

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

Order Instituting Rulemaking to Continue Implementation
and Administration of California Renewables Portfolio
Standard Program

Rulemaking 11-05-005

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and checked), ALJ RULING
ON SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

Customer (party intending to claim intervenor compensation): The Utility Reform Network (TURN)			
Assigned Commissioner: Mark Ferron		Assigned ALJ: Anne E. Simon, Burton Mattson, Regina DeAngelis	
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent (NOI) is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this NOI and has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).			
		Signature: /S/	
Date:	6-7-11	Printed Name:	Matthew Freedman

PART I: PROCEDURAL ISSUES

(To be completed by the party ("customer") intending to claim intervenor compensation)

A. Status as "customer" (see Pub. Util. Code § 1802(b)): Are you claiming "customer" status because you (check one):	Applies (check)
1. Category 1: Represent consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to the jurisdiction of the Commission (§ 1802(b)(1)(A))?	
2. Category 2: Are a representative who has been authorized by a "customer" (§ 1802(b)(1)(B))?	
3. Category 3: Represent a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers, to represent "small commercial customers" (§ 1802(h)) who receive bundled electric service from an electrical corporation (§	X

1802(b)(1)(C)), or to represent another eligible group?	
<p>4. Please explain your customer status, economic interest (if any), and provide any documentation (such as articles of incorporation or bylaws) that supports your status. Identify any attached documents in Part IV.</p> <p>TURN is a “group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers.” TURN provided the relevant portion of our articles of incorporation in the NOI submitted in A.98-02-017, and again in A.99-12-024. The articles of incorporation have not changed since the time of those earlier submissions. D.98-04-059 directs groups such as TURN to indicate the percentage of their members that are residential ratepayers. <u>Id.</u>, FOF 12. TURN has approximately 20,000 dues paying members, of whom we believe the vast majority are residential ratepayers. TURN does not poll our members in a manner that would allow a precise breakdown between residential and small business members, so a precise percentage is not available.</p> <p>In this proceeding TURN will represent the interests of its residential and small business constituents who take service as customers of all three investor-owned utilities. These customers have an interest in ensuring that any money spent to comply with the California Renewables Portfolio Standard program is used as efficiently as possible.</p>	

B. Timely Filing of NOI (§ 1804(a)(1)):	Check
1. Is your NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: _____	Yes ___ No <u>X</u>
2. Is your NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	Yes <u>X</u> No ___
2a. Describe the reason for filing your NOI at this other time: The Order Instituting Rulemaking 11-05-005 states that any Notice of Intent to Seek Compensation “should be filed within 30 days of the date this OIR is mailed.” (page 20). The OIR was mailed on May 10, 2011.	
2b. Provide the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, or ALJ ruling, or other document authorizing the filing of your NOI at this other time: Order Instituting Rulemaking 11-05-005, page 20, Ordering Paragraph 16.	

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party (“customer”) intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)(i)):
1. What is the nature and extent of your planned participation in this proceeding (as far as it is possible to describe on the date this NOI is filed)? On what issues do you plan

to participate?

Nature and Extent of Planned Participation

This proceeding entails the Commission’s efforts to continue implementation and administration of the California Renewables Portfolio Standard Program including the review of RPS procurement plans, establishing new obligations for each retail seller, assessing compliance, and enforcing results. Given the importance of this program, TURN will be active in this proceeding on behalf of residential ratepayers of the three major investor-owned utilities. TURN will be attending the upcoming prehearing conference, has already begun coordinating with various parties on the issue matrix in response to the OIR, and will submit comments, testimony, briefs and any other filings authorized by the Commission. Since no scoping memo has yet been issued, TURN cannot fully identify the types of participation that will be required.

Issues Likely to Be Addressed

The Commission has not yet determined the full scope and phasing of this rulemaking, so TURN cannot provide a complete list of issues to be addressed throughout the entire course of the proceeding. TURN anticipates focusing on, at a minimum, the following issues: (1) interpreting various statutory requirements contained in SBx2 (Simitian), (2) reviewing renewable procurement plans submitted by the major investor-owned utilities, (3) establishing compliance obligations for all retail sellers, (5) reviewing procurement activities by all retail sellers, and (5) identifying and enforcing noncompliance by retail sellers. As the rulemaking evolves and the scoping is determined with greater precision, additional issues of concern may arise.

Avoiding Undue Duplication

The Commission has stated that it will make a preliminary determination based on the NOI whether an intervenor represents interests that, if not for the availability of compensation, would be “underrepresented” in the proceeding. D.98-04-059, mimeo, at 27. TURN and the Division of Ratepayer Advocates (DRA) represent ratepayer interests. However, TURN only represents the interests of residential and small commercial customers. Furthermore, as has been demonstrated in recent similar cases, TURN will work to closely coordinate with DRA in a manner that ensures maximum coverage of issues and, by design, reduced duplication of effort. TURN will also work with other intervenor organizations to minimize duplication to the extent reasonable.

B. Please provide an itemized estimate of the compensation that you expect to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY FEES				
Matthew Freedman	200	\$345	\$69,000	1
Marcel Hawiger	100	\$345	\$34,500	
		<i>Subtotal:</i>	\$103,500	

EXPERT FEES				
William Marcus	50	\$260	\$13,000	2
Kevin Woodruff	150	\$240	\$36,000	
		<i>Subtotal:</i>	\$49,000	
OTHER FEES				
N/A				
		<i>Subtotal:</i>	\$0	
COSTS				
Estimated Miscellaneous Expenses (i.e., Telecommunications, Photocopying)			\$1,000	
Travel Expenses for consultants			\$500	
		<i>Subtotal:</i>	\$1,500	
TOTAL ESTIMATE \$:			\$154,000	
<p>Comments/Elaboration (use reference # from above):</p> <p>The reasonableness of the hourly rates requested for TURN's representatives will be addressed in our Request for Compensation (#s 1 and 2). TURN has not included in this estimate claim preparation time (#1). The amount of any future request for compensation will depend upon the Commission's ultimate decision in this case, as well as the resources TURN has available to devote to the case going forward.</p>				
<p>When entering items, type over bracketed text; add additional rows to table as necessary.</p> <p>Estimate may (but does not need to) include estimated claim preparation time. Claim preparation is typically compensated at ½ of preparer's normal hourly rate.</p>				

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party ("customer") intending to claim intervenor compensation; see Instructions for options for providing this information)**

A. On what basis are you claiming "significant financial hardship" for your claim for intervenor compensation in this proceeding (§ 1802(g))?	Applies (check)
1. "[T]he customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation"; or	
2. "[I]n the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding."	X

B. Please explain, and attach necessary documentation as warranted, the factual basis for your claim of “significant financial hardship” (§ 1802(g)):

TURN is making its showing of significant financial hardship at this time pursuant to Section 1804(b)(1), which states in part that:

A finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding.

TURN last received a finding of significant financial hardship in an ALJ’s Ruling issued November 22, 2010 in P.10-08-016. TURN does not anticipate any challenge to its eligibility for compensation in this proceeding. If any party does attempt to rebut the presumption of eligibility, however, TURN requests that it be granted the opportunity to reply to such party's allegations within 10 days after the service of such filing

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE
(Claimant identifies and attaches documents; add rows as necessary)**

Attachment No.	Description
1	Certificate of Service

**ADMINISTRATIVE LAW JUDGE RULING¹
(ALJ completes)**

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	
a. The NOI has not demonstrated status as a “customer” for the following reason(s):	
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	

¹ An ALJ Ruling will not be issued unless: (a) the NOI is deficient; (b) the ALJ desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer’s claim for compensation); or (c) the NOI has included a claim of “significant financial hardship.”

c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	
4. The ALJ provides the following additional guidance (see § 1804(b)(2)):	

ORDER

	Check all that apply
1. The Notice of Intent is rejected.	
2. Additional guidance is provided to the customer as set forth above.	
3. The customer has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	
4. The customer has shown significant financial hardship. The customer is entitled to a rebuttable presumption of eligibility for intervenor compensation in other Commission proceedings commencing within one year of the date of this ruling (§ 1804(b)(1)).	
5. The customer is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	

Dated _____, at San Francisco, California.

ADMINISTRATIVE LAW JUDGE

**Attachment 1:
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION** by (check as appropriate):

hand delivery;
 first-class mail; and/or
 electronic mail

to the following persons appearing on the official Service List:

abb@eslawfirm.com
abiecunasjp@bv.com
abrowning@votesolar.org
acitrin@prosoliana.com
aecaonline@gmail.com
AEG@cpuc.ca.gov
aes@cpuc.ca.gov
alex.kang@itron.com
alexandra.konieczny@sutherland.com
amartin@nextlight.com
amber@iepa.com
AMRO@pge.com
AMSmith@SempraUtilities.com
anders.glader@elpower.com
andre.devilbiss@recurrentenergy.com
andrea.morrison@directenergy.com
Andrew.Luszcz@GlacialEnergy.com
andy.vanhorn@vhcenergy.com
andykatz@sonic.net
angela.gregory@DirectEnergy.com
artrivera@comcast.net
as2@cpuc.ca.gov
atk4@pge.com
atrowbridge@daycartermurphy.com
austin.yang@sfgov.org
avege@firstwind.com
barmackm@calpine.com
bcragg@goodinmacbride.com
bepstein@fablaw.com
bernardo@braunlegal.com
beth@beth411.com
bill@fitcoalition.com
BJeider@ci.burbank.ca.us

bkc7@pge.com
blaising@braunlegal.com
bobgex@dwt.com
brbarkovich@earthlink.net
Brian.Prusnek@sce.com
brian.theaker@nrgenergy.com
bryan.schweickert@ladwp.com
bsb@eslawfirm.com
bwm@cpuc.ca.gov
BXSZ@pge.com
c.mentzel@cleanenergymaui.com
cadowney@cadowneylaw.com
case.admin@sce.com
castille@landsenergy.com
catherine.krupka@sutherland.com
cathie.allen@pacificorp.com
cathy.karlstad@sce.com
CBlack@riversideca.gov
ccasselman@pilotpowergroup.com
cchang@cityofpasadena.net
ccollins@Energystrat.com
cem@newsdata.com
CentralFiles@SempraUtilities.com
CentralFiles@SempraUtilities.com
chad@cenergypower.com
chestonem@sharpsec.com
chilen@sppc.com
chris.leveriza@glacialenergy.vi
chris@emeter.com
CKeblor@SempraGeneration.com
claufenb@energy.state.ca.us
cleni@energy.state.ca.us
clu@cpuc.ca.gov
clyde.murley@comcast.net
cmkehrein@ems-ca.com
cmmw@pge.com
CNL@cpuc.ca.gov
cpacc@calpine.com
cponds@ci.chula-vista.ca.us
cpuc@liberty-energy.com
CPUCCases@pge.com
cpucdockets@keyesandfox.com
cpucrulings@navigantconsulting.com

CRMd@pge.com
csteen@bakerlaw.com
cswollums@midamerican.com
ctd@cpuc.ca.gov
cte@eslawfirm.com
cwooten@lumenxconsulting.com
cynthia.brady@constellation.com
cynthia.brady@constellation.com
d.moss@renewables100.org
DAKing@SempraGeneration.com
Dan.adler@calcef.org
danielle@ceert.org
david.oliver@navigantconsulting.com
davidb@cwo.com
davidmorse9@gmail.com
davido@mid.org
DBodine@LibertyPowerCorp.com
DBP@cpuc.ca.gov
dbp@cpuc.ca.gov
dbranchcomb@spi-ind.com
dcarroll@downeybrand.com
dcover@esassoc.com
ddavie@wellhead.com
dennis@ddecuir.com
Derek@AltaPowerGroup.com
dgrandy@caonsitegen.com
dgulino@ridgewoodpower.com
dhuard@manatt.com
Diane.Fellman@nrgenergy.com
dietrichlaw2@earthlink.net
dietrichlaw2@earthlink.net
djurijew@capitalpower.com
dkk@eslawfirm.com
DNiehaus@SempraUtilities.com
DocToxics@aol.com
dorth@krcd.org
dot@cpuc.ca.gov
Douglas@Idealab.com
douglass@energyattorney.com
dsanchez@daycartermurphy.com
dsaul@pacificsolar.net
dseperas@calpine.com
dtownley@infiniacorp.com

dvidaver@energy.state.ca.us
dweisz@marinenergyauthority.org
dws@r-c-s-inc.com
dwtpucdockets@dwt.com
echiang@elementmarkets.com
ed.mainland@sierraclub.org
ed.smeloff@sunpowercorp.com
eddyconsulting@gmail.com
edwardoneill@dwt.com
ehadley@reupower.com
ej_wright@oxy.com
ek@a-klaw.com
ELL5@pge.com
elvine@lbl.gov
emello@sppc.com
erasmussen@marinenergyauthority.org
e-recipient@caiso.com
e-recipient@caiso.com
eric.cherniss@gmail.com
Eriks@ecoplexus.com
Erin.Grizard@BloomEnergy.com
esison@smud.org
farrellytc@earthlink.net
fderosa@nextlight.com
fhall@solarelectricsolutions.com
filings@a-klaw.com
fortlieb@sandiego.gov
freesa@thirdplanetwind.com
fwnoble@WintecEnergy.com
fyanney@fulbright.com
galiteva@aol.com
gbass@noblesolutions.com
gbawa@cityofpasadena.net
george.wiltsee@sce.com
ggisel@indenergysolutions.com
gherrera@energy.state.ca.us
GloriaB@anzaelectric.org
gmorris@emf.net
GouletCA@email.laccd.edu
gpetlin@3degreesinc.com
gtd@cpuc.ca.gov
gtrobinson@lbl.gov
GXL2@pge.com

hal@rwitz.net
hanigan@encous.com
harry.singh@gs.com
hcronin@water.ca.gov
HPandey@ci.burbank.ca.us
hrait@energy.state.ca.us
HRasool@SempraUtilities.com
hurlock@water.ca.gov
HYao@SempraUtilities.com
igoodman@commerceenergy.com
imcgowan@3DegreesInc.com
info@calseia.org
j.miles.cox@sbcglobal.net
jaa@cpuc.ca.gov
jackmack@suesec.com
James.Stack@CityofPaloAlto.org
janet.gagnon@solarworldusa.com
janice@strategenconsulting.com
janreid@coastecon.com
jared.johnson@lw.com
jarmstrong@goodinmacbride.com
jay2@pge.com
JCasadont@BlueStarEnergy.com
JChamberlin@LSPower.com
jcolive@bpa.gov
Jean-Claude.Bertet@ladwp.com
jeanne.sole@sfgov.org
Jeff.Hirsch@DOE2.com
Jeff.Newman@bth.ca.gov
jeffgray@dwt.com
jenine.schenk@apses.com
Jennifer.Barnes@Navigantconsulting.com
jf2@cpuc.ca.gov
jgreco@terra-genpower.com
jim.howell@recurrentenergy.com
jim.metropulos@sierraclub.org
jim_p_white@transcanada.com
jig@eslawfirm.com
jkarp@winston.com
jkepke@ch2m.com
jkern@bluestarenergy.com
jkeyes@keyesandfox.com
JLehman@anaheim.net

jleslie@luce.com
jls@cpuc.ca.gov
jluckhardt@downeybrand.com
jm3@cpuc.ca.gov
jmcfarland@treasurer.ca.gov
jmcmahon@8760energy.com
jmh@cpuc.ca.gov
jna@speakeasy.org
jnelson@psrec.coop
jody_london_consulting@earthlink.net
Joe.Langenberg@gmail.com
john@deweygroup.com
john_dunn@transcanada.com
johnredding@earthlink.net
johnspilman@netzero.net
jon.jacobs@paconsulting.com
Joni.Templeton@sce.com
jordan.white@pacificorp.com
joyw@mid.org
jp6@cpuc.ca.gov
jpepper@svpower.com
jpierce@semprautilities.com
jpittsjr@pcgconsultants.com
jpross@sungevity.com
jrehfeld@naturener.net
jrobertpayne@gmail.com
jsanders@caiso.com
jsanders@caiso.com
jscancarelli@crowell.com
jsp5@pge.com
jspears@orrick.com
jsqueri@goodinmacbride.com
jstoddard@manatt.com
judypau@dwt.com
juliettea7@aol.com
jweil@aglet.org
jwoodruff@nextlight.com
jwoodwar@energy.state.ca.us
jzr@cpuc.ca.gov
k1k3@pge.com
kar@cpuc.ca.gov
Karen.Kochonies@MorganStanley.com
karen@klindh.com

kb@EnerCalUSA.com
KDeremer@SempraUtilities.com
keith.mccrea@sablaw.com
keithwhite@earthlink.net
kelly.cauvel@build-laccd.org
kenneth.swain@navigantconsulting.com
kerry.eden@ci.corona.ca.us
kerry.hattevik@nexteraenergy.com
kevin.lynch@iberdrolaren.com
kfox@keyesandfox.com
KFrancone@energystrat.com
kgiddens@orrick.com
kho@cpuc.ca.gov
kjsimonsen@ems-ca.com
klatt@energyattorney.com
kmills@cfbf.com
kmills@cfbf.com
kowalewskia@calpine.com
kristin@consciousventuresgroup.com
kswitzer@gswater.com
kswitzer@gswater.com
kswitzer@scwater.com
kwh@cpuc.ca.gov
kzocchet@energy.state.ca.us
Laura.Genao@sce.com
Laurie.Mazer@bp.com
lcottle@winston.com
ldri@pge.com
leichnetz@lumospower.com
leilani.johnson@ladwp.com
lgonzale@energy.state.ca.us
liddell@energyattorney.com
lindaf@mid.org
lindsay_zaitsoff@transalta.com
lmh@eslawfirm.com
lmitchell@hanmor.com
lpark@navigantconsulting.com
lsherman@orrick.com
lterry@water.ca.gov
luke.dunnington@recurrentenergy.com
lwhouse@innercite.com
lwisland@ucsusa.org
lynn@lmaconsulting.com

m.stout@meridianenergyusa.com
marcel@turn.org
marcie.milner@shell.com
mark.thompson@powerex.com
mark@pdsplc.com
markfumia@dwt.com
martinhomec@gmail.com
mary@solutionsforutilities.com
masont@bv.com
matt.miller@recurrentenergy.com
matthew@turn.org
mc3@cpuc.ca.gov
mcampbell@sflower.org
mcarboy@signalhill.com
mchediak@bloomberg.net
mclaughlin@braunlegal.com
mcox@calplg.com
mdacunha@ecoplexus.com
mday@goodinmacbride.com
mday@goodinmacbride.com
mdeange@smud.org
mdeange@smud.org
mdjoseph@adamsbroadwell.com
meredith_lamey@transcanada.com
mfraze@anaheim.net
mginsburg@orrick.com
MGML@pge.com
michael.wheeler@recurrentenergy.com
michaelboyd@sbcglobal.net
mjd@cpuc.ca.gov
mjensen@mercedid.org
mjs@cpuc.ca.gov
mkuchera@bluestarenergy.com
mmazur@3PhasesRenewables.com
mmcdannel@lacs.org
MMCL@pge.com
mniroula@water.ca.gov
moxsen@calpine.com
mpa@a-klaw.com
mpf@stateside.com
mpo@cpuc.ca.gov
mpr-ca@coolearthsolar.com
mprior@energy.state.ca.us

mramirez@sewater.org
mrh2@pge.com
mrl@cpuc.ca.gov
mrw@mrwassoc.com
msamra@anaheim.net
MWT@cpuc.ca.gov
Nancy.Norris@powerex.com
nao@cpuc.ca.gov
nblack@calbioenergy.com
ndesnoo@ci.berkeley.ca.us
nedrayoung@gmail.com
nellie.tong@us.kema.com
nes@a-klaw.com
nicole.fabri@clearenergybrokerage.com
nil@cpuc.ca.gov
nlr@cpuc.ca.gov
nmurray@natureener.net
norman.furuta@navy.mil
npedersen@hanmor.com
nquan@gswater.com
nrader@calwea.org
nxk2@pge.com
obartho@smud.org
patrick.vanbeek@commercialenergy.net
Patrick.VanBeek@CommercialEnergy.net
paulfenn@local.org
pbarthol@energy.state.ca.us
pblood@columbiaenergypartners.com
pdoughma@energy.state.ca.us
peter.eichler@libertywater.com
peter.pearson@bves.com
pfmoritzburke@gmail.com
phanschen@mofa.com
phil@reesechambers.com
pletkarj@bv.com
pmaxwell@navigantconsulting.com
psd@cpuc.ca.gov
pshaw@suntechamerica.com
pssed@adelphia.net
pstoner@lgc.org
r.raushenbush@comcast.net
rafi.hassan@sig.com
Ralf1241a@cs.com

ramesh.ramchandani@commercialenergy.net
ramonag@ebmud.com
Randy.Howard@ladwp.com
reg@silveradopower.com
RegRelCPUCCases@pge.com
regulatory.affairs@recurrentenergy.com
regulatory@silveradopower.com
regulatory_affairs@recurrentenergy.com
renee@gem-corp.com
rhardy@hardyenergy.com
richard.chandler@bp.com
rick@sierraecos.com
rick_noger@praxair.com
rjgilleskie@san.rr.com
rkeen@manatt.com
rkmoore@gswater.com
rkn@cpuc.ca.gov
rmccann@umich.edu
rmcmahon@amonix.com
rmd@cpuc.ca.gov
rmiller@energy.state.ca.us
rmm@cpuc.ca.gov
ron.cerniglia@directenergy.com
ron.perry@commercialenergy.net
roxane.perruso@tac-denver.com
rresch@seia.org
rroth@smud.org
rschmidt@bartlewells.com
rwalther@pacbell.net
ryan.heidari@endimensions.com
S2B9@pge.com
saeed.farrokhpay@ferc.gov
sahm@fitcoalition.com
sam.maslin@recurrentenergy.com
sara@solaralliance.org
sas@a-klaw.com
sberlin@mccarthylaw.com
scott.goorland@fpl.com
sdhilton@stoel.com
sean.beatty@genon.com
seang@kroadpower.com
SEHC@pge.com
sgp@eslawfirm.com

sha@cpuc.ca.gov
shani@scvas.org
sharding@iidenergy.com
sheldon.kimber@recurrentenergy.com
sho@ogrady.us
shong@goodinmacbride.com
siobhan.doherty@frv.com
SMK@cpuc.ca.gov
SNelson@Sempra.com
snuller@ethree.com
spauker@wsgr.com
spillott@capitalpower.com
srt@cpuc.ca.gov
ssmyers@att.net
sstanfield@keyesandfox.com
StephanieC@greenlining.org
stephen.burnage@gmail.com
steveb@cwo.com
stevegreenwald@dwt.com
steven@iepa.com
sue.mara@rtoadvisors.com
susan.munves@smgov.net
svn@cpuc.ca.gov
tam.hunt@gmail.com
Tashiana.Wangler@PacifiCorp.com
tbo@cpuc.ca.gov
tbrunello@calstrat.com
tburke@sflower.org
tculley@keyesandfox.com
tdarton@pilotpowergroup.com
tdillard@sppc.com
ted@fitcoalition.com
tfaust@redwoodrenewables.com
thall@laccd.edu
thomase.hobson@ge.com
thomaspcorr@gmail.com
Tiffany.Roberts@lao.ca.gov
tim@marinemt.org
timea.Zentai@navigantconsulting.com
tjaffe@energybusinessconsultants.com
tjl@a-klaw.com
tkaushik@manatt.com
tlocascio@libertypowercorp.com

tobinjr@sbcglobal.net
todd.edmister@bingham.com
todd.johansen@recurrentenergy.com
Tom.Elgie@powerex.com
tom_victorine@sjwater.com
tomb@crossborderenergy.com
TPhillips@TigerNaturalGas.com
tpomales@arb.ca.gov
TReid@fce.com
TRH@cpuc.ca.gov
TRoberts@SempraUtilities.com
tsolomon@winston.com
ttutt@smud.org
varanini@sbcglobal.net
vidhyaprabakaran@dwt.com
vjw3@pge.com
vpuffer@gwpenergy.com
vsuravarapu@cera.com
vwood@smud.org
WBlattner@SempraUtilities.com
wbooth@booth-law.com
wem@igc.org
wetstone@alamedamp.com
Will.Brieger@doj.ca.gov
wplaxico@axiopower.com
wwester@smud.org
wynne@braunlegal.com
ylehr@ci.azusa.ca.us
ys2@cpuc.ca.gov

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/S/

Matthew Freedman

The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104
Ph: 415-929-8876
matthew@turn.org