

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of "**Opening Comments of Environmental Defense Fund Responding to the Administrative Law Judges' Ruling Inviting Comments Dated Nov. 6, 2012**" on all known parties to R. 12-06-013 by e-mail message with the document attached to each person named in the official service list.

Executed on November 20, 2012 at New York, New York.

/s/ Raya Salter

Raya Salter
Attorney
Environmental Defense Fund
257 Park Avenue South
New York, NY 10010
Phone - (212) 505-1320
rsalter@edf.org



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Parties

ENRIQUE GALLARDO
 THE GREENLINING INSTITUTE
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: THE GREENLINING INSTITUTE

NORA SHERIFF
 ALCANTAR & KAHL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CALIFORNIA LARGE ENERGY CONSUMERS
 ASSOC./ENERGY PRODUCERS USERS COALITION

SACHU CONSTANTINE
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CALIFORNIA CENTER FOR SUSTAINABLE
 ENERGY

SCOTT BLAISING
 BRAUN BLAISING MCLAUGHLIN P.C.
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: LOCAL ENERGY AGGREGATION NETWORK

STEVE SCHILLER
 CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CALIFORNIA ENERGY EFFICIENCY
 INDUSTRY COUNCIL

RAYA SALTER
 ATTORNEY
 ENVIRONMENTAL DEFENSE FUND
 257 PARK AVENUE SOUTH, 17TH FLOOR
 NEW YORK, NY 10010
 FOR: ENVIRONMENTAL DEFENSE FUND

JOHN PACHECO
 SAN DIEGO GAS & ELECTRIC COMPANY
 101 ASH STREET, HQ12B
 SAN DIEGO, CA 62101
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

JORGE CORRALEJO
 CHAIRMAN / PRESIDENT
 LAT. BUS. CHAMBER OF GREATER L.A.
 634 S. SPRING STREET, STE 600
 LOS ANGELES, CA 90014
 FOR: LATINO BUSINESS CHAMBER OF GREATER

LOS ANGELES

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

AKBAR JAZAYEIRI
 DIR. REVENUE & TARIFFS, RM 390
 SOUTHERN CALIFORNIA EDISON COMPANY
 PO BOX 800, 2241 WALNUT GROVE AVE
 ROSEMEAD, CA 91770
 FOR: SCE

GLORIA ING
 ATTORNEY AT LAW
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE./PO BOX 800
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

BRUCE REED
 ATTORNEY AT LAW
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE., PO BOX 800
 ROSEMEAD, CA 91770-3714
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

NGUYEN QUAN
 MGR - REGULATORY AFFAIRS
 GOLDEN STATE WATER CO. - ELECTRIC OP.
 630 EAST FOOTHILL BOULEVARD
 SAN DIMAS, CA 91773
 FOR: GOLDEN STATE WATER COMPANY

ALVIN PAK
 SAN DIEGO GAS & ELECTRIC CO.
 101 ASH STREET, HQ-12
 SAN DIEGO, CA 92101
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL SHAMES
 SAN DIEGO CONSUMERS' ACTION NETWORK
 6975 CAMINO AMERO
 SAN DIEGO, CA 92111
 FOR: SAN DIEGO CONSUMERS' ACTION NETWORK

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

FAITH BAUTISTA
 PRESIDENT
 NATIONAL ASIAN AMERICAN COALITION
 1758 EL CAMINO REAL
 SAN BRUNO, CA 94066
 FOR: NATIONAL ASIAN AMERICAN COALITION

JAMIE MAULDIN
 ADAMS BROADWELL JOSEPH & CARDOZO, PC
 601 GATEWAY BLVD., STE. 1000
 SOUTH SAN FRANCISCO, CA 94080
 FOR: COALITION OF CALIFORNIA UTILITY
 EMPLOYEES

ERIN GRIZARD
 BLOOM ENERGY
 1299 ORLEANS DRIVE
 SUNNYVALE, CA 94089
 FOR: BLOOM ENERGY

GREGORY HEIDEN
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 5039
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: DRA

HAYLEY GOODSON
 THE UTILITY REFORM NETWORK
 115 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94104
 FOR: TURN

SHERYL CARTER
 NATURAL RESOURCES DEFENSE COUNCIL
 111 SUTTER ST., 20TH FLR.
 SAN FRANCISCO, CA 94104-4540
 FOR: NATURAL RESOURCES DEFENSE COUNCIL

JEANNE ARMSTRONG
ATTORNEY AT LAW
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

VIDHYA PRABHAKARAN
DAVIS WRIGHT & TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111
FOR: CALIFORNIA PACIFIC ELECTRIC
COMPANY, LLC

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGY

BRIAN CHERRY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B10C
SAN FRANCISCO, CA 94177
FOR: PG&E

LEN CANTY
CHAIRMAN
BLACK ECONOMIC COUNCIL
484 LAKE PARK AVE., SUITE 338
OAKLAND, CA 94610
FOR: BLACK ECONOMIC COUNCIL

JASON B. KEYES
COUNSEL
KEYES FOX & WEIDMAN LLP
436 14TH STREET, STE. 1305
OAKLAND, CA 94612
FOR: INTERSTATE RENEWABLE ENERGY
COUNCIL, INC.

MELISSA W. KASNITZ
CENTER FOR ACCESSIBLE TECHNOLOGY
3075 ADELIN STREET, SUITE 220
BERKELEY, CA 94703
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY

ANDY KATZ
LAW OFFICES OF ANDY KATZ
2150 ALLSTON WAY, STE. 400
BERKELEY, CA 94704
FOR: SIERRA CLUB

LAURA WISLAND
SENIOR ENERGY ANALYST
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVE., STE. 203
BERKELEY, CA 94704
FOR: UNION OF CONCERNED SCIENTISTS

ELIZABETH KELLY
REG. AND LEGAL COUNSEL
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, SUITE 320
SAN RAFAEL, CA 94901
FOR: MARIN ENERGY AUTHORITY

BRAD BORDINE
DISTRIBUTED ENERGY CONSUMER ADVOCATES
516 WHITEWOOD DRIVE
SAN RAFAEL, CA 94903
FOR: DISTRIBUTED ENERGY CONSUMER
ADVOCATES

ANNE SMART
DIR - ENERGY
SILICON VALLEY LEADERSHIP GROUP
2001 GATEWAY PLACE, STE. 101E
SAN JOSE, CA 95110
FOR: SILICON VALLEY LEADERSHIP GROUP

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

ERIC EISENHAMMER
COALITION OF ENERGY USERS
4010 FOOTHILLS BLVD., STE 103 NO. 115
ROSEVILLE, CA 95747
FOR: COALITION OF ENERGY USERS

NICOLE BLAKE
CONSUMER FEDERATION OF CALIFORNIA
1107 9TH STREET, STE. 625
SACRAMENTO, CA 95814
FOR: CONSUMER FEDERATION OF CALIFORNIA

KAREN NORENE MILLS
ASSOC. COUNSEL
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

BOB DODDS
 CALIFORNIA PACIFIC ELECTRIC COMPANY
 933 ELOISE AVENUE
 SOUTH LAKE TAHOE, CA 96150
 FOR: CALIFORNIA PACIFIC ELECTRIC
 COMPANY, LLC

SARAH WALLACE
 PACIFICORP
 825 NE MULTNOMAH STREET, STE. 1800
 PORTLAND, OR 97232
 FOR: PACIFICORP

Information Only

BARBARA BARKOVICH
 BARKOVICH & YAP
 EMAIL ONLY
 EMAIL ONLY, CA 00000

CASE COORDINATION
 PACIFIC GAS AND ELECTRIC COMPANY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

CHARLIE BUCK
 CALIF. CENTER FOR SUSTAINABLE ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

DIANE I. FELLMAN
 DIRECTOR, REGULATORY & GOV'T AFFAIRS
 NRG WEST & SOLAR
 EMAIL ONLY
 EMAIL ONLY, CA 00000

ERIN FALQUIER
 CA. ENERGY EFFICIENCY INDUSTRY COUNCIL
 EMAIL ONLY
 EMAIL ONLY, CA 00000

EVELYN KAHL
 ALCANTAR & KAHL
 EMAIL ONLY
 EMAIL ONLY, CA 00000

FRANCOIS CARLIER
 CODA STRATEGIES
 EMAIL ONLY
 EMAIL ONLY, CA 00000

JACK CLARK
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

JOELLE STEWARD
 PACIFICORP
 EMAIL ONLY
 EMAIL ONLY, OR 00000

MATTHEW O'KEEFE
 CAL. ENERGY EFFECIENCY INDUSTRY COUNCIL
 EMAIL ONLY
 EMAIL ONLY, CA 00000

NICK PAPPAS
 OFFICE OF ASSEMBLYMAN NATHAN FLETCHER
 EMAIL ONLY
 EMAIL ONLY, CA 00000

OLIVIA PARA
 DAVIS WRIGHT TREMAINE LLP
 EMAIL ONLY
 EMAIL ONLY, CA 00000

SEPHRA NINOW
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000

SHERIDAN J. PAUKER
 WILSON SONSINI GOODRICH & ROSATI
 EMAIL ONLY
 EMAIL ON LY, CA 00000

STEPHANIE C. CHEN
 THE GREENLINING INSTITUTE
 EMAIL ONLY
 EMAIL ONLY, CA 00000

SUSANNAH CHURCHILL
 SOLAR POLICY ADVOCATE
 THE VOTE SOLAR INITIATIVE
 EMAIL ONLY
 EMAIL ONLY, CA 00000

TIMOTHY TREADWELL
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
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

DAVID MARCUS
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

KAREN TERRANOVA
ALCANTAR & KAHL
EMAIL ONLY
EMAIL ON LY, CA 00000-0000

SIOBHAN FOLEY
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

TERRY CLAPHAM
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

NANCY BROCKWAY
NBROCKWAY & ASSOCIATES
10 ALLEN STREET
BOSTON, MA 02131

DAN DELUREY
DEMAND RESPONSE AND SMART GRID COALITION
1301 CONNECTICUT AVE., NW, STE. 350
WASHINGTON, DC 20036
FOR: DEMAND RESPONSE AND SMART GRID
COALITION

KIM KIENER
REGIONAL DIRECTOR-WESTERN U.S.
SOLAR ELECTRIC POWER ASSOCIATION
1220 19TH STREET, NW, STE. 800
WASHINGTON, DC 20036

PAUL M. PIETSCH
RESEARCH COORDINATOR
DRSG COALITION
1301 CONNECTICUT AVE., NW, STE. 350
WASHINGTON, DC 20036

RICK GILLIAM
THE VOTE SOLAR INITIATIVE
1120 PEARL STREET
BOULDER, CO 80302

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

FADIA KHOURY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

RUSSELL GARWACKI
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

JOHN W. LESLIE
MCKENNA LONG & ALDRIDGE LLP
600 WEST BROADWAY, SUITE 2600
SAN DIEGO, CA 92101

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

TODD CAHILL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123

ERIC WRIGHT
RATE ANALYST
BEAR VALLEY ELECTRIC SERVICE
PO BOX 1547

JANETTE OLKO
ELECTRIC UTILITY DIVISION MANAGER
CITY OF MORENO VALLEY
14325 FREDERICK ST., STE. 9

BIG BEAR LAKE, CA 92315

MORENO VALLEY, CA 92552

MONA TIERNEY-LLOYD
 DIR., WESTERN REGULATORY AFFAIRS
 ENERNOC, INC.
 PO BOX 378
 CAYUCOS, CA 93430

EDWARD G. CAZALET
 TEMIX, INC.
 101 FIRST STREET
 LOS ALTOS HILLS, CA 94022

SUE MARA
 PRINCIPAL
 RTO ADVISORS, LLC
 164 SPRINGDALE WAY
 REDWOOD CITY, CA 94062

ROBERT GNAIZDA
 OF COUNSEL
 1758 EL CAMINO REAL
 SAN BRUNO, CA 94066

SHALINI SWAROOP
 SR. STAFF ATTORNEY
 NATIONAL ASIAN AMERICAN COALITION
 1758 EL CAMINO REAL
 SAN BRUNO, CA 94066

MARC D. JOSEPH
 ADAMS BROADWELL JOSEPH & CARDOZO
 601 GATEWAY BLVD., SUITE 1000
 SOUTH SAN FRANCISCO, CA 94080

SHAIBYA DALAL
 REGULATORY ANALYST
 SAN FRANCISCO PUBLIC UTILITIES COMM.
 525 GOLDEN GATE AVE., 7TH FLOOR
 SAN FRANCISCO, CA 94102

JOSH BODE
 FREEMAN SULLIVAN & COMPANY
 101 MONTGOMERY STREET, 15TH FLOOR
 SAN FRANCISCO, CA 94104

MARCEL HAWIGER
 THE UTILITY REFORM NETWORK
 115 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94104

MATTHEW FREEDMAN
 THE UTILITY REFORM NETWORK
 115 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94104
 FOR: THE UTILITY REFORM NETWORK

MICHAEL PERRY
 FREEMAN SULLIVAN & CO.
 101 MONTGOMERY ST., 15TH FLOOR
 SAN FRANCISCO, CA 94104

MICHAEL SULLIVAN
 FREEMAN SULLIVAN & CO.
 101 MONTGOMERY ST., 15TH FLOOR
 SAN FRANCISCO, CA 94104

SAM HOLMBERG
 FREEMAN SULLIVAN & CO.
 101 MONTGOMERY ST., 15TH FLOOR
 SAN FRANCISCO, CA 94104

STEPHEN GEORGE
 FREEMAN SULLIVAN & CO.
 101 MONTGOMERY ST., 15TH FLOOR
 SAN FRANCISCO, CA 94104

ARMIT SINGH
 PACIFIC GAS & ELECTRIC COMPANY
 77 BEALE STREET, ROOM 1061
 SAN FRANCISCO, CA 94105

CHRISTOPHER J. WARNER
 PACIFIC GAS AND ELECTRIC COMPANY
 LAW DEPT.
 77 BEALE STREET, MC B30A, ROOM 3145
 SAN FRANCISCO, CA 94105

CLAUDIA BUSTAMANTE
 PACIFIC GAS & ELECTRIC COMPANY
 77 BEALE STREET, ROOM 991
 SAN FRANCISCO, CA 94105

HOLLY GORDON
 VP, LEGISLATIVE & REGULATORY AFFAIR
 SUNRUN INC.
 45 FREMONT STREET, 32ND FL.
 SAN FRANCISCO, CA 94105

JAMIE FINE
SR. ECONOMIST
ENVIRONMENTAL DEFENSE FUND
123 MISSION ST., 28TH FLOOR
SAN FRANCISCO, CA 94105

KAREN KHAMOU
ENERGY PROCEEDINGS DEPT.
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE STREET, ROOM 908
SAN FRANCISCO, CA 94105

MATTHEW VESPA
STAFF ATTORNEY
SIERRA CLUB
85 SECOND ST., 2ND FL
SAN FRANCISCO, CA 94105

STEVE HAERTLE
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE STREET, ROOM 967
SAN FRANCISCO, CA 94105

WALKER WRIGHT
SUNRUN INC.
45 FREMONT ST., 32ND FL.
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST STE 303
SAN FRANCISCO, CA 94117-2242

STEPHEN M. BARRAGER
BAKER STREET PUBLISHING, LLC
2703 BRODERICK STREET
SAN FRANCISCO, CA 94123

CHRIS KING
SIEMENS SMART GRID SOLUTIONS
4000 E. THIRD AVE., STE. 400
FOSTER CITY, CA 94404

KERRY HATTEVIK
DIRECTOR OF WEST MARKET AFFAIRS
NEXT ERA ENERGY RESOURCES LLC
829 ARLINGTON BLVD.
EL CERRITO, CA 94530

ALLEN MCWONGAHEY
1431 MAPLEWOOD DR.
LIVERMORE, CA 94551

SEAN BEATTY
DIRECTOR - WEST REGULATORY AFFAIRS
GENON ENERGY, INC.
PO BOX 192
PITTSBURG, CA 94565

JOSEPH F. WIEDMAN
ATTORNEY
KEYES FOX & WIEDMAN LLP
436 - 14TH STREET, SUITE 1305
OAKLAND, CA 94612
FOR: INTERSTATE RENEWABLE ENERGY
COUNCIL (IREC)

TOM BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710

JEREMY WAEN
REGULATORY ANALYST
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, STE. 320
SAN RAFAEL, CA 94901

JAMES WEIL
DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 866
NOVATO, CA 94948

JIMI NETNISS
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

JOY A. WARREN
REGULATORY ADMINISTRATOR
MODESTO IRRIGATION DISTRICT
1231 11TH STREET

LINDA FISCHER
LEGAL DEPARTMENT
MODESTO IRRIGATION DISTRICT
1231 11TH STREET

MODESTO, CA 95354

GAYATRI M. SCHILBERG
 JBS ENERGY, INC.
 311 D STREET, SUITE A
 WEST SACRAMENTO, CA 95605

BRIAN THEAKER
 DIRECTOR - MARKET AFFAIRS
 NRG ENERGY, INC.
 3161 KEN DEREK LANE
 PLACERVILLE, CA 95667

DAVID MILLER
 CEERT
 1100 ELEVENTH ST., SUITE 311
 SACRAMENTO, CA 95814

NICOLE WRIGHT
 BRAUN BLAISING MCLAUGHLIN & SMITH
 915 L STREET, SUITE 1270
 SACRAMENTO, CA 95814

RACHEL GOLD
 LARGE SCALE SOLAR ASSOCIATION
 2501 PORTOLA WAY
 SACRAMENTO, CA 95818

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

SARA BIRMINGHAM
 SOLAR ENERGY INDUSTRIES ASSOCIATION
 3300 NE 157TH PLACE
 PORTLAND, OR 97230

MODESTO, CA 95354

WILLIAM B. MARCUS
 CONSULTING ECONOMIST
 JBS ENERGY, INC.
 311 D STREET, SUITE A
 WEST SACRAMENTO, CA 95605

DANIELLE OSBORN MILLS
 POLICY DIRECTOR
 CEERT
 1100 11TH STREET, SUITE 311
 SACRAMENTO, CA 95814

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

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

ANN TROWBRIDGE
 ATTORNEY
 DAY CARTER & MURPHY LLP
 3620 AMERICAN RIVER DR., STE. 205
 SACRAMENTO, CA 95864

ROSS VAN NESS
 ALCANTAR & KAHL
 1300 SW FIFTH AVE., STE. 1750
 PORTLAND, OR 97209

CATHIE ALLEN
 PACIFICORP
 825 NE MULTNOMAH STREET, STE 2000
 PORTLAND, OR 97232

State Service

ARTHUR J. O'DONNELL
 CALIF PUBLIC UTILITIES COMMISSION
 INFRASTRUCTURE PLANNING AND PERMITTING B
 ROOM 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER DANFORTH
 CALIF PUBLIC UTILITIES COMMISSION

AVA N. TRAN
 CALIF PUBLIC UTILITIES COMMISSION
 DEMAND SIDE PROGRAMS BRANCH
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER R VILLARREAL
 CALIF PUBLIC UTILITIES COMMISSION

ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

DEXTER E. KHOURY
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELISE TORRES
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GABRIEL PETLIN
CALIF PUBLIC UTILITIES COMMISSION
DEMAND SIDE ANALYSIS BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
DEMAND SIDE PROGRAMS BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEANNE MCKINNEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN CAMILLE WATTS-ZAGHA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LEE-WHEI TAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARZIA ZAFAR
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 2-B
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHELE KITO
CALIF PUBLIC UTILITIES COMMISSION
DEMAND SIDE ANALYSIS BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

SCOTT MURTISHAW
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5115
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ZHEN ZHANG
CALIF PUBLIC UTILITIES COMMISSION
DEMAND SIDE ANALYSIS BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PATRICK SAXTON
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST., MS-37
SACRAMENTO, CA 95814

REBECCA TSAI-WEI LEE
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
770 L Street, Suite 1250
Sacramento, CA 95814

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