

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

Application of Pacific Gas and Electric Company for  
Authority, Among Other Things, to Increase Rates and  
Charges for Electric and Gas Service Effective on  
January 1, 2011.

(U 39 M)

Order Instituting Investigation on the Commission's Own  
Motion into the Rates, Operations, Practices, Service and  
Facilities of Pacific Gas and Electric Company.

Application No. 09-12-020  
(Filed December 21, 2009)

Investigation 10-07-027  
(Filed July 29, 2010)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY  
ON THE PROPOSED DECISION OF ALJ FUKUTOME AND THE  
ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY**

PATRICK G. GOLDEN  
WILLIAM V. MANHEIM  
CRAIG M. BUCHSBAUM  
STEVEN W. FRANK  
ANN H. KIM  
PETER P. VAN MIEGHEM

Law Department  
PACIFIC GAS AND ELECTRIC COMPANY  
Post Office Box 7442  
San Francisco, California 94120  
Telephone: (415) 973-6976  
Fax: (415) 973-5520  
SWF5@pge.com

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

March 21, 2011

## TABLE OF CONTENTS

	Page
I. NON-UTILITY INTERVENORS ARE MISTAKEN ON THE METER ISSUE.....	1
A. Providing a Reasonable Opportunity to Earn a Fair Return is Not a “Gift.” .....	1
B. Intervenors Mischaracterize Prior CPUC Decisions, Including AMI.....	2
1. The PDs Appropriately Focus on the Incremental Cost-Benefit Analysis as a Basis for Distinguishing Prior Cases Denying a Return.....	2
2. The PDs are Correct that PG&E’s Methodology for Recovering Stranded Meter Costs was Adopted in PG&E’s Prior AMI Decisions.....	2
C. Aglet’s Claims of Technical Error are Incorrect. ....	3
II. THE CORRECT STANDARD OF PROOF IS PREPONDERANCE OF EVIDENCE.....	4
III. GREENLINING’S REQUEST FOR ORAL ARGUMENT SHOULD BE DENIED.....	5
IV. THIRTY DAYS IS NOT ENOUGH TIME TO PREPARE THE ANNUAL REPORT.....	5

**TABLE OF AUTHORITIES**

**Page**

**CALIFORNIA CASES**

*Liodas v. Sahadi* 19 Cal 3d 278 (1977) .....4

**CALIFORNIA STATUTES**

Evidence Code

§115.....4  
§190.....4  
§300.....5  
§660.....4  
§664.....4

**CALIFORNIA PUBLIC UTILITIES COMMISSION DECISIONS**

D.83-08-031.....2  
D.01-10-031.....4  
D.06-07-027.....1  
D.08-12-058.....5  
D.09-03-026.....1  
D.09-07-024.....4, 5  
D.10-06-014.....5

**CPUC RULES OF PRACTICE AND PROCEDURE**

Rule 14.3(d).....1

**MISCELLANEOUS**

California Administrative Hearing Practice (2<sup>nd</sup> Ed.) § 7.51 .....5

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY  
ON THE PROPOSED DECISION OF ALJ FUKUTOME AND THE  
ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY**

Pursuant to Rule 14.3(d) of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC), Pacific Gas and Electric Company (PG&E) respectfully submits these reply comments concerning the Proposed Decision (PD) of Assigned Administrative Law Judge (ALJ) David Fukutome and the Alternate Proposed Decision (APD) of CPUC President Michael Peevey (together, the PDs).<sup>1</sup> As explained below, PG&E respectfully requests that the CPUC (i) dismiss intervenors' arguments in support of the PD's treatment of ratemaking on the meter issue, (ii) dismiss intervenors' arguments against the description of the standard of proof, (iii) deny Greenlining's request for oral argument and (iv) require that the first report on cost prioritization be due 90 days after a final decision.

**I. NON-UTILITY INTERVENORS ARE MISTAKEN ON THE METER ISSUE**

**A. Providing a Reasonable Opportunity to Earn a Fair Return is Not a "Gift."**

Intervenors wrongly claim that the APD would be making a "gift" to shareholders of \$37.5 million.<sup>2</sup> The overall return under the APD - averaging the return on the new meters with the reduced return on the old meters<sup>3</sup> - is actually below the return otherwise deemed "fair" by the CPUC. Providing a utility a subpar return for implementing CPUC policies is not a "gift."<sup>4</sup>

As a corollary of their "gift" argument, intervenors also claim that under PG&E's position ratepayers unfairly will be paying for the cost of, and return on, *both* the current meters and the retired meters. However, these assertions are inaccurate based on the CPUC findings in the AMI proceedings.<sup>5</sup> The whole purpose of the incremental cost-benefit analysis conducted by the CPUC in those AMI proceedings was to determine that savings to customers (computed on a present value revenue

---

<sup>1</sup> Opening comments from the other parties were filed on March 14, 2011 by the Division of Ratepayer Advocates (DRA), The Utility Reform Network (TURN), the Greenlining Institute (Greenlining), Aglet Consumer Alliance (Aglet), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E) and Women's Energy Matters (WEM). In addition, comments on the APD were filed jointly by TURN, DRA, Aglet, WEM and DACC (the Joint APD Comments). Unless otherwise noted, the citations herein are to these March 14, 2011 opening comments.

<sup>2</sup> Joint APD Comments, cover page.

<sup>3</sup> PG&E agrees with TURN that: "[t]he Commission needs to keep in mind the other side of the equation here, even though it is only alluded to in the Proposed Decision. The retirement of the electromechanical meters is part and parcel of PG&E's smart meter program." TURN, p. 2.

<sup>4</sup> Greenlining urges shareholders to contribute the return on the retired meters to PG&E's REACH program. (Greenlining, p. 6.) PG&E is proud of the REACH program and supports it through shareholder contributions. However, for the reasons described in this section, it would be wrong to conclude that shareholders are receiving a windfall that should be applied to charitable purposes.

<sup>5</sup> D.09-03-026, *mimeo*, pp. 153-154; D.06-07-027, *mimeo*, pp. 27-30 and p. 50.

requirement, or PVRR, basis) would entirely pay for the cost of, and return on, the new meters. Thus, the CPUC has determined that, far from paying for the cost of, and return on, two sets of meters, customers will receive the new meters at no cost after applying the forecasted savings, with excess savings available to defray the cost of the retired set.

**B. Intervenor Mischaracterize Prior CPUC Decisions, Including AMI.**

**1. The PDs Appropriately Focus on the Incremental Cost-Benefit Analysis as a Basis for Distinguishing Prior Cases Denying a Return.**

TURN wrongly claims that CPUC determinations of ratepayer benefits from AMI implementation should have no bearing on the treatment of retired meter costs.<sup>6</sup> TURN first claims that this situation is “similar” to those involving retired power plants that no longer were economic due to market conditions.<sup>7</sup> While it is true that in both situations ratepayers were benefitted by removing the old assets from service, the similarity ends there. Unlike the AMI proceedings where an investment was required to replace the old assets and a detailed incremental analysis was done to justify the new investment, the case cited by TURN involved a shutdown of a generation facility that could no longer be operated economically.<sup>8</sup> PG&E’s Reply Brief has already explained the many differences between AMI deployment and the cases involving generation plants.<sup>9</sup> TURN also argues that the findings in the prior AMI proceedings should be ignored until they “pencil out” in practice.<sup>10</sup> This argument, too, should be rejected, since it asks the CPUC to engage in after-the-fact second guessing of its own determinations that led to AMI being implemented in the first place.

**2. The PDs are Correct that PG&E’s Methodology for Recovering Stranded Meter Costs was Adopted in PG&E’s Prior AMI Decisions.**

PG&E’s Opening and Reply Briefs set forth the many ways in which PG&E’s proposed recovery of stranded meter costs was implicitly and explicitly adopted in its prior AMI decisions.<sup>11</sup> Notwithstanding PG&E’s clear testimony on this point and TURN’s apparent knowledge - at that time - of PG&E’s intention to include retired meter costs in rate base, TURN repeats its unfounded claim that “the utility’s testimony said nothing *explicit* about continuing to earn the authorized return even after the meters were taken out of service.”<sup>12</sup> Throughout the chapters of its AMI testimony that discuss PG&E’s

---

<sup>6</sup> TURN, pp. 8-11.

<sup>7</sup> TURN, p. 9.

<sup>8</sup> TURN, p. 9.

<sup>9</sup> PG&E’s Reply Brief, pp. 13-18. *See also* D.83-08-031, *as discussed in* PG&E’s Reply Brief, pp. 18-20, which allowed a full return on groups of telephone assets that were replaced due to technological change.

<sup>10</sup> TURN, p. 10. *See also* Greenlining, pp. 5-6.

<sup>11</sup> PG&E Opening Brief, pp. 6-15; PG&E Reply Brief, pp. 22-26.

<sup>12</sup> TURN, p. 5 (emphasis added). *See also* PG&E’s Reply Brief, pp. 26-28.

cost recovery plans and Results of Operations (RO) models, PG&E made clear there would be no change to net plant (rate base) on account of its proposed treatment and this “no change” or “status quo” treatment of retired meter costs was reflected in both the RO model and its cost recovery proposal.<sup>13</sup>

Rather than conceding that this status quo treatment was embedded in the RO model and cost recovery proposals, TURN pulls snippets of testimony and data responses out of context to try to prove its position. For example, TURN cites portions of a chapter of PG&E’s AMI testimony setting forth items that PG&E explained were included in the RO model,<sup>14</sup> but TURN ignores that PG&E had explained in that same chapter that because there would be no change in net plant (i.e., rate base) from retirements, there would effectively be no rate impact reflecting retirements (other than tax consequences, and future salvage and cost of removal).<sup>15</sup>

TURN similarly mischaracterizes PG&E’s response to a data request as affirming that “the record evidence in this GRC contains undisputed evidence that PG&E did not treat the revenue requirements associated with the retired meters as being ‘associated with the upgrade.’”<sup>16</sup> In fact, PG&E’s response indicated that it did not view recovery in rate base of the stranded meter costs (which were sunk costs) as an *incremental* (or marginal) cost or benefit of implementing AMI. Hence, contrary to TURN’s claim, the record evidence in this proceeding showed that retirements were explicitly considered as part of the RO modeling; that rate base would be maintained for retired meters as if the retirement did not occur; and that the only RO consequences from such retirements were for taxes, salvage and cost of removal.

### **C. Aglet’s Claims of Technical Error are Incorrect.**

Aglet incorrectly claims that the PDs contain a technical error by providing “the chosen rate of return on retired meters and on deferred revenue requirements.”<sup>17</sup> Aglet misunderstands the PDs’ mechanism for recovery of retired meter costs. Both PDs have created a mortgage-style recovery of the \$341 million rate base amount. Under this approach, the revenue requirement is leveled with more of the revenue going towards return (interest) in the early years and less going towards return in the later years. Revenues for amortization (principal) have the opposite profile, with less revenue going towards amortization in the early years and more in the later years. Under this approach, all return is on unamortized plant and not on deferred revenue. Aglet calls for a \$7.8 million reduction (using values in

---

<sup>13</sup> See, e.g., A.05-06-028, Exhibit PG&E-5, pp. 3-5, 4-2 and 5-5.

<sup>14</sup> TURN, pp. 6-7, citing various pages in A.05-06-028, Exhibit PG&E-5.

<sup>15</sup> A.05-06-028, Exhibit PG&E-5, pp. 3-5, 4-2 and 5-5.

<sup>16</sup> TURN, p. 6.

<sup>17</sup> Aglet, p. 5 (emphasis in original).

the PD), claiming the “\$7.8 million is what ratepayers would pay PG&E for the privilege of earning a full rate of return on undercollected revenue requirements. It is not the result of the adopted rate of return applied to undepreciated plant.”<sup>18</sup>

Aglet’s statement is fundamentally inconsistent with the intent of the PDs, which clearly calculate the fixed revenue requirements on a mortgage-style basis.<sup>19</sup> Consequently, contrary to Aglet’s conclusion, under the approach adopted in the PDs, the lower revenue requirement in the early years as compared to the traditional declining revenue requirement results in a higher balance of unrecovered costs (i.e., rate base), not deferred revenue. In fact, the methodology incorporated in the PDs would provide PG&E with sufficient current revenues to enable PG&E to earn the rates of return on retired meter rate base envisioned by the PD (equity return at 90% of the embedded cost of debt) and APD (equity return midway between the cost of debt and equity). Aglet’s method would incorrectly and unfairly further reduce PG&E’s returns.

## II. THE CORRECT STANDARD OF PROOF IS PREPONDERANCE OF EVIDENCE

DRA and TURN criticize the PDs for applying a standard of proof of “preponderance of the evidence.”<sup>20</sup> DRA criticizes a “sudden departure from decades of decisions” using the clear and convincing standard, although the practice has not been as uniform as DRA suggests.<sup>21</sup> In fact, in a quotation used by DRA, the CPUC acknowledges that it has “not wholly consistently” applied the clear and convincing standard.<sup>22</sup> DRA criticizes the sufficiency of the CPUC’s citation to Evidence Code 190 for support for the preponderance standard.<sup>23</sup> Yet, DRA fails to cite Evidence Code Section 115, which states, “Except as provided by law, the burden of proof requires proof by a preponderance of the evidence.” This section makes it clear that the party with the burden of proof satisfies it by a preponderance of the evidence unless a greater or lesser burden is imposed by statute or judicial decision.<sup>24</sup> Section 115 has been regularly cited by the CPUC for the principle that the default standard

---

<sup>18</sup> Aglet, p. 7.

<sup>19</sup> Late-Filed Exhibit ALJ-1, Table PG&E TEST YEAR 2011 GRC SETTLEMENT, Column J; and Late-Filed Exhibit ALJ-2, Table PG&E TEST YEAR 2011 GRC SETTLEMENT, Column J.

<sup>20</sup> DRA, pp. 2-4; TURN, pp. 11-12.

<sup>21</sup> DRA, p. 3.

<sup>22</sup> DRA, p. 3, quoting D.01-10-031. Nor is it clear whether the CPUC has been using the phrase “clear and convincing” in its legal sense or in its lay sense. D.08-12-058, *mimeo*, pp. 18-19, fn. 28.

<sup>23</sup> DRA, p. 3.

<sup>24</sup> *Liodas vs. Sahadi*, 19 Cal 3d 278, 291 (1977). DRA’s citations to Evidence Code Section 660 and 664 have no relevance to the question at hand. (DRA, pp. 3-4.) Rather, those sections create a presumption that the Commission acts reasonably in setting rates, and those sections apply where a party has challenged the reasonableness of Commission action.

in cases before the CPUC is the preponderance of evidence standard.<sup>25</sup> The preponderance of evidence standard is also generally acknowledged to be the default standard in California administrative proceedings.<sup>26</sup> Accordingly, the PDs are correct on this issue.

### III. GREENLINING'S REQUEST FOR ORAL ARGUMENT SHOULD BE DENIED

Greenlining's request for a final oral argument in this proceeding<sup>27</sup> is untimely and unnecessary. In this proceeding, any party wishing to make a final oral argument was to file and serve a motion within 10 days of the reply briefs, after which responses could be filed.<sup>28</sup> Motions were to include "the issues to be addressed," "the amount of time requested," and "recommended procedure and order of presentations."<sup>29</sup> Greenlining has not made the requisite showing, nor demonstrated any need for oral argument. At this juncture, PG&E is opposed to Greenlining's request because it is unnecessary and could delay the issuance of a timely decision in the matter.

### IV. THIRTY DAYS IS NOT ENOUGH TIME TO PREPARE THE ANNUAL REPORT

DRA proposes that the first annual reporting requirement concerning reprioritization be due either June 1, 2011, or 30 days after a final decision.<sup>30</sup> For the reasons explained in PG&E's opening comments, the first report should be due no earlier than 90 days after the issuance of a final decision, which would mean no earlier than June 22, 2011 (assuming a decision on March 24, 2011).

Respectfully submitted,

By: \_\_\_\_\_ /s/ \_\_\_\_\_

STEVEN W. FRANK  
Post Office Box 7442  
San Francisco, California 94120  
Telephone: (415) 973-6976  
Fax: (415) 973-5520  
E-mail: [SWF5@pge.com](mailto:SWF5@pge.com)  
Attorney for  
PACIFIC GAS AND ELECTRIC COMPANY

March 21, 2011

---

<sup>25</sup> See, e.g., D.10-06-014, *mimeo*, p. 4; D.08-12-058, *mimeo*, p. 19.

<sup>26</sup> California Administrative Hearing Practice (2<sup>nd</sup> Ed.), Section 7.51, page 376. The Evidence Code does not necessarily apply to Commission proceedings, but the Commission can choose to apply the code. (Evidence Code Section 300.)

<sup>27</sup> Greenlining, p. 7.

<sup>28</sup> Assigned Commissioner's Ruling and Scoping Memo (March 5, 2010) (Scoping Memo), p. 8.

<sup>29</sup> Scoping Memo, p. 8.

<sup>30</sup> DRA, p. 4.





**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST, B30A  
SAN FRANCISCO CA 94105-1814  
Email: lawcpuccases@pge.com  
Status: INFORMATION

BRUCE P. FRASER  
**PACIFIC GAS & ELECTRIC COMPANY**  
77 BEALE ST, B9A  
SAN FRANCISCO CA 94105  
Email: bpf2@pge.com  
Status: INFORMATION

PATRICK G. GOLDEN ATTORNEY  
**PACIFIC GAS AND ELECTRIC COMPANY**  
77 BEALE ST, MAIL CODE B30A  
SAN FRANCISCO CA 94105  
FOR: Pacific gas & Electric Company  
Email: pgg4@pge.com  
Status: PARTY

Truman L. Burns  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY COST OF SERVICE & NATURAL GAS BRANCH  
505 VAN NESS AVE RM 4205  
SAN FRANCISCO CA 94102-3214  
Email: txb@cpuc.ca.gov  
Status: STATE-SERVICE

Belinda Gatti  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: beg@cpuc.ca.gov  
Status: STATE-SERVICE

Elaine Chan Lau  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: ec2@cpuc.ca.gov  
Status: STATE-SERVICE

SCOTT MURTISHAW  
**CPUC**  
EMAIL ONLY  
EMAIL ONLY CA 0  
Email: SGM@cpuc.ca.gov  
Status: STATE-SERVICE

CASE ADMINISTRATION  
**PACIFIC GAS & ELECTRIC COMPANY**  
77 BEALE ST, MC B9A  
SAN FRANCISCO CA 94177  
Email: RegRelCPUCcases@pge.com  
Status: INFORMATION

BRIAN K. CHERRY DIRECTOR, REGULATORY  
RELATIONS  
**PACIFIC GAS AND ELECTRIC COMPANY (39)**  
77N BEALE ST., PO BOX 770000, MC B10C  
SAN FRANCISCO CA 94177  
FOR: Pacific Gas and Electric Company  
Email: bkc7@pge.com  
Status: PARTY

Donna-Fay Bower  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY COST OF SERVICE & NATURAL GAS BRANCH  
505 VAN NESS AVE RM 4205  
SAN FRANCISCO CA 94102-3214  
Email: dfb@cpuc.ca.gov  
Status: STATE-SERVICE

David K. Fukutome  
**CALIF PUBLIC UTILITIES COMMISSION**  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
505 VAN NESS AVE RM 5042  
SAN FRANCISCO CA 94102-3214  
Email: dkf@cpuc.ca.gov  
Status: STATE-SERVICE

Donald J. Lafrenz  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: dlf@cpuc.ca.gov  
Status: STATE-SERVICE

Karl Meeusen  
**CALIF PUBLIC UTILITIES COMMISSION**  
EXECUTIVE DIVISION  
505 VAN NESS AVE RM 5217  
SAN FRANCISCO CA 94102-3214  
Email: kkm@cpuc.ca.gov  
Status: STATE-SERVICE

Richard A. Myers  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY DIVISION  
505 VAN NESS AVE AREA 4-A  
SAN FRANCISCO CA 94102-3214  
Email: ram@cpuc.ca.gov  
Status: STATE-SERVICE

# THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: March 16, 2011

## CPUC DOCKET NO. A0912020 - I1007027

Total number of addressees: 98

David Peck  
**CALIF PUBLIC UTILITIES COMMISSION**  
ELECTRICITY PLANNING & POLICY BRANCH  
505 VAN NESS AVE RM 4103  
SAN FRANCISCO CA 94102-3214  
Email: dbp@cpuc.ca.gov  
Status: STATE-SERVICE

Robert M. Pocta  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY COST OF SERVICE & NATURAL GAS BRANCH  
505 VAN NESS AVE RM 4205  
SAN FRANCISCO CA 94102-3214  
Email: rmp@cpuc.ca.gov  
Status: STATE-SERVICE

Clayton K. Tang  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY COST OF SERVICE & NATURAL GAS BRANCH  
505 VAN NESS AVE RM 4205  
SAN FRANCISCO CA 94102-3214  
Email: ckt@cpuc.ca.gov  
Status: STATE-SERVICE

KAREN TERRANOVA  
**ALCANTAR & KAHL, LLP**  
33 NEW MONTGOMERY ST, STE 1850  
SAN FRANCISCO CA 94105  
Email: filings@a-klaw.com  
Status: INFORMATION

RICHARD MCCANN  
**ASPEN ENVIRONMENTAL GROUP**  
8801 FOLSOM BLVD, STE 290  
SACRAMENTO CA 95826-3250  
Email: rmccann@umich.edu  
Status: INFORMATION

ROBERT BERMAN  
**BERMAN ECONOMICS**  
1915 GRAND COURT  
VIENNA VA 22182  
Email: BermanEconomics@gmail.com  
Status: INFORMATION

DAVID J. BYERS, ESQ. ATTORNEY  
**MCCRACKEN, BYERS & HAESLOOP, LLP**  
870 MITTEN ROAD  
BURLINGAME CA 94010  
FOR: California City-County Street Light Association  
Email: dbyers@landuselaw.com  
Status: PARTY

Dao A. Phan  
**CALIF PUBLIC UTILITIES COMMISSION**  
ENERGY COST OF SERVICE & NATURAL GAS BRANCH  
505 VAN NESS AVE RM 4205  
SAN FRANCISCO CA 94102-3214  
Email: dao@cpuc.ca.gov  
Status: STATE-SERVICE

Nicholas Sher  
**CALIF PUBLIC UTILITIES COMMISSION**  
LEGAL DIVISION  
505 VAN NESS AVE RM 4007  
SAN FRANCISCO CA 94102-3214  
Email: nms@cpuc.ca.gov  
Status: STATE-SERVICE

JAMES WEIL DIRECTOR  
**AGLET CONSUMER ALLIANCE**  
PO BOX 1916  
SEBASTOPOL CA 95473  
FOR: Aglet Consumer Alliance  
Email: jweil@aglet.org  
Status: PARTY

EDWARD G. POOLE  
**ANDERSON & POOLE**  
601 CALIFORNIA ST, STE 1300  
SAN FRANCISCO CA 94108-2812  
Email: epoole@adplaw.com  
Status: INFORMATION

REED V. SCHMIDT  
**BARTLE WELLS ASSOCIATES**  
1889 ALCATRAZ AVE  
BERKELEY CA 94703-2714  
Email: rschmidt@bartlewells.com  
Status: INFORMATION

SCOTT BLAISING  
**BRAUN BLAISING MCLAUGHLIN, P.C.**  
915 L ST, STE 1270  
SACRAMENTO CA 95814  
Email: blaising@braunlegal.com  
Status: INFORMATION

**CALIFORNIA ENERGY MARKETS**  
425 DIVISADERO ST. STE 303  
SAN FRANCISCO CA 94117-2242  
Email: cem@newsdata.com  
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

KAREN NORENE MILLS ATTORNEY  
**CALIFORNIA FARM BUREAU FEDERATION**  
EMAIL ONLY  
EMAIL ONLY CA 0  
FOR: California Farm Bureau Federation  
Email: kmills@cfbf.com  
Status: PARTY

JACK D'ANGELO  
**CATAPULT CAPITAL MANAGEMENT LLC**  
650 5TH AVE, 32ND FLR  
NEW YORK NY 10019  
Email: jdangelo@catapult-llc.com  
Status: INFORMATION

RACHAEL E. KOSS  
**ADAMS BROADWELL JOSEPH & CARDOZO**  
601 GATEWAY BLVD, STE 1000  
SOUTH SAN FRANCISCO CA 94080  
FOR: Coalition of California Utility Employee  
Email: rkoss@adamsbroadwell.com  
Status: PARTY

JAN REID  
**COAST ECONOMICS CONSULTING**  
3185 GROSS ROAD  
SANTA CRUZ CA 95062  
Email: janreid@coastecon.com  
Status: INFORMATION

NICOLE A. BLAKE STAFF ATTORNEY  
**CONSUMER FEDERATION OF CALIFORNIA**  
1107 9TH ST., STE. 625  
SACRAMENTO CA 95814  
FOR: Consumer Federation of California  
Email: blake@consumercal.org  
Status: PARTY

**DAVIS WRIGHT TREMAINE LLP**  
EMAIL ONLY  
EMAIL ONLY CA 0  
Email: DWTCPUEDOCKETS@dwt.com  
Status: INFORMATION

SALLE E. YOO  
**DAVIS WRIGHT TREMAINE LLP**  
505 MONTGOMERY ST, STE 800  
SAN FRANCISCO CA 94111  
Email: salleyoo@dwt.com  
Status: INFORMATION

JOHN LARREA  
**CALIFORNIA LEAGUE OF FOOD PROCESSORS**  
1755 CREEKSIDE OAKS DRIVE, STE 250  
SACRAMENTO CA 95833  
Email: john@clfp.com  
Status: INFORMATION

WILLIAM K. SANDERS DEPUTY CITY ATTORNEY  
**OFFICE OF THE CITY ATTORNEY**  
1 DR. CARLTON B. GOODLETT PLACE, RM 234  
SAN FRANCISCO CA 94102-4682  
FOR: City and County of San Francisco  
Email: william.sanders@sfgov.org  
Status: PARTY

MARC D. JOSEPH  
**ADAMS BROADWELL JOSEPH & CARDOZO**  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO CA 94080  
FOR: Coalition of California Utility Employees  
Email: mdjoseph@adamsbroadwell.com  
Status: INFORMATION

WILLIAM MITCHELL  
**COMPETITIVE POWER VENTURES, INC.**  
55 2ND ST, STE 525  
SAN FRANCISCO CA 94105  
Email: will.mitchell@cpv.com  
Status: INFORMATION

VIDHYA PRABHAKARAN  
**DAVIS WRIGHT & TREMAINE LLP**  
505 MONTGOMERY ST, STE 800  
SAN FRANCISCO CA 94111  
Email: vidhyaprabhakaran@dwt.com  
Status: INFORMATION

JUDY PAU  
**DAVIS WRIGHT TREMAINE LLP**  
EMAIL ONLY  
EMAIL ONLY CA 00000-0000  
Email: judypau@dwt.com  
Status: INFORMATION

RALPH R. NEVIS  
**DAY CARTER & MURPHY LLP**  
3620 AMERICAN RIVER DR., STE 205  
SACRAMENTO CA 95864  
Email: rnevis@daycartermurphy.com  
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

SCOTT SENCHAK  
**DECADE CAPITAL**  
EMAIL ONLY  
EMAIL ONLY CA 00000-0000  
Email: scott.senchak@decade-llc.com  
Status: INFORMATION

WILLIAM F. DIETRICH ATTORNEY  
**DIETRICH LAW**  
2977 YGNACIO VALLEY ROAD, NO. 613  
WALNUT CREEK CA 94598-3535  
Email: dietrichlaw2@earthlink.net  
Status: INFORMATION

MELISSA A. KASNITZ ATTORNEY  
**DISABILITY RIGHTS ADVOCATES**  
2001 CENTER ST, FOURTH FLR  
BERKELEY CA 94704-1204  
FOR: Disability Rights Advocates  
Email: pucservice@dralegal.org  
Status: PARTY

MICHELLE GRANT  
**DYNEGY, INC.**  
EMAIL ONLY  
EMAIL ONLY TX 00000-0000  
Email: michelle.d.grant@dynegy.com  
Status: INFORMATION

LYNN HAUG  
**ELLISON, SCHNEIDER & HARRIS L.L.P.**  
2600 CAPITAL AVE, STE 400  
SACRAMENTO CA 95816-5931  
Email: lmh@eslawfirm.com  
Status: INFORMATION

KEVIN J. SIMONSEN  
**ENERGY MANAGEMENT SERVICES**  
646 E. THIRD AVE.  
DURANGO CA 81301  
FOR: Energy Management Services  
Email: kjsimonsen@ems-ca.com  
Status: PARTY

BRIAN T. CRAGG  
**GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY**  
505 SANSOME ST, STE 900  
SAN FRANCISCO CA 94111  
FOR: Engineers and Scientists of California Local 20  
Email: bcragg@goodinmacbride.com  
Status: PARTY

LAUREN DUKE  
**DEUTSCHE BANK SECURITIES INC.**  
EMAIL ONLY  
EMAIL ONLY NY 0  
Email: lauren.duke@db.com  
Status: INFORMATION

KARLA GILBRIDE  
**DISABILITY RIGHTS ADVOCATES**  
2001 CENTER ST, 4TH FLR  
BERKELEY CA 94704-1204  
Email: pucservice@dralegal.org  
Status: INFORMATION

Laura J. Tudisco  
**CALIF PUBLIC UTILITIES COMMISSION**  
LEGAL DIVISION  
505 VAN NESS AVE RM 5032  
SAN FRANCISCO CA 94102-3214  
FOR: Division of Ratepayers Advocate  
Email: ljt@cpuc.ca.gov  
Status: PARTY

WENDY L. ILLINGWORTH  
**ECONOMIC INSIGHTS**  
320 FEATHER LANE  
SANTA CRUZ CA 95060  
Email: wendy@econinsights.com  
Status: INFORMATION

CAROLYN KEHREIN  
**ENERGY MANAGEMENT SERVICES**  
2602 CELEBRATION WAY  
WOODLAND CA 95776  
Email: cmkehrein@ems-ca.com  
Status: INFORMATION

NORA SHERIFF  
**ALCANTAR & KAHL**  
33 NEW MONTGOMERY ST, STE 1850  
SAN FRANCISCO CA 94105  
FOR: Energy Producers & Users Coalition  
Email: nes@a-klaw.com  
Status: PARTY

BARBARA R. BARKOVICH  
44810 ROSEWOOD TERRACE  
MENDOCINO CA 95460  
Email: brbarkovich@earthlink.net  
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

DONN DAVY  
EMAIL ONLY  
EMAIL ONLY CA 0  
Email: dfdavy@well.com  
Status: INFORMATION

DAVID MARCUS  
PO BOX 1287  
BERKELEY CA 94701  
Email: dmarcus2@sbcglobal.net  
Status: INFORMATION

SEAN P. BEATTY DIR - WEST REGULATORY AFFAIRS  
**GENON ENERGY, INC.**  
PO BOX 192  
PITTSBURGH CA 94565  
Email: sean.beatty@genon.com  
Status: INFORMATION

STEVEN KELLY POLICY DIRECTOR  
**INDEPENDENT ENERGY PRODUCERS ASSOCIATION**  
1215 K ST, STE 900  
SACRAMENTO CA 95814  
FOR: Independent Energy Producers Association  
Email: steven@iepa.com  
Status: PARTY

GARRICK JONES  
**JBS ENERGY**  
311 D ST  
WEST SACRAMENTO CA 95605  
Email: garrick@jbsenergy.com  
Status: INFORMATION

IVANA ERGOVIC  
**JEFFERIES & COMPANY, INC.**  
520 MADISON AVE, 19TH FLR  
NEW YORK NY 10022  
Email: IERGovic@Jefferies.com  
Status: INFORMATION

MICHAEL TURNIPSEED EXEC. DIR.  
**KERN COUNTY TAXPAYERS ASSOCIATION**  
331 TRUTUN AVE  
BAKERSFIELD CA 93301  
FOR: Kern County Taxpayers Association  
Email: kerntax@kerntaxpayers.org  
Status: INFORMATION

JAMES J. HECKLER  
**LEVIN CAPITAL STRATEGIES**  
595 MADISON AVE  
NEW YORK NY 10022  
Email: jheckler@levincap.com  
Status: INFORMATION

CLEO ZAGREAN  
**MACQUARIE CAPITAL (USA)**  
EMAIL ONLY  
EMAIL ONLY NY 0  
Email: cleo.zagrean@macquarie.com  
Status: INFORMATION

ANN L. TROWBRIDGE  
**DAY CARTER MURPHY LLC**  
3620 AMERICAN RIVER DRIVE, STE 205  
SACRAMENTO CA 95864  
FOR: Merced Irrigation District/Modesto Irrigation District  
Email: atrowbridge@daycartermurphy.com  
Status: PARTY

NAAZ KHUMAWALA  
**MERRILL LYNCH, PIERCE, FENNER & SMITH**  
EMAIL ONLY  
EMAIL ONLY TX 0  
Email: naaz.khumawala@baml.com  
Status: INFORMATION

JOY A. WARREN  
**MODESTO IRRIGATION DISTRICT**  
1231 11TH ST  
MODESTO CA 95354  
Email: joyw@mid.org  
Status: INFORMATION

**MRW & ASSOCIATES, LLC**  
EMAIL ONLY  
EMAIL ONLY CA 0  
Email: mrw@mrwassoc.com  
Status: INFORMATION

MARTIN A. MATTES COUNSEL  
**NOSSAMAN, LLP**  
50 CALIFORNIA ST, 34TH FLR  
SAN FRANCISCO CA 94111-4799  
Email: mmattes@nossaman.com  
Status: INFORMATION

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

THOMAS J. LONG  
**OFFICE OF THE CITY ATTORNEY**  
CITY HALL, RM 234  
SAN FRANCISCO CA 94102  
Email: thomas.long@sfgov.org  
Status: INFORMATION

JIM ROSS  
**RCS, INC.**  
500 CHESTERFIELD CENTER, STE 320  
CHESTERFIELD MO 63017  
Email: jimross@r-c-s-inc.com  
Status: INFORMATION

KEITH MELVILLE  
**SAN DIEGO GAS & ELECTRIC COMPANY**  
101 ASH ST, HQ 13D  
SAN DIEGO CA 92101  
FOR: San Diego Gas & Electric/Southern California Gas  
Company  
Email: KMelville@SempraUtilities.com  
Status: PARTY

MANUEL RAMIREZ  
**SAN FRANCISCO PUC - POWER ENTERPRISE**  
1155 MARKET ST, 4TH FLR  
SAN FRANCISCO CA 94103  
Email: mramirez@sflower.org  
Status: INFORMATION

EDWARD W. O'NEILL  
**DAVIS WRIGHT TREMAINE LLP**  
505 MONTGOMERY ST, STE 800  
SAN FRANCISCO CA 94111-6533  
FOR: South San Joaquin Irrigation District  
Email: edwardoneill@dwt.com  
Status: PARTY

HERB EMMRICH SAN DEIGO GAS & ELECTRIC  
COMPANY  
**SOUTHERN CALIFORNIA GAS CO., GT14D6**  
555 WEST 5TH ST  
LOS ANGELES CA 90013  
Email: HEmmrich@SempraUtilities.com  
Status: INFORMATION

KRIS G. VYAS  
**SOUTHERN CALIFORNIA EDISON COMPANY**  
QUAD 3-B  
2244 WALNUT GROVE AVE  
ROSEMEAD CA 91770  
Email: kris.vyas@sce.com  
Status: INFORMATION

ANDERS NIELSEN  
**OPEN TOP SIGHTSEEING SAN FRANCISCO, LLC**  
5500 TUXEDO ROAD  
HYATTSVILLE MD 20781  
Email: anders@opentopensightseeing.com  
Status: INFORMATION

SUE MARA  
**RTO ADVISORS, LLC**  
164 SPRINGDALE WAY  
REDWOOD CITY CA 94062  
Email: sue.mara@rtoadvisors.com  
Status: INFORMATION

CENTRAL FILES  
**SAN DIEGO GAS AND ELECTRIC CO.**  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO CA 92123  
Email: CentralFiles@SempraUtilities.com  
Status: INFORMATION

FRASER D. SMITH CITY AND COUNTY OF SAN  
FRANCISCO  
**SAN FRANCISCO PUBLIC UTILITIES COMM**  
1155 MARKET ST, 4TH FLR  
SAN FRANCISCO CA 94103  
Email: fsmith@sflower.org  
Status: INFORMATION

CASE ADMINISTRATION  
**SOUTHERN CALIFORNIA EDISON COMPANY**  
2244 WALNUT GROVE AVE, RM 370  
ROSEMEAD CA 91770  
Email: case.admin@sce.com  
Status: INFORMATION

ANDREW STEINBERG  
**SOUTHERN CALIFORNIA GAS CO.**  
555 W. 5TH ST, GT 14D6  
LOS ANGELES CA 90013-1034  
Email: ASteinberg@SempraUtilities.com  
Status: INFORMATION

FRANCIS MCNULTY ATTORNEY  
**SOUTHERN CALIFORNIA EDISON COMPANY**  
2244 WALNUT GROVE AVE  
ROSEMEAD CA 91770  
FOR: Southern California Edison  
Email: francis.mcnulty@sce.com  
Status: PARTY

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

Total number of addressees: 98

STEPHANIE C. CHEN  
**THE GREENLINING INSTITUTE**  
EMAIL ONLY  
EMAIL ONLY CA 0  
FOR: The Greenlining Institute  
Email: stephaniec@greenlining.org  
Status: PARTY

ENRIQUE GALLARDO  
**THE GREENLINING INSTITUTE**  
1918 UNIVERSITY AVE., 2ND FLR  
BERKELEY CA 94704-1051  
Email: enriqueg@greenlining.org  
Status: INFORMATION

SAMUEL S. KANG  
**THE GREENLINING INSTITUTE**  
1918 UNIVERSITY AVE, 2ND FLR.  
BERKELEY CA 94704  
Email: samuelk@greenlining.org  
Status: INFORMATION

ROBERT FINKELSTEIN  
**THE UTILITY REFORM NETWORK**  
115 SANSOME ST, STE 900  
SAN FRANCISCO CA 94104  
Email: bfinkelstein@turn.org  
Status: INFORMATION

HAYLEY GOODSON STAFF ATTORNEY  
**THE UTILITY REFORM NETWORK**  
EMAIL ONLY  
EMAIL ONLY CA 00000-0000  
FOR: The Utility Reform Network  
Email: hayley@turn.org  
Status: PARTY

JULIEN DUMOULIN-SMITH ASSOCIATE ANALYST  
**UBS INVESTMENT RESEARCH**  
1285 AVE OF THE AMERICAS  
NEW YORK NY 10019  
Email: julien.dumoulin-smith@ubs.com  
Status: INFORMATION

PAUL KERKORIAN  
**UTILITY COST MANAGEMENT LLC**  
6475 N. PALM AVE, STE 105  
FRESNO CA 93704  
Email: pk@utilitycostmanagement.com  
Status: INFORMATION

ASHAR KHAN  
**VISIUM ASSET MANAGEMENT**  
EMAIL ONLY  
EMAIL ONLY NY 0  
Email: akhan@visiumfunds.com  
Status: INFORMATION

ROBERT RATHIE  
**WELLINGTON LAW OFFICE**  
857 CASS ST, STE D  
MONTEREY CA 93940  
Email: info@dcisc.org  
Status: INFORMATION

DANIEL W. DOUGLASS  
**DOUGLASS & LIDDELL**  
EMAIL ONLY  
EMAIL ONLY CA 0  
FOR: Western Power Trading Forum/Alliance for Retail  
Energy Markets/Equinix, Inc./Direct Access Customer  
Coalition  
Email: douglass@energyattorney.com  
Status: PARTY

MARTIN HOMEC  
EMAIL ONLY  
EMAIL ONLY CA 00000-0000  
FOR: Women's Energy Matters  
Email: martinhomec@gmail.com  
Status: INFORMATION

BARBARA GEORGE  
**WOMEN'S ENERGY MATTERS**  
PO BOX 548  
FAIRFAX CA 94978-0548  
FOR: Womern's Energy Matters  
Email: wem@igc.org  
Status: PARTY

ANDREW YIM  
**ZIMMER LUCAS PARTNERS**  
535 MADISON AVE., 6TH FLR  
NEW YORK NY 10022  
Email: Yim@ZimmerLucas.com  
Status: INFORMATION

ADAR ZANGO ANALYST  
**ZIMMER LUCAS PARTNERS**  
535 MADISON - 6TH FLR  
NEW YORK NY 10022  
Email: zango@zimmerlucas.com  
Status: INFORMATION



**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
EMAIL SERVICE LIST**

Last Updated: March 16, 2011

**CPUC DOCKET NO. A0912020 - I1007027**

akhan@visiumfunds.com;anders@opentopensightseeing.com;ASteinberg@SempraUtilities.com;atrowbridge@daycartermurphy.com;bcragg@goodinmacbride.com;beg@cpuc.ca.gov;BermanEconomics@gmail.com;bfinkelstein@turn.org;bkc7@pge.com;blaising@braunlegal.com;blake@consumercal.org;bpf2@pge.com;brbarkovich@earthlink.net;case.admin@sce.com;cem@newsdata.com;CentralFiles@SempraUtilities.com;ckt@cpuc.ca.gov;cleo.zagrean@macquarie.com;cmkehrein@ems-ca.com;dao@cpuc.ca.gov;dbp@cpuc.ca.gov;dbyers@landuselaw.com;dfb@cpuc.ca.gov;dfdavy@well.com;dietrichlaw2@earthlink.net;dkf@cpuc.ca.gov;dlf@cpuc.ca.gov;dmarcus2@sbcglobal.net;douglass@energyattorney.com;DWTCPUCDOCKETS@dwt.com;ec2@cpuc.ca.gov;edwardoneill@dwt.com;enriqueg@greenlining.org;epoole@adplaw.com;filings@aklaw.com;francis.mculty@sce.com;fsmith@swater.org;garrick@jbsenergy.com;hayley@turn.org;HEmmerich@SempraUtilities.com;IErgovic@Jefferies.com;info@dcisc.org;janreid@coastecon.com;jdangelo@catapult-llc.com;jheckler@levincap.com;jimross@r-c-s-inc.com;john@clfp.com;joyw@mid.org;judypau@dwt.com;julien.dumoulin-smith@ubs.com;jweil@aglet.org;kerntax@kerntaxpayers.org;kjsimonsen@ems-ca.com;kkm@cpuc.ca.gov;KMelville@SempraUtilities.com;kmills@cfbf.com;kris.vyas@sce.com;lauren.dukey@db.com;lawcpucases@pge.com;ljt@cpuc.ca.gov;lmh@eslawfirm.com;martinhomec@gmail.com;mdjoseph@adamsbroadwell.com;michelle.d.grant@dynegy.com;mmattes@nossaman.com;mramirez@swater.org;mrw@mrwassoc.com;naaz.khumawala@bamf.com;nes@aklaw.com;nms@cpuc.ca.gov;pgg4@pge.com;pk@utilitycostmanagement.com;pucservice@dralegal.org;pucservice@dralegal.org;ram@cpuc.ca.gov;RegRelCPUCCases@pge.com;rkoss@adamsbroadwell.com;rmccann@umich.edu;rmp@cpuc.ca.gov;rnevis@daycartermurphy.com;rschmidt@bartlewells.com;salleyo@dwt.com;samuelk@greenlining.org;scott.senchak@decade-llc.com;sean.beatty@genon.com;SGM@cpuc.ca.gov;stephaniec@greenlining.org;steven@iepa.com;sue.mara@rtoadvisors.com;thomas.long@sfgov.org;txb@cpuc.ca.gov;vidhyaprabakaran@dwt.com;wem@igc.org;wendy@econinsights.com;will.mitchell@cpv.com;william.sanders@sfgov.org;Yim@ZimmerLucas.com;zango@zimmerlucas.com;