL SERVICES
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
9750 WASHBURN ROAD
DOWNEY, CA 90241
FOR: LIBERTY UTILITIES (CALIFORNIA)

JANE TERJUNG
TOPANGA COMMUNITY ALLIANCE
1639 OAK DRIVE
TOPANGA, CA 90290

FRED G. YANNEY
ATTORNEY
YANNEY LAW OFFICE
17409 MARQUARDT AVE. UNIT C-4
CERRITOS, CA 90703

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
4766 PARK GRANADA, SUITE 209
CALABASAS, CA 91302

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

CONNOR FLANNIGAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

GARY STERN
MANAGING DIR.
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

MARGARITA GEVONDYAN
SR. ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

RYAN STEVENSON
PRINCIPAL ADVISOR / REG - POLICY
SOUTHERN CALIFORNIA EDISON COMPANY

SIMONE S. BRYAN
PROJECT / PROGRAM ANALYST
SOUTHERN CALIFORNIA EDISON COMPANY

8631 RUSH ST., GEN. OFFICE 4
ROSEMEAD, CA 91770

2244 WALNUT GROVE AVE
ROSEMEAD, CA 91770

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

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

MARIA BYRNES
LEGAL ASSISTANT
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, STE. 1050
SAN DIEGO, CA 92101
FOR: RUTH HENRICKS

MARIA C. SEVERSON, ESQ.
ATTORNEY
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, STE. 1050
SAN DIEGO, CA 92101-3591
FOR: RUTH HENRICKS

ESTHER NORTHRUP
STATE REGULATORY AFFAIRS
COX CALIFORNIA TELCOM, LLC
5887 COPLEY DRIVE, STE. 300
SAN DIEGO, CA 92111

JOHN W. LESLIE, ESQ
ATTORNEY
DENTONS US LLP
EMAIL ONLY
EMAIL ONLY, CA 92121

CHUCK MANZUK
DIR - GRC & REVENUE REQUIREMENTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123

JAMIE K. YORK
GRC PROGRAM MGR.
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123

KEITH MELVILLE
SR. COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT., CP-32D
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

NORMA G. JASSO
MGR - REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT, CP31E
SAN DIEGO, CA 92123

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT, CP31-E
SAN DIEGO, CA 92123-1530

SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT (CP31E)
SAN DIEGO, CA 92123-1548

BRITT K. STROTTMAN
BARON & BUDD, P.C.
11440 WEST BERNARD COURT
SAN DIEGO, CA 92127
FOR: COUNTIES OF SONOMA, NAPA,
MENDOCINO, LAKE, YUBA, NEVADA. CITIES
OF SANTA ROSA, AND CLEARLAKE.

ERIC CARDELLA
SUPERVISOR, ENGINEERING & PLANNING
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE / PO BOX 1547
BIG BEAR LAKE, CA 92315

PAUL MARCONI
DIRECTOR
BEAR VALLEY ELECTRIC SERVICE
42020 GRASSTIN DRIVE / PO BOX 1547
BIG BEAR LAKE, CA 92315

WILLIAM R. SMITH
CITY MGR
CITY OF COLTON
650 N. LA CADENA DRIVE
COLTON, CA 92324
FOR: CITY OF COLTON

JESUS G. ROMAN
 ASSIST. GEN. COUNSEL
 VERIZON
 15505 SAND CANYON AVE. D201
 IRVINE, CA 92618

DOUG KARPA
 PENINSULA CLEAN ENERGY
 2075 WOODSIDE ROAD
 REDWOOD CITY, CA 94061

JOSEPH F. WIEDMAN
 DIR - REGULATORY & LEGISLATIVE AFFAIRS
 PENINSULA CLEAN ENERGY AUTHORITY
 2075 WOODSIDE ROAD
 REDWOOD CITY, CA 94061

SUE MARA
 CONSULTANT
 RTO ADVISORS, L.L.C.
 164 SPRINGDALE WAY
 REDWOOD CITY, CA 94062

MARC D. JOSEPH
 ATTORNEY AT LAW
 ADAMS, BROADWELL JOSEPH & CARDOZO
 601 GATEWAY BLVD., STE. 1000
 SOUTH SAN FRANCISCO, CA 94080

MILES F. MAURINO
 ADAMS BROADWELL JOSEPH & CARDOZO
 601 GATEWAY BLVD., SUITE 1000
 SOUTH SAN FRANCISCO, CA 94080
 FOR: COALITION OF CALIFORNIA UTILITY
 EMPLOYEES (CUE)

ROSS NAKASONE
 PLANNING & REGULATORY COMPLIANCE
 SAN FRANCISCO PUBLIC UTILITIES COMMISSION
 525 GOLDEN GATE AVE., 7TH FL.
 SAN FRANCISCO, CA 94102

AMY C. CHAMARTY
 CALIF PUBLIC UTILITIES COMMISSION
 COMMISSIONER RECHTSCHAFFEN
 ROOM 5210
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

AMY C. YIP-KIKUGAWA
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 4107
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

ANAND DURVASULA
 CALIF PUBLIC UTILITIES COMMISSION
 COMMISSIONER RANDOLPH
 ROOM 5130
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

ANDIE BIGGS
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRIC SAFETY AND RELIABILITY BRANCH
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

ANNA WRIGHT
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

BILLIE C. BLANCHARD
 CALIF PUBLIC UTILITIES COMMISSION
 INFRASTRUCTURE PLANNING AND PERMITTING B
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

BRIAN STEVENS
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5023
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

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

CAROLINA CONTRERAS
 CALIF PUBLIC UTILITIES COMMISSION
 OFFICE OF THE SAFETY ADVOCATE
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHARLOTTE TERKEURST
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRIC SAFETY AND RELIABILITY BRANCH
 ROOM 2201
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: SED

CHLOE LUKINS
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY SAFETY & INFRASTRUCTURE BRANCH
 ROOM 4102
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER CHOW
 CALIF PUBLIC UTILITIES COMMISSION
 NEWS AND SOCIAL MEDIA
 ROOM 5301
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER HOGAN
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PRICING AND CUSTOMER PROGRAM
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER PARKES
 CALIF PUBLIC UTILITIES COMMISSION
 OFFICE OF THE SAFETY ADVOCATE
 AREA 2-D
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

COLIN RIZZO
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5042
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

DAPHNE GOLDBERG
 CALIF PUBLIC UTILITIES COMMISSION
 COMMUNICATIONS AND WATER POLICY BRANCH
 ROOM 4208
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

DAVID LIEVANOS
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY SAFETY & INFRASTRUCTURE BRANCH
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

DAVID PECK
 CALIF PUBLIC UTILITIES COMMISSION
 PRESIDENT PICKER
 ROOM 5215
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

ELAINE LAU
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5102
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

FRANZ CHENG
 CALIF PUBLIC UTILITIES COMMISSION
 MARKET STRUCTURE, COSTS AND NATURAL GAS
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

GARY C. ERMANN
 CALIF PUBLIC UTILITIES COMMISSION
 RISK ASSESSMENT AND ENFORCEMENT
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

JAMES RALPH
 CALIF PUBLIC UTILITIES COMMISSION
 PRESIDENT PICKER
 ROOM 5037
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5116
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

JONATHAN J. REIGER
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION

JULIA ENDE
 CALIF PUBLIC UTILITIES COMMISSION
 MARKET STRUCTURE, COSTS AND NATURAL GAS

ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROOM 4011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JUNAID RAHMAN
CALIF PUBLIC UTILITIES COMMISSION
RISK ASSESSMENT AND ENFORCEMENT
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LESLIE L. PALMER
CALIF PUBLIC UTILITIES COMMISSION
SAFETY AND ENFORCEMENT DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: SED

LEUWAM TESFAI
CALIF PUBLIC UTILITIES COMMISSION
COMMISSIONER SHIROMA
ROOM 5137
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARIANNE DIVINA
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5013
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARY F. MCKENZIE
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5109
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MASOUD FOUDEH
CALIF PUBLIC UTILITIES COMMISSION
DEMAND RESPONSE, CUSTOMER GENERATION, AN
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW YUNGE
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATHAN POON
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5013
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATHANIEL SKINNER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY SAFETY & INFRASTRUCTURE BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PETER V. ALLEN
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5017
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

QUANG PHAM
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RACHEL MCMAHON
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE, COSTS AND NATURAL GAS
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICK TSE
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT HAGA
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5006
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARAH R. THOMAS
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5033
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

SEAN A. SIMON
 CALIF PUBLIC UTILITIES COMMISSION
 COMMISSIONER RECHTSCHAFFEN
 ROOM 5201
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

SHELBY CHASE
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY SAFETY & INFRASTRUCTURE BRANCH
 AREA
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

SIMI ROSE GEORGE
 CALIF PUBLIC UTILITIES COMMISSION
 COMMISSIONER RECHTSCHAFFEN
 ROOM 5119
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

TRUMAN L. BURNS
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY COST OF SERVICE & NATURAL GAS BRA
 ROOM 4205
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

VALERIE KAO
 CALIF PUBLIC UTILITIES COMMISSION
 ADMINISTRATIVE LAW JUDGE DIVISION
 ROOM 5005
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

WENDY AL-MUKDAD
 CALIF PUBLIC UTILITIES COMMISSION
 RISK ASSESSMENT AND ENFORCEMENT
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

WILLIAM K. SANDERS
 DEPUTY CITY ATTORNEY
 CITY AND COUNTY OF SAN FRANCISCO
 CITY HALL RM 234
 1 DR. CARLTON B. GOODLETT PLACE
 SAN FRANCISCO, CA 94102-4682
 FOR: CITY AND COUNTY OF SAN FRANCISCO

ERIC BORDEN
 ENERGY POLICY ANALYST
 THE UTILITY REFORM NETWORK
 785 MARKET STREET, STE. 1400
 SAN FRANCISCO, CA 94103

KATY MORSONY
 STAFF ATTORNEY
 THE UTILITY REFORM NETWORK
 785 MARKET STREET, SUITE 1400
 SAN FRANCISCO, CA 94103

MARCEL HAWIGER
 STAFF ATTORNEY
 THE UTILITY REFORM NETWORK
 785 MARKET ST., STE. 1400
 SAN FRANCISCO, CA 94103

JAMES M. BIRKELUND
 PRESIDENT
 SMALL BUSINESS UTILITY ADVOCATES
 548 MARKET STREET, STE. 11200
 SAN FRANCISCO, CA 94104

SCOTT CASTRO
 HORIZON WEST TRANSMISSION, LLC
 ONE POST STREET, SUITE 2550
 SAN FRANCISCO, CA 94104
 FOR: (FORMERLY NEXTERA ENERGY
 TRANSMISSION, LLC)

CHARLES R. MIDDLEKAUFF
 PACIFIC GAS AND ELECTRIC COMPANY
 77 BEALE STREET, B30A / BOX 7442
 SAN FRANCISCO, CA 94105

GARETH STAMP
 PACIFIC GAS AND ELECTRIC COMPANY
 245 MARKET STREET, ROOM 914C
 SAN FRANCISCO, CA 94105

JAMES W. MCTARNAGHAN
 ATTORNEY
 PERKINS COIE LLP
 505 HOWARD STREET, STE. 1000
 SAN FRANCISCO, CA 94105

JANE WHANG
STAFF COUNSEL
VERIZON
201 SPEAR STREET, 7TH FL.
SAN FRANCISCO, CA 94105

KARI CAMERON
LEGAL ADMINISTRATOR
BUCHALTER
EMAIL ONLY
EMAIL ONLY, CA 94105

LISE H. JORDAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

MEREDITH ALLEN
SR. DIRECTOR, REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B10C
SAN FRANCISCO, CA 94105

MICHAEL ALCANTAR
ATTORNEY AT LAW
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, SUITE 1700
SAN FRANCISCO, CA 94105

MICHAEL CADE
ANALYST - ENERGY & NAT'L RESOURCES
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, SUITE 1700
SAN FRANCISCO, CA 94105

SPENCER OLINEK
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 2333
SAN FRANCISCO, CA 94105

TRACY MARATUKULAM
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET, ROOM 903
SAN FRANCISCO, CA 94105

VIKTORIYA MALKINA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B23A
SAN FRANCISCO, CA 94105

LILLIAN RAFII
ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, STE. 1700
SAN FRANCISCO, CA 94105-3493
FOR: ENERGY PRODUCERS AND USERS
COALITION

FASSIL FENIKILE
DIR - REGULATORY
AT&T SERVICES, INC.
430 BUSH STREET, 5TH FL.
SAN FRANCISCO, CA 94108

GWEN JOHNSON
QUALITY TESTING
AT&T SERVICES, INC.
430 BUSH STREET, 5TH FL.
SAN FRANCISCO, CA 94108

MICHELLE CHOO
ASSISTANT
AT&T SERVICES, INC.
430 BUSH STREET, 3ND FL.
SAN FRANCISCO, CA 94108

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

BUCK B. ENDEMANN
PARTNER
K&L GATES LLP
4 EMBARCADERO CENTER, STE. 1200
SAN FRANCISCO, CA 94111

EMILY LIEBAN
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, STE. 2800
SAN FRANCISCO, CA 94111

JIM TOMLINSON
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

KATIE JORRIE
ATTORNEY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FL.
SAN FRANCISCO, CA 94111

MICHAEL B. DAY
ATTORNEY
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY,
505 SANSOME ST., STE. 900
SAN FRANCISCO, CA 94111
FOR: TRANS-ELECT NTD PATH 15, LLC

PATRICK FERGUSON
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

TAHIYA SULTAN
ASSOCIATE
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA 94111

TARA KAUSHIK
PARTNER
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA 94111

TONY BRUNELLO
CALIFORNIA STRATEGIES & ADVOCACY, LLC
1 EMBARCADERO CENTER, STE. 1060
SAN FRANCISCO, CA 94111

TRINA HORNER
DIRECTOR
NAVIGANT CONSULTING
101 CALIFORNIA STREET, STE. 4100
SAN FRANCISCO, CA 94111

DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA 94111

SUZANNE TOLLER
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

STEVEN MOSS
PARTNER
M.CUBED
296 LIBERTY STREET
SAN FRANCISCO, CA 94114
FOR: THE LOCAL GOVERNMENT SUSTAINABLE
ENERGY COALITION

MAVIS SCANLON
EDITOR
CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST., STE 303
SAN FRANCISCO, CA 94117

DEBORAH BEHLES
OF COUNSEL
2912 DIAMOND STREET, STE 162
SAN FRANCISCO, CA 94131
FOR: CALIFORNIA ENVIRONMENTAL JUSTICE
ALLIANCE (CEJA)

DEBORAH BEHLES
OF COUNSEL
CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANC
2912 DIAMOND STREET, NO. 162
SAN FRANCISCO, CA 94131

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B23A
SAN FRANCISCO, CA 94177

WILLIAM V. MANHEIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B30A
SAN FRANCISCO, CA 94177

PETRA BRUGGISSER
DEPUTY COUNTY COUNSEL
COUNTY OF SONOMA
575 ADMINISTRATION DRIVE, ROOM 105-A
SANTA ROSA, CA 94503

MARY NEHER
 DISTRICT SECRETARY
 CONTRA COSTA WATER DISTRICT
 PO BOX H20
 CONCORD, CA 94524

BRETT T. KAWAKAMI
 EBMUD
 375 11TH STREET, STE. 200
 OAKLAND, CA 94541

AVIS KOWALEWSKI
 VP - GOV'T & REGULATORY AFFAIRS
 CALPINE CORPORATION
 4160 DUBLIN BLVD, SUITE 100
 DUBLIN, CA 94568

KATHERINE C. PIPER
 REGIONAL MANAGING COUNSEL
 CALPINE COPORATION
 4160 DUBLIN BLVD., STE. 100
 DUBLIN, CA 94568

MARK T. PRESTWICH
 CITY MGR
 CITY OF ST. HELENA
 1480 MAIN STREET
 ST. HELENA, CA 94574
 FOR: CITY OF ST. HELENA

BENJAMIN BODELL
 ATTORNEY
 BEST BEST AND KRIEGER LLP
 2001 N MAIN ST., STE. 390
 WALNUT CREEK, CA 94596

JAMIE PANG
 LEGAL FELLOW
 PROTECT OUR COMMUNITIES FOUNDATION
 1547 PALOS VERDES MALL SUITE 196
 WALNUT CREEK, CA 94597

APRIL ROSE SOMMER
 LEAD COUNSEL
 PROTECT OUR COMMUNITIES FOUNDATION
 1547 PALOS VERDES MALL, NO. 196
 WALNUT CREEK, CA 94598
 FOR: PROTECT OUR COMMUNITIES FOUNDATION

ALICE L. HARRON
 CEO
 HARRON, LLC
 4016 EVERETT AVE.
 OAKLAND, CA 94602

ALLIE DETRIO
 POLICY MANAGER
 ENGIE SERVICES
 500 12TH STREET, SUITE 300
 OAKLAND, CA 94607

RACHEL JONES
 EAST BAY MUNICIPAL UTILITY DISTRICT
 375 ELEVENTH STREET
 OAKLAND, CA 94607

SAJI THOMAS PIERCE
 EAST BAY MUNICIPAL UTILITY DISTRICT
 375 11TH STREET
 OAKLAND, CA 94607-4240

CATHERINE E. YAP
 BARKOVICH & YAP, INC.
 PO BOX 11031
 OAKLAND, CA 94611

PAUL NELSON
 CONSULTANT
 BARKOVICH & YAP, INC.
 PO BOX 11031
 OAKLAND, CA 94611

LEON BLOOMFIELD
 ATTORNEY
 LAW OFFICES OF LEON BLOOMFIELD
 1901 HARRISON STREET, SUITE 1400
 OAKLAND, CA 94612

SHERIDAN PAUKER
 PARTNER
 KEYES & FOX LLP
 436 14TH STREET, SUITE 1305
 OAKLAND, CA 94612

ALEX J. MORRIS
 VP - POLICY & OPERS
 CALIFORNIA ENERGY STORAGE ALLIANCE
 2150 ALLSTON WAY, STE.400
 BERKELEY, CA 94709

PAUL SCHULMAN
 SR RESEARCH FELLOW
 CTR FOR CATASTROPHIC RISK MGNT
 MILLS COLLEGE
 UNIVERSITY OF CALIFORNIA

BERKELEY, CA 94720

FRANK LINDH
 ATTORNEY
 CITIZENS ENERGY CORPORATION
 110 TAYLOR STREET
 SAN RAFAEL, CA 94901
 FOR: CITIZENS ENERGY CORPORATION

PHILLIP MULLER
 PRESIDENT
 SCD ENERGY SOLUTIONS
 436 NOVA ALBION WAY
 SAN RAFAEL, CA 94903

MARC KOLB
 GRID DEL SOL CONSULTING
 46 VISTA DEL SOL
 MILL VALLEY, CA 94941

SUSIE BERLIN
 LAW OFFICES OF SUSIE BERLIN
 1346 THE ALAMEDA, SUITE 7-141
 SAN JOSE, CA 95126

BRUCE GOLDSTEIN
 COUNTY COUNSEL
 COUNTY OF SONOMA
 575 ADMINISTRATION DRIVE, ROOM 105-A
 SANTA ROSA, CA 95403

CORY O'CONNOR
 CHIEF DEPUTY COUNTY COUNSEL
 COUNTY OF SONOMA
 575 ADMINISTRATION DRIVE, ROOM 105-A
 SANTA ROSA, CA 95403

ADAM ABEL
 ASSIST. CITY ATTORNEY
 CITY OF SANTA ROSA
 100 SANTA ROSA AVENUE, RM 8
 SANTA ROSA, CA 95404

SUE A. GALLAGHER
 CITY ATTORNEY
 CITY OF SANTA ROSA
 100 SANTA ROSA AVE., RM 8
 SANTA ROSA, CA 95404

KATHARINE L. ELLIOTT
 COUNTY COUNSEL
 COUNTY OF MENDOCINO
 501 LOW GAP ROAD, RM 1030
 UKIAH, CA 95482
 FOR: COUNTY OF MENDOCINO

JORDAN PINJUV
 COUNSEL
 CALIFORNIA INDEPENDENT SYSTEM OPERATOR
 250 OUTCROPPING WAY
 FOLSOM, CA 95630
 FOR: CALIFORNIA ISO

LAURA J. MANZ
 DIRECTOR
 ENERGY NAVIGANT
 35 IRON POINT CIRCLE, STE. 225
 FOLSOM, CA 95630

JOHN DRISCOLL
 CITY ATTORNEY
 CITY OF PLACERVILLE
 31001 CENTER STREET
 PLACERVILLE, CA 95667
 FOR: CITY OF PLACERVILLE

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

AMY WARSHAUER
 MGR - GOV'T & EXTERNAL AFFAIRS
 FRONTIER COMMUNICATIONS
 1201 K STREET, SUITE 1980
 SACRAMENTO, CA 95814

ASISH GAUTAM
 CALIF PUBLIC UTILITIES COMMISSION
 OFFICE OF THE SAFETY ADVOCATE
 300 Capitol Mall
 Sacramento, CA 95814

AUDRA HARTMANN
 PRINCIPAL
 SMITH, WATTS & HARTMANN
 925 L STREET, SUITE 220
 SACRAMENTO, CA 95814

CHARLIE BORN

CHERYL COX

FRONTIER COMMUNICATIONS
1201 K STREET, STE. 1980
SACRAMENTO, CA 95814

CALIF PUBLIC UTILITIES COMMISSION
PROCUREMENT STRATEGY AND OVERSIGHT BRANC
300 Capitol Mall
Sacramento, CA 95814

DRUCILLA DUNTON
CALIF PUBLIC UTILITIES COMMISSION
ENTERPRISE RISK AND COMPLIANCE OFFICE
300 Capitol Mall
Sacramento, CA 95814

FILIBERTO A. PINEDA
CALIF PUBLIC UTILITIES COMMISSION
OFFICE OF THE SAFETY ADVOCATE
300 Capitol Mall
Sacramento, CA 95814

JOSHUA NELSON
ATTORNEY
BEST BEST AND KRIEGER LLP
500 CAPITOL MALL, STE. 1700
SACRAMENTO, CA 95814

LAURA FERNANDEZ
ATTORNEY
BRAUN BLAISING SMITH WYNNE, P.C.
915 L STREET, STE 1480
SACRAMENTO, CA 95814
FOR: CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATION

LAURA MCWILLIAMS
STATE SENATOR JERRY HILL
STATE CAPITOL, ROOM 5035
SACRAMENTO, CA 95814

NICK CRONENWETT
LEGISLATIVE ANALYST
CALIFORNIA STATE ASSOC. OF COUNTIES
1100 K STREET, STE 101
SACRAMENTO, CA 95814

ANDREW B. BROWN
ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816

JEFFERY D. HARRIS
ATTORNEY
ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816

BRIAN S. BIERING
ATTORNEY
ELLISON SCHNEIDER HARRIS & DONAN LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5931
FOR: DATC PATH 15, LLC

JOY MASTACHE
SR. ATTORNEY - OFF. OF GEN. COUNSEL
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A311
SACRAMENTO, CA 95817

TIM MASON
POLICY DIR
LARGE-SCALE SOLAR ASSOCIATION
2501 PORTOLA WAY
SACRAMENTO, CA 95818

SARBJIT BAGRI
CALIF PUBLIC UTILITIES COMMISSION
OFFICE OF THE SAFETY ADVOCATE
180 Promenade Circle, Suite 115
Sacramento, CA 95834

SULTAN BANU ACIMIS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC SAFETY AND RELIABILITY BRANCH
180 Promenade Circle, Suite 115
Sacramento, CA 95834
FOR: SED

KERRI TIMMER
SIERRA BUISNESS COUNCIL
10183 TRUCKEE AIRPORT RD
TRUCKEE, CA 96161

CATHIE ALLEN
DIR - REGULATORY AFFAIRS
PACIFICORP

HEIDE MARIE CASWELL
PACIFICORP
825 NE MULTNOMAH, STE. 1700

825 N. E. MULTNOMAH, SUITE 300
PORTLAND, OR 97232

PORTLAND, OR 97232

[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)