

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

To implement a pilot program to provide to limited English Proficient customers, an in-language education, complaint resolution and outreach program for energy matters which will be provided by the same contractor and community based organizations involved in the California Public Utilities Commission's Telecommunications Education and Assistance in Multiple-Languages program.

Resolution CSID-004  
(Issued October 1, 2010)

**OPENING COMMENTS OF THE GREENLINING INSTITUTE  
ON THE CONSUMER SERVICE AND INFORMATION DIVISION RESOLUTION  
CSID – 004 TO IMPLEMENT A PILOT PROGRAM FOR LIMITED ENGLISH  
PROFICIENT GAS AND ELECTRIC CUSTOMERS**

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October 21, 2010

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To implement a pilot program to provide to limited English Proficient customers, an in-language education, complaint resolution and outreach program for energy matters which will be provided by the same contractor and community based organizations involved in the California Public Utilities Commission’s Telecommunications Education and Assistance in Multiple-Languages program.

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**I. INTRODUCTION**

In accordance with Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Greenlining Institute (“Greenlining”) hereby files the following opening comments on the Draft Resolution.<sup>1</sup> The Draft Resolution proposes to approve a pilot program to provide energy-related education, outreach, and complaint resolution assistance to limited English proficient (“LEP”) customers.<sup>2</sup> This pilot, termed the “Community Help and Assistance with Natural Gas and Electricity Services” (“CHANGES”) program, will utilize the existing network of Community Based Organizations (“CBOs”) participating the Telecommunications Education and Assistance in Multiple-Languages

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<sup>1</sup> Consumer Service and Information Division, Draft Resolution CSID – 004 (Nov. 19, 2010) (To implement a pilot program to provide to limited English Proficient customers, an in-language education, complaint resolution and outreach program for energy matters which will be provided by the same contractor and community based organizations involved in the California Public Utilities Commission’s Telecommunications Education and Assistance in Multiple-Languages program. The California Public Utilities Commission’s Consumer Service and Information Division will evaluate the effectiveness of the pilot to determine if it should recommend to the Commission to continue the program.) (hereinafter “Draft Resolution”).

<sup>2</sup> *Id.* at 2.

(“TEAM”) program.<sup>3</sup> Greenlining has long advocated for an increased role for CBOs in LEP customer outreach, education, and complaint resolution in the gas and electric sectors. As such, Greenlining supports the purpose and intent behind the CHANGES program. However, Greenlining has a number of concerns related to how this program will be funded, structured and implemented.

## **II. DISCUSSION**

Greenlining is pleased to note the Commission’s recognition that twenty percent of California’s population is limited English proficient (“LEP”).<sup>4</sup> Greenlining commends the Commission for its leadership in assisting these customers in the telecommunications industry by launching the TEAM program. It is highly appropriate that the Commission take steps to assist these same customers address the challenges they face in the gas and energy sectors. Unfortunately, it is currently unclear whether the CHANGES program as described in the Draft Resolution will be up to that challenge.

### **A. A Comprehensive Review of the Challenges Facing LEP Electric and Gas Customers Should be Conducted.**

TEAM commenced on June 16, 2008 and has been relatively successful; during its first eight months it consisted of 28 CBOs, serving customers in over 23 languages.<sup>5</sup> However, TEAM was not conceived in a vacuum. Rather it arose out of the Commission’s “Decision Addressing the Needs of Telecommunications Customers Who Have Limited English Proficiency.”<sup>6</sup> That decision was itself built on the Consumer Protection Initiative Decision, D.06-03-013, and a Staff Report entitled “Challenges Facing Consumers with Limited English Skills in the Rapidly Changing Telecommunications Marketplace” which was issued in October 2006. Consequently, by the time TEAM was established the Commission had been reviewing and evaluating the specific challenges facing LEP telecommunications customers for over two years. The Commission was well aware that a comprehensive review was the key to truly

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<sup>3</sup> *Id.*

<sup>4</sup> Draft Resolution at 3; American Community Survey, 2006-2008 3-Year Estimates for California (6,709,325 Californians speak English less than “very well”).

<sup>5</sup> TEAM Annual Report, June 16, 2008-February 15, 2009.

<sup>6</sup> Decision 07-07-043 (July 26, 2007).

understanding and adequately addressing the needs of LEP telecommunications customers.<sup>7</sup> The result of such a comprehensive review, was the implementation of *many* rules and measures to protect LEP customers, only one of which was the TEAM program.<sup>8</sup>

In contrast, the CHANGES program, at least as described in the Draft Resolution, is based on assumptions about the needs of LEP electric and gas customers rather than a systematic review. The impetus for CHANGES is presumably the residential disconnection proceeding,<sup>9</sup> which is at the same time too broad and too narrow to provide a sound basis for designing the program. On the one hand, it is too broad because it addresses the challenges of *all* customers facing disconnection, not those unique to LEP customers. On the other hand it is too narrow because it addresses *only* the challenges related to disconnection, and not the myriad others facing LEP customers. Moreover, many issues in that proceeding, including those dealing with LEP customers, are yet to be resolved.<sup>10</sup> While the TEAM model has proved to be a valuable one for telecommunications customers, Greenlining is concerned that it may be premature to expand it into the electric and gas sectors. Without first having a firm grasp on all relevant issues, there is a risk that the CHANGES pilot may not be as successful as it could be. This inquiry may include:

- (1) the appropriate statutory basis for the program;<sup>11</sup>
- (2) how the program will be funded on an ongoing basis;
- (3) what rules and measures are currently in effect to protect LEP customers;
- (4) what challenges LEP customers currently face;
- (5) what challenges LEP customers will face as the transition to advanced metering infrastructure is completed; and
- (6) what other rules and measures could be implemented to ensure the IOUs effectively serve their LEP customers.

Without the answers to fundamental questions such as these, a pilot program may fall short of its potential. In fact, the answers to these questions may shape how the pilot should be structured. Unfortunately, we do not yet have the benefit of this information.

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<sup>7</sup> *Id.* at 5.

<sup>8</sup> *Id.* at 5-7 (table summarizing rules adopted) and 133-136 (ordering paragraphs).

<sup>9</sup> R.10.02.005. Service of the draft resolution was provided to all persons on the service list from R.10.02.005.

<sup>10</sup> Administrative Law Judge's Ruling, R.10.02.005 (Sept. 21, 2010).

<sup>11</sup> The TEAM program was based on statutes that are unique to the telecommunications sector, such as the Dymally Alatorre Bilingual Services Act. For CHANGES, the Commission must be sure to establish the appropriate and separate legal groundwork.

Even if the Commission feels a searching review of that sort is unnecessary here, the Draft Resolution seems ill timed. Based on discussions during the All Party Meeting, it appears that the Public Advisor’s Office, the lead TEAM CBO contractor, and the Investor Owned Utilities (“IOUs”) are still in the process of designing the CHANGES program.<sup>12</sup> As such, due to the timing of this Draft Resolution, interested stakeholders do not have the opportunity to comment on the specifics of the pilot program.<sup>13</sup> This places the Commission in the unenviable position of being asked to approve funding for a program not subject to thorough review. Until the specifics discussed below are fully thought through and evaluated by stakeholders and the Commission, implementation of the program may be premature.

**B. The Scope of the CHANGES Pilot Program is Undefined.**

Whether or not CHANGES continues as a viable program is contingent upon whether the Public Advisor’s Office determines that the pilot program is successful. Whether any program is successful turns on many factors, including funding, the scope of the program’s mandate, and how success is measured and defined. Unfortunately, it is not yet clear how many CBOs will be included in the CHANGES pilot, what the scope of the services they provide will be, how much funding they will receive, and how their success will be measured. Even basic questions remain unresolved, such as whether the intent of the program is to have a small number of CBOs offering a wide variety of services, a large number of CBOs offering a small number of services, or something in between. Allocating funding to a program without first having a clear picture of the intended results is premature.

1. The number of CBOs and allocation of funding was not specified.

The Draft Resolution indicates that the initial one year pilot will be funded with \$500,000 of California Alternate Rates for Energy (“CARE”) funds.<sup>14</sup> It also indicates that it will use the existing network of CBOs, which currently includes 32 CBOs concentrated in the San Francisco

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<sup>12</sup> The All Party Meeting held was by Commissioner Dian M. Grueneich’s Office on October 19, 2010 from 10am-12pm to discuss and educate parties about the CHANGES pilot program.

<sup>13</sup> In contrast, the Resolution CSID – 002 which established the TEAM program was much more detailed in outlining the specifics of the program, how the CBOs would qualify for participation, and how the funding would be allocated.

<sup>14</sup> Draft Resolution at 6.

and Los Angeles areas.<sup>15</sup> It is unclear whether all of these CBOs will participate, or only a limited subset. If all 32 CBOs participate and each is funded equally, then the maximum each CBO could receive for their work over the next year is \$15,620. This amount is not even close to sufficient to enable the CBOs to devote one full time staff member to the CHANGES program.

If it is anticipated that the pilot would instead use a more limited group of CBOs, it is unclear how these would be chosen, how they would be distributed among the service territories of the state, and which LEP communities they would target. Finally, it is not clear how the funding would be allocated: would it be grant based, per-capita, or some type of hybrid approach? With specifics of this sort still being determined between the IOUs, the TEAM CBO contractor and the Public Advisor's Office, it makes it very difficult, if not impossible, for parties to the residential disconnections proceeding offer meaningful comments. Greenlining believes in the potential of the CHANGES program and hopes it will have the opportunity to review and comment on the relevant specifics once they have been determined.

2. The scope of services the CBO's will provide has not been established.

A related concern is the scope of the services to be offered by the CBOs. As noted above, the CHANGES program has arisen in the context of the residential disconnection proceeding, but it is not clear whether the CBOs would be limited to assisting customers with disconnection related issues. The Draft Resolution does not resolve the issue of whether the CBOs could also educate customers on certain basic issues such as understanding baseline rates, how to read bills, how to reduce their bills by energy efficiency measures, and how to enroll in the Low Income Energy Efficiency ("LIEE") or Medical Baseline programs.<sup>16</sup> Increasingly these issues overlap. For example, for a customer to be an engaged and active energy consumer they must understand how to read their bill, how to conserve and use energy efficiently, and how to take advantage of the various programs available to them. The obvious problem however, is that the more services the CBOs may offer, the more the associated costs. Thus, perhaps it is appropriate for the pilot to have an expansive network of CBOs offering a circumscribed set of

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<sup>15</sup> *Id.* This is based on information provided to parties at the All Party Meeting held by Commissioner Dian M. Grueneich's Office on October 19, 2010 from 10am-12pm.

<sup>16</sup> Draft Resolution at 5. The Draft Resolution indicates that some things may be within the scope, but does not clearly define which areas the CBOs may offer assistance in.

services. On the other hand, having a small number of CBOs provide the full panoply of services may be a better way to measure the success of the pilot to determine whether it is worth expanding. The Draft Resolution should state the goals and scope of the CHANGES pilot with greater specificity before the Commission approves it.

3. There are no objective metrics to determine whether the pilot is a success.

Finally, Greenlining is concerned that there are no evaluative tools to objectively determine whether the pilot program is deemed a success. Many of these tools will be driven by the scope and mandate of the program, which as discussed above, is yet to be clarified. If the primary intent of the program is to have a large number of CBOs assist customers only with disconnection related problems, perhaps an appropriate metric would be to track the all-residential and CARE-only disconnection rates for each IOU over the life of the program. This information is already being reported by the IOUs and would impose very few additional costs. On the other hand, if the goal of the program is to have a select few CBOs offer a comprehensive suite of services to LEP customers then statewide information offers very little insight. It appears that the Public Advisor's Office will determine whether the pilot is a success, but they offered no transparency as to how this determination will be made. Simply put, the position that any penetration into the LEP population is a deemed a success misses the point. The focus must be on tracking whether the program adequately addresses the actual challenges facing LEP customers. The Commission has been presented with the opportunity to reach out to underserved communities and should not settle for a pilot that is not as effective as it could be. Greenlining looks forward to working with the Commission to ensure the CHANGES program succeeds in adequately serving its target populations.

**C. The Components of the Pilot Program Have Not Been Fully Detailed.**

As discussed above, what services the CBOs will be able to offer will be determined in large part by the scope of the program and the funding they receive. Since these preliminary issues are still unresolved, it is difficult to delve further into the specific operational details of the CHANGES program. As such, Greenlining offers general comments on the three main components of the CHANGES program: outreach, education, and complaint resolution.

1. Both the CBOs and the IOUs must conduct outreach.

The Draft Resolution indicates that the primary outreach will be through the existing TEAM outreach activities. Greenlining supports this approach, but believes that additional outreach may be warranted. Specifically, the IOUs should be required to inform customers of the CBOs that will be available to assist them with education and complaint resolution. For example, in the context of disconnections, on every disconnect notice the IOUs should provide in-language instructions for how to contact the IOU and receive in-language assistance.<sup>17</sup> Moreover, the IOUs should provide an insert along with every bill, or at a minimum every disconnect notice, listing all CHANGES CBOs in the territory and explaining they are available to help with any gas and electric related questions. The IOUs are the only party who has a touch point with every customer at every stage of their service: establishment, maintenance, and disconnection. Unless the IOUs truly partner with the CBOs in their service territory, a valuable opportunity to serve LEP customers will be missed. This is one area where the CHANGES and TEAM programs will differ substantially. Due to the monopolies the IOUs hold in their territory, there are no competitive concerns related to the IOUs partnering with the CBOs in their territory.

On the other hand, protections must be put in place to ensure the CBOs do not become merely a marketing tool or mouthpiece of the IOUs. The CBOs must retain their independence to develop their own outreach materials and message to the communities they serve. For example, they must be able to determine whether or not it would be appropriate to use an IOU's trademark or logo on outreach materials. Striking the right balance between CBO independence and partnership with the IOUs is crucial and depends on details not yet fleshed out.

2. The CBOs should produce the materials to educate their communities about a minimum set of basic topics.

Similarly, the CBOs must retain discretion to design, write, translate, and disseminate educational materials. They are the parties who understand the issues most important to LEP communities. They also have not only the linguistic tools, but importantly the cultural

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<sup>17</sup> San Diego Gas & Electric Company and the Southern California Gas Company are already prepared to adopt a similar practice. Joint Motion of San Diego Gas & Electric Company (U 902E), The Southern California Gas Company (U 904G), Disability Rights Advocates, The Division of Ratepayer Advocates, The Greenlining Institute, The National Consumer Law Center, and The Utility Reform Network for Adoption of the Settlement Agreement, Appendix A at 10, R.10.02.005 (Sept. 9, 2010).



understanding, to ensure effective communication with LEP customers. As such, they should have the ability to craft the educational and outreach materials for the communities they serve. Greenlining acknowledges that the Commission and the IOUs may have concerns about the accuracy of CBO generated materials. As such, it may be appropriate for the Commission staff to fact check these materials or solicit a second opinion as to the quality of the translation. However, Greenlining urges the Commission not to allow the educational materials to be limited to those prepared by the IOUs.

Moreover, the Commission should require that the components of the educational program be more specifically delineated. As currently written the Draft Resolution contains no definitive statements regarding the components of the education element. Instead it indicates that many basic issues, such as how to read and understand your utility bill, “may” be included but will not be required.<sup>18</sup> Prior to approval, the Draft Resolution should clearly identify the basic or minimum topics each CBO must be trained to educate their communities about, who would conduct that training, and who would prepare the educational materials distributed to and by the CBOs.

3. An adequate network of CBOs must be trained in IOU and Commission complaint resolution rules and practices.

A central component of the CHANGES program will be the ability of the CBOs to assist customers to resolve complaints and other issues. The Draft Resolution states that because the CBOs are of the same culture as the consumers they assist, it “makes it easier for them to liais[e] between the utility and the consumer and to negotiate on the consumer’s behalf.”<sup>19</sup> This is only the case if the primary assumption, that the CBOs are of the same culture as the consumers they assist, is actually true. Greenlining is concerned about whether the current TEAM CBO network adequately reflects the needs of the diverse communities of California. Specifically, the Commission should take a critical view of whether languages spoken correlates with communities served. For example, some of the CBOs in the TEAM program that indicate

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<sup>18</sup> Draft Resolution at 5.

<sup>19</sup> Draft Resolution at 5.

Spanish as a language spoken are in fact targeted to Asian Pacific Islander audiences.<sup>20</sup> If the CBO network is to be effective in resolving complaints and educating customers, it must be reflective of California's diverse demographics.

Another core element of whether the CBOs can effectively resolve complaints is the training they receive. The CBOs need to be adequately trained in the relevant IOU's policies, rules, and procedures. This will necessarily involve input and education by the IOU but should not be limited to this. Complaint resolution is a complex process and the CBOs must be provided with training to enable them to craft the most effective remedy for the consumer's unique situation and budget; not just the IOUs preferred solution. For example, The CBOs will be in a unique position to assist the negotiation of a payment plan, because a LEP customer may be more comfortable disclosing information regarding their monthly budget to the CBO than the IOU. However, the CBO will only be able to optimize this potential if they understand the crucial consumer protections the Commission recently approved in the residential disconnections proceeding.<sup>21</sup> Initial and ongoing CBO training is essential to the success of this program, but unfortunately it is not even addressed in the Draft Resolution.

Finally, the CBOs should also be able to utilize the Commission's complaint process. If negotiations with the IOUs are unsuccessful, the CBO must be able to refer to complaint to the Commission's Consumer Affairs Bureau ("CAB") directly. The Commission must ensure there are no impediments or perverse incentives which would prevent this, such as a requirement to first direct the customer to the Public Advisor's Office or CBO contractor, or a stipulation the CBO would only receive a per-capita fee if the complaint is resolved rather than referred. In addition, a referral to CAB should not just be a hand-off from CBO to the Commission. Rather the CBO should remain involved to help shepherd the customer through the process if and as needed. This could be coupled with education for the customer so they would know how to access the CAB complaint resolution process in the future. Empowering the CBOs to directly refer complaints to the CAB not only would provide an alternative resolution mechanism when needed, but provide powerful leverage in negotiations with the IOUs. This can and should not

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<sup>20</sup> For example, the Asian-American Resource Center, the Chinatown Service Center, the Koreatown Youth and Community Center, the Search to Involve Pilipino Americans, and the Union of Pan Asian Communities all list Spanish among their languages spoken, but clearly target non-Latino communities.

<sup>21</sup> D.10.07.048

merely be a partnership between the IOUs and the CBOs but must also necessarily include the Commission.

### **III. CONCLUSION**

While Greenlining appreciates the intent behind the CHANGES pilot program, it submits that a more thorough review of the challenges facing LEP gas and electric customers must be conducted. Specifically, this will allow the Commission to implement many rules and alternative measures to ease the burdens on LEP customers and craft the most appropriate structure for the CHANGES program. Utilizing CBOs is a powerful tool to reach LEP customers and Greenlining is loath to see this shortchanged.

Once the details of the CHANGES program have been finalized, interested parties should be offered the opportunity to comment on the full proposal. Greenlining understands the desire to get a pilot program in place in a timely manner, but quality must not be sacrificed for the sake of expediency. The Commission is being presented with a golden opportunity to help some of its neediest constituents. It must be taken seriously and the CHANGES program designed purposefully and mindfully to effectively assist these underserved communities. Greenlining appreciates the opportunity to submit these comments and looks forward to working with the Commission to design an appropriate and effective LEP outreach, education and complaint resolution program.

Respectfully submitted,

Dated: October 21, 2010

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**CERTIFICATE OF SERVICE**

I, Alicia Miller, am 18 years of age or older and a non-party to the within proceeding. I hereby certify that I have this day served a copy of

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on all known parties to R.10.02.005 by transmitting an e-mail message with the document attached to each party named in the official service list and by faxing or mailing a properly addressed copy by first-class mail with postage prepaid to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in Berkeley, California on October 21, 2010.

/s/ Alicia F. Miller  
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