

From: Sara Steck Myers

Sent: 2/16/2012 2:52:20 PM

cpacc@calpine.com (cpacc@calpine.com); mark@pdsplc.com (mark@pdsplc.com);
kjsimonsen@ems-ca.com (kjsimonsen@ems-ca.com); jenine.schenk@apses.com
(jenine.schenk@apses.com); Jeff.Guldner@aps.com (Jeff.Guldner@aps.com);
echiang@elementmarkets.com (echiang@elementmarkets.com);
jon.jacobs@paconsulting.com (jon.jacobs@paconsulting.com);
chilen@NVEnergy.com (chilen@NVEnergy.com); susan.rudolph@calpine.com
(susan.rudolph@calpine.com); emello@sppc.com (emello@sppc.com);
csteen@fulbright.com (csteen@fulbright.com); cchang@cityofpasadena.net
(cchang@cityofpasadena.net); galiteva@aol.com (galiteva@aol.com);
albyr24@gmail.com (albyr24@gmail.com); leilani.johnson@ladwp.com
(leilani.johnson@ladwp.com); tdillard@sppc.com (tdillard@sppc.com);
fyanney@fulbright.com (fyanney@fulbright.com); gbawa@cityofpasadena.net
(gbawa@cityofpasadena.net); rkeen@manatt.com (rkeen@manatt.com);
bryan.schweickert@ladwp.com (bryan.schweickert@ladwp.com);
Andrew.Wang@SolarReserve.com (Andrew.Wang@SolarReserve.com);
jgreco@terra-genpower.com (jgreco@terra-genpower.com);
Randy.Howard@ladwp.com (Randy.Howard@ladwp.com);
Jeff.Newman@bth.ca.gov (Jeff.Newman@bth.ca.gov); aayala@amonix.com
(aayala@amonix.com); Jennifer.Shigekawa@sce.com
(Jennifer.Shigekawa@sce.com); CentralFiles@SempraUtilities.com
(CentralFiles@SempraUtilities.com); andrew.mcallister@energycenter.org
(andrew.mcallister@energycenter.org); Laura.Genao@sce.com
(Laura.Genao@sce.com); case.admin@sce.com (case.admin@sce.com);
kswitzer@gswater.com (kswitzer@gswater.com); BJeider@ci.burbank.ca.us
(BJeider@ci.burbank.ca.us); gbass@noblesolutions.com
(gbass@noblesolutions.com); jackmack@suesec.com (jackmack@suesec.com);
george.wiltsee@sce.com (george.wiltsee@sce.com); j.miles.cox@sbcglobal.net
(j.miles.cox@sbcglobal.net); curt.roney@sce.com (curt.roney@sce.com);
vpuffer@gwpenergy.com (vpuffer@gwpenergy.com); Joni.Templeton@sce.com
(Joni.Templeton@sce.com); rjgilleskie@san.rr.com (rjgilleskie@san.rr.com);
rkmoore@gswater.com (rkmoore@gswater.com); marcie.milner@shell.com
(marcie.milner@shell.com); hal@rwitz.net (hal@rwitz.net); farrellytc@earthlink.net
(farrellytc@earthlink.net); ggisel@indenergysolutions.com
(ggisel@indenergysolutions.com); nquan@gswater.com (nquan@gswater.com);
TRoberts@SempraUtilities.com (TRoberts@SempraUtilities.com);
SNelson@Sempra.com (SNelson@Sempra.com); ylehr@ci.azusa.ca.us
(ylehr@ci.azusa.ca.us); janice.Wang@sce.com (janice.Wang@sce.com);
chad@cenergypower.com (chad@cenergypower.com); jpierce@semprautilities.com
(jpierce@semprautilities.com); mc@amandfm.com (mc@amandfm.com);
kholmes@trane.com (kholmes@trane.com); jay@trealestate.net
(jay@trealestate.net); Melissa.Hovsepian@sce.com (Melissa.Hovsepian@sce.com);
Rebecca.Meiers-DePastino@SCE.com (Rebecca.Meiers-DePastino@SCE.com);
Jeff.Hirsch@DOE2.com (Jeff.Hirsch@DOE2.com); sls@a-klaw.com (sls@a-

klaw.com); marcel@turn.org (marcel@turn.org); filings@a-klaw.com (filings@a-klaw.com); filings@a-klaw.com (filings@a-klaw.com); CentralFiles@SempraUtilities.com (CentralFiles@SempraUtilities.com); Middlekauff, Charles (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CRMd); jwoodruff@nextlight.com (jwoodruff@nextlight.com); Dan.adler@calcef.org (Dan.adler@calcef.org); Lucha, Ed (/O=PG&E/OU=Corporate/cn=Recipients/cn=ELL5); katherine@evomarkets.com (katherine@evomarkets.com); DNiehaus@SempraUtilities.com (DNiehaus@SempraUtilities.com); msamra@anaheim.net (msamra@anaheim.net); mchediak@bloomberg.net (mchediak@bloomberg.net); dcover@esassoc.com (dcover@esassoc.com); eklebaner@adamsbroadwell.com (eklebaner@adamsbroadwell.com); Mason, Cory (law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CMMw); Chan, Maggie M (/O=PG&E/OU=Corporate/cn=Recipients/cn=MMCL); fderosa@nextlight.com (fderosa@nextlight.com); CBlack@riversideca.gov (CBlack@riversideca.gov); sam.maslin@recurrentenergy.com (sam.maslin@recurrentenergy.com); avege@firstwind.com (avege@firstwind.com); mginsburg@orrick.com (mginsburg@orrick.com); mramirez@sflower.org (mramirez@sflower.org); Abreu, Carlos (/O=PG&E/OU=Corporate/cn=Recipients/cn=CxAs); regulatory_affairs@recurrentenergy.com (regulatory_affairs@recurrentenergy.com); JLehman@anaheim.net (JLehman@anaheim.net); austin.yang@sfgov.org (austin.yang@sfgov.org); mcarboy@signalhill.com (mcarboy@signalhill.com); fwnoble@WintecEnergy.com (fwnoble@WintecEnergy.com); tburke@sflower.org (tburke@sflower.org); ek@a-klaw.com (ek@a-klaw.com); hans@silveradopower.com (hans@silveradopower.com); sharding@iidenergy.com (sharding@iidenergy.com); Monica.Schwebs@bingham.com (Monica.Schwebs@bingham.com); Kjellund, Niels (/O=PG&E/OU=Corporate/cn=Recipients/cn=NXX2); luke.dunnington@recurrentenergy.com (luke.dunnington@recurrentenergy.com); Yan, Jason (/O=PG&E/OU=Corporate/cn=Recipients/cn=JaY2); amartin@nextlight.com (amartin@nextlight.com); Pappas, John (/O=PG&E/OU=Corporate/cn=Recipients/cn=JSP5); ashiana.esmail@lw.com (ashiana.esmail@lw.com); jmalta-weingard@naturener.net (jmalta-weingard@naturener.net); jscancarelli@crowell.com (jscancarelli@crowell.com); tkaushik@manatt.com (tkaushik@manatt.com); andre.devilbiss@recurrentenergy.com (andre.devilbiss@recurrentenergy.com); abrowning@votesolar.org (abrowning@votesolar.org); pfmoritzburke@gmail.com (pfmoritzburke@gmail.com); phanschen@mofocom (phanschen@mofocom); cseymour@sunedison.com (cseymour@sunedison.com); jared.johnson@lw.com (jared.johnson@lw.com); john@deweygroup.com (john@deweygroup.com); markfumia@dwt.com (markfumia@dwt.com); jstoddard@manatt.com (jstoddard@manatt.com); peter.pearson@bves.com (peter.pearson@bves.com); cathompson@anaheim.net (cathompson@anaheim.net); cathompson@anaheim.net (cathompson@anaheim.net); pauldonahue@ieee.org (pauldonahue@ieee.org); susan.preston@calcefangelfund.com (susan.preston@calcefangelfund.com); nao@cpuc.ca.gov (nao@cpuc.ca.gov); Choudhuri, Saipriya

(/O=PG&E/OU=Corporate/cn=Recipients/cn=S1C7);
ian.kalin@poweradvocate.com (ian.kalin@poweradvocate.com);
jpaul@naturener.net (jpaul@naturener.net); jim@govlaw.com (jim@govlaw.com);
chestonem@sharpec.com (chestonem@sharpec.com); Cherry, Brian K
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7);
rmccann@umich.edu (rmccann@umich.edu); mclaughlin@braunlegal.com
(mclaughlin@braunlegal.com); joyw@mid.org (joyw@mid.org);
brbarkovich@earthlink.net (brbarkovich@earthlink.net); bernardo@braunlegal.com
(bernardo@braunlegal.com); mpa@a-klaw.com (mpa@a-klaw.com);
kenneth.swain@navigantconsulting.com (kenneth.swain@navigantconsulting.com);
cem@newsdata.com (cem@newsdata.com); lisa_weinzimer@platts.com
(lisa_weinzimer@platts.com); alex.kang@itron.com (alex.kang@itron.com);
cbarry@iwpnews.com (cbarry@iwpnews.com); tim@marinemt.org
(tim@marinemt.org); wem@igc.org (wem@igc.org); vwood@smud.org
(vwood@smud.org); as2@cpuc.ca.gov (as2@cpuc.ca.gov); e-recipient@caiso.com
(e-recipient@caiso.com); cpuc@liberty-energy.com (cpuc@liberty-energy.com);
Huffman, Mark (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2);
Khamou, Karen (/O=PG&E/OU=Corporate/cn=Recipients/cn=K1K3);
bepstein@fablaw.com (bepstein@fablaw.com); rschmidt@bartlewells.com
(rschmidt@bartlewells.com); lisa.cherkas@morganstanley.com
(lisa.cherkas@morganstanley.com); anders.glader@elpower.com
(anders.glader@elpower.com); mjensen@mercedid.org (mjensen@mercedid.org);
lgonzale@energy.state.ca.us (lgonzale@energy.state.ca.us);
kowalewska@calpine.com (kowalewska@calpine.com);
david.oliver@navigantconsulting.com (david.oliver@navigantconsulting.com);
andykatz@sonic.net (andykatz@sonic.net); Tiffany.Roberts@lao.ca.gov
(Tiffany.Roberts@lao.ca.gov); tbrunello@calstrat.com (tbrunello@calstrat.com);
varanini@sbcglobal.net (varanini@sbcglobal.net);
meredith_lamey@transcanada.com (meredith_lamey@transcanada.com);
andy.vanhorn@vhcenergy.com (andy.vanhorn@vhcenergy.com);
steven@lipmanconsulting.com (steven@lipmanconsulting.com);
barmackm@calpine.com (barmackm@calpine.com); steveb@foresthealth.org
(steveb@foresthealth.org); tom_victorine@sjwater.com
(tom_victorine@sjwater.com); mark.thompson@powerex.com
(mark.thompson@powerex.com); castille@landsenergy.com
(castille@landsenergy.com); cte@eslawfirm.com (cte@eslawfirm.com);
tobinjmr@sbcglobal.net (tobinjmr@sbcglobal.net); saeed.farrokhpay@ferc.gov
(saeed.farrokhpay@ferc.gov); rroth@smud.org (rroth@smud.org);
dbranchcomb@spi-ind.com (dbranchcomb@spi-ind.com); rick@sierraecos.com
(rick@sierraecos.com); paulfenn@local.org (paulfenn@local.org);
cwooten@lumenxconsulting.com (cwooten@lumenxconsulting.com);
ed.smeloff@sunpowercorp.com (ed.smeloff@sunpowercorp.com);
dgrandy@caonsitegen.com (dgrandy@caonsitegen.com);
ron.perry@commercialenergy.net (ron.perry@commercialenergy.net);
eric.cherniss@gmail.com (eric.cherniss@gmail.com); john_dunn@transcanada.com
(john_dunn@transcanada.com); djurijew@capitalpower.com

(djurijew@capitalpower.com); tfaust@redwoodrenewables.com
(tfaust@redwoodrenewables.com); lterry@water.ca.gov (lterry@water.ca.gov);
dietrichlaw2@earthlink.net (dietrichlaw2@earthlink.net); Varner.Seaman@edpr.com
(Varner.Seaman@edpr.com); lcottle@winston.com (lcottle@winston.com);
tpomales@arb.ca.gov (tpomales@arb.ca.gov); CPUCCases@pge.com
(CPUCCases@pge.com); dws@r-c-s-inc.com (dws@r-c-s-inc.com); lindaf@mid.org
(lindaf@mid.org); davido@mid.org (davido@mid.org); jna@speakeasy.org
(jna@speakeasy.org); californiadockets@pacificorp.com
(californiadockets@pacificorp.com); sberlin@mccarthy.com (sberlin@mccarthy.com);
Livingston-Nunley, Grace
(/O=PG&E/OU=Corporate/cn=Recipients/cn=GXL2);
pmaxwell@navigantconsulting.com (pmaxwell@navigantconsulting.com);
c.mentzel@cleanenergymaui.com (c.mentzel@cleanenergymaui.com);
ed.mainland@sierraclub.org (ed.mainland@sierraclub.org); kdw@woodruff-expert-
services.com (kdw@woodruff-expert-services.com); eschroeder@keyesandfox.com
(eschroeder@keyesandfox.com); Margaret.Miller@brookfieldpower.com
(Margaret.Miller@brookfieldpower.com); keithwhite@earthlink.net
(keithwhite@earthlink.net); johnspilman@netzero.net (johnspilman@netzero.net);
DocToxics@aol.com (DocToxics@aol.com); spillott@capitalpower.com
(spillott@capitalpower.com); lynn@lmaconsulting.com (lynn@lmaconsulting.com);
nellie.tong@us.kema.com (nellie.tong@us.kema.com); hurlock@water.ca.gov
(hurlock@water.ca.gov); karen@klindh.com (karen@klindh.com);
teri.iked@pacificorp.com (teri.iked@pacificorp.com); shani@scvas.org
(shani@scvas.org); danielle@ceert.org (danielle@ceert.org); gtrobinson@lbl.gov
(gtrobinson@lbl.gov); matthew.schafer@nexteraenergy.com
(matthew.schafer@nexteraenergy.com); bossman_burgess@yahoo.com
(bossman_burgess@yahoo.com); JChamberlin@LSPower.com
(JChamberlin@LSPower.com); jluckhardt@downeybrand.com
(jluckhardt@downeybrand.com); masont@bv.com (masont@bv.com);
ramesh.ramchandani@commercialenergy.net
(ramesh.ramchandani@commercialenergy.net); rvn@a-klaw.com (rvn@a-klaw.com);
tsolomon@winston.com (tsolomon@winston.com); chris@emeter.com
(chris@emeter.com); Tashiana.Wangler@PacifiCorp.com
(Tashiana.Wangler@PacifiCorp.com); vsuravarapu@cera.com
(vsuravarapu@cera.com); brian.theaker@nrgenergy.com
(brian.theaker@nrgenergy.com); beth@beth411.com (beth@beth411.com);
ramonag@ebmud.com (ramonag@ebmud.com); jmcMahon@8760energy.com
(jmcMahon@8760energy.com); Koo, Alyssa (Law
(/O=PG&E/OU=Corporate/cn=Recipients/cn=ATK4); nformosa@winston.com
(nformosa@winston.com); dbp@cpuc.ca.gov (dbp@cpuc.ca.gov);
wylier@beutlercorp.com (wylier@beutlercorp.com); michael@rockwood-
consulting.com (michael@rockwood-consulting.com); jerry.mix@wattstopper.com
(jerry.mix@wattstopper.com); mjberm@davisenergy.com
(mjberm@davisenergy.com); tlindl@keyesandfox.com (tlindl@keyesandfox.com);
mlowder@rcrcnet.org (mlowder@rcrcnet.org); acsmith@stoel.com
(acsmith@stoel.com); clu@cpuc.ca.gov (clu@cpuc.ca.gov); SMK@cpuc.ca.gov

(SMK@cpuc.ca.gov); niki.bawa@cpuc.ca.gov (niki.bawa@cpuc.ca.gov); braun@braunlegal.com (braun@braunlegal.com); Reilly, Brooke A (/O=PG&E/OU=Corporate/cn=Recipients/cn=BARII); Vanko, Maria (/O=PG&E/OU=Corporate/cn=Recipients/cn=MNVA); aes@cpuc.ca.gov (aes@cpuc.ca.gov); TRH@cpuc.ca.gov (TRH@cpuc.ca.gov); CNL@cpuc.ca.gov (CNL@cpuc.ca.gov); bwm@cpuc.ca.gov (bwm@cpuc.ca.gov); jvandalen@calpine.com (jvandalen@calpine.com); MaryTuckerConsulting@mindspring.com (MaryTuckerConsulting@mindspring.com); rb3@cpuc.ca.gov (rb3@cpuc.ca.gov); as6@cpuc.ca.gov (as6@cpuc.ca.gov); mm2@cpuc.ca.gov (mm2@cpuc.ca.gov); aecaonline@gmail.com (aecaonline@gmail.com); JWaen@MarinEnergyAuthority.org (JWaen@MarinEnergyAuthority.org); cleni@energy.state.ca.us (cleni@energy.state.ca.us); dvidaver@energy.state.ca.us (dvidaver@energy.state.ca.us); mpryor@energy.state.ca.us (mpryor@energy.state.ca.us); pdoughma@energy.state.ca.us (pdoughma@energy.state.ca.us); gherrera@energy.state.ca.us (gherrera@energy.state.ca.us); kzocchet@energy.state.ca.us (kzocchet@energy.state.ca.us); claufenb@energy.state.ca.us (claufenb@energy.state.ca.us); rmiller@energy.state.ca.us (rmiller@energy.state.ca.us); hrait@energy.state.ca.us (hrait@energy.state.ca.us); jwoodwar@energy.state.ca.us (jwoodwar@energy.state.ca.us); jzr@cpuc.ca.gov (jzr@cpuc.ca.gov); mpo@cpuc.ca.gov (mpo@cpuc.ca.gov); jmh@cpuc.ca.gov (jmh@cpuc.ca.gov); mjaske@energy.state.ca.us (mjaske@energy.state.ca.us); psd@cpuc.ca.gov (psd@cpuc.ca.gov); svn@cpuc.ca.gov (svn@cpuc.ca.gov); jm3@cpuc.ca.gov (jm3@cpuc.ca.gov); nlr@cpuc.ca.gov (nlr@cpuc.ca.gov); mjs@cpuc.ca.gov (mjs@cpuc.ca.gov); jf2@cpuc.ca.gov (jf2@cpuc.ca.gov); kwh@cpuc.ca.gov (kwh@cpuc.ca.gov); ctd@cpuc.ca.gov (ctd@cpuc.ca.gov); wtr@cpuc.ca.gov (wtr@cpuc.ca.gov); kar@cpuc.ca.gov (kar@cpuc.ca.gov); tbo@cpuc.ca.gov (tbo@cpuc.ca.gov); meb@cpuc.ca.gov (meb@cpuc.ca.gov); dsc@cpuc.ca.gov (dsc@cpuc.ca.gov); jls@cpuc.ca.gov (jls@cpuc.ca.gov); iak@cpuc.ca.gov (iak@cpuc.ca.gov); nil@cpuc.ca.gov (nil@cpuc.ca.gov); mrl@cpuc.ca.gov (mrl@cpuc.ca.gov); ys2@cpuc.ca.gov (ys2@cpuc.ca.gov); jaa@cpuc.ca.gov (jaa@cpuc.ca.gov); jnr@cpuc.ca.gov (jnr@cpuc.ca.gov); rmd@cpuc.ca.gov (rmd@cpuc.ca.gov); jp6@cpuc.ca.gov (jp6@cpuc.ca.gov); kho@cpuc.ca.gov (kho@cpuc.ca.gov); mc3@cpuc.ca.gov (mc3@cpuc.ca.gov); rmm@cpuc.ca.gov (rmm@cpuc.ca.gov); gbarkalo@energy.state.ca.us (gbarkalo@energy.state.ca.us); JHaile@energy.ca.gov (JHaile@energy.ca.gov)

Cc: 'Sara Steck Myers' (ssmyers@att.net)

Bcc:

Subject: R11-05-005 (RPS) CEERT Comments on RPS Procurement Expenditure Limitations

TO: Assigned Commissioner Ferron and Assigned ALJs Simon, DeAngelis, Mattson, and Ebke

Service List in R11-05-005 (RPS)

Please find attached the Comments of the Center for Energy Efficiency and Renewable Technologies on RPS Procurement Expenditure Limitations in R.11-05-005 (RPS). These Comments have been filed and served pursuant to the Commission's Rules of Practice and Procedure and the ALJ's Ruling issued on January 24, 2012, with additional and separate hard copy service by U.S. Mail to Assigned ALJ Simon, the lead ALJ on the issue addressed.

The attached is a PDF file. This electronic service has been accomplished by 2 transmissions.

If you have any questions or problems receiving this document, please contact:

Sara Steck Myers

ssmyers@att.net

(415) 387-1904