

From: Shanna Foley

Sent: 10/22/2012 3:50:40 PM

mmazur@3PhasesRenewables.com (mmazur@3PhasesRenewables.com); deb@aklaw.com (deb@aklaw.com); nes@aklaw.com (nes@aklaw.com); filings@aklaw.com (filings@aklaw.com); mpa@aklaw.com (mpa@aklaw.com); whb@aklaw.com (whb@aklaw.com); mdjoseph@adamsbroadwell.com (mdjoseph@adamsbroadwell.com); ek@aklaw.com (ek@aklaw.com); rvn@aklaw.com (rvn@aklaw.com); ehsieh@a123systems.com (ehsieh@a123systems.com); ssmyers@att.net (ssmyers@att.net); e-recipient@caiso.com (e-recipient@caiso.com); todd.edmister@bingham.com (todd.edmister@bingham.com); GloriaB@anzaelectric.org (GloriaB@anzaelectric.org); blaising@braunlegal.com (blaising@braunlegal.com); jsanders@caiso.com (jsanders@caiso.com); beth@beth411.com (beth@beth411.com); nicole@braunlegal.com (nicole@braunlegal.com); ahmad.faruqui@brattle.com (ahmad.faruqui@brattle.com); AKaplan@BrownRudnick.com (AKaplan@BrownRudnick.com); margaret.miller@brookfieldrenewable.com (margaret.miller@brookfieldrenewable.com); Berlinski@BeaconPower.com (Berlinski@BeaconPower.com); WJKeese@aol.com (WJKeese@aol.com); dhou@caiso.com (dhou@caiso.com); ronknecht@aol.com (ronknecht@aol.com); jcandelaria@aspenerg.com (jcandelaria@aspenerg.com); kmills@cbbf.com (kmills@cbbf.com); janreid@coastecon.com (janreid@coastecon.com); igoodman@commerceenergy.com (igoodman@commerceenergy.com); Patrick.VanBeek@CommercialEnergy.net (Patrick.VanBeek@CommercialEnergy.net); kowalewskia@calpine.com (kowalewskia@calpine.com); djurijew@capitalpower.com (djurijew@capitalpower.com); cpacc@calpine.com (cpacc@calpine.com); dbp@cpuc.ca.gov (dbp@cpuc.ca.gov); david@ceert.org (david@ceert.org); matthew.barmack@calpine.com (matthew.barmack@calpine.com); jack@casaraquel.com (jack@casaraquel.com); slazerow@cbeal.org (slazerow@cbeal.org); clu@cpuc.ca.gov (clu@cpuc.ca.gov); ao1@cpuc.ca.gov (ao1@cpuc.ca.gov); jderosa@ces-ltd.com (jderosa@ces-ltd.com); dil@cpuc.ca.gov (dil@cpuc.ca.gov); Rachel@ConsciousVenturesGroup.com (Rachel@ConsciousVenturesGroup.com); sahm@clean-coalition.org (sahm@clean-coalition.org); df1@cpuc.ca.gov (df1@cpuc.ca.gov); dyana@clean-coalition.org (dyana@clean-coalition.org); ag2@cpuc.ca.gov (ag2@cpuc.ca.gov); aw3@cpuc.ca.gov (aw3@cpuc.ca.gov); randy.keller@calenergy.com (randy.keller@calenergy.com); STomec@CapitalPower.com (STomec@CapitalPower.com); brc@cpuc.ca.gov (brc@cpuc.ca.gov); hudsonr@conedsolutions.com (hudsonr@conedsolutions.com); tam@clean-coalition.org (tam@clean-coalition.org); FairbanksA@ConEdSolutions.com (FairbanksA@ConEdSolutions.com); charles.purshouse@camcoglobal.com (charles.purshouse@camcoglobal.com); eszalkowski@cleanlineenergy.com (eszalkowski@cleanlineenergy.com); cu2@cpuc.ca.gov (cu2@cpuc.ca.gov); bvitalc@climatetrust.org (bvitalc@climatetrust.org); lmh@eslawfirm.com

To:

(lmh@eslawfirm.com); edwardoneill@dwt.com (edwardoneill@dwt.com);
brbarkovich@earthlink.net (brbarkovich@earthlink.net);
jody_london_consulting@earthlink.net (jody_london_consulting@earthlink.net);
glw@eslawfirm.com (glw@eslawfirm.com); mtierney-lloyd@enernoc.com (mtierney-
lloyd@enernoc.com); liddell@energyattorney.com (liddell@energyattorney.com);
bobgex@dwt.com (bobgex@dwt.com); gmorris@emf.net (gmorris@emf.net);
DWTCPUCDOCKETS@dwt.com (DWTCPUCDOCKETS@dwt.com);
douglass@energyattorney.com (douglass@energyattorney.com);
kb@EnerCalUSA.com (kb@EnerCalUSA.com); andrea.morrison@directenergy.com
(andrea.morrison@directenergy.com); abb@eslawfirm.com (abb@eslawfirm.com);
dkk@eslawfirm.com (dkk@eslawfirm.com); jeffgray@dwt.com (jeffgray@dwt.com);
tomb@crossborderenergy.com (tomb@crossborderenergy.com);
klatt@energyattorney.com (klatt@energyattorney.com); mpryor@energy.state.ca.us
(mpryor@energy.state.ca.us); cte@eslawfirm.com (cte@eslawfirm.com);
atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com);
dietrichlaw2@earthlink.net (dietrichlaw2@earthlink.net); bsb@eslawfirm.com
(bsb@eslawfirm.com); ccollins@Energystrat.com (ccollins@Energystrat.com);
skh@cpuc.ca.gov (skh@cpuc.ca.gov); mpo@cpuc.ca.gov (mpo@cpuc.ca.gov);
pcort@earthjustice.org (pcort@earthjustice.org); wrostov@earthjustice.org
(wrostov@earthjustice.org); jbaird@earthjustice.org (jbaird@earthjustice.org);
will.mitchell@cpv.com (will.mitchell@cpv.com); nlr@cpuc.ca.gov
(nlr@cpuc.ca.gov); kwh@cpuc.ca.gov (kwh@cpuc.ca.gov); nws@cpuc.ca.gov
(nws@cpuc.ca.gov); b.bordine@d-e-c-a.org (b.bordine@d-e-c-a.org);
cbk@eslawfirm.com (cbk@eslawfirm.com); efr@cpuc.ca.gov (efr@cpuc.ca.gov);
wtr@cpuc.ca.gov (wtr@cpuc.ca.gov); kar@cpuc.ca.gov (kar@cpuc.ca.gov);
los@cpuc.ca.gov (los@cpuc.ca.gov); mk1@cpuc.ca.gov (mk1@cpuc.ca.gov);
iak@cpuc.ca.gov (iak@cpuc.ca.gov); kho@cpuc.ca.gov (kho@cpuc.ca.gov);
oliviapara@dwt.com (oliviapara@dwt.com); aadeyeye@earthjustice.org
(aadeyeye@earthjustice.org); john@dicksongeesman.com
(john@dicksongeesman.com); ds1@cpuc.ca.gov (ds1@cpuc.ca.gov);
connie.leni@energy.ca.gov (connie.leni@energy.ca.gov);
mike.jaske@energy.state.ca.us (mike.jaske@energy.state.ca.us); dmg@cpuc.ca.gov
(dmg@cpuc.ca.gov); mla@cpuc.ca.gov (mla@cpuc.ca.gov); phs@cpuc.ca.gov
(phs@cpuc.ca.gov); ynl@cpuc.ca.gov (ynl@cpuc.ca.gov);
cpospisil@edisonmission.com (cpospisil@edisonmission.com); p.shepard@dgc-
us.com (p.shepard@dgc-us.com); d.hicks@dgc-us.com (d.hicks@dgc-us.com);
nick@ethree.com (nick@ethree.com); kd1@cpuc.ca.gov (kd1@cpuc.ca.gov);
rc5@cpuc.ca.gov (rc5@cpuc.ca.gov); vuk@cpuc.ca.gov (vuk@cpuc.ca.gov);
py2@cpuc.ca.gov (py2@cpuc.ca.gov); lily.chow@cpuc.ca.gov
(lily.chow@cpuc.ca.gov); jordan.parrillo@cpuc.ca.gov
(jordan.parrillo@cpuc.ca.gov); nk1@cpuc.ca.gov (nk1@cpuc.ca.gov);
fmobasheri@electricpowergroup.com (fmobasheri@electricpowergroup.com);
Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7);
RegRelCPUCCases
(/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases); Duenas, Rosa
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=R1DJ1);

sdhilton@stoel.com (sdhilton@stoel.com); jeanne.sole@sfgov.org
(jeanne.sole@sfgov.org); CentralFiles@SempraUtilities.com
(CentralFiles@SempraUtilities.com); jimross@r-c-s-inc.com (jimross@r-c-s-
inc.com); cem@newsdata.com (cem@newsdata.com); case.admin@sce.com
(case.admin@sce.com); mrw@mrwassoc.com (mrw@mrwassoc.com);
wem@igc.org (wem@igc.org); pthomsen@ormat.com (pthomsen@ormat.com);
bcragg@goodinmacbride.com (bcragg@goodinmacbride.com);
tdarton@pilotpowergroup.com (tdarton@pilotpowergroup.com); Middlekauff,
Charles (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CRMd); Jones,
Kimberly (/O=PG&E/OU=Corporate/cn=Recipients/cn=KCJ5); Gonzales, Matthew
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRGg); kelly@votesolar.org
(kelly@votesolar.org); rick_noger@praxair.com (rick_noger@praxair.com);
shong@goodinmacbride.com (shong@goodinmacbride.com); Huffman, Mark (Law)
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2); lwisland@ucsusa.org
(lwisland@ucsusa.org); adam.green@solarreserve.com
(adam.green@solarreserve.com); Zahariudakis, George
(/O=PG&E/OU=Corporate/cn=Recipients/cn=GxZ5); tam.hunt@gmail.com
(tam.hunt@gmail.com); TPhillips@TigerNaturalGas.com
(TPhillips@TigerNaturalGas.com); sue.mara@RTOadvisors.com
(sue.mara@RTOadvisors.com); matthew@turn.org (matthew@turn.org); Gong,
Alice (/O=PG&E/OU=Corporate/cn=Recipients/cn=AxL3); Patry, Daniel
(/O=PG&E/OU=Corporate/cn=Recipients/cn=DbP0);
AMSmith@SempraUtilities.com (AMSmith@SempraUtilities.com);
kara.morgan@tac-denver.com (kara.morgan@tac-denver.com); dorth@krcd.org
(dorth@krcd.org); DBodine@LibertyPowerCorp.com
(DBodine@LibertyPowerCorp.com); gbass@noblesolutions.com
(gbass@noblesolutions.com); mcampbell@sflower.org (mcampbell@sflower.org);
eddyconsulting@gmail.com (eddyconsulting@gmail.com); steven@iepa.com
(steven@iepa.com); martinhomec@gmail.com (martinhomec@gmail.com);
marcusdacunha@hotmail.com (marcusdacunha@hotmail.com);
lcottle@winston.com (lcottle@winston.com); Diane.Fellman@nrgenergy.com
(Diane.Fellman@nrgenergy.com); dws@r-c-s-inc.com (dws@r-c-s-inc.com);
californiadockets@pacificorp.com (californiadockets@pacificorp.com);
Andrew.Wang@SolarReserve.com (Andrew.Wang@SolarReserve.com);
kdw@woodruff-expert-services.com (kdw@woodruff-expert-services.com);
rkmoore@gswater.com (rkmoore@gswater.com); sean.beatty@genon.com
(sean.beatty@genon.com); ddavie@wellhead.com (ddavie@wellhead.com);
JChamberlin@LSPower.com (JChamberlin@LSPower.com);
mday@goodinmacbride.com (mday@goodinmacbride.com);
mary.wiencke@pacificorp.com (mary.wiencke@pacificorp.com);
brian.theaker@nrgenergy.com (brian.theaker@nrgenergy.com);
jstoddard@manatt.com (jstoddard@manatt.com); mmattes@nossaman.com
(mmattes@nossaman.com); dmarcus2@sbcglobal.net (dmarcus2@sbcglobal.net);
theresa.mueller@sfgov.org (theresa.mueller@sfgov.org);
carol.schmidfrazee@sce.com (carol.schmidfrazee@sce.com);
pushkarwagle@flynnrci.com (pushkarwagle@flynnrci.com); bmarshall@psrec.coop

(bmarshall@psrec.coop); dwang@nrdc.org (dwang@nrdc.org); martin.kadillak@shell.com (martin.kadillak@shell.com); dansvec@hdo.net (dansvec@hdo.net); rpsantos@semprautilities.com (rpsantos@semprautilities.com); agerterlinda@gmail.com (agerterlinda@gmail.com); Jarman, Thomas A (/O=PG&E/OU=Corporate/cn=Recipients/cn=TAJ8); WKeilani@SempraUtilities.com (WKeilani@SempraUtilities.com); philm@scdenergy.com (philm@scdenergy.com); bspeckman@nexant.com (bspeckman@nexant.com); smartinez@nrdc.org (smartinez@nrdc.org); daniel.h.kim@me.com (daniel.h.kim@me.com); akbar.jazayeri@sce.com (akbar.jazayeri@sce.com); abraham.silverman@nrgenergy.com (abraham.silverman@nrgenergy.com); gifford.jung@powerex.com (gifford.jung@powerex.com); stephen.t.greenleaf@jpmorgan.com (stephen.t.greenleaf@jpmorgan.com); Melissa.Hovsepian@sce.com (Melissa.Hovsepian@sce.com); KKloberdanz@SempraUtilities.com (KKloberdanz@SempraUtilities.com); jleslie@mckennalong.com (jleslie@mckennalong.com); matt.vespa@SierraClub.org (matt.vespa@SierraClub.org); TLindl@kfwlaw.com (TLindl@kfwlaw.com); tculley@kfwlaw.com (tculley@kfwlaw.com); Rachel.McMahon@firstsolar.com (Rachel.McMahon@firstsolar.com); ksoutherland@tas.com (ksoutherland@tas.com); greencowboysdf@gmail.com (greencowboysdf@gmail.com); sbailey@semprausgp.com (sbailey@semprausgp.com); daking@semprausgp.com (daking@semprausgp.com); irene@igc.org (irene@igc.org); ericg@votesolar.org (ericg@votesolar.org); TCSaile@SempraUtilities.com (TCSaile@SempraUtilities.com); proceedings@megawatts.com (proceedings@megawatts.com); CalConsumersAlliance@gmail.com (CalConsumersAlliance@gmail.com); chris.hendrix@wal-mart.com (chris.hendrix@wal-mart.com); andra.pligavko@gmail.com (andra.pligavko@gmail.com); JWaen@MarinEnergy.com (JWaen@MarinEnergy.com); mark.tucker@pacificcorp.com (mark.tucker@pacificcorp.com); bruce.perlstein@navigant.com (bruce.perlstein@navigant.com); Iwahashi, Miyuki (/O=PG&E/OU=Corporate/cn=Recipients/cn=MXI8); lchaset@keyesandfox.com (lchaset@keyesandfox.com); Sarah.Friedman@SierraClub.org (Sarah.Friedman@SierraClub.org); Rich.Quattrini@jci.com (Rich.Quattrini@jci.com); rfagan@synapse-energy.com (rfagan@synapse-energy.com); David.Weidberg@jci.com (David.Weidberg@jci.com); ravage@ieta.org (ravage@ieta.org); Adam.Gusman@GlacialEnergy.com (Adam.Gusman@GlacialEnergy.com); tvitolo@synapse-energy.com (tvitolo@synapse-energy.com); marilyn@sbesc.com (marilyn@sbesc.com); PLuckow@Synapse-Energy.com (PLuckow@Synapse-Energy.com); KUlrich@foe.org (KUlrich@foe.org); kristine@SoCalTelephone.com (kristine@SoCalTelephone.com); gestrada@krismayeslaw.com (gestrada@krismayeslaw.com); adaberko@starwood.com (adaberko@starwood.com); rwilson@synapse-energy.com (rwilson@synapse-energy.com); snichols@summitpower.com (snichols@summitpower.com); kwd@vnf.com (kwd@vnf.com); amanda.klopf@sce.com (amanda.klopf@sce.com);

jshields@ssjid.com (jshields@ssjid.com); peter.cavan@pulseenergy.com
(peter.cavan@pulseenergy.com); greg.blue@sbcglobal.net
(greg.blue@sbcglobal.net); lschwartz@raponline.org (lschwartz@raponline.org);
Deborah Behles (dbehles@ggu.edu); ERasmussen@MarinEnergy.com
(ERasmussen@MarinEnergy.com); ndivekar@synapse-energy.com
(ndivekar@synapse-energy.com); Shanna Foley (sfoley@ggu.edu);
mansell@ieta.org (mansell@ieta.org); brad.meikle@sovereignenergy.net
(brad.meikle@sovereignenergy.net)

Cc:

Bcc:

Subject: R.12-03-014: CEJA and Clean Coalition's Response to MegaWatt Motion

Dear Parties to Proceeding R.12-03-14:

Attached, please find the Response to MegaWatt Storage Farms Motion on Behalf of the California Environmental Justice Alliance and the Clean Coalition.

Please contact me if there are any issues with the attachments.

Thank you,

Shanna Foley

Environmental Law & Justice Clinic
536 Mission Street
San Francisco, CA 94015
tel: (415)-369-5351
fax: (415)-896-2540
e: sfoley@ggu.edu