

Decision 99-11-004 November 4, 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority to Establish Post-Transition Period Electric Ratemaking Mechanisms (U 39 E)

Application 99-01-016
(Filed January 15, 1999)

Application of San Diego Gas & Electric Company for Authority to Implement Post Rate Freeze Ratemaking Mechanics (U 902-E)

Application 99-01-019
(Filed January 15, 1999)

Application of Southern California Edison Company (U 338-E) to: (1) Propose a Method to Determine and Implement the end of the Rate Freeze; and (2) Propose Ratemaking Mechanisms which would be in place after the end of the Rate Freeze Period.

Application 99-01-034
(Filed January 15, 1999)

Application of San Diego Gas & Electric Company: (1) informing the Commission of the Probable Timing of the End of its Electric Rate Freeze, (2) for Authorization to Change Electric Rates Through Implementation of Interim Ratemaking Mechanisms Concurrent with Termination of the Electric Rate Freeze, and (3) for Authorization to Change Electric Rates by Adding New, and Revising or Terminating Existing, Rate and Revenue Mechanisms and Rate Designs.

Application 99-02-029
(Filed February 19, 1999)

(U 902 E)

(See Appendix A for List of Appearances)

**INTERIM OPINION REGARDING PRIMARY
AT SUBSTATION RATE DESIGN ISSUES FOR
SAN DIEGO GAS & ELECTRIC COMPANY**

Summary

In this decision, we find that the primary at substation proposal by San Diego Gas & Electric Company (SDG&E) should not be considered in isolation in this proceeding, but should be addressed in SDG&E's next Rate Design Window application.

Background

The Scoping Memo in this proceeding, issued on March 11, 1999, bifurcated this proceeding. Phase 1 is limited to the mechanics integral to ending the rate freeze, while Phase 2 addresses broad policy issues related to rate design and cost allocation, among other things. These proceedings do not include the development of marginal costs, nor do they address particular changes to distribution rate design. Such issues are to be addressed in individual utility applications.

However, SDG&E was permitted to address this issue because it claimed that this matter is critical to avoid bypass. The principal hearing officer set the matter for hearing on June 4, 1999, and SDG&E, Enron Corporation (Enron), and the Office of Ratepayer Advocates (ORA) filed timely opening briefs. SDG&E and Enron filed reply briefs on July 2, at which time this issue was submitted. The proposed decision in this matter was timely mailed 90 days after submission.

In Decision (D.) 95-04-048, issued in SDG&E's 1994 Rate Design Window proceeding, we adopted a new category of service called "primary at substation." These rates are "lower than standard primary rates and higher than

transmission rates.”¹ (D.95-04-048, mimeo., at p. 6.) The 1995 decision required the development of a new marginal customer cost, based on the size of the customer, and referred to as a basic service fee. For customers with a maximum annual demand greater than 10 megawatts (MW), the basic service fee was set at \$30,000 a month; for customers with maximum annual demand less than 10 MW, the service fee was set at \$20,000 per month.

SDG&E's Proposal

In this proceeding, SDG&E proposes to update the basic service fee by changing the maximum demand determination from 10 MW to 12 MW and to change the dollar amount of the basic service fee to reflect SDG&E's current marginal cost of a substation. SDG&E proposes to change the basis for the marginal cost calculation from one 25 mega volt amperes (MVA) substation to two 50 MVA substations.²

SDG&E proposes to change the marginal cost basis for the distance adjustment fee (DAF), which was introduced to allow customers not immediately adjacent to a substation to take service under the primary at substation rate. The fee represents the cost of connecting the customers and is calculated using a dollars-per-foot-per-month calculation. SDG&E requests two changes: 1) to distinguish the cost associated with underground facilities and

¹ Primary service is service taken at a level more than 2 kV, but less than 25 kV. Secondary service is service taken at a level less than 2 kV. Transmission level service is service taken above 25 kV, but the customer connects directly with the transmission line and has its own substation. For primary at substation service, there is no difference in how the customer takes service, but there is a difference in rates. Basic service fees are higher for the primary at substation level compared to the primary service, and the energy costs are lower.

² The MVA is a measure of capacity and power factor (which is an efficiency measure).

those associated with overhead facilities because underground facilities are more expensive; and 2) to change the assessment of the DAF to be the distance from the customers to the nearest transmission line rather than the distance to the nearest substation. SDG&E claims that it is the distance to the nearest transmission line which the customer uses to determine the economics of departing the system.

SDG&E argues that these changes are necessary to keep its customers from reacting to incorrect price signals and avoid bypass, which it believes is a matter requiring immediate remedy.

Other Parties' Position

Enron protests SDG&E's proposal on several grounds. First, Enron states that SDG&E has the option to use a load retention discount to avoid bypass. Enron argues that the reason SDG&E wants to re-design rates rather than use the discount is because shareholders assume 100% of the discount cost in the post-rate freeze, pursuant to D.96-06-033. Enron adds that in addition to the discount, SDG&E has other options to address this issue including the Expedited Application Docket and the Rate Design Window. Enron also argues that the record lacks support for SDG&E's basic service fee change and that the record provides no cost basis for changing the distance adjustment fee.

ORA supports SDG&E's proposal although it did not participate in hearings or submit direct testimony. ORA states that it has determined that SDG&E's proposal is consistent with the Commission's policy of cost-based ratemaking, assuming that SDG&E's long-run marginal cost calculation represents its substation investments. ORA did not verify the marginal cost calculations associated with SDG&E's proposal.

Discussion

The proposed change in marginal costs will decrease the primary at substation rate and shift the costs to other customers within the same rate class, i.e., cost shifting is limited to the A-6 TOU and AL TOU rate classes, whose distribution commodity rates would increase by about 6%. While we agree with ORA that such a rate re-design may be appropriate in terms of cost shifting, we have other concerns with this proposal. We note that SDG&E is revenue neutral to the rate re-design, but obtains benefits in that it retains load without being obliged to implement a load retention discount for which shareholders are 100% responsible in the post-rate freeze era. (D.96-06-033 66 CPUC2d 393, 403, 404.)

SDG&E admits that it does, in fact, have the option to discount to retain load, but contends that discounting to retain customer load is not the optimal approach to the problem of inaccurate price signals. In this case, however, we direct SDG&E to continue to negotiate special discounts with individual customers until the primary at substation rate issue can be resolved in context.

This issue should be addressed in SDG&E's rate design window proceeding, to be filed on November 1, 1999³, where rate design issues can be viewed more thoroughly and in the context of broader rate design considerations in the post rate freeze era. Any information elicited in this record is available for use in SDG&E's rate design window proceeding, if it is relevant, through incorporation in that record by stipulation or through a motion to take official

³ D.99-06-058 directed SDG&E to file an application initiating a review of its cost allocation and rate design issues, including marginal costs, by July 25, 1999. Pursuant to Rule 48, the Executive Director granted SDG&E's request to file the relevant information as part of its rate design window application, to be filed on November 1, 1999.

notice. This approach provides parties an opportunity to fully assess marginal cost calculations. Resolving this specific rate design issue is not a matter necessary to ending the rate freeze.

We are concerned that SDG&E has selectively chosen to "update" its marginal costs for primary at substation customers by claiming that incorrect price signals are causing large customers to consider bypass. The updating of marginal costs should not be limited to prized customers. Instead, a thorough review of the marginal costs of services to various rate groups should be assessed as a whole and not selectively for valued customers. The rate design window proceeding is the appropriate proceeding to review marginal cost adjustments for all classes of customers. While SDG&E states that its discounting option will expire at the end of this year, we note that SDG&E recently filed a petition to modify D.96-06-033. The petition specifically requests an extension of the discounting option. We plan to consider this petition as soon as practicable.

Comments on Proposed Decision

The proposed decision of the administrative law judge in this matter was mailed to the parties in accordance with Pub. Util. Code § 311(d) and Rule 77.1 of the Rules of Practice and Procedure. SDG&E and Enron Corp. filed comments.

Findings of Fact

1. The post-rate freeze proceedings do not include the development of marginal costs, nor do they address particular changes to distribution rate design. Such issues are to be addressed in individual utility applications.

2. SDG&E's proposed change in marginal costs will decrease the primary at substation rate and shift the costs to other customers within the rate class.

3. While SDG&E is revenue neutral to the proposed re-design, SDG&E also has the opportunity to retain load without implementing a load retention discount for which shareholders are 100% responsible in the post rate freeze era.

4. No party has verified SDG&E's long-run marginal cost calculation represents its substation investments.

Conclusions of Law

1. SDG&E has the option to discount to retain load. Shareholders assume 100% of any shortfalls due to such discounts after the rate freeze, pursuant to D.96-06-033.

2. A thorough consideration of the marginal costs of service to various rate groups should be evaluated as a whole and not selectively for valued customers. The rate design window proceeding is the appropriate place to review marginal cost adjustments for all classes of customers.

3. This decision should be effective immediately so that SDG&E can include this issue in its Rate Design Window Filing, to be filed on November 1, 1999.

INTERIM ORDER

IT IS ORDERED that San Diego Gas & Electric Company's request for a modification to its primary at substation rate design is denied without prejudice to its refiling such a proposal in its Rate Design Window Filing, to be filed on November 1, 1999.

This order is effective today.

Dated November 4, 1999, at San Francisco, California.

RICHARD A. BILAS
President
HENRY M. DUQUE
JOSIAH L. NEEPER
JOEL Z. HYATT
CARL W. WOOD
Commissioners

APPENDIX A

***** SERVICE LIST *****

Last updated on 01-SEP-1999 by: LIL

A9901016 LIST

A9901019/A9901034/A99020

29

***** APPEARANCES *****

Marc D. Joseph
Attorney At Law
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BLVD., SUITE 900
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660
mdjoseph@adamsbroadwell.com
For: Coalition of California Utility Employees

James Weil
AGLET CONSUMER ALLIANCE
PO BOX 6640
SAN RAFAEL CA 94903-0640
(415) 472-4064
jweil@aglet.org

Daniel W. Douglass
Attorney At Law
ARTER & HADDEN LLP
725 S. FIGUEROA STREET, 34TH FLOOR
LOS ANGELES CA 90017-5418
(213) 430-3343
douglass@arterhadden.com
For: ALLIANCE OF RETAIL MARKETS and WESTERN POWER
TRADING FORUM

Freya Christian
ARTER & HADDEN, LLP
725 S. FIGUEROA ST., SUITE 3400
LOS ANGELES CA 90017
(213) 430-3359
fchristi@arterhadden.com
For: RELIANT ENERGY RETAIL, INC.

Robert Berry
AUTOMATED POWER EXCHANGE
10455 BANDLEY
CUPERTINO CA 95014
(408) 517-2100
berry@apx.com
For: AUTOMATED POWER EXCHANGE

Barbara R. Barkovich
BARKOVICH AND YAP, INC.
PO BOX 11031
OAKLAND CA 94611-0031
brbarkovich@earthlink.net
For: California Large Energy Consumers
Association (CLECA)

Reed V. Schmidt
BARTLE WELLS ASSOCIATES
1636 BUSH STREET
SAN FRANCISCO CA 94109
(415) 775-3113
bwa@slip.net
For: California City County Streetlight
Association (CAL-SLA)

Marco Gomez
Office Of The General Counsel
BAY AREA RAPID TRANSIT DISTRICT
800 MADISON STREET, 5TH FLOOR
OAKLAND CA 94607-4774
(510) 464-6058
For: San Francisco Bay Area Rapid Transit

Edwin J. Bouillon
Attorney At Law
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-14
SACRAMENTO CA 95814-5512
(916) 654-3855
ebouillo@energy.state.ca.us
For: CALIFORNIA ENERGY COMMISSION

Karen Norene Mills
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5655
kmills@cbbf.com
For: California Farm Bureau Federation

Lisa G. Urick
Attorney At Law
CALIFORNIA POWER EXCHANGE
200 S. LOS ROBLES AVE., STE 400
PASADENA CA 91101
(626) 537-3328
lgurick@calpx.com
For: CALIFORNIA POWER EXCHANGE

Theresa Mueller
Deputy City Attorney
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO CA 94102
(415) 554-4640
theresa_mueller@ci.sf.ca.us
For: City & County of San Francisco

Andrew J. Skaff
Attorney At Law
CROSBY HEAFEY ROACH & MAY
1999 HARRISON STREET,
OAKLAND CA 94612-3573
(510) 466-6858
askaff@chrm.com
For: New York Mercantile Exchange & Dynegy, Inc.

Patrick Mcguire
CROSSBORDER SERVICES
2560 NINTH STREET, SUITE 316
BERKELEY CA 94710
(510) 649-9790
patrickm@crossborderenergy.com
For: Watson Cogeneration Company

***** SERVICE LIST *****

Audrey J. Van Dyke
DEPARTMENT OF THE NAVY
1013 D STREET, S.E., SUITE 340
WASHINGTON DC 20374-5051
(202) 685-1931
For: FEDERAL EXECUTIVE AGENCIES

Jody S. London
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO CA 94104
(415) 834-2300
jlondon@gralegal.com

Norman J. Furuta
Attorney At Law
DEPARTMENT OF THE NAVY
900 COMMODORE DRIVE, BLDG. 107
SAN BRUNO CA 94066-5006
(650) 244-2100
furutanj@efawest.navy.mil
For: Federal Executive Agencies

Jeff Nahigian
Senior Economist
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO CA 95605
(916) 372-0534
jeff@jbsenergy.com
For: The Utility Reform Network (TURN)

Philip A. Stohr
DAN L. CARROLL, ATTORNEY AT LAW
Attorney At Law
DOWNEY, BRAND, SEYMOUR & ROHWER
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO CA 95814-4686
(916) 441-0131
pstohr@dbsr.com
For: California Industrial Users (CIU)

Edward W. O'Neill
Attorney At Law
JEFFER, MANGELS, BUTLER & MARMARO, LLP
ONE SANSOME STREET
SAN FRANCISCO CA 94104
(415) 398-8080
ewo@jmbm.com
For: CALIFORNIA POWER EXCHANGE

Andrew Brown
Attorney At Law
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
abb@eslawfirm.com
For: California Dept. General Services

Norman A. Pedersen
Esquire
JONES DAY REAVES & POGUE
555 WEST FIFTH STREET, SUITE 4600
LOS ANGELES CA 90013-1025
(213) 243-2810
napedersen@jonesday.com
For: Commonwealth Energy Corporation and
Automated Power Exchange Inc.

Carolyn Kehrein
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON CA 95620-4208
(707) 678-9506
cmkehrein@ems-ca.com
For: Energy Users Forum

Bill Julian
1127 11TH STREET, SUITE 226
SACRAMENTO CA 95814
For: Self

Patrick McDonnell
ENSERCH ENERGY SERVICES
SUITE 240
900 LARKSPUR LANDING CIRCLE
LARKSPUR CA 94939
(415) 461-5820
pmcdonnell@eesinc.com
For: Enserch Energy Services

Ron Knecht
1465 MARLBAROUGH AVENUE
LOS ALTOS CA 94024-5742
(650) 968-0115
ronknecht@aol.com
For: SELF

Jeanne M. Bennett
Attorney At Law
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
jbennett@gmssr.com
For: Alliance for Retail Markets and Enron
Corporation

William H. Booth
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, 5TH FLOOR
WALNUT CREEK CA 94596
(925) 296-2460
wbooth@booth-law.com
For: California Large Energy Consumers Assn.

Richard H. Counihan
GREEN MOUNTAIN ENERGY RESOURCES
50 CALIFORNIA STREET
SAN FRANCISCO CA 94111
(415) 439-5310
counihan@greenmountain.com
For: GREEN MOUNTAIN ENERGY RESOURCES

Steven Moss
M.CUBED
849 SANCHEZ STREET
SAN FRANCISCO CA 94114
(415) 643-9578
smoss@hooked.net
For: WESTERN MOBILHOME PARK ASSOCIATION

***** SERVICE LIST *****

David J. Byers
 Attorney At Law
 MCCRACKEN & BYERS
 840 MALCOLM ROAD, SUITE 100
 BURLINGAME CA 94010
 (650) 259-5979
 mcbyer@earthlink.net
 For: California City County Streetlight
 Association (CAL-SLA)

Patricia R. Williams
 MERVYN'S CALIFORNIA
 22301 FOOTHILL BOULEVARD
 HAYWARD CA 94541
 (510) 727-5905
 pat.williams@dhcmail.com
 For: Mervyn's/Target Stores Division of Dayton
 Hudson Corporation

Christopher J. Mayer
 MODESTO IRRIGATION DISTRICT
 PO BOX 4060
 MODESTO CA 95352-4060
 (209) 526-7430
 chrism@mid.org
 For: Modesto Irrigation District

Peter W. Hanschen
 Attorney At Law
 MORRISON & FOERSTER
 425 MARKET STREET
 SAN FRANCISCO CA 94105
 (415) 268-7214
 phanschen@mofo.com
 For: NEW WEST ENERGY CORPORATION

Aaron Thomas
 NEW ENERGY VENTURES, INC.
 1000 WILSHIRE BOULEVARD, SUITE 1900
 LOS ANGELES CA 90017
 (213) 996-6136
 athomas@newenergy.com
 For: New Energy Ventures, Inc.

William H. Edwards
 KELLY M. MORTON
 Attorney At Law
 PACIFIC GAS AND ELECTRIC CO.
 77 BEALE STREET, S.F., CA 94105
 PO BOX 7442, RM 3115-B30A
 SAN FRANCISCO CA 94120-7442
 (415) 973-2768
 whel@pge.com
 For: PG&E

Joan Searls
 PG&E ENERGY SERVICES CORPORATION
 345 CALIFORNIA STREET, 26TH FLOOR
 SAN FRANCISCO CA 94104
 (415) 733-4747
 peter.bray@pgees.com
 For: PG&E Energy Services Corporation

Keith Sappenfield
 RELIANT ENERGY RETAIL, INC.
 PO BOX 1409
 HOUSTON TX 77251-1409
 (713) 207-5570
 keith-sappenfield@reliantenergy.com
 For: Reliant Energy Retail, Inc.

Randy Britt
 ROBINSONS-MAY
 6160 LAUREL CANYON BLVD.
 NORTH HOLLYWOOD CA 91606
 (818) 509-4777
 randy.britt@mayco.com
 For: Robinsons-May

Arlin Orchard
 Attorney At Law
 SACRAMENTO MUNICIPAL UTILITY DISTRICT
 PO BOX 15830, MAIL STOP-B406
 SACRAMENTO CA 95852-1830
 (916) 732-5830
 aorchard@smud.org
 For: Sacramento Municipal Utility District

Phillip J. Muller
 SCD ENERGY SOLUTIONS
 436 NOVA ALBION WAY
 SAN RAFAEL CA 94903
 (415) 479-1710
 pjmulder@ricochet.net
 For: Southern Company Energy Marketing

Keith W. Melville
 DAVID R. CLARK
 Attorney At Law
 SEMpra ENERGY
 101 ASH STREET
 SAN DIEGO CA 92101-3017
 (619) 699-5039
 kmelville@sempra.com
 For: San Diego Gas & Electric Company

Ann P. Cohn
 JIM LEHRER
 Attorney At Law
 SOUTHERN CALIFORNIA EDISON
 2244 WALNUT GROVE AVENUE
 ROSEMEAD CA 91770
 (626) 302-2211
 cohnaps@sce.com
 For: SOUTHERN CALIFORNIA EDISON

Christine Costa
 Attorney At Law
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVENUE
 ROSEMEAD CA 91770
 (626) 302-3102
 costacs@sce.com
 For: SOUTHERN CALIFORNIA EDISON COMPANY

***** SERVICE LIST *****

James M. Lehrer
CHRISTINE COSTA
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-3252
lehrerjm@sce.com
For: SOUTHERN CALIFORNIA EDISON COMPANY

Jason J. Zeller
Legal Division
RM. 5002
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-4673
jjz@cpuc.ca.gov
For: Office of Ratepayer Advocates

***** STATE SERVICE *****

James Bushee
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE
WASHINGTON DC 20004
(202) 383-0100
jbushee@sablaw.gov
For: CALIFORNIA MANUFACTURERS ASSOCIATION (CMA)

Lorenzo Kristov
CALIFORNIA ENERGY COMMISSION
1516 9TH ST., MS-22
SACRAMENTO CA 95814
(916) 654-4773
LKristov@energy.state.ca.us
For: California Energy Commission

Keith Mc Crea
Attorney At Law
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, N.W., STE. 600
WASHINGTON DC 20004-2404
(202) 383-0705
kmccrea@sablaw.com
For: California Manufacturers Association

Ruben Tavares
Electricity Analysis Office
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO CA 95814
(916) 654-5171
RTavares@energy.state.ca.us
For: California Energy Commission

Gene L. Waas
THE CALIFORNIA POWER EXCHANGE
1000 SOUTH FREMONT BUILDING A9 WEST
ALHAMBRA CA 91803
(626) 537-3326
glwaas@calpx.com
For: The California Power Exchange

Robert T. Feraru
Public Advisor Office
RM. 5303
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-2074
rtf@cpuc.ca.gov
For: Public Advisor's Office

Robert Finkelstein
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876 X-301
bfinkelstein@turn.org
For: The Utility Reform Network (TURN)

Faline Fua
Energy Division
AREA 4-A
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-2481
fua@cpuc.ca.gov

Michael Shames
Attorney At Law
UTILITY CONSUMERS' ACTION NETWORK
1717 KETTNER BLVD., SUITE 101
SAN DIEGO CA 92101-2532
(619) 696-6966
mshames@ucan.org
For: Utility Consumers' Action Network (UCAN)

Kerry T. Hattevik
Energy Division
RM. 4102
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-2317
kth@cpuc.ca.gov

Jerry Bloom
MARGARET ROSTKER (EMAIL: ROSTKMA@LAWWHITECASE.COM)
Attorney At Law
WHITE & CASE
TWO EMBARCADERO CENTER, SUITE 650
SAN FRANCISCO CA 94111
(415) 544-1104
bloomje@la.whitecase.com
For: California Cogeneration Council

Kim Malcolm
Administrative Law Judge Division
RM. 5115
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-1926
kim@cpuc.ca.gov

Angela K. Minkin
Administrative Law Judge Division
RM. 5116
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-1573
ang@cpuc.ca.gov

***** SERVICE LIST *****

Barbara Ortega
Executive Division
RM. 5109
320 WEST 4TH STREET SUITE 500
LOS ANGELES CA 90013
(213) 576-7070
bho@cpuc.ca.gov

Scott Blaising
Attorney At Law
BRAUN & ASSOCIATES
8980 MOONEY ROAD
ELK GROVE CA 95624
(916) 682-9702
blaising@jps.net

James E. Price
Office of Ratepayer Advocates
RM. 4101
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-1797
jep@cpuc.ca.gov

Maurice Brubaker
BRUBAKER & ASSOCIATES, INC
1215 FERN RIDGE PARKWAY, STE 208
ST. LOUIS MO 63141
(314) 275-7007
mbrubaker@consultbai.com
For: Brubaker & Associates, Inc.

Zenaida G. Tapawan-Conway
Energy Division
AREA 4-A
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-2624
ztc@cpuc.ca.gov

Derk Pippin
CALIFORNIA ENERGY MARKETS
9 ROSCOE STREET
SAN FRANCISCO CA 94110-5921
(415) 824-3222
derkp@newsdata.com
For: CALIFORNIA ENERGY MARKETS (CEM)

Rosalina White
Public Advisor Office
RM. 5303
505 VAN NESS AVE
SAN FRANCISCO CA 94102
(415) 703-1647
raw@cpuc.ca.gov
For: PUBLIC ADVISOR'S OFFICE

J. A. Savage
CALIFORNIA ENERGY MARKETS
3006 SHEFFIELD AVENUE
OAKLAND CA 94602-1545
(510) 534-9109
honest@compuserve.com
For: California Energy Markets

***** INFORMATION ONLY *****

David Marcus
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY CA 94701-1287
(510) 528-0728
dmarcus@slip.net
For: Coalition of California Utility Employees

Ronald Liebert
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5657
rliebert@cbbf.com

Katherine S. Poole
ADAMS BROADWELL & JOSEPH
651 GATEWAY BLVD., SUITE 900
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660
kpoole@adamsbroadwell.com

William Dombrowski
CALIFORNIA RETAILERS ASSOCIATION
980 9TH STREET, SUITE 2100
SACRAMENTO CA 95814-2741
(916) 443-1975

Michael Alcantar
Attorney
ALCANTAR & ELSESSER
1300 SW FIFTH, SUITE 1750
PORTLAND OR 97201
(503) 402-8700
mpa@aelaw.com
For: Cogeneration Association of California

Frederick M. Bloom
COMMONWEALTH ENERGY CORP.
15991 RED HILL AVENUE, NO. 201
TUSTIN CA 92780
(714) 258-0470
fbloom@powersavers.com
For: Commonwealth Energy Corp.

Ed Cazalet
AUTOMATED POWER EXCHANGE, INC.
10455-3 BANDLEY DR.
CUPERTINO CA 95014
(408) 517-2900
ed@apx.com
For: Automated Power Exchange, Inc.

Gregory T. Blue
Manager, State Regulatory Affairs
DYNEGY, INC.
5976 W. LAS POSITAS BLVD., STE. 200
PLEASANTON CA 94588
(925) 469-2355
gtblue@dynegy.com
For: Dynegy, Inc.

Jon S. Silva
Government Affairs Associate
EDISON SOURCE
955 OVERLAND COURT
SAN DIMAS CA 91773
(909) 450-6035
jsilva@edisonenterprises.com

***** SERVICE LIST *****

Susan A. Huse
Research Analyst
EES CONSULTING, INC.
12011 BEL-RED ROAD, SUITE 200
BELLEVUE WA 98005-2471
(425) 452-9200

Jeffrey D. Harris
Attorney At Law
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO CA 95814-3105
(916) 447-2166
jdh@eslawfirm.com
For: Sacramento Municipal Utility District

Jim Meyn
Senior Structure Power Representative
ENGAGE ENERGY US, L.P.
101 W. BROADWAY, SUITE 1970
SAN DIEGO CA 92101
(619) 702-9501

Diane I. Fellman
Attorney At Law
234 VAN NESS AVENUE
SAN FRANCISCO CA 94102-4515
(415) 703-6000
difellman@earthlink.net
For: NEO CORPORATION

Jon Collins
HENWOOD ENERGY SERVICES, INC.
2710 GATEWAY OAKS DRIVE, STE. 300 NORTH
SACRAMENTO CA 95833
(916) 569-0985
jcollins@hesinet.com

Jeffrey D. Schlichting
HMH RESOURCES, INC.
475 GATE FIVE ROAD, SUITE 213
SAUSALITO CA 94965
(415) 289-4080

Ralph Smith
LARKIN & ASSOCIATES, INC.
15728 FARMINGTON ROAD
LIVONIA MI 48154
(734) 522-3420
rsmithLA@aol.com
For: Larkin & Associates, Inc.

Karen Lindh
LINDH & ASSOCIATES
7909 WALERGA ROAD, SUITE 112, PMB 119
ANTELOPE CA 95843
(916) 729-1562
karen@klinlh.com
For: California Manufacturers Assn.

Richard J. Mccann
M.CUBED
2655 PORTAGE BAY, SUITE 3
DAVIS CA 95616
(530) 757-6363
rmccann@cal.net

Robert B. Weisenmiller
MRW & ASSOCIATES
1999 HARRISON STREET, SUITE 1440
OAKLAND CA 94612-3517
(510) 834-1999
rbw@mrwassoc.com
For: MRW & Associaes

Sam De Frawi
NAVY RATE INTERVENTION
WASHINGTON NAVY YARD
851 SICARD STREET, SE
WASHINGTON DC 20374-5018
(202) 685-0130
sdefrawi@efaches.navfac.navy.mil
For: Navy Rate Intervention

Joe Migocki
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST. MAIL CODE B9A
SAN FRANCISCO CA 94105-1890
(415) 973-1332
j3m9@pge.com

Ed Lucha
PG&E
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-3872

Donald Schoenbeck
RCS INC
900 WASHINGTON STREET, NO. 1000
VANCOUVER WA 98660
(360) 737-3877
dws@keywaycorp.com

Tim Haines
SACRAMENTO MUNICIPAL UTILITY DISTRICT
PO BOX 15830
SACRAMENTO CA 95852-1830
(916) 732-6342
thaines@smud.org
For: Sacramento Municipal Utility District

Lynn G. Van Wagenen
Regulatory Affairs Project Manager
SEMPRA ENERGY
101 ASH STREET, ROOM 10A
SAN DIEGO CA 92101
(619) 699-5031
lvanwage@sempra.com
For: Sempra Energy

Bruce Foster
Regulatory Affairs
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, SUITE 2040
SAN FRANCISCO CA 94102
(415) 775-1856

(END OF APPENDIX A)