

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

Order Instituting Rulemaking Pursuant
to Assembly Bill 2514 to Consider the
Adoption of Procurement Targets for
Viable and Cost-Effective Energy Storage
Systems.

Rulemaking 10-12-007
(Filed December 16, 2010)

MOTION OF JACK ELLIS REQUESTING PARTY STATUS

Jack Ellis
PO Box 6600
1425 Alpine Way
Tahoe City, CA 96145
+1 530-581-2134
Email: jack@casaraquel.com

Dated: June 30, 2011

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THE STATE OF CALIFORNIA**

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MOTION OF JACK ELLIS REQUESTING PARTY STATUS

I. Motion for Party Status

Pursuant to Rule 1.4(a) and Rule 11.1(b) of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, I, Jack Ellis, hereby submit this motion for party status in the above-captioned proceeding.

I am not representing a stakeholder or party interest in this proceeding, however I believe my participation will lead to a more complete record that can help the Commission reach an informed decision

My professional qualifications include more than 35 years of industry experience, and 15 years performing and directing studies that required the use of production simulation models. I have conducted or been involved in simulations and operational studies of the California statewide grid in a variety of capacities since 1979. I conducted numerous economic analyses of storage projects and technologies, including Compressed Air

Energy Storage and conventional pumped storage, for both utilities and the Electric Power Research Institute, from the late 1970s through the early 1990s. I am familiar with the technical, economic, policy and ratemaking issues that are likely to arise in the course of this proceeding and will provide independent viewpoints that are unlikely to be offered by other parties.

Accordingly, I respectfully request that I be granted party status and that all correspondence, pleadings, notices, orders, rulings and other communications concerning this proceeding be provided to me, preferably via e-mail, at the address shown below.

Jack Ellis
PO Box 6600
1425 Alpine Way
Tahoe City, CA 96145
+1 530-581-2134
Email: jack@casaraquel.com

If this motion is granted, I request that the Docket Office remove me from the information-only list for this proceeding.

Respectfully submitted,

/s/ Jack Ellis

Dated: June 30, 2011

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **MOTION OF JACK ELLIS REQUESTING PARTY STATUS OF JACK ELLIS** on all parties identified on the service list obtained from the Commission's web site as of June 30, 2011.

Copies have been transmitted to all parties on the service list for R.10-12-007.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 30th day of June, 2011 at Tahoe City, California.

/s/

Jack Ellis

Service List for R.10-12-007 as of June 30, 2011

Parties

DONALD C. LIDDELL
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE
/ ICE ENERGY, INC. / WALMART STORES,
INC & SAM'S WEST, INC.

MATTHEW FREEDMAN
THE UTILITY REFORM NETWORK
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: TURN

THOMAS R. DARTON
PILOT POWER GROUP, INC. (1365)
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: PILOT POWER GROUP, INC.

LAURA WISLAND
UNION OF CONCERNED SCIENTISTS
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: UNION OF CONCERNED SCIENTISTS

ERIC HSIEH
A 123 SYSTEMS
10 AVENUE E
HOPKINTON, MA 01748
FOR: A 123 SYSTEMS

ANDREW O. KAPLAN
BROWN RUDNICK LLP
ONE FINANCIAL CENTER
BOSTON, MA 02111
FOR: BEACON POWER CORP.

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
FOR: PRAXAIR PLAINFIELD, INC.

JOSEPH B. WILLIAMS
CADWALADER WICKERSHAM & TAFT LLP
700 SIXTH STREET, N.W.
WASHINGTON, DC 20001
FOR: BROOKFIELD RENEWABLE POWER, INC.

MIKE JACOBS
XTREME POWER
816 CONNECTICUT AVE., SUITE 200
WASHINGTON, DC 20006
FOR: XTREME POWER

JENNY ZYAK
LIBERTY POWER HOLDINGS LLC (1371)
1901 W. CYPRESS CREEK ROAD, SUITE 600
FORT LAUDERDALE, FL 33309
FOR: LIBERTY POWER HOLDINGS LLC

LYNN FLOWERS
FLOWERS ENERGY CONSULTING, LLC
4390 W. PINE BLVD.,
ST LOUIS, MO 63108
FOR: SOLAR RESERVE

ERIC OSBORN
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVENUE, STE 100
HOUSTON, TX 77002
FOR: CALPINE POWER AMERICA - CA, LLC

KATHERINE KRAUSE
DIR OF WHOLESALE COMPLIANCE, U.S.
DIRECT ENERGY BUSINESS
12 GREENWAY PLAZA, STE. 600
HOUSTON, TX 77046
FOR: DIRECT ENERGY BUSINESS

BRIAN FICKETT
VALLEY ELECTRIC ASSOCIATION
800 E. HWY 372
PAHRUMP, NV 89048
FOR: VALLEY ELECTRIC ASSOCIATION

MICHAEL MAZUR
3 PHASES ELECTRICAL CONSULTING
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266
FOR: 3 PHASES ELECTRICAL CONSULTING

DAVID NEMTZOW
ICE ENERGY, INC.
1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401
FOR: ICE ENERGY, INC.

ADAM GREEN
SOLAR RESERVE
2425 OLYMPIC BLVD., STE. 500E
SANTA MONICA, CA 90404
FOR: SOLAR RESERVE

INGER GOODMAN
COMMERCE ENERGY, INC.
1 CENTERPOINTE DRIVE, STE. 350
LA PALMA, CA 90623-3630
FOR: COMMERCE ENERGY, INC.

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD ST., STE. 1030
WOODLAND HILLS, CA 91367
FOR: WESTERN POWER TRADING FORUM;
ALLIANCE FOR RETAIL ENERGY MARKETS;
COMPANY
DIRECT ACCESS CUSTOMER COALITION

CATHY A. KARLSTAD
ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

RONALD MOORE
SR ANALYST, REGULATORY AFFAIRS
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773
FOR: GOLDEN STATE WATER COMPANY / BEAR
VALLEY ELECTRIC

KLAUS SCHIESS
KSENGINEERS
8763 CAMINITO SUENO
LA JOLLA, CA 92037
FOR: KSENGINEERS

DAVID KATES
THE NEVADA HYDRO COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA, CA 92083
FOR: THE NEVADA HYDRO COMPANY

ALLEN K. TRIAL
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

JOHN W. LESLIE, ESQ.
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
600 WES BROADWAY, STE. 2600
SAN DIEGO, CA 92101
FOR: SHELL ENERGY NORTH AMERICA (US),
L.P.

GREG BASS
NOBLE AMERICAS ENERGY SOLUTIONS LLC
401 WEST A STREET, SUITE 500
SAN DIEGO, CA 92101-3017
FOR: SEMBRA ENERGY SOLUTIONS

STEVE RAHON
DIR., TARIFF & REGULATORY ACCTS
SAN DIEGO GAS & ELECTRIC COMPANY (902)
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

GLORIA BRITTON
REGULATORY AFFAIRS MGR.
ANZA ELECTRIC CO-OPERATIVE, INC (909)
PO BOX 39109 / 58470 HWY 371
ANZA, CA 92539-1909
FOR: ANZA ELECTRIC CO-OPERATIVE, INC.

DOUGLAS AMES
AMES LAW OFFICE
9550 WARNER AVE., STE. 250
FOUNTAIN VALLEY, CA 92708
FOR: TRANSPHASE COMPANY

ANDREA MORRISON
MARKET DEVELOPMENT REGIONAL DIR.
DIRECT ENERGY SERVICES, LLC
415 DIXON STREET
ARROYO GRANDE, CA 93420
FOR: DIRECT ENERGY SERVICES, LLC

MONA TIERNEY-LLOYD
SENIOR MANAGER WESTERN REG. AFFAIRS

DAVID ORTH
SAN JOAQUIN VALLEY POWER AUTHORITY

ENERNOC, INC.
DISTRICT
PO BOX 378
CAYUCOS, CA 93430
FOR: ENERNOC, INC.
AUTHORITY

ADMIN OFF @KINGS RIVER CONSERV
4886 EAST JENSEN AVENUE
FRESNO, CA 93725
FOR: SAN JOAQUIN VALLEY POWER

DAVID MACMILLAN
MEGAWATT STORAGE FARMS
3931 JEFFERSON AVE.
WOODSIDE, CA 94062
FOR: MEGAWATT STORAGE FARMS

CANDACE MOREY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

MIKE CAMPBELL
COMMUNITY CHOICE AGGREGATION DIR.
CITY AND COUNTY OF SAN FRANCISCO
1155 MARKET STREET, 4TH FL.
SAN FRANCISCO, CA 94103
FOR: CITY AND COUNTY OF SAN FRANCISCO

NORA SHERIFF
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105
FOR: ENERGY PRODUCERS AND USERS
COALITION (EPUC)

TIM O'CONNOR
ENVIRONMENTAL DEFENSE FUND
LAMPREY
123 MISSION STREET, 28TH FLOOR
SAN FRANCISCO, CA 94105
FOR: ENVIRONMENTAL DEFENSE FUND

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY &
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: INDEPENDENT ENERGY PRODUCERS
ASSOCIATION

JESSICA MULLAN
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA 94111
FOR: CALIFORNIA PACIFIC ELECTRIC
COMPANY LLC

CHRIS LAVERY
POWERGETICS, INC.
2027 MARKET STREET, SUITE 6
SAN FRANCISCO, CA 94114
FOR: POWERGETICS, INC.

ALICE L. REID
PACIFIC GAS AND ELECTRIC CO.
PO BOX 7442
SAN FRANCISCO, CA 94120
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SARA STECK MYERS
ATTORNEY AT LAW
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES (CEERT)

MATTHEW BARMACK
CALPINE CORPORATION
4160 CUBLIN BLVD., SUITE 100
COALITION
DUBLIN, CA 94568
FOR: CALPINE CORPORATION

KEITH NAKATANI
DIRECTOR
CALIFORNIA HYDROPOWER REFORM
4361 4TH STREET, SUITE 801
OAKLAND, CA 94612
FOR: CALIFORNIA HYDROPOWER REFORM
COALITION

WILLIAM B. ROSTOV
EARTHJUSTICE
426 17TH STREET, 5TH FLOOR

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUTE. 402

OAKLAND, CA 94612
FOR: SIERRA CLUB OF CALIFORNIA

BERKELEY, CA 94704
FOR: GREEN POWER INSTITUTE

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710
FOR: THE CALIFORNIA WIND ENERGY
ASSOCIATION

ELIZABETH RASMUSSEN
PROJECT MGR.
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, SUITE 320
SAN RAFAEL, CA 94901
FOR: MARIN ENERGY AUTHORITY

GRANT ROSENBLUM, ESQ.
CALIFORNIA ISO
LEGAL AND REGULATORY DEPARTMENT
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA ISO

KELLY M. FOLEY
ATTORNEY
THE VOTE SOLAR INITIATIVE
2089 TRACY COURT
FOLSOM, CA 95630
FOR: THE VOTE SOLAR INITIATIVE

WAYNE AMER
PRESIDENT
MOUNTAIN UTILITIES (906)
PO BOX 205
KIRKWOOD, CA 95646
FOR: MOUNTAIN UTILITIES

DAWN WEISZ
INTERIM EXECUTIVE DIR
MARIN ENERGY AUTHORITY
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670
FOR: MARIN ENERGY AUTHORITY

NICOLE A. BLAKE
STAFF ATTORNEY
CONSUMER FEDERATION OF CALIFORNIA
1107 9TH ST., STE. 625
SACRAMENTO, CA 95814
FOR: CONSUMER FEDERATION OF CALIFORNIA

ANDY BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITAL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931
FOR: NV ENERGY / SIERRA PACIFIC POWER
COMPANY

DANIEL SILVERIA
GENERAL MANAGER
SURPRISE VALLEY ELECTRIC CORP.
(908)
PO BOX 691
ALTURAS, CA 96101
FOR: SURPRISE VALLEY ELECTRIC
COOP
CORPORATION

ROBERT MARSHALL
GENERAL MANAGER
PLUMAS SIERRA RURAL ELECTRIC COOP.
73233 STATE ROUTE 70 / PO BOX 2000
PORTOLA, CA 96122-7069
FOR: PLUMAS SIERRA RURAL ELECTRIC

Information Only

BHUPEN MEHTA
MEHTA ASSOCIATES
EMAIL ONLY
EMAIL ONLY, CA 00000

ERIN GRIZARD
BLOOM ENERGY, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

GREGORY S.G. KLATT
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY, CA 00000

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JOHN M. SPILMAN
GRIDFLEX ENERGY, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JONNA ANDERSON
VIRIDITY ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

LAURA MANZ
VIRIDITY ENERGY, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

LON W. HOUSE, PH.D
WEC
EMAIL ONLY
EMAIL ONLY, CA 00000

NOAH DAVIDSON
RENEWABLE ANALYTICS, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

PHILIP L. CARSON
ENERGY CENTRAL
EMAIL ONLY
EMAIL ONLY, CO 00000

RICHARD S. FLOOD
JOHNSON CONTROLS, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

SEAN BEATTY
GENON ENERGY, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

STEPHEN G. DAVIS
KNGRID
EMAIL ONLY
EMAIL ONLY, CA 00000

TIMOTHY TUTT
SACRAMENTO MUNICIPAL UTILITY DISTRICT
EMAIL ONLY
EMAIL ONLY, CA 00000

TOM SMOLAREK
CYPRESS LTD
EMAIL ONLY
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JACK ELLIS
RESERO CONSULTING
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

MICHELLE GRANT
DYNEGY, INC.
EMAIL ONLY
EMAIL ONLY, TX 00000-0000

STEVEN ECKERT
BROOKFIELD RENEWABLE POWER, INC.
200 DONALD LYNCH BLVD.
MALBOROUGH, MA 01752
FOR: BROOKFIELD RENEWABLE POWER, INC.

ALI AMIRALI
SVP
STARWOOD ENERGY GROUP, LLC
591 W. PUTNAM AVENUE
GREENWICH, CT 06830

JUDITH F. JUDSON
BEACON POWER CORPORATION
65 MIDDLESEX ROAD
TYNGSBORO, MA 08179

STEVEN HUHMANN
MORGAN STANLEY CAPITAL GROUP INC.
2000 WESTCHESTER AVENUE
PURCHASE, NY 10577

VICTORIA LAUTERBACH
CADWALADER WICJERSHAM & TAFT, LLP
700 SIXTH STREET, N.W.
WASHINGTON, DC 20001

JORDAN WHITE
PACIFICORP
1407 W. NORTH TEMPLE, SUITE 320
SALT LAKE CITY, UT 84116

TERRY ANDREWS
CALMAC MANUFACTURING CORPORATION
40191 N. 110TH PLACE
SCOTTSDALE, AZ 85262

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., NO. 25
1020
SANTA MONICA, CA 90401

DOUG DEVINE
EAGLE CREST ENERGY COMPANY
3000 OCEAN PARK BOULEVARD, SUITE
SANTA MONICA, CA 90405

AKBAR JAZAYEIRI
DIR OF REVENUE & TARIFFS
SOUTHERN CALIFORNIA EDISON COMPANY (338)
2241 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770

AMBER DEAN WYATT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
PO BOX 800 / 2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

DREW ADAMS
VIRIDITY ENERGY
4778 CASS ST., APT. A
SAN DIEGO, CA 92109

MARCIE A. MILNER
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO, CA 92121

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123

HANNON RASOOL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT.
SAN DIEGO, CA 92123

ALLEN FREIFELD
VIRIDITY ENERY, INC.
16870 WEST BERNARDO DRIVE, ST. 400
SAN DIEGO, CA 92127

ROND DICKERSON
PO BOX 3751
CLOVIS, CA 93613

EVELYN KAHL
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015

SUE MARA
CONSULTANT
RTO ADVISORS, LLC
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

JEANNE M. SOLE
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLET PLACE
SAN FRANCISCO, CA 94102-4682

ERIC CUTTER
ENERGY AND ENVIRONMENTAL ECONOMIC
101 MONTGOMERY STREET, SUITE 1600
SAN FRANCISCO, CA 94104

FLORIAN SCHUBERT
RENEWABLE ANALYTICS, LLC
44 MONTGOMERY ST., STE. 3055
SAN FRANCISCO, CA 94104

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., PO BOX 770000 MC B9A
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

KEVIN HIETBRINK
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B9A
SAN FRANCISCO, CA 94105

LUCY FUKUI
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B9A
SAN FRANCISCO, CA 94105

STEVE HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

STEVE HIETBRINK
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

SHERIDAN J. PAUKER
WILSON SONSINI GOODRICH & ROSATI
SPEAR TOWER, SUITE 3300
ONE MARKET STREET
SAN FRANCISCO, CA 94105-1126

DEBORAH N. BEHLES
GOLDEN GATE UNIVERSITY SCHOOL OF LAW
536 MISSION STREET
SAN FRANCISCO, CA 94105-2968

ALAN WALTNER
LAW OFFICES OF ALAN WALTNER
779 DOLORES STREET
SAN FRANCISCO, CA 94110

STACEY REINECCIUS
POWERGETICS INC.
3150 - 18TH STREET, BOX 412
SAN FRANCISCO, CA 94110

IRENE K. MOOSEN
ATTORNEY AT LAW
53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112

DIANE I. FELLMAN
DIR - REGULATORY & GOV'T AFFAIRS
NRG WEST & SOLAR
73 DOWNEY STREET
SAN FRANCISCO, CA 94117

CALIFORNIA ENERGY MARKETS
425 DIVISADERO STREET, SUITE 303
SAN FRANCISCO, CA 94117

BRIAN CHERRY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B10C
SAN FRANCISCO, CA 94177

EILEEN COTRONEO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177

CHRIS KING
CHIEF REGULATORY OFFICER
EMETER CORPORATION
2215 BRIDGEPOINTE PARKWAY, STE. 300
SAN MATEO, CA 94404

TOM STEPIEN
PRIMUS POWER
3967 TRUST WAY
HAYWARD, CA 94545

FARSHID ARMAN
SIEMENS TTB
1995 UNIVERSITY AVE., STE. 375
BERKELEY, CA 94549

AVIS KOWALEWSKI
CALPINE CORPORATION
4160 DUBLIN BLVD, SUITE 100
DUBLIN, CA 94568

SARAH BESERRA
CALIFORNIA REPORTS
39 CASTLE HILL CT
VALLEJO, CA 94591

JESSIE BAIRD
EARTHJUSTICE
426 17TH STREET, 5TH FLOOR
OAKLAND, CA 94612

ANDY KATZ
SIERRA CLUB CALIFORNIA
2150 ALLSTON WAY, STE. 400
102
BERKELEY, CA 94704

ARMANDO VIRAMONTES
LAWRENCE BERKELEY NATIONAL LABORATORY
1 CYCLOTRON RD., MS 65, BLDG 65, RM
BERKELEY, CA 94720

JULIETTE ANTHONY
678 BLACKBERRY LANE
SAN RAFAEL, CA 94903

BARRY F. MCCARTHY
ATTORNEY
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 W SAN FERNANDO ST., STE 501
SAN JOSE, CA 95113

JOY A. WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

BRIAN THEAKER
NRG ENERGY
3161 KEN DEREK LANE
PLACERVILLE, CA 95667

FRANCIS TAYLOR
ENERSYS, INC.
3417 RABEN WAY
CAMERON PARK, CA 95682

JIM METROPULOS
SR. ADVOCATE
SIERRA CLUB CALIFORNIA
801 K STREET, SUITE 2700
SACRAMENTO, CA 95814

JOHN SHEARS
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814

RONALD LIEBERT
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS L.L.P.
2600 CAPITAL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

KEVIN SNYDER
HDR/DTA
2379 GATEWAY OAKS DRIVE, STE. 200
SACRAMENTO, CA 95833

DIANA S. GENASCI
ATTORNEY AT LAW
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

ELIZABETH W. HADLEY
RESOURCE PLANNER
REDDING ELECTRIC UTILITY
777 CYPRESS AVENUE
REDDING, CA 96001

CALIFORNIA PACIFIC ELECTRIC COMPANY, LLC
933 ELOISE AVENUE
SOUTH LAKE TAHOE, CA 96150

ANNE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., STE. 1750
PORTLAND, OR 97201

NATE SANDVIG

WILLIAM H. HOLMES

SITE DEVELOPER
ENXCO - AN EDF ENERGIES NOUVELLES CO.
517 SW 4TH AVENUE, STE. 300
PORTLAND, OR 97204

STOEL RIVES LLP
900 SW FIFTH AVENUE, SUITE 2600
PORTLAND, OR 97204

CATHIE ALLEN
REGULATORY MGR.
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232

JIM HICKS
OREGON PUBLIC UTILITIES COMMISSION
PO BOX 2148
SALEM, OR 97308-2148

ANDREA ROCHELEAU
BROOKFIELD RENEWABLE POWER, INC.
480 DE LA CITE BLVD.
STREET
GATINEAU, PQ J85 8R3
CANADA

MARY C. HEMMINGSEN
BROOKFIELD RENEWABLE POWER, INC.
STE. 458, BENTALL 5, 550 BURRARD
VANCOUVER, BC V6C 2B5
CANADA

State Service

ALOKE GUPTA
CALIF PUBLIC UTILITIES COMMISSION
INFRASTRUCTURE PLANNING AND PERMITTING B
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AMY C. YIP-KIKUGAWA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHLOE LUKINS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER R VILLARREAL
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID PECK
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EDWARD HOWARD
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FARZAD GHAZZAGH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
BRANC
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JASON SIMON
CALIF PUBLIC UTILITIES COMMISSION
PROCUREMENT STRATEGY AND OVERSIGHT
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MERIDETH STERKEL
CALIF PUBLIC UTILITIES COMMISSION
INFRASTRUCTURE PLANNING AND PERMITTING B
AREA 4-A
505 VAN NESS AVENUE

MICHAEL COLVIN
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

RAHMOM MOMOH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
BRANC
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

ROBERT LEVIN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
PROGRAM
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

WENDY AL-MUKDAD
CALIF PUBLIC UTILITIES COMMISSION
INFRASTRUCTURE PLANNING AND PERMITTING B
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SAN FRANCISCO, CA 94102-3214

REBECCA TSAI-WEI LEE
CALIF PUBLIC UTILITIES COMMISSION
PROCUREMENT STRATEGY AND OVERSIGHT
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS ROBERTS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AVTAR BINING
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-43
SACRAMENTO, CA 95814-5512