BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U39E) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014.	Application 11-03-001 (Filed March 1, 2011)
Application of San Diego Gas & Electric Company (U902M) for Approval of Demand Response Programs and Budgets for Years 2012-2014.	Application 11-03-002 (Filed March 1, 2011)
Application of Southern California Edison Company (U338E) for Approval of Demand Response Programs, Activities and Budgets for 2012-2014.	Application 11-03-003 (Filed March 1, 2011)

PROTEST OF THE DIVISION OF RATEPAYER ADVOCATES

KE HAO OUYANG
RADU CIUPAGEA
Public Utilities Regulatory Analysts

SUDHEER GOKHALE
Senior Utilities Engineer
Division of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2247
E-mail: skg@cpuc.ca.gov

LISA-MARIE SALVACION
Attorney for the Division of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2069
Fax: (415) 703-2262
E-mail: lms@cpuc.ca.gov

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**PROTEST OF
THE DIVISION OF RATEPAYER ADVOCATES**

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates ("DRA") hereby submits this protest to the three electric utilities' request for approval for their 2012-2014 Demand Response Programs and Budgets. In a March 31, 2011 e-mail to the parties, Administrative Law Judge ("ALJ") Kelly A. Hymes clarified that protests to these applications are due Monday, April 4, 2011; thus, this filing is timely.

I. INTRODUCTION

On March 1, 2011, the following investor-owned utilities ("IOUs") filed the following applications requesting Commission approval of their respective 2012-2014 Demand Response ("DR") Programs and Budgets:

- Southern California Edison Company ("SCE"), A.11-03-003;

- San Diego Gas & Electric Company ("SDG&E") A.11-03-002;
- Pacific Gas & Electric Company ("PG&E"), A.11-03-001.

On March 30, 2011, all three applications were consolidated. Commissioner Michael R. Peevey and ALJ Hymes are assigned to this proceeding.

Based on the applications, supporting testimony, the three IOUs, in summary, request the following:

	SCE A.11-03-003	**PG&E** A.11-03-001	**SDG&E** A.11-03-002
Requested Amount (2012-2014)	$229 Million[1]	$234.4 Million[2]	$69.2 Million[3]
Load Reduction by 2014	1,868 MW [4]	1,116 MW[5] (without bilateral aggregator contracts) 1,325 MW[6] (with bilateral aggregator contracts	220 MW[7]
Third-Party Contracts (2012-2014)	None [8]	TBD[9]	None[10]

II. ISSUES ANTICIPATED

DRA intends to conduct discovery and review the IOUs' applications, prepared testimony, and workpapers, and will submit a report with its recommendations. While it

[1] *Application of Southern California Edison Company (U 338-E) for Approval of Demand Response Programs, Activities and Budgets for 2012-2014*, filed March 1, 2011, p. 7, Table III-2.
[2] *Application of Pacific Gas and Electric Company (U 39-E) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014*, filed March 1, 2011, p. 9.
[3] *Application of San Diego Gas & Electric Company (U 902-M) for Approval of Demand Response Programs and Budgets for Years 2012-2014*, filed March 1, 2011, p. 7, Table A-1.
[4] SCE Prepared Testimony, Ex. SCE-1, Vol. 4, p. 19, Table II-3.
[5] PG&E's Prepared Testimony, p. 2-4, Table 2-2, lns. 5-6.
[6] *Id.*, ln. 20.
[7] SDG&E's Prepared Testimony, Ch. III, p. GMK-1.
[8] SCE is not seeking to replace its existing aggregator contracts that expire in 2012.
[9] PG&E seeks permission to issue an RFP in 2011 to solicit new aggregator contracts to replace its existing contracts.
[10] SDG&E is not seeking to obtain any additional aggregator contracts beyond the one 15 year contract it signed in 2009.

is still too early to identify all issues, based on a preliminary review of the application materials, DRA identifies the issues below in support of its protest. DRA reserves the right to raise any additional issues it finds over the course of discovery.

A. ISSUES COMMON TO ALL THREE APPLICATIONS

1. Cost-Effectiveness

DRA wants to ensure that all costs in the proposed budgets are accounted for in the programs' cost-effectiveness analysis. DRA will review the IOUs' cost-effectiveness results and analysis, as well as deviations from the Commission adopted cost-effectiveness protocols, if any. For example, to calculate the Availability Adjustment Factor ("A Factor"), SCE uses E3's Avoided Cost Calculator top 250 load hours.[11] PG&E presents its analysis using both the default Loss of Load Expectation ("LOLE") percentages in the E3's Avoided Cost Calculator and its own LOLE percentages.[12] Rather than using the top 250 hours, SDG&E presents its analysis using a top 100 load hours approach.[13] SDG&E has not followed the Commission's guidelines to present all calculations—both with the values generated by the E3 Avoided Cost Calculator and the alternate values.[14] The Cost-Effectiveness Protocols state,

> LSEs will be permitted to use their LOLE/LOLP models as an alternate to the method described above. However, they must provide **both** analyses so that all parties can compare the results.[15]

DRA would need to review SDG&E's analysis using the E3 Avoided Cost Calculator top 250 load hours. Both PG&E and SDG&E need to clearly explain and document their

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[11] The DR Avoided Cost Calculator. *See* http://www.ethree.com/public_projects/cpucdr.html.
[12] PG&E's Prepared Testimony, p. 9-7.
[13] SDG&E Prepared Testimony, Ch. IV, p. KCM-4. DRA's initial review is based on the original testimony, not the amended testimony SDG&E served on March 25, 2011. DRA expects to review the amended testimony by the prehearing conference date to update any issues with regard to SDG&E.
[14] *Decision Adopting a Method for Estimating the Cost Effectiveness of Demand Response Activities,* D.10-12-024, dated December 16, 2010, Attachment 1, p. 24.
[15] *Id.*

LOLE and LOLP models, including any proprietary models, and how they differ from E3's Avoided Cost Calculator model.

a) Avoided Costs

Although the Commission has now adopted the final cost-effectiveness protocols,[16] the Commission states that the cost-effectiveness protocols are not intended as "the means by which the Commission will use these protocols to determine whether to pursue various DR programs, activities or policies."[17] The adopted protocols are based on the long-term avoided generation capacity costs determined from a new combustion turbine ("CT")[18] and do not take into account the current and expected capacity surplus in California for the next several years.[19] At a minimum, the current capacity surplus should be an important consideration when approving programs that are only marginally cost-effective.

b) Load Impacts

One of the important inputs in the determination of cost effectiveness is the *ex-ante* estimated load impacts, both at the program and portfolio levels. Although the Commission has adopted the final load impact protocols in Rulemaking 07-01-041, it also provided considerable flexibility to each utility regarding the assumptions the IOU can make in applying the protocols. In addition, to the extent a DR program's *ex-ante* load impacts differ from its Net Qualifying Capacity ("NQC") for Resource Adequacy ("RA") purposes, the true value of the program in avoiding or deferring new generation capacity could be different. DRA would like to review the IOUs' load impact assumptions carefully in the RA context.

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[16] *Decision Adopting a Method for Estimating the Cost Effectiveness of Demand Response Activities,* D.10-12-024, dated December 16, 2010.
[17] *Id.*, Attachment 1, p. 5.
[18] *Id.*, p. 13.
[19] *California ISO 2010 Summer Loads and Resources Operations Preparedness Assessment*, dated May 10, 2010, p. 4, Table 1. The Planning Reserve calculation shows NP-26 with a 38.5% Planning Reserve for the Summer 2010. *See* http://www.caiso.com/2793/2793ae4d395f2.pdf.

2. Programs' Compatibility with the RA rules

The new RA rules in D.10-06-036 include changes to the event hours for RA.[20] DRA will examine the compatibility of IOU programs with the new RA rules and explore ways to make them compatible in cases where they are not.

3. Direct Participation in CAISO Markets

DRA will investigate how and to what extent the current and proposed programs will integrate with California Independent System Operator ("CAISO") grid operations, including the utilities' ability to call DR programs by local capacity area in a cost-effective manner.

4. Authority for Bi-lateral Agreements with Third-Party DR Aggregators

Only PG&E proposes to issue an RFP to procure new bilateral third-party aggregator contracts during 2012-2014. SCE does not propose to replace its existing aggregator contracts that will expire in 2012.[21] SCE cites D.10-12-033, where the Commission denied PG&E's request to extend its contract with one of its aggregators, reasoning that the IOUs should gain experience with bidding into the CAISO's Proxy Demand Response ("PDR") markets before proposing any new aggregator contracts.[22] SDG&E also does not propose any new bilateral third-party agreements beyond the one 15-year aggregator contract that the Commission already authorized.[23] DRA is concerned that any bilateral agreements with third-party DR aggregators may reduce or undermine the Commission's objective of encouraging a robust direct participation market in which all demand response providers (IOUs, ESPs[24] and third-party aggregators[25]) may compete.

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[20] *Decision Adopting Local Procurement Obligations for 2011 and Further Refining the Resource Adequacy Program*, D.10-06-036, dated June 24, 2010.

[21] SCE's Prepared Testimony, Vol. 2, pp.70-71

[22] *Id.*

[23] SDG&E's Prepared Testimony, Ch. I, p. MFG 9-10.

[24] Energy Service Provider

[25] Third-party aggregators are also sometimes referred to as "demand response providers" or "DRPs."

5. Performance of Bilateral Agreements with Third-Party DR Aggregators

SCE states that the aggregators did not perform relative to the contract capacity in their agreements.[26] SDG&E states the aggregator in its existing contract has not been able to enroll enough customers to provide the contracted capacity provided for in the agreement.[27] DRA intends to examine the performance of IOUs' existing third-party aggregator contracts during 2008 to 2010. The Commission needs to consider aggregator performance before determining its policy on whether to continue third-party bilateral agreements for DR.

6. Dual Participation

SDG&E proposes to eliminate customers' dual participation in the Base Interruptible Program ("BIP"), Capacity Bidding Program ("CBP") and DemandSMART programs with Critical Peak Pricing ("CPP").[28] PG&E states the administrative burdens of implementing dual participation outweigh the benefits.[29] At the same time, PG&E wants to expand dual participation by proposing to allow BIP customers to concurrently participate with some options in its PeakChoice program.[30] Furthermore, SCE notes dual participation of a single resource is not allowed in CAISO markets at this time, and would necessitate program tariff and design changes.[31] DRA would like to explore whether dual participation should be expanded, narrowed, or eliminated in certain cases.

7. Permanent Load Shifting Programs

In their March 7, 2011 opening comments on a joint utility Permanent Load Shifting ("PLS") study, [32] SCE and PG&E sought several clarifications from the Commission about the appropriateness of certain avoided cost assumptions in the PLS

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[26] SCE's Prepared Testimony, Vol. 2, p. 70, Table V-30.
[27] SDG&E's Prepared Testimony, Ch. III, pp. GMK 28-30.
[28] *Id.*, GMK-7.
[29] PG&E's Prepared Testimony, p. 2-2.
[30] *Id,* p. 2-13.
[31] SCE's Prepared Testimony, Vol. 2, p. 9.
[32] Statewide Joint IOU Study of Permanent Load Shifting, dated November 30, 2010, Appendix A.

study,[33] as well as differences between the cost-effectiveness methodology for PLS and the DR Reporting template included in the DR cost-effectiveness protocols.[34] In its March 18, 2011 reply comments on the PLS study, DRA proposed that the Energy Division hold a workshop to resolve these issues. DRA would like to see a Commission's directive on the issues raised by PG&E and SCE before forming a DRA recommendation on the IOUs' proposed PLS programs.

8. Pre-enrollment Qualification and Retesting of BIP Customers

PG&E proposes to add applicant screening requirements to its Base Interruptible Program (BIP) to deter free riders and non-compliant participants from remaining in the program. DRA will investigate if a similar provision should be included in SCE and SDG&E's BIP program.

9. Recovery of Incentives

SDG&E includes BIP incentives in the proposed program budgets, while SCE and PG&E do not. Instead, they propose to recover these costs in rate design phases of their general rate cases. There is a similar mismatch between the utilities with respect to Air Conditioning cycling program incentives. DRA will explore whether all three IOUs should either all include or exclude incentives in their DR program budgets.

10. Fund Shifting

PG&E proposes to reduce the current ten budget categories specified in D.09-08-027 to six categories in order to provide flexibility between programs that have similar goals and to respond to shifts in customer enrollment.[35] DRA would like to examine PG&E's proposal and explore its applicability to SCE and SDG&E as well.

11. Emergency-Triggered Program MW Oversupply

DRA will examine IOUs' proposals regarding regulatory mechanisms, ensuring that neither RA payments nor other ratepayer funds subsidize their emergency-triggered

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[33] SCE's Opening Comments, filed March 7, 2011 in docket R.07-01-041, pp. 4-8.
[34] PG&E's Opening Comments, filed March 7, 2011 in docket R.07-01-041, pp. 2-3.
[35] PG&E's Prepared Testimony, p. 10-3.

programs, if an oversupply is determined based on the MW caps stated in the settlement agreement adopted in D.10-06-034.

12. Overlap with Other Related Proceedings

a) CA Energy Efficiency Strategic Plan (A.08-06-004)

The IOUs need to clarify what areas of their proposed DR programs and budgets will be attributable to the final plans and methodology for integrating all Demand Side Management (DR, Energy Efficiency, Low Income Energy Efficiency, etc.) programs, for allocating total load impacts, and all common costs between integrated programs.

b) Advanced Metering Infrastructure, SmartGrid, and General Rate Cases

DRA is concerned whether the technology needs for the DR program portfolios in these DR applications have been already met, or partially met, in the IOUs' advanced metering infrastructure ("AMI") applications, in their General Rate Case ("GRC") applications, SmartGrid enhancements, or elsewhere. For example, DRA understands that all approved AMI systems already include load-limit switches, feedback of energy usage, a Home Area Network (HAN) radio, and the ability to provide two-way communication to provide consumers with price data and alerts.

DRA wants to ensure that the funding requested in the instant applications is not also being requested or funded elsewhere in other related proceedings. Similarly, DRA wants to ensure that DR benefits are not double-counted in the utilities' AMI or other proceedings.

B. ISSUES FOR SCE'S APPLICATION

DRA identifies the issues below that are specific to the 2012-2014 DR Cycle application of Southern California Edison ("SCE"). Discovery is still continuing, and DRA reserves the right to raise additional issues, as appropriate.

1. Cost-Effectiveness

SCE presents its cost-effectiveness analysis based on the E3 DR Reporting Template. SCE's Capacity Bidding Program ("CBP") and Critical Peak Pricing ("CPP") program are not cost-effective.[36] In particular, CBP has a Total Resource Cost ("TRC") ratio of only 0.58 and Ratepayer Impact Measure Ratio ("RIM") of only 0.48.[37]

DRA would like to explore how these programs could be made more cost-effective.

2. Capacity Bidding Program

SCE proposes to change the CBP program season from May 1 through October 30, to a year-round program. DRA is concerned how additional costs of business process and system modifications necessary for dispatch on a year-round basis [38] will help increase the already low TRC (0.58) cost-effectiveness ratio for this program.

3. Ancillary Services Tariff

For the Ancillary Service ("AS") Tariff program, SCE proposes to provide the high-cost, real-time, telemetry installations (estimated at $70,000 per meter) up to a maximum of $500,000 on a first-come, first-served basis, until funds are exhausted. SCE anticipates that no more than five active service accounts would participate during the 2012-2014 program cycle.[39] SCE states it is proposing this program in response to the Commission's directive in D.09-08-027.[40] DRA, however, is concerned the very high costs of telemetry alone may make this program unsustainable and not cost-effective.

4. Auto DR Technology Incentives

SCE proposes a different front-loaded payment structure for technology incentives ("TI") incentives paid to customers. DRA would like to explore the efficacy of SCE's proposal.

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[36] SCE's Prepared Testimony, Vol. 4, Table III-5, p. 22.
[37] *Id.*
[38] *Id.,* Vol. 2, p. 17.
[39] *Id.,* Vol. 2, pp. 20-22.
[40] *Id.,* Vol. 2, p. 20.

C. ISSUES FOR SDG&E'S APPLICATION[41]

DRA identifies the issues below that are specific to the 2012-2014 DR Cycle application of San Diego Gas and Electric ("SDG&E"). Discovery is still continuing, and DRA reserves the right to raise additional issues, as appropriate.

1. Cost-effectiveness

SDG&E's analysis shows its Demand Response Program Portfolio is not cost-effective.[42] Furthermore, CBP, Small Customer Technology Deployment ("SCTD"), and DemandSMART™ Program are individually not cost-effective.

SDG&E also presents cost-effectiveness results after eliminating the allocation of administrative overheads to programs.[43] SDG&E's analysis shows the Demand Response Program Portfolio is still not cost-effective even after this allocation change.[44]

DRA would like to explore how these programs could be made more cost-effective.

2. Capacity Bidding Program

SDG&E proposes several modifications to its CBP program including a change in the methodology for calculating the baseline and guaranteeing the aggregators who participate in the program a three-year contract with their customers *from* the date of the contract, even for those customers who sign the contract on the last day of 2014.[45] DRA is concerned that this will necessitate the Commission to fund the CBP for the next six years (2012-2017) and foreclose further Commission review of CBP in the next DR cycle (2015-2017).

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[41] DRA's initial review is based on the original testimony, not the amended testimony SDG&E served on March 25, 2011. DRA expects to review the amended testimony by the prehearing conference date to update any issues with regard to SDG&E.

[42] SDG&E Prepared Testimony, Table 1, p. KCM-13.
[43] *Id.*, Figure 1, p. KCM-13 and p. KCM-14.
[44] *Id.*, Table 2, p. KCM-14.
[45] *Id.*, Ch. III, pp. GMK-26-27.

3. DemandSmart Program

SDG&E states its 15-yr third-party bilateral contract is performing far below the aggregator's commitment. Although the contract provides for aggregator commitment level of 40 MW beginning 2012, the contract is expected to provide only 15 MW in 2014.[46] DRA would like to assess whether the aggregator over-promised without analyzing characteristics of SDG&E's customer base and whether additional scrutiny is required of all existing aggregator bilateral contracts, including those in PG&E and SCE's DR portfolios.

D. ISSUES FOR PG&E'S APPLICATION

DRA identifies the issues below that are specific to the 2012-2014 DR Cycle application of Pacific Gas and Electric ("PG&E"). Discovery is still continuing, and DRA reserves the right to raise additional issues, as appropriate.

1. Cost-Effectiveness

All of PG&E's proposed programs as measured by the TRC and the RIM tests are not cost-effective using calculations and inputs prescribed by the Commission in its cost-effectiveness protocols.[47] On the other hand, PG&E's alternative calculations using its own different assumptions show most of the program to be cost-effective. DRA wants to investigate the reasons for this difference. DRA intends to explore how these programs could be made more cost-effective using the inputs prescribed by the Commission in its cost-effectiveness protocols.

2. Extension of Existing AMP contracts by One Year through 2012

PG&E requests approval to extend four of the five existing Aggregator Managed Portfolio ("AMP") contracts by one year to 2012.[48] DRA is concerned in California's current surplus capacity environment, such extensions are unnecessary. DRA would like to explore the need for these contracts in 2012.

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[46] *Id.*, pp. GMK-28-30.
[47] PG&E's DR Reporting Template 2 of 2: PG&E with Default A Factors.
[48] PG&E's Prepared Testimony, pp. 1-10 to 1-11.

3. Request for Proposal

PG&E requests to file an RFP for up to 250 MW to replace the expiring PG&E AMP contracts in 2012 in this application.[49] DRA is concerned whether PG&E's RFP process results in the most cost-effective DR contracts for PG&E's ratepayers.

4. CBP Program Modifications

PG&E proposes to offer capacity payments to CBP in the shoulder months of May and October of summer season. DRA questions the need for this change. PG&E has not provided sufficient reasoning based on the need for capacity during these two months.

5. Budgets for Activities Other Than DR Program Portfolio

Of the total budget of $234.4 million[50] that PG&E requests for 2012-2014, only $74.7 million is to be spent directly on DR Program portfolio costs (Administration, Incentives and Capital).[51] The remaining $156.9 million is for several related activities. For example, PG&E proposes to spend $33.7 million on DR-Han Integration projects that are highly dependent on the development of HAN standards (e.g., SEP 2.0), scaling up of HAN technology, and schedule for devices available from third party vendors.[52] DRA would like to investigate the scope of these activities, whether all of these activities are required to be funded during this DR cycle or are funded elsewhere, and whether projected costs are reasonable. In addition, DRA wants to ensure all of the costs in the proposed budget are accounted for in the programs' cost effectiveness analysis.

6. AutoDR

PG&E proposes to increase AutoDR incentives to as high as $450/kW for certain small business customers and also to extend the AutoDR incentives to customers who already participate in programs (e.g., CPB) that receive a capacity payment.[53] SCE and SDG&E do not appear to see the need to raise the Auto incentives to the level proposed

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[49] *Id.*, pp. 1-11 and 2-28.
[50] *Id.*, p. 1-18, Table 1-2.
[51] *Id.*, p. 2-3, Table 2-1.
[52] *Id.*, p. 5-6.
[53] *Id.*, p. 3-13, Table 3-3.

by PG&E. DRA is concerned whether PG&E is deploying program dollars in a cost-effective manner.

E. NOTICE OF COMPLIANCE AND OTHER POSSIBLE ISSUES

DRA will review the utilities' proof of compliance filings pursuant to Rule 3.2 of the Commission's Rules of Practice and Procedure and reserves the right to raise other issues and objections as appropriate.

III. SCHEDULE

A. DRA Needs Adequate Time for Review to Develop Testimony

The IOUs all have proposed a schedule that requires DRA and other intervener testimony on May 23, 2011. Collectively, the IOUs' application and supporting testimony and workpapers consist of over a thousand pages. Due to DRA's limited resources, DRA requires additional time for testimony than what is provided by the schedules proposed by the IOUs.[54] Given the substantial dollar amount (approximately $532.6 million, collectively) and complicated issues at stake in this proceeding, DRA requests the IOU proposed May 23 date for intervener testimony be pushed to at least June 15, 2011. This would allow DRA to submit several rounds of data requests, which typically have a turnaround of ten business days under the Commission's discovery custom and practice guidelines.[55] A expedited review period would hamper DRA's ability to conduct a meaningful review.

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[54] SCE Application, p. 13; PG&E Application, p. 18; SDG&E Application, p. 14.

[55] *See* http://docs.cpuc.ca.gov/word_pdf/REPORT/117475.pdf.

DRA offers the following schedule as an alternative:

Applications Filed	March 1, 2011
Protest Filed	April 1, 2011
Replies to protests and responses due	April 11, 2011
Prehearing Conference	April 15, 2011
DRA/Intervenor Testimony	**June 15, 2011**
Utility Reply Testimony	July 15, 2011
Hearings begin (if necessary)	August 15, 2011
Opening Briefs	September 16, 2011
Reply Briefs	September 30, 2011
Proposed Decision	November 16, 2011
Comments on Proposed Decision	December 1, 2011
Reply Comments	December 6, 2011
Final Decision	December 15, 2011

DRA's proposed schedule is reasonable, as it still accommodates the IOUs' request for a final Commission decision by the end of 2011. At this time, DRA reserves the right for cross-examination of witnesses at hearings. DRA's proposed schedule may be accelerated, if and when the parties make a determination that hearings may not be necessary.

Respectfully submitted,

/s/ LISA-MARIE SALVACION

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Lisa-Marie Salvacion
Staff Counsel

Division of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2069
Fax: (415) 703-2262
Email: lms@cpuc.ca.gov

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