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

Application of Pacific Gas and Electric Company
Proposing Cost of Service and Rates for
Gas Transmission and Storage Services for the
Period 2011-2013 (U 39 G)

Application 09-09-013
(Filed September 20, 2010)

**JOINT REBUTTAL TESTIMONY OF
KRISHNA K. YADAV
ON BEHALF OF WILD GOOSE STORAGE, LLC
AND
DENNIS HENDERSON
ON BEHALF OF GILL RANCH STORAGE, LLC**

October 11, 2010



1 **JOINT REBUTTAL TESTIMONY OF**
2 **KRISHNA K. YADAV**
3 **ON BEHALF OF WILD GOOSE STORAGE, LLC**
4 **AND**
5 **DENNIS HENDERSON**
6 **ON BEHALF OF GILL RANCH STORAGE, LLC**

7
8 **I. INTRODUCTION**

9 Q. Mr. Yadav, can you please state your full name and business address.

10 A. My name is Krishna K. Yadav. My business address is 400 – 607 8TH Avenue, SW,
11 Calgary, Alberta, Canada T2P 0A7

12 Q. What is your occupation?

13 A. I am employed by Niska Gas Storage Partners LLC (Niska) as Director, Marketing for
14 Wild Goose Storage, LLC (Wild Goose).

15 Q. On whose behalf are you testifying?

16 A. For purposes of this testimony, I am testifying only on behalf of Wild Goose. I am
17 sponsoring this testimony jointly with Mr. Henderson of Gill Ranch Storage. In addition,
18 I am sponsoring the portion of this testimony which is applicable only to Wild Goose.
19 This testimony is located at: page 3, line 25 to page 4, line 10; page 11, lines 13-14; and
20 page 12, lines 4-11.

21 Q. Please describe your educational background and occupational experience related to your
22 testimony in this proceeding.

23 A. In my current role at Niska, I am primarily responsible for third party marketing at
24 Niska's U.S. facilities, including Wild Goose in California and Salt Plains Storage in
25 Oklahoma. I have been in this position since January 2004. I have been employed by
26
27
28

1 Niska and two of its predecessor companies since July 1996. I have held a number of
2 diverse roles with the company, including positions in regulatory affairs, transportation
3 management, producer services, and gas and power trading. I hold a Bachelor of
4 Commerce (1988) and a Masters Degree in Economics (1995), both from the University
5 of Calgary. In addition, I have previously testified before this Commission in Application
6 05-03-001, the PG&E incremental core storage proceeding.
7

8 Q. Mr. Henderson, can you please state your full name and business address.

9 A. My name is Dennis Henderson. My business address is 220 N.W. Second Avenue,
10 Portland, OR 97209.

11 Q. What is your occupation?

12 A. I am the Vice President, Marketing, for Gill Ranch Storage, LLC (GRS) and NW Natural
13 Gas Storage, LLC (NW Natural). I have been employed with GRS since it was formed in
14 2007.
15

16 Q. Please describe your educational background and occupational experience related to your
17 testimony in this proceeding.

18 A. Throughout my employment with GRS, I have had and continue to have primary
19 responsibility for marketing storage services in connection with GRS' share of capacity in
20 the Gill Ranch Gas Storage Project (Gill Ranch Project). I am also responsible for
21 developing and managing the revenue of the Mist gas storage field in Oregon on behalf of
22 NW Natural. My responsibilities for GRS and NW Natural include the marketing of term
23 storage and hub services.
24

25 In addition, I have over ten years of storage marketing and gas storage
26 development experience and twenty-plus years of gas marketing experience in both
27 upstream and downstream sectors of the industry. Most recently, for GRS, I have
28

1 participated in the development of the Gill Ranch Project, including the analysis of market
2 issues and revenue projections pertaining to GRS' interest in the Gill Ranch Project.
3 Through my work and based on my experience I have become familiar with the Northern
4 California natural gas storage market.

5
6 Prior to my responsibilities described above, I managed the industrial and
7 commercial marketing group for NW Natural and managed a 65-mile pipeline
8 development project in Coos County, Oregon. Prior to joining NW Natural, I spent 15
9 years in the upstream exploration and production sector of the natural gas industry. I
10 earned a Bachelor of Science degree in Pharmacy from the University of Kansas in 1978,
11 and a Masters in Business Administration from the University of Arkansas in 1981.

12 Q. On whose behalf are you testifying?

13
14 A. For purposes of this testimony, I am testifying only on behalf of GRS. I am sponsoring
15 this testimony jointly with Mr. Yadav of Wild Goose Storage. In addition, I am
16 sponsoring the portion of this testimony which is applicable only to GRS. The testimony
17 applicable only to GRS is located at: page 4, line 14 to page 5, line 5.

18 Q. What is the purpose of your joint rebuttal testimony in this proceeding?

19
20 A. The purpose of our testimony is to explain Wild Goose's and GRS' support for the Gas
21 Accord settlement from the perspective of independent gas storage providers. That
22 settlement does not provide for any additional information posting requirements relative to
23 PG&E market storage. More specifically, this testimony is offered in rebuttal to the
24 testimony of Steve Watson of Southern California Gas Company (SoCalGas).

25 **II. BACKGROUND**

26 Q. Mr. Yadav, please briefly describe Wild Goose.
27
28

1 A. Wild Goose is the first independent storage provider (ISP) in California, and operates a
2 facility in Butte and Colusa Counties. Wild Goose received a certificate of public
3 convenience and necessity from the Commission in June of 1997 and commenced
4 operation in 1999 with a working gas capacity of 14 Bcf. The Wild Goose facility
5 consists of a well pad directly over the reservoir which is connected to a remote facility
6 site containing the project's compression and gas processing equipment. Wild Goose is
7 interconnected to both PG&E's Line 400 and its Sacramento Valley local transmission
8 system. An expansion of the project to a working gas capacity of 29 Bcf was approved by
9 the Commission in 2002. The Commission is currently considering an additional
10 expansion of Wild Goose in Application 09-04-021. If approved by the Commission,
11 Wild Goose's working gas capacity would increase up to 50 Bcf.
12

13 Q. Mr. Henderson, please briefly describe GRS.
14

15 A. GRS is an independent gas storage provider. GRS received a certificate of public
16 convenience and necessity from the California Public Utilities Commission in November
17 2009. The Gill Ranch Project is located in Madera and Fresno Counties in Northern
18 California and is comprised of a 20 Bcf underground natural gas storage field, a
19 compressor station for injecting and withdrawing gas from the storage field and associated
20 dehydration and control facilities, an approximately 27-mile natural gas pipeline
21 connecting the Proposed Project to Pacific Gas and Electric's (PG&E) Line 401, an
22 electric substation located at the compressor station, and a 9-mile 115 kV power line
23 connecting the substation to PG&E's Dairyland-Mendota 115 kV power line to serve the
24 compressors and other facilities. GRS owns a 75 percent undivided interest in the Gill
25 Ranch Project and PG&E owns a 25 percent undivided interest. GRS and PG&E each
26 separately market their respective shares of storage capacity in the Gill Ranch Project,
27
28

1 which was constructed by GRS and PG&E and will be operated by GRS during
2 development, permitting and construction pursuant to an operator agreement between
3 GRS and PG&E. The 115 kV power line was constructed and is owned and operated
4 exclusively by PG&E.

5
6 **III. PG&E'S GAS ACCORD PROCEEDING IS NOT THE APPROPRIATE
7 PROCEEDING IN WHICH TO ADDRESS STORAGE REPORTING RULES.**

8 Q. Please briefly describe SoCalGas's proposal with regard to storage reporting rules.

9 A. SoCalGas has proposed that PG&E be required to comply with information posting
10 requirements regarding its storage operations equivalent to those which the Federal
11 Energy Regulatory Commission (FERC) imposes on market-based storage fields directly
12 connected to interstate pipelines and providing interstate gas storage service under Section
13 7(c) of the Natural Gas Act of 1938. (Watson Testimony at 3.) These requirements
14 would include publicly posting all firm and interruptible storage transactions, the posting
15 of all firm storage release transactions, the posting of an index of firm storage customers,
16 and daily postings of storage design and operating capacity, available storage capacity, the
17 quantity of storage capacity available from the storage provider and the quantity available
18 from capacity release, as well as daily scheduled injections and withdrawals.

19
20 In fact, SoCalGas appears to recommend that all ISPs in Northern California be
21 made subject to similar information posting requirements over time. (Watson Testimony
22 at 14.)

23 Q. Do you believe that SoCalGas's proposal is appropriate based on the nature of the Gas
24 Accord proceeding?

25
26 A. No. The Gas Accord proceeding is a rate case focused *solely* on PG&E's system. The Gas
27 Accord proceeding does not involve the creation of new reporting requirements generally
28 applicable to all storage providers in the Northern California market. As a matter of

1 fairness, the Commission should not adopt rules in this proceeding that would apply to all
2 storage providers in Northern California as the issue of posting requirements for ISPs was
3 not included within the scope of issues in this proceeding, nor could the ISPs participating
4 in this proceeding have reasonably contemplated the introduction of such an issue in this
5 case, which is limited to issues regarding PG&E's gas system.

6
7 Furthermore, the Commission should not adopt in this proceeding a piecemeal
8 reporting regulation that would apply only to PG&E. As described more fully below, the
9 Northern California storage market is a competitive market. Wild Goose and GRS believe
10 that such changes in reporting requirements should not be adopted unless all Northern
11 California ISPs, as well as new storage project developers and other parties concerned
12 with storage issues, have adequate notice at the commencement of the proceeding that an
13 issue affecting all market storage providers will be addressed in that proceeding. This was
14 clearly not the case in this Gas Accord proceeding, as SoCalGas is seeking to impose
15 information posting requirements only on PG&E, and the regulation of ISPs is entirely
16 outside the scope of this proceeding.

17
18 **IV. THE NORTHERN CALIFORNIA STORAGE MARKET IS COMPETITIVE.**

19 Q. Please describe the market for gas storage in Northern California.

20
21 A. Northern California features a competitive market for gas storage. In addition to PG&E,
22 which has substantial storage assets totaling 98 Bcf of capacity and provides both core
23 storage and market storage for non-core customers, Wild Goose and Lodi Gas Storage
24 operate independent gas storage operations. Wild Goose began commercial operations
25 with 14 Bcf of working gas capacity, later expanded to its current working gas capacity of
26 29 Bcf, and is seeking a further expansion of up to 50 Bcf of working gas capacity. Lodi
27 Gas Storage began with a 12 Bcf project, and now has expanded to a total working gas
28

1 capacity of approximately 34 Bcf. In addition, several new independent gas storage
2 projects are in various stages of development. Gill Ranch has received a certificate to
3 construct and operate an independent gas storage facility and commenced commercial
4 operation on October 3, 2010. The GRS portion of the Gill Ranch Project has a working
5 gas capacity of 15 Bcf out of a total of 20 Bcf capacity. PG&E's portion of the project is
6 5 Bcf. Central Valley Gas Storage (CVGS) and Sacramento Natural Gas Company have
7 also filed applications for certificates to construct and operate additional facilities. A
8 proposed decision (PD) has been issued in A.09-08-008 granting CVGS a certificate of
9 public convenience and necessity. We understand that the Commission will vote on this
10 PD soon.

11
12 The market for storage in Northern California is growing, and attracting additional
13 investment in natural gas infrastructure as more competitive entrants are seeking entry
14 into the market. Clearly, there is no barrier to entry in this market and, given the lack of
15 any complaints about pricing or availability of competitive storage in Northern California
16 to date, the storage market in this portion of California appears to be working very well.

17
18 **V. A PENDING COMMISSION DECISION WOULD REJECT SOCALGAS'S**
19 **PROPOSAL TO IMPOSE ADDITIONAL REPORTING OBLIGATIONS ON**
20 **COMPETITIVE STORAGE PROVIDERS.**

21 Q. Is the market for gas storage in Southern California similar to the market in Northern
22 California?

23 A. No. In contrast to Northern California, the Southern California storage market is a
24 monopoly of SoCalGas. It operates the only gas storage facilities in its service territory.

25 Q. Are the information posting requirements applicable to SoCalGas based to some extent on
26 the fact that the Southern California gas storage market is not a competitive market?
27

1 A. Our understanding is that as a result of the energy crisis in 2000-2001, SoCalGas faced
2 allegations of anticompetitive conduct, and related market power abuses with regard to its
3 storage and transmission operations. These allegations led to settlements in which
4 SoCalGas agreed to the information posting requirements it currently complies with. This
5 issue was discussed in the PD issued in the CVGS case, where SoCalGas also proposed
6 additional reporting requirements that would apply to a single ISP, namely CVGS. In the
7 August 31, 2010 Proposed Decision in A.09-08-008, ALJ Kenney wrote:
8

9 We decline to adopt SoCalGas's recommendation. As explained in
10 CVGS's Brief, the posting requirements that apply to SoCalGas stem from an
11 investigation of alleged market abuses by SoCalGas during the California energy
12 crisis in 2000 - 2001. SoCalGas voluntarily agreed to these posting requirements
13 to settle claims of market abuse. The posting requirements are intended to
14 prevent potential market abuses by SoCalGas in the future.

15 There is no need to impose the same posting requirements on CVGS
16 because it lacks market power. Unlike CVGS, SoCalGas holds a dominant
17 position in the California gas storage market.

18 It is the largest storage provider in the State with over 130 Bcf of capacity
19 (approximately 44% of the entire capacity in California). It also controls the gas
20 transportation system connected to its storage fields, has captive ratepayers, is not
21 fully at-risk for its investment in storage facilities, and has extensive affiliate
22 connections in California. In short, SoCalGas has the ability to engage in
23 anticompetitive activities that could harm its ratepayers and California's
24 economy. CVGS will not have this ability.

25 PG&E, like CVGS, does not have a monopoly on gas storage services in Northern
26 California. The very same reasons cited by the CVGS Proposed Decision in rejecting the
27 SoCalGas proposal for reporting rules for CVGS also apply to both PG&E and each of the
28 ISPs in Northern California. Neither PG&E nor any of the ISPs should be required to bear
the reporting obligations that SoCalGas voluntarily accepted as part of a settlement which
resolved market abuse claims against it.

VI. THERE IS NO MARKET POWER ISSUE IN THE NORTHERN CALIFORNIA STORAGE MARKET.

1 Q. Do you support imposing SoCalGas's proposed information posting rules on PG&E or on
2 any other gas storage providers in Northern California?

3 A. No. As stated above, unlike in Southern California, there is no monopoly for storage
4 services in Northern California. More importantly, there have been no assertions of
5 market power abuses by any of the Northern California storage providers. Neither gas
6 transportation customers, storage customers, nor competing storage providers have raised
7 any allegations of market power abuse in the competitive Northern California storage
8 market.
9

10 The Commission has successfully created a competitive storage market in
11 Northern California that is attracting increased investment in new gas storage capacity and
12 has made increased storage capacity available to customers, which benefits all market
13 participants, including core and noncore customers on the PG&E system. The market is
14 functioning, growing, and diversifying as we believe the Commission intended. In the
15 absence of complaints from customers or competitors, there is no reason to adopt the
16 SoCalGas information posting proposal. It is a solution in search of a problem.
17

18 **VII. MARKET STORAGE PROVIDERS IN NORTHERN CALIFORNIA ARE**
19 **ADEQUATELY REGULATED.**

20 Q. Are gas storage providers in Northern California subject to regulation?

21 A. Absolutely. There is regulatory oversight over PG&E's market storage and ISPs in
22 Northern California. The Commission has adopted rules to monitor the market and each
23 individual competitive storage provider.
24

25 Q. Please briefly describe some of these rules.

26 A. The Commission has created a regulatory construct for independent gas storage in
27 California that permits market based rates for storage providers that bear the risk of
28 investment in their storage facilities. Each of the ISPs in Northern California are fully at

1 risk for their investment in their respective storage facilities. If the settlement in this
2 proceeding is adopted, PG&E will also be fully at risk for its investments in market
3 storage (as opposed to core storage). In addition, the Commission monitors storage
4 activity in Northern California through detailed reports (described below) in order to
5 ensure that no storage provider obtains market power in the Northern California storage
6 market.
7

8 For example, existing Commission rules require ISPs to regularly file all storage
9 contracts with the CPUC Energy Division, and also to report any transactions involving
10 affiliates, as well as any mergers or acquisitions whereby an affiliate would own or control
11 energy assets in Western North America, including both electric generation, transmission
12 and distribution as well as natural gas production, storage, transportation or distribution.
13

14 **VIII. SOCALGAS'S CITATION TO FERC OR TEXAS STORAGE REPORTING**
15 **REQUIREMENTS IS NOT PERSUASIVE PRECEDENT IN THE CONTEXT OF**
16 **THE NORTHERN CALIFORNIA MARKET.**

17 Q. Should information posting requirements be imposed on PG&E based on FERC reporting
18 requirements for gas storage providers?

19 A. No. SoCalGas's witness Watson argues that PG&E should be required to adopt additional
20 information posting requirements in order to match those required by the FERC for
21 Section 7(c) natural gas storage facilities. (Watson Testimony at 4-5.) However, Mr.
22 Watson fails to give sufficient weight to the fact that FERC does not require such
23 reporting requirements for Section 311 gas facilities or Hinshaw gas facilities (those that
24 are entirely intrastate). The policy reason behind this difference is that such facilities are
25 subject to state regulation, and in those cases, FERC forbears imposing its own regulations
26 and defers to state regulation.
27
28

1 As described above, California has instituted its own gas storage regulatory
2 scheme, including requirements that allow it to monitor the workings of the gas storage
3 market in great detail. The Commission has access to every storage agreement entered
4 into by competitive storage providers and is fully capable of ensuring that market power
5 abuses do not take place. The fact that FERC chooses to require a different set of reports
6 or postings from storage operators that it actively regulates is not dispositive, as FERC is
7 also content to allow states to set their own regulatory formats for Section 311 and
8 Hinshaw gas systems. PG&E is a Hinshaw system, and, therefore, FERC has deferred to
9 California's state specific regulatory model for PG&E's gas storage operations. We
10 believe this is both sufficient and appropriate.

11
12 Q. Mr. Watson also cites to gas storage information disclosure policies instituted in Texas.
13 (Watson Testimony at 12.) Should information posting requirements be imposed on
14 PG&E based on Texas posting requirements for gas storage providers?
15

16 A. No. As discussed with regard to FERC posting requirements, the existence of certain
17 posting requirements in Texas does not mean that the same requirements are appropriate
18 for California. In other jurisdictions such as Canada and Oklahoma where Niska Gas
19 operates other storage facilities, it is not required to post storage information.
20 SoCalGas's testimony does not even discuss, let alone distinguish, the California gas
21 market regulatory model and the reporting requirements already in place, nor does
22 SoCalGas demonstrate that the Texas model is superior to those in California or the other
23 jurisdictions mentioned above.
24

25 **IX. SOCALGAS OVERSTATES THE BENEFITS TO BE DERIVED FROM ITS**
26 **PROPOSAL.**

27 Q. Is the posting of storage information in the manner proposed by SoCalGas necessary for
28 customers to benefit from market transparency in the Northern California storage market?

1 A. No. SoCalGas implies that extensive posting of storage contract information is the only
2 way for price discovery to occur. (Watson Testimony at 9-10.) That is not true. Storage
3 customers contact the Northern California ISPs and PG&E routinely to obtain information
4 about current market prices for storage. While there is a robust competitive market in
5 Northern California, there are only a few storage providers, and even with the addition of
6 the current crop of proposed new projects there will only be a handful of providers.
7 Customers can, and do, readily communicate directly with storage providers and compare
8 prices and terms of service.
9

10 Q. Has Wild Goose experienced customer movement based on such “comparison shopping”?

11 A. Indeed. Speaking just for Wild Goose, it has lost customers to other storage providers
12 and signed new customers who previously stored gas with other providers. These
13 customer decisions have come as a direct result of customers comparing the prices and
14 terms of service offered by ISPs (and PG&E market storage). As indicated above,
15 customers are readily able to compare prices and terms of storage service in the Northern
16 California market without the use of any information posting by storage providers.
17 Notwithstanding the posting of SoCalGas storage price information, storage customers in
18 Southern California do not have the same opportunity to compare prices with alternative
19 storage providers as customers have in Northern California.
20
21

22 Q. Does this conclude your testimony?

23 A. Yes.
24
25
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27

28 3278/003/X122902.v1

CERTIFICATE OF SERVICE

I, Linda Chaffee, certify that I have on this 11th day of October 2010 caused a copy of the foregoing

**JOINT REBUTTAL TESTIMONY OF
KRISHNA K. YADAV
ON BEHALF OF WILD GOOSE STORAGE, LLC
AND
DENNIS HENDERSON
ON BEHALF OF GILL RANCH STORAGE, LLC**

to be served on all known parties to A.09-09-013 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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HAND DELIVERY

ALJ John S. Wong
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of October 2010 at San Francisco, California.

/s/ Linda Chaffee
Linda Chaffee

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