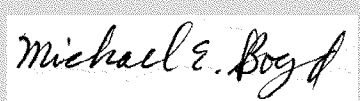


**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

<b>[Proceeding Name]</b> Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	<b>[Proceeding Number]</b> Rulemaking 10-05-006 (Filed May 6, 2010)
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**SUPPLEMENTAL 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): <b>CALifornians for Renewable Energy, Inc. (CARE)</b>			
Assigned Commissioner: Michael R. Peevey on May 13, 2010		ALJ Assigned: Peter V. Allen on December 3, 2010	
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:	
Date:	July 4, 2011	Printed Name:	Michael E. Boyd

**PART I: PROCEDURAL ISSUES**

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

<b>A. Status as "customer" (see Pub. Util. Code § 1802(b)): The party claims "customer" status because it (check one):</b>	<b>Applies (check)</b>
1. Category 1: Represents 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: Is a representative who has been authorized by a "customer" (§ 1802(b)(1)(B)).	
3. Category 3: Represents 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	X

receive bundled electric service from an electrical corporation (§ 1802(b)(1)(C)), or to represent another eligible group.	
<p>4. The party's explanation of its customer status, economic interest (if any), with any documentation (such as articles of incorporation or bylaws) that supports the party's "customer" status. Any attached documents should be identified in Part IV.</p> <p>CAlifornians for Renewable Energy, Inc. (CARE) is a "group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential ratepayers."</p> <p>CARE is authorized by its Bylaws to represent the interest of residential customers. Specifically, CARE's functions are:</p> <ol style="list-style-type: none"> <li>1 To supply on a nonprofit basis both nonprofessional and professional legal assistance to planning, conservation groups, small business customers, <b>residential customers</b>, small business and residential renewable energy self suppliers, and neighborhood groups, in regards to new energy projects in the state of California.</li> <li>2 To engage on a nonprofit basis in research and information dissemination with respect to legal rights in a healthy environment by giving legal advice, <b>appearing before administrative bodies</b>, and enforcing environmental laws through court actions</li> <li>3 To employ legal counsel, technical experts, and associated staffing on a professional or contractual basis to carry out these purposes.</li> </ol> <p>Because CARE is specifically authorized by its Bylaws to represent the interests of residential customers before administrative bodies, it clearly qualifies as a category 3 group or organization. For the preceding reasons, CARE qualifies as an authorized group in accordance with Section 1802(b). CARE's corporate documents were provided to the Commission on April 3, 2008 in the A.07-12-021 proceeding.</p>	

<b>B. Timely Filing of NOI (§ 1804(a)(1)):</b>	<b>Check</b>
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: _____	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
2. Is the party's 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>2a. The party's description of the reasons for filing its NOI at this other time:</p> <p>On June 10, 2011 CARE filed a law suit in the United States District Court, Central District of California; in Solutions for Utilities, Inc., CAlifornians for Renewable Energy, Inc, Plaintiffs v. California Public Utilities Commission, Southern California Edison, Inc., Defendants, Complaint CV11-4975-SJO(JCGx).<sup>1</sup></p> <p>According to Rule 17.1 (f) of the Commission's Rules of Procedure and Practice "An intervenor who intends to request compensation for costs of judicial review shall file a supplemental notice</p>	

<sup>1</sup> <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=12684088>

of intent within 30 days after the date that the intervenor first appears or files a pleading in the judicial review proceeding. The supplemental notice of intent shall identify the issues upon which the intervenor intends to participate in judicial review, and an itemized estimate of the compensation that the intervenor expects to request by reference to those identified issues. If the intervenor intends to support the Commission's decision on review, the supplemental notice of intent shall include a showing of why the intervenor expects that its participation in judicial review will supplement, complement or contribute to the Commission's defense of its decision."

2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, or ALJ ruling, or other document authorizing the filing of its NOI at that other time:

See Rule 17.1 authorizing filing of amended NOI

## **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)):**

- The party's description of the nature and extent of the party's planned participation in this proceeding (as far as it is possible to describe on the date this NOI is filed).

***This legal action challenges the basis in law and facts for the Order Decision 10-12-034 issued by CPUC 12/21/2010***

#### **Findings of Fact**

1. FERC directed CAISO to file a tariff to authorize convergence bidding in the CAISO Day-Ahead and Real-Time energy markets. CAISO filed such a tariff modification in June 2010, which has been conditionally accepted by FERC. Convergence bidding activities in the CAISO Day-Ahead and Real-Time energy markets is expected to begin as early as February, 2011.
2. FERC believes that convergence bidding will improve market performance by adding liquidity, increasing the numbers of offers in the Day-Ahead market and minimize the exercise of market power.
3. There is always a risk that a generation resource will not perform as scheduled, requiring IOUs to purchase replacement power in the CAISO Real-Time market. IOUs are in the best position to know the extent of that risk and should be able to save ratepayers money through convergence bidding to hedge against generation performance risk.
4. IOU submission of virtual supply bids in the Day-Ahead market up to, but not exceeding, the amount of the Day-Ahead forecast of intermittent generation in the Day-Ahead market, followed by buying it back in the Real-Time market, would offset or hedge the financial exposure for the underlying Real-Time market sale of scheduled physical intermittent generation.
5. IOUs proposed several defensive convergence bidding strategies to protect against potential price manipulation or other market dynamics.
6. Market manipulation is monitored by the CAISO's DMM, but IOUs as market participants may have the opportunity to make quick bidding decisions to reduce the negative impacts of market manipulation or other market dynamics to the benefit of ratepayers.
7. Convergence bidding can lead to significant financial gains and losses for ratepayers.

## Conclusions of Law

1. The Commission should authorize IOU participation in convergence bidding based upon a uniform set of rules limiting convergence bidding to three specified bidding strategies to be applied by each IOU flexibly to its own circumstances, and subject to stop-loss limits and reporting requirements to minimize ratepayer exposure to financial risk. The IOUs should not be required to engage in convergence bidding or to use all three strategies.

2. The Commission should authorize the IOUs to participate in convergence bidding to manage Real-Time price exposure resulting from unanticipated forced outages, derating of generating units, derating of transmission, or uncertain generation performance for resources scheduled by the IOUs in the CAISO's Day-Ahead Market, and to hedge against load forecast uncertainty, as these strategies pursue objectives that will benefit ratepayers.

3. IOUs should be authorized to submit convergence supply bids in the Day-Ahead market up to, but not exceeding, the amount of the Day-Ahead forecast of intermittent generation in the Day-Ahead market, followed by buying it back through the convergence sale in the Real-Time market.

4. It is prudent to allow IOUs to utilize defensive convergence bidding strategies to mitigate real harms from market manipulation or other unintended market dynamics.

5. IOUs should report the use of defensive convergence bidding on a case-by-case basis using actual market and settlement data, and not just hypothetical scenarios, showing how engaging in convergence bidding by the IOU protected ratepayers. An IOU should report if and how it employed convergence bidding strategies to protect ratepayers from unusual price spikes or other avoidable risks at identified locations. This information should be used for future review of convergence bidding authority, and not for post-hoc reasonableness reviews of IOU bidding activities.

6. Because Commission authorization of IOU convergence bidding activities is intended for the benefit of ratepayers, ratepayers should receive all of the benefits and pay all of the costs of such activities. Such costs shall be recoverable in the IOU's Energy Resource Recovery Account.

7. The Commission should place an absolute stop loss limit on the amount of loss an IOU can incur from participation in convergence bidding. Such stop loss limits should operate on a rolling 365 day basis, and exceeding the limit should suspend IOU authorization to participate in convergence bidding until the IOU files a Tier 3 Advice Letter and gains Commission approval to resume convergence bidding.

8. The Advice Letter must contain, at a minimum: 1) an explanation for why the IOU exceeded the stop-loss limit, 2) an explanation of what actions or changes to its bidding activity the IOU will implement to ensure that future convergence bidding will not continue to lose ratepayer funds, and 3) an explanation for why the IOU's authority to engage in convergence bidding should be reinstated, in light of the specific facts of the IOU's convergence bidding history and remedial activities to protect ratepayer funds.

9. The appropriate stop loss limits are \$20 million for SCE and PG&E and \$5 million for SDG&E.

10. It is appropriate to require that an IOU, within one business day of its receipt of notice, to provide written notice to the Commission's Executive Director, the Director of Energy Division and the General Counsel of: (1) notice from the CAISO or DMM that the IOU or its scheduling coordinator is the subject of an investigation pursuant to the CAISO Tariff, including Section 37.8.4; (2) notice from the CAISO that the conduct of the IOU or its scheduling coordinator conduct has been referred to FERC by the CAISO pursuant to the CAISO Tariff, including Section 37.8.2; or (3) notice from the CAISO that the IOU or its scheduling coordinator's convergence bidding trading has been suspended or limited by the CAISO.

11. It is reasonable to direct the IOUs to provide a set of information for each calendar month, no later than two weeks days from the end of each month to the Energy Division. The IOUs shall provide this information monthly for a period of one year after the CAISO convergence bidding market becomes active. At the end of one year, absent further direction from the Commission, this information shall be reported in the QCR filings beginning with the Q1 2012 filings and presented to the PRGs on a quarterly basis.

At a minimum, the IOUs shall include in their monthly reports:

- 1) A list of each cleared convergence bid, containing the hour, location, volume, and justification for the transaction;
- 2) A list of the Day-Ahead and Hour Ahead prices corresponding with each convergence bid;
- 3) For each day the gains or losses, in dollars, as a result of convergence bidding;
- 4) For that month, and any past months during the calendar year in which convergence bids were transacted, a monthly total of volume, gains or losses (in dollars), the number of times each strategy was employed, and the number of bids conducted outside of that IOU's service territory;
- 5) The approved convergence bidding strategies utilized during that time period; and
- 6) Qualitative analysis of convergence bidding impacts upon other related products, such as CRRs; and
- 7) A list of any affiliates who have or are registered with the CAISO to participate in convergence bidding.

12. It is reasonable to direct each IOU to provide to PRG participants review of its convergence bidding strategies, performance, and market analysis in the quarterly PRG meetings, beginning with the first quarter in which convergence bidding activities commence.

13. It is reasonable to direct the IOUs to use a common template when reporting the summary of convergence bids for each month. The Energy Division should develop the reporting template, with inputs from all parties, and to modify it as appropriate.

14. Application 10-05-006 should remain open.

## **O R D E R**

**IT IS ORDERED** that:

1. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison are authorized to participate in convergence bidding in the California Independent System Operator's Day-Ahead and Real-Time energy markets based upon a uniform set of rules limiting convergence bidding to three specified bidding strategies set forth in this decision, and subject to stop loss limits and reporting requirements. The utilities are not required to use any or all of the three bidding strategies and may apply them flexibly to meet their own circumstances, consistent with the other provisions of this Decision. All costs of such participation shall be recoverable in the individual utility's Energy Resource Recovery Account.

2. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison are authorized to participate in convergence bidding in the California Independent System Operator's Day-Ahead and Real-Time energy markets to manage Real-Time price exposure resulting from unanticipated forced outages, derating of generating units, derating of transmission, or uncertain generation performance for resources scheduled by the IOUs in the California Independent System Operator's Day-Ahead Market.

3. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison are authorized to submit virtual supply bids in the California Independent System Operator's Day-Ahead market up to, but not exceeding, the amount of the Day-Ahead forecast of intermittent generation in the Day-Ahead market, followed by buying it back through the convergence sale in the CAISO Real-Time market.

4. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison are authorized to participate in defensive convergence bidding in the California Independent System Operator's Day-Ahead and Real-Time energy markets to mitigate real harms from market manipulation or other unintended market dynamics. Any investor owned utility using defensive convergence bidding must report such use on a case-

by-case basis with actual market and settlement data, and not just hypothetical scenarios showing how engaging in convergence bidding by the investor owned utilities protected ratepayers. Each investor owned utility must report if and how it employed convergence bidding strategies intended to protect the investor owned utility's ratepayers from avoidable risks at identified locations. This information will be used for future review of convergence bidding authority and not for post-hoc reasonableness reviews of utility bidding activities.

5. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison shall, within one business day of its receipt of notice, provide written notice to the Commission's Executive Director, the Director of Energy Division and the General Counsel of: 1) notice from the California Independent System Operator or its Department of Market Monitoring that the investor owned utilities or its scheduling coordinator is the subject of an investigation pursuant to the California Independent System Operator Tariff, including Section 37.8.4; 2) notice from the California Independent System Operator that the conduct of the investor owned utilities or its scheduling coordinator conduct has been referred to the Federal Energy Regulatory Commission by the California Independent System Operator pursuant to the California Independent System Operator Tariff, including Section 37.8.2; or 3) notice from the California Independent System Operator that the investor owned utilities or its scheduling coordinator's convergence bidding trading has been suspended or limited by the California Independent System Operator.

6. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison convergence bidding in the California Independent System Operator's Day-Ahead and Real-Time energy markets shall be subject to an absolute stop loss limit on the amount of loss an investor owned utilities can incur from convergence bidding activities in the California Independent System Operator's Day-Ahead and Real-Time energy markets. Such stop loss limits shall operate on a rolling 365 day basis, and exceeding the limit will suspend investor owned utilities authorization to participate in convergence bidding until the investor owned utility files a Tier 3 Advice Letter and gains Commission approval to resume convergence bidding. The Advice Letter must contain, at a minimum: 1) an explanation for why the investor-owned utilities exceeded the stop-loss limit, 2) an explanation of what actions or changes to its bidding activity the investor-owned utilities will implement to ensure that future convergence bidding will not continue to lose ratepayer funds, and 3) an explanation for why the investor-owned utilities' authority to engage in convergence bidding should be reinstated, in light of the specific facts of the investor owned utility's convergence bidding history and remedial activities to protect ratepayer funds. Unless and until the Commission approves the Advice Letter with or without conditions, the investor-owned utility shall have no authority to engage in convergence bidding regardless of how long the Commission takes to issue a ruling on the Advice Letter. The stop loss limits are \$20 million for Southern California Edison, \$20 million for Pacific Gas and Electric Company and \$5 million for San Diego Gas & Electric Company.

7. The investor owned utilities Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison shall provide a set of information regarding convergence bidding activities in the California Independent System Operator's Day-Ahead and Real-Time energy markets for each calendar month, no later than two weeks days from the end of each month to the Energy Division. At a minimum, the IOUs shall include in their monthly reports:

- 1) A list of each cleared convergence bid, containing the hour, location, volume, and justification for the transaction;
- 2) A list of the Day-Ahead and Hour Ahead prices corresponding with each convergence bid;
- 3) For each day the gains or losses, in dollars, as a result of convergence bidding;
- 4) For that month, and any past months during the calendar year in which convergence bids were transacted, a monthly total of volume, gains or losses (in dollars), the number of times each strategy was employed, and the number of bids conducted outside of that IOU's

service territory;

- 5) The approved convergence bidding strategies utilized during that time period; and
- 6) Qualitative analysis of convergence bidding impacts upon other related products, such as CRRs; and
- 7) A list of any affiliates who have or are registered with the CAISO to participate in convergence bidding.

Each investor owned utility shall provide this information monthly for a period of one year after the California Independent System Operator convergence bidding market becomes active. At the end of one year, absent further direction from the Commission, this information shall be reported in the Quarterly Compliance Report filings beginning with the Q1 2012 filings and presented to the Procurement Review Groups on a quarterly basis.

8. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison shall provide to their Procurement Review Group participants review of their convergence bidding strategies, performance, and market analysis in the quarterly PRG meetings, beginning with the first quarter in which convergence bidding activities commence.

9. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison shall use a common template when reporting the summary of convergence bids for each month made in the California Independent System Operator's Day-Ahead and Real-Time energy markets. The Energy Division shall develop the reporting template, with inputs from all parties, and to modify it as appropriate.

10. Rulemaking 10-05-006 remains open.

- The party's statement of the issues on which it plans to participate.

CARE effectuated service on the California Public Utilities Commission [CPUC] on June 17, 2011. The suit's introduction is as follows:

This is a federal question action in which Plaintiffs, Solutions for Utilities, Inc. ["SFUI"] and CALifornians for Renewable Energy, Inc. ["CARE"], California based small scale energy companies, are seeking equitable relief and money damages from Defendants, California Public Utilities Commission ["CPUC"] a California state agency charged with inter alia California energy policymaking and delegated federal regulation enforcement, and Southern California Edison, Inc. ["SCE"], a state enabled monopoly energy corporation acting collusively and in concert with CPUC to undermine the federal policy of promoting the viability and integration of small energy generating companies and protecting them from monopolistic practices.

Plaintiffs seek injunctive and/or declaratory relief compelling and/or commanding Defendant CPUC to perform its federal-mandated regulatory duties, including federally mandated standards in connection with the Public Utility Regulatory Polices Act ["PURPA"], as prescribed by the Federal Energy Regulatory Commission ["FERC"]. Plaintiffs also seek remedial money damages from Defendants for Plaintiffs' economic injuries caused by Defendants' violations of said federal laws and regulations, and punitive damages for Defendants' intentional and repetitive violations of law.

**B. The party's itemized estimate of the compensation that the party expects to**

request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):				
Item	Hours	Rate \$	Total \$	#
<b>ATTORNEY FEES</b>				
[Attorney 1] Meir J. Westreich Attorney at Law CSB 73133 221 East Walnut, Suite 200 Pasadena, California 91101 Phone: 626-440-9906 FAX: 626-440-9970 E-mail: meirjw@aol.com	300	\$535/hour	\$160,500	1
[Attorney 2]				
	<b>Subtotal:</b>		\$160,500	
<b>EXPERT FEES</b>				
[Expert 1] Michael E. Boyd	200	\$135/hour	\$27,000	2
[Expert 2]				
	<b>Subtotal:</b>		\$27,000	
<b>OTHER FEES</b>				
[Person 1]				
[Person 2]				
	<b>Subtotal:</b>			
<b>COSTS</b>				
[Item 1]				
[Item 2]				
[Item 3]				
	<b>Subtotal:</b>			
<b>TOTAL ESTIMATE \$:</b>			\$187,500	
Comments/Elaboration (use reference # from above): Attorney 1 based on Market Rate, Expert 1 based on Basis for Rate D.10-05-046 rate of \$135/hr.				
When entering items, type over bracketed text; add additional rows to table as necessary. 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.				

**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)

<b>A. The party claims "significant financial hardship" for its claim for intervenor compensation in this proceeding on the following basis:</b>	<b>Applies (check)</b>
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” (§ 1802(g)); 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” (§ 1802(g)).	
3. A § 1802(g) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption of eligibility for compensation in this proceeding (§ 1804(b)(1)).	X
ALJ ruling (or CPUC decision) issued in proceeding number:  Date of ALJ ruling (or CPUC decision):  CARE most recent showing of “significant financial hardship” pursuant (§ 1802(g)) was found in Decision 11-03-020 on March 10, 2011 issued in proceeding number A.09-09-021	

**B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(g)) (necessary documentation, if warranted, is attached to the NOI):**

**PART IV: THE PARTY’S ATTACHMENTS DOCUMENTING SPECIFIC  
ASSERTIONS MADE IN THIS NOTICE**

(The party (“customer”) intending to claim intervenor compensation identifies and attaches documents (add rows as necessary.) Documents are not attached to final ALJ ruling.)

Attachment No.	Description
1	Certificate of Service

**ADMINISTRATIVE LAW JUDGE RULING<sup>2</sup>**  
(ALJ completes)

	Check all that apply
<b>1. The Notice of Intent (NOI) is rejected for the following reasons:</b>	
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):	
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	
<b>2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).</b>	
<b>3. The NOI has not demonstrated significant financial hardship for the following reason(s):</b>	
<b>4. The ALJ provides the following additional guidance (see § 1804(b)(2)):</b>	

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<sup>2</sup> 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” that requires a finding under § 1802(g).

**IT IS RULED that:**

	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.	
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.

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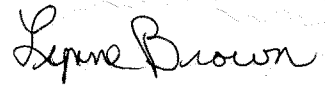
ADMINISTRATIVE LAW JUDGE

**Verification**

I am an officer of the Intervening Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3<sup>rd</sup> day of July 2011, at San Francisco, California.

A handwritten signature in cursive script that reads "Lynne Brown". The signature is written in black ink on a white background.

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Lynne Brown Vice-President  
CALifornians for Renewable Energy,  
Inc. (CARE)