

Decision \_\_\_\_\_

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 12-03-014 (Filed March 22, 2013)
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**INTERVENOR COMPENSATION CLAIM OF L. JAN REID  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF L. JAN REID**

<b>Claimant:</b> L. Jan Reid	<b>For contribution to D.12-12-010</b>
<b>Claimed: \$</b> 16,657.28	<b>Awarded: \$</b>
<b>Assigned Commissioner:</b> Florio	<b>Assigned ALJ:</b> Gamson
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/ L. Jan Reid
<b>Date:</b>	<b>Printed Name:</b> L. Jan Reid

**PART I: PROCEDURAL ISSUES (to be completed by Claimant except where indicated)**

<b>A. Brief Description of Decision:</b>	The decision adopted final Standardized Planning Assumptions and Scenarios for Track 2 of the 2012 Long-Term Procurement Plans.
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**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	April 18, 2012	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	May 17, 2012	
4. Was the NOI timely filed? Yes		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:		

6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status? Yes		
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship? Yes		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	N/A See comment below.	
14. Date of Issuance of Final Order or Decision:	N/A	
15. File date of compensation request:	October 11, 2013	
16. Was the request for compensation timely? Yes.		

**C. Additional Comments on Part I (use line reference # as appropriate):**

#	Claimant	CPUC	Comment
3	L. Jan Reid		<p>On May 17, 2012 in R.12-03-014, I filed a Public NOI, a Confidential NOI, and a Motion for Leave to File Confidential Materials Under Seal. The Confidential NOI consisted of two attachments: Attachment A, a Statement of Income and Attachment B, a Statement of Assets. Attachments A and B were for the year ending December 31, 2011.</p> <p>On June 3, 2013 in A.12-04-015 et. al., I filed a Public Compensation Claim, a Confidential Compensation Claim, a Motion for Leave to File Confidential Materials Under Seal. The Confidential Compensation Claim consisted of two attachments: Attachment A, a Statement of Income and Attachment B, a Statement of Assets. Attachments A and B were for the year ending December 31, 2012.</p> <p>The Commission has not acted on either the motions, the Compensation Claims, or the NOIs.</p>
13	L. Jan Reid		<p>A final decision closing proceeding R.12-03-014 has not been issued. Therefore, the request is timely pursuant to Public Utilities Code § 1804(c).</p>

**PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Claimant except where indicated)**

**A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059). (For each contribution, support with specific reference to the record.)**

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
1. Planning Period	<p>Reid argued that: (Comments of L. Jan Reid on Standardized Planning Assumptions [Reid Comments], October 5, 2012, p. 2)</p> <p>“A 20-year planning period is not reasonable because the LTPP is limited to a 10-year period. Very little useful information would be gained from a 20-year analysis; and a 20-year analysis is not consistent with real-world possibilities due to the timeframe of the LTPP. Therefore, the Commission should set a planning period of 10 years, from 2013-2022.”</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the Planning Period issue in D.12-12-010.</p>	
2. CHP	<p>Reid argued that: (Reid Comments, p. 3)</p> <p>“The ACR would effectively ignore the benefits of combined heat and power (CHP) by treating CHP as both a demand-side and a supply side resource with a magnitude equal to only 81% of the statewide CHP goal.”</p> <p>..;</p> <p>“Consistent with the EAP [Energy Action Plan], the Commission should assume that CHP is a supply-side resource, equal to 100% of the statewide CHP goal.”</p>	

	<p>In part, the Commission agreed with Reid when it established a High Distributed Generation, High Demand Side Management Scenario. The Commission stated that: (D.12-12-010, slip op. at 18)</p> <p>“The High Distributed Generation, High Demand Side Management Scenario applies the High assumption for small incremental PV. It projects a strong increase in the quantities of Incremental CHP on both supply and demand sides via high assumptions, a high level of incremental EE, and a mid-level of DR.”</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the CHP issue in D.12-12-010.</p>	
<p>3. Replicating the Transmission Planning Process (TPP)</p>	<p>Reid argued that: (Reid Comments, p. 3)</p> <p>“The Replicating the Transmission Planning Process (TPP) scenario should be deleted because it is based on an unrealistic assumption that is inconsistent with Guiding Principle IV.B. The Replicating TPP scenario assumes that the Commission will terminate preferred resource policies (other than RPS) and reduce demand response.”</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the TPP issue in D.12-12-010.</p>	

<p>4. Nuclear Retirement</p>	<p>Reid argued that: (Reid Comments, p. 4)</p> <p>“An Early Nuclear Retirement scenario would provide valuable information to both the Commission and the parties and would assist in the Commission’s resolution of the nuclear retirement issue. Therefore, I recommend that an Early Nuclear Retirement scenario be performed for the planning period 2013-2022. The Early Nuclear Retirement scenario should include both the Diablo Canyon and San Onofre facilities.”</p> <p>The Commission indicated that an Early Nuclear Retirement scenario would not be performed “at this time.” (D.12-12-010, slip op. at 10)</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the Nuclear Retirement issue in D.12-12-010.</p>	
<p>5. Environmental Scenario</p>	<p>Reid argued that: (Reid Comments, p. 5)</p> <p>“The Environmental Sensitivity replaces the commercial portfolio with the environmental portfolio. This is an important sensitivity because it will indicate the problems associated with moving from a commercial portfolio to an environmental portfolio. Therefore, the Commission should mandate that an environmental sensitivity be performed as part of the standardized planning scenarios.”</p> <p>The Commission indicated that an Environmental Scenario would not be performed “at this time.” (D.12-12-010, slip op. at 10)</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the Environmental Scenario issue in D.12-12-010.</p>	

<p>6. Demand Response</p>	<p>Reid argued that: (Reid Comments, p. 5)</p> <p>“The Commission has an obligation under Public Utilities Code Section (PUC §) 451 to protect ratepayers and ensure that rates are just and reasonable. Consistent with PUC § 451, the Commission must protect ratepayers from resource over-procurement associated with uncertainties such as the estimation of the magnitude of demand response. In this instance, the Commission should risk overestimating supply in order to protect ratepayers from the potential overprocurement of fossil fuel resources. Therefore, I recommend that the Commission assume the savings estimated by PG&amp;E for planning purposes.”</p> <p>In part, the Commission agreed with Reid when it stated that “we will assume a cautious outlook for PG&amp;E’s PTR program, with the “low” and “mid” cases as zero, and the “high” as 108 MW of additional impact by 2014.” (D.12-12-010, slip op. at 7)</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Demand Response issue in D.12-12-010.</p>	
<p>7. COD</p>	<p>Reid argued that: (Reid Comments, p. 6)</p> <p>“The ACR states that ‘For existing resources with no documented commercial online date (COD), assume 1/1/2000 for retirement accounting purposes.’ (ACR, Attachment, p. 25, Item 10)”</p>	

	<p>“In this instance, Staff’s proposal is not reasonable and could lead to the over-procurement of resources. Staff relies on the CEC’s list of siting cases, (<a href="http://www.energy.ca.gov/sitingcases/all_projects_xls">http://www.energy.ca.gov/sitingcases/all_projects_xls</a>). I used the same document and calculated that projects came online in an average of 809 days after the project was approved. Therefore, I recommend that staff assume a COD which is 809 days after a project has been approved.”</p> <p>Although the Commission did not agree with Reid on this issue, Reid made a substantial contribution to the Commission’s resolution of the COD issue in D.12-12-010.</p>	
<p>8. Energy Efficiency</p>	<p>Reid recommended that the: (Reply Comments of L. Jan Reid on Standardized Planning Assumptions (Reid Reply Comments), October 19, 2012, p. 3)</p> <p>“Commission order the IOUs to track the location of energy efficiency resources and to communicate this information to both the CAISO and to the Commission’s Energy Division. Relevant locational information can then be accounted for when different scenarios are modeled in the instant rulemaking.”</p> <p>The Commission effectively agreed with Reid on the need to identify the location of energy efficiency resources when it stated that “Appendix A – Assessing Impacts of Incremental Energy Efficiency Program Initiatives on Local Capacity Requirements appended provides the methodology for assigning incremental energy efficiency to specific busbars for use in power flow and other modeling needs that require greater granularity.” (D.12-12-010, slip op. at 24)</p>	

	<p>Thus, Reid made a substantial contribution to the Commission’s resolution of the Energy Efficiency issue in D.12-12-010.</p>	
<p>9. RPS Sensitivity</p>	<p>Southern California Edison Company (SCE) recommended that “the Commission change the priority of the 40% RPS sensitivity to ‘not at this time.’ ” (SCE PD Comments, Section II).</p> <p>Reid argued that: (Reply Comments of L. Jan Reid on Proposed Decision of ALJ Gamson, December 17, 2012, p. 3)</p> <p>“A 40% RPS Sensitivity is forward looking and will provide valuable information to the Commission when the state legislature increases the RPS targets to 40% or higher. Therefore, I recommend that the Commission not change the priority of the 40% RPS Sensitivity as recommended by SCE.</p> <p>The Commission did not change the RPS sensitivity as suggested by SCE.</p> <p>Thus, Reid made a substantial contribution to the Commission’s resolution of the RPS Sensitivity issue in D.12-12-010.</p>	
<p>10. Minor Errors</p>	<p>Reid pointed out that: (Comments of L. Jan Reid on Proposed Decision of ALJ Gamson, December 10, 2012, p. 4)</p> <p>“Although Attachment A contains a table of contents that lists page numbers for each item, there are no page numbers on the attachment. The Commission should modify the PD by adding page numbers to the document and editing the table of contents where necessary.”</p> <p>The Commission changed the PD as suggested by Reid.</p>	



**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</b>	<b>Yes.</b>	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	<b>Yes</b>	
<b>e. If so, provide name of other parties: DRA and TURN.</b>		
<p><b>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b></p> <p>Reid met with the DRA and TURN throughout the course of the proceeding to understand the nature of their comments and pleadings, and thus to avoid duplication. Reid does not seek compensation for most of these meetings. As a matter of personal policy, Reid does not participate in Commission proceedings where his showing is likely to duplicate the showings of other consumer representatives such as DRA and TURN. For example, Reid did not serve testimony in Phase 2 of A.12-04-018 because his showing would likely have duplicated the showings of the DRA and TURN.</p> <p>Reid had positions similar to either DRA or TURN on only one of the issues identified by Reid in Section II.A above. Reid and the DRA had similar positions on the Demand Response issue. Reid and TURN had no similar positions on the issues identified above.</p> <p>Reid’s compensation in this proceeding should not be reduced for any duplication with respect to the showings of other parties. In a proceeding with subject matter as complex as in this one and with multiple parties, it is virtually impossible for Reid or any party to fully anticipate where showings of other parties may duplicate some of Reid’s showing, especially in view of the need to make a coherent and sufficient showing on the issues Reid emphasizes and on the ultimate issues.</p> <p>Given these circumstances, no reduction to Reid’s requested compensation due to duplication is warranted, pursuant to the standards adopted by the Commission in D.03-03-031.</p>		

**C. Additional Comments on Part II (use line reference # or letter as appropriate):**

<b>#</b>	<b>Claimant</b>	<b>CPUC</b>	<b>Comment</b>

**PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)**

**A. General Claim of Reasonableness (§§ 1801 & 1806):**

<p><b>a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</b></p> <p>Reid contributed to the proceeding in a manner that was productive and will result in benefits to ratepayers that exceed the costs of participation.</p> <p>In consolidated Rulemaking 97-01-009 and Investigation 97-01-010, the Commission required intervenors seeking compensation to show that they represent interests that would otherwise be underrepresented and to present information sufficient to justify a finding that the overall benefits of a customer's participation will exceed the customer's costs. (D.98-04-059, 79 CPUC2d 628, Finding of Fact 13 at 674, Finding of Fact 42 at 676) The Commission noted that assigning a dollar value to intangible benefits may be difficult.</p> <p>As mentioned previously, Reid made a substantial contribution to the proceeding. It is reasonable to assume that the resolution of the issues raised in this proceeding will benefit ratepayers in the future.</p> <p>The Commission can safely find that the participation of Reid in this proceeding was productive. Overall, the benefits of Reid's contributions to D.12-12-010 justify compensation in the amount requested.</p>	<p><b>CPUC Verified</b></p>
<p><b>b. Reasonableness of Hours Claimed.</b></p> <p>All of Reid's work in this proceeding was performed by L. Jan Reid. Thus, no unnecessary internal duplication took place.</p> <p>In this pleading, Reid requests compensation in the total amount of \$16,657.28 for time reasonably devoted to this proceeding. A more detailed breakdown of the time devoted to this proceeding by Reid is provided in Attachment A to this pleading.</p> <p>Reid's work was performed efficiently. L. Jan Reid is a former Commission employee who has testified on many occasions on issues such as long term procurement plans, renewables procurement, cost-of-capital, utility finance, and electricity and natural gas procurement issues.</p> <p>Reid has allocated his professional time to major subjects, except for general activities that cannot reasonably be assigned to substantive issues. See Section III.A.c below for more detail.</p>	

During the course of this proceeding, Administrative Law Judge (ALJ) Gamson issued rulings requesting that parties answer a number of questions. Therefore, general activities include some of the time that was spent answering these questions and responding to the answers of other parties.

Daily listings of the specific tasks performed by Reid in connection with this proceeding are available in Attachment A to this pleading. The cost listings demonstrate that the hours claimed are reasonable given the scope and timeframe of this part of the instant rulemaking.

No compensation for administrative time is requested, in accordance with Commission practice. (D.99-06-002, discussion, slip op. at 8-10). I understand that the Commission may audit my books and records to the extent necessary to verify the basis for any award, pursuant to PU Code §1804(d).

The direct expenses of \$42.78 (or 0.3% of the total compensation request) are reasonable and were necessary for the substantial contribution of Reid in this proceeding. Copying costs are computed at 8 cents per page. Postage costs are included at actual costs. I request compensation in full for these expenses without reduction for any adjustment in compensation hours that the Commission might impose. Such compensation is consistent with past Commission practice.

**c. Allocation of Hours by Issue**

1. Planning Period	1.17%
2. CHP	1.30%
3. TPP	11.72%
4. Nuclear Retirement	10.68%
5. Environmental Scenario	5.08%
6. Demand Response	5.47%
7. COD	5.08%
8. Energy Efficiency	7.68%
9. RPS Sensitivity	4.82%
10. Minor Errors	0.39%
General	46.61%

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Attorney 1]								
[Attorney 2]								
L. Jan Reid, Expert and Advocate	2012	76	200	D.12-06-011, Appendix, Resolutions ALJ-281 and ALJ-287	15,200			
[Advocate 2]								
<b>Subtotal: \$ 15,200.00</b>						<b>Subtotal: \$</b>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
L. Jan Reid wrote Public and Confidential NOIs, State of Income, Statement of Assets, and motion.	2012	9.2	100	D.12-06-011, Appendix, Resolutions ALJ-281 and ALJ-287	920			
[Person 2]								
<b>Subtotal: \$ 920</b>						<b>Subtotal: \$</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
L. Jan Reid	2013	4.6	107.50	D.12-06-011, Appendix, Resolutions ALJ-281 and ALJ-287	494.50			
[Preparer 2]								
<b>Subtotal: \$ 494.50</b>						<b>Subtotal: \$</b>		
COSTS								
#	Item	Detail			Amount	Amount		
1	Postage	Postage for 2012 (See Attachment A)			15.90			
2	Copies	Copying costs for 2012 (See Attachment A)			26.88			
<b>TOTAL REQUEST: \$ 16,657.28</b>						<b>TOTAL AWARD: \$</b>		

When entering items, type over bracketed text; add additional rows as necessary. *If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale. **Travel and Reasonable Claim preparation time are compensated at ½ of preparer's normal hourly rate.			
Attorney	Date Admitted to CA BAR <sup>1</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation

**C. Attachments Documenting Specific Claim and Comments on Part III (Claimant completes; attachments not attached to final Decision):**

Attachment or Comment #	Description/Comment
1	<b>Certificate of Service</b>
2	<b>Attachment A, A daily listing of the work performed by Reid.</b>
3	<p><b>Reid Hourly Rate</b></p> <p>Reid requests that the Commission authorize an hourly rate of \$200 for L. Jan Reid for 2011 and 2012 professional work, and \$215 for 2013 professional work. Reid also requests an hourly rate for L. Jan Reid of \$100 for 2011-2012 compensatory time, and \$107.50 for 2013 compensatory time.</p> <p>The Commission has previously awarded Reid compensation for 2010 professional work at a rate of \$185 per hour. (D.12-06-011, Appendix) Intervenor compensation rates for experts are separated into three tiers based on experience. The tiers are Tier I (0-6 years), Tier II (7-12 years), and Tier III (13 years and over). (See Resolution ALJ-281, slip op. at 5)</p> <p>Reid now has 15 full years of experience (1998-2013). Thus, Reid moved from Tier II to Tier III in 2011 after Reid had 13 years of experience. The Commission has provided that intervenors will receive two step increases of 5% within each tier, rounded up to the nearest \$5 increment. (Resolution ALJ-281, Ordering Paragraph 2, slip op. at 7; and D.08-04-010, slip op. at 11-13) The Commission has also adopted two cost of living adjustments (COLAs): a 2.2% COLA for 2012 (See Resolution ALJ-281, slip op. at 1.) and a 2.0% COLA for 2013 (See Resolution ALJ-287, slip op. at 1).</p> <p>Thus, Reid should receive two increases for calendar year 2012: a 5% step increase and a 2.2% Cost of Living Adjustment.. Five percent of Reid's 2010 rate (\$185) is \$9.25, which rounds to an hourly increase of \$10 for a total rate of \$195/hr. for 2011-2012 work. 2.2 percent of \$195 is \$4.29, which rounds to an hourly increase of \$5 for a total rate of \$200/hr. for 2011-2012 work.</p>

<sup>1</sup> This information may be obtained at: <http://www.calbar.ca.gov/>.

	For 2013, Reid should receive a step increase of 5% (\$5/hr.) for work performed in 2013 and a 2.0% COLA (\$5 hour). Thus, Reid should be awarded a 2013 rate of \$215/hr.
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**D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):**

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**  
 Within 30 days after service of this Claim, Commission Staff  
 or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Disposition

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?</b>	
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If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

1. Claimant [has/has not] made a substantial contribution to Decision (D.) \_\_\_\_\_.
2. The requested hourly rates for Claimant’s representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$\_\_\_\_\_.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Claimant is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay Claimant the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of Claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**Attachment 1:  
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **INTERVENOR COMPENSATION CLAIM OF L. JAN REID AND DECISION ON INTERVENOR COMPENSATION CLAIM** by (check as appropriate):

- hand delivery;  
 first-class mail; and/or  
 electronic mail

to the following persons appearing on the official Service List:

R.12-03-014 Service List Last Changed October 9, 2013	
PARTIES	
ADAM GUSMAN CORPORATE COUNSEL GLACIAL ENERGY OF CALIFORNIA, INC. EMAIL ONLY EMAIL ONLY, VI 00000 FOR: GLACIAL ENERGY OF CALIFORNIA, INC.	ANDREW WANG SOLARRESERVE, LLC EMAIL ONLY EMAIL ONLY, CA 00000 FOR: SOLARRESERVE
KATHY TRELEVEN LARGE-SCALE SOLAR ASSOCIATION EMAIL ONLY EMAIL ONLY, CA 00000 FOR: LARGE-SCALE SOLAR ASSOCIATION	KENNETH SAHM WHITE CLEAN COALITION EMAIL ONLY EMAIL ONLY, CA 00000 FOR: CLEAN COALITION
LISA BOND ATTORNEY RICHARDS WATSON GERSHON EMAIL ONLY EMAIL ONLY, CA 00000 FOR: CITY OF REDONDO BEACH	MARCUS V. DA CUNHA EMAIL ONLY EMAIL ONLY, CA 00000 FOR: MARCUS V. DA CUNHA



Revised September 2013

SCOTT BLAISING  
BRAUN BLAISING MCLAUGHLIN P.C.  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: KINGS RIVER CONSERVATION DISTRICT  
(KRCD)

TAM HUNT  
ATTORNEY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: COMMUNITY ENVIRONMENTAL COUNCIL

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

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

VICTOR GONZALES  
CONSTELLATION NEW ENERGY, INC. (1359)  
111 MARKET PLACE, SUITE 500  
BALTIMORE, MD 21202  
FOR: CONSTELLATION NEW ENERGY, INC.

ALRINE WILLIAMS  
LEGAL COUNSEL  
LIBERTY POWER DELAWARE LLC  
1901 W. CYPRESS CREEK ROAD, SUITE 600  
FORT LAUDERDALE, FL 33309  
FOR: LIBERTY POWER DELAWARE LLC

JASON ARMENTA  
CALPINE POWERAMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002  
FOR: CALPINE POWERAMERICA-CA, LLC

KARA MORGAN  
TRANSWEST EXPRESS, LLC  
555 SEVENTEENTH STREET, SUITE 2400  
DENVER, CO 80202  
FOR: TRANSWEST EXPRESS, LLC

PAUL SHEPARD  
WILDFLOWER ENERGY  
333 S. GRAND AVENUE, SUITE 1570  
LOS ANGELES, CA 90071  
FOR: WILDFLOWER ENERGY

SIERRA MARTINEZ  
ATTORNEY  
NATURAL RESOURCES DEFENSE COUNCIL  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: NATIONAL RESOURCES DEFENSE COUNCIL

GENERAL MANAGER  
PLUMAS SIERRA RURAL ELECTRIC COOP. (908)  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: PLUMAS SIERRA RURAL ELECTRIC CORP

ABRAHAM SILVERMAN  
ASSIST. GEN. COUNSEL - REGULATORY  
NRG ENERGY, INC.  
211 CARNEGIE CENTER DRIVE  
PRINCETON, NJ 08540  
FOR: NRG ENERGY, INC.

KYLE W. DANISH  
VAN NESS FELDMAN, P.C.  
1050 THOMAS JEFFERSON ST., N. W.  
WASHINGTON, DC 20007-3877  
FOR: COALITION FOR EMISSION REDUCTION  
POLICY

ALRINE WILLIAMS  
LEGAL COUNSEL  
LIBERTY POWER HOLDINGS LLC (1371)  
1901 W. CYPRESS CREEK ROAD, SUITE 600  
FORT LAUDERDALE, FL 33309  
FOR: LIBERTY POWER HOLDINGS LLC

TRACY PHILLIPS  
VP OF MARKETING  
TIGER NATURAL GAS, INC.  
1422 E. 71ST., STE J  
TULSA, OK 74136  
FOR: TIGER NATURAL GAS, INC.

KEVIN BOUDREAUX  
ENERCAL USA LLC  
7660 WOODWAY DRIVE, STE. 471A  
HOUSTON, TX 77063  
FOR: ENERCAL USA, LLC

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

MICHAEL MAZUR  
PRINCIPAL  
3 PHASES RENEWABLES LLC (1373)  
2100 SEPULVEDA BLVD, SUITE 37  
MANHATTAN BEACH, CA 90266  
FOR: 3 PHASES RENEWABLES, LLC

Revised September 2013

INGER GOODMAN  
COMMERCE ENERGY INC  
1 CENTERPOINTE DRIVE, SUITE 350  
LA PALMA, CA 90623-2520  
FOR: COMMERCE ENERGY, INC.

CAROL A. SCHMID-FRAZEE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800 2244 WALNUT GROVE AVE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DANIEL KING  
SEMPRA U.S. GAS & POWER, LLC  
101 ASH STREET, HQ-15B  
SAN DIEGO, CA 92101  
FOR: SEMPra U.S. GAS & POWER, LLC

DONALD C. LIDDELL  
COUNSEL  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
FOR: STARWOOD POWER-MIDWAY, LLC /  
CALIFORNIA ENERGY STORAGE ALLIANCE /  
CAMCO INTERNATIONAL GROUP, INC ./ TAS  
ENERGY

MARCIE MILNER  
SHELL ENERGY (1374)  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121  
FOR: SHELL ENERGY NORTH AMERICA (US),  
L.P. (SHELL ENERGY)

THOMAS R. DARTON  
PILOT POWER GROUP, INC. (1365)  
8910 UNIVERSITY CENTER LANE, STE. 520  
SAN DIEGO, CA 92122  
FOR: PILOT POWER GROUP, INC.

KRISTINE MICHAELS  
CHIEF FINANCIAL OFFICER  
SOUTHERN CALIFORNIA TELEPHONE & ENERGY  
27515 ENTERPRISE CIRCLE WEST  
TEMECULA, CA 92590  
FOR: SOUTHERN CALIFORNIA TELEPHONE &  
ENERGY

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

DANIEL W. DOUGLASS  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367  
FOR: CONEDISON SOLUTIONS, INC./WESTERN  
POWER TRADING FORUM

AIMEE SMITH  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

GREG BASS  
NOBLE AMERICAS ENERGY SOLUTIONS, LLC  
401 WEST A STREET, STE. 500  
SAN DIEGO, CA 92101  
FOR: NOBLE AMERICAS ENERGY SOLUTIONS LLC

DAVID A. PEFFER, ESQ.  
PROTECT OUR COMMUNITIES FOUNDATION  
4452 PARK BOULEVARD, STE. 209  
SAN DIEGO, CA 92116  
FOR: PROTECT OUR COMMUNITIES FOUNDATION

SARAH TOMEK  
SR. ADVISOR, REGULATORY AFFAIRS WEST  
CAPITAL POWER CORPORATION  
9255 TOWNE CENTRE DRIVE, STE. 900  
SAN DIEGO, CA 92121  
FOR: CAPITAL POWER CORPORATION

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

ANDREA MORRISON  
DIRECTOR - GOV'T. AND REGULATORY AFFAIRS  
DIRECT ENERGY SERVICES, LLC (1341)  
415 DIXON STREET  
ARROYO GRANDE, CA 93420  
FOR: DIRECT ENERGY, LLC/DIRECT ENERGY  
SERVICES

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

EVELYN KAHL  
ALCANTAR & KAHL, LLP  
33 NEW MONTGOMERY STREET, SUITE 1850  
SAN FRANCISCO, CA 94015  
FOR: ENERGY PRODUCERS & USERS COALITION

SUE MARA  
PRINCIPAL  
RTO ADVISORS, LLC  
164 SPRINGDALE WAY  
REDWOOD CITY, CA 94062  
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS  
(AREM) /DIRECT ACCESS CUSTOMER  
COALITION

DIANA L. LEE  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: ORA

MATTHEW FREEDMAN  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103  
FOR: THE UTILITY REFORM NETWORK

BRIAN CHERRY  
DIRECTOR - REGULATORY RELATIONS  
PACIFIC GAS AND ELECTRIC COMPANY (39)  
77 BEALE STREET ROOM 1087  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

DEBORAH N. BEHLES  
ENVIRONMENTAL LAW AND JUSTICE CLINIC  
GOLDEN GATE UNIVERSITY SCHOOL OF LAW  
536 MISSION STREET  
SAN FRANCISCO, CA 94105-2968  
FOR: THE CALIFORNIA ENVIRONMENTAL  
JUSTICE ALLIANCE

JACK STODDARD  
MANATT PHELPS & PHILLIPS, LLP  
ONE EMBARCADERO CENTER, 30TH FL.  
SANFRANCISCO, CA 94111  
FOR: PANOCHÉ ENERGY CENTER, LLC

MICHAEL B. DAY  
ATTORNEY  
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY,  
505 SANSOME ST., STE. 900  
SAN FRANCISCO, CA 94111  
FOR: ABENGOA SOLAR, INC./CALENERGY  
GENERATION

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

MARC D. JOSEPH  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD., SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080  
FOR: COALITION OF CALIFORNIA UTILITY  
EMPLOYEES

THERESA L. MUELLER  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, ROOM 234  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102-4682  
FOR: CITY AND COUNTY OF SAN FRANCISCO

ETHAN RAVAGE  
WEST COAST LEAD - US  
INTERNATIONAL EMISSIONS TRADING ASSN.  
456 MONTGOMERY ST., 18TH FLOOR  
SAN FRANCISCO, CA 94104  
FOR: INTERNATIONAL EMISSIONS TRADING  
ASSOCIATION (IETA)

NORA SHERIFF  
ALCANTAR & KAHL  
33 NEW MONTGOMERY ST., STE. 1850  
SAN FRANCISCO, CA 94105  
FOR: CALIFORNIA LARGE ENERGY CONSUMERS  
ASSOCIATION (CLECA)

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

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

SETH D. HILTON  
ATTORNEY AT LAW  
STOEL RIVES LLP  
THREE EMBARCADERO CENTER, STE. 1120  
SAN FRANCISCO, CA 94111  
FOR: AES SOUTHLAND/ZEPHYR POWER  
TRANSMISSION

WILLIAM KISSINGER  
BINGHAM MCCUTCHEM LLP  
THREE EMBARCADERO CENTER, 28TH FL.  
SAN FRANCISCO, CA 94111  
FOR: COMPETITIVE POWER VENTURES/POWER  
DEVELOPMENT, INC.

MARTIN A. MATTES  
ATTORNEY  
NOSSAMAN, LLP  
50 CALIFORNIA STREET, 34TH FL.  
SAN FRANCISCO, CA 94111-4799  
FOR: NOSSAMAN, LLP

EDWARD O'NEILL  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
FOR: SOUTH SAN JOAQUIN IRRIGATION  
DISTRICT

MARK HUFFMAN  
LAW DEPT  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 7442, B30A  
SAN FRANCISCO, CA 94120  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JENNIFER CHAMBERLIN  
LS POWER DEVELOPMENT, LLC  
5000 HOPYARD ROAD, SUITE 480  
PLEASANTON, CA 94588  
FOR: LS POWER

LAURENCE G. CHASET  
KEYES FOX & WIEDMAN, LLP  
436 14TH STREET, STE. 1305  
OAKLAND, CA 94612  
FOR: INTERSTATE RENEWABLE ENERGY  
COUNCIL, INC. / FRIENDS OF THE EARTH

PATRICK VANBEEK  
DIR - CUSTOMER SUPPORT  
COMMERCIAL ENERGY OF CALIFORNIA  
7677 OAKPORT STREET, STE. 525  
OAKLAND, CA 94621  
FOR: COMMERCIAL ENERGY OF CALIFORNIA

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

R. THOMAS BEACH  
CROSSBORDER ENERGY  
2560 9TH ST., SUITE 213A  
BERKELEY, CA 94710-2557  
FOR: THE CALIFORNIA COGENERATION COUNCIL

WILLIAM V. ROSTOV  
EARTHJUSTICE  
50 CALIFORNIA ST., STE. 500  
SAN FRANCISCO, CA 94111  
FOR: SIERRA CLUB CALIFORNIA

LISA A. COTTLE  
ATTORNEY AT LAW  
WINSTON & STRAWN LLP  
101 CALIFORNIA STREET, 39TH FLOOR  
SAN FRANCISCO, CA 94111-5802  
FOR: GENON ENERGY, INC.

JEFFREY P. GRAY  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
FOR: CALPINE CORPORATION

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

JOHN L. GEESMAN  
ATTORNEY  
DICKSON GEESMAN LLP  
1999 HARRISON STREET, STE. 2000  
OAKLAND, CA 94612  
FOR: ALLIANCE FOR NUCLEAR  
RESPONSIBILITY (A4NR)

MARGIE GARDNER  
EXECUTIVE DIRECTOR  
CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL  
436 14TH STREET, SUITE 1123  
OAKLAND, CA 94612  
FOR: CALIFORNIA ENERGY EFFICIENCY  
INDUSTRY COUNCIL (CEEIC)

GREGG MORRIS  
DIRECTOR  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVENUE, STE 402  
BERKELEY, CA 94704  
FOR: GREEN POWER INSTITUTE

NANCY RADER  
EXECUTIVE DIRECTOR  
CALIFORNIA WIND ENERGY ASSOCIATION  
2560 NINTH STREET, SUITE 213A  
BERKELEY, CA 94710  
FOR: CALIFORNIA WIND ENERGY ASSOCIATION

ELIZABETH KELLY  
LEGAL DIRECTOR  
MARIN ENERGY AUTHORITY  
781 LINCOLN AVENUE, SUITE 320  
SAN RAFAEL, CA 94901  
FOR: MARIN ENERGY AUTHORITY

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

JAN REID  
COAST ECONOMICS CONSULTING  
3185 GROSS ROAD  
SANTA CRUZ, CA 95062  
FOR: L. JAN REID

JUDITH B. SANDERS  
SR. COUNSEL  
CALIF. INDEPENDENT SYSTEM OPERATOR CORP  
250 OUTCROPPING WAY  
FOLSOM, CA 95630  
FOR: CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION

STEPHEN T. GREENLEAF  
V.P. & COMPLIANCE DIRECTOR  
J.P. MORGAN CHASE BANK, N.A.  
2864 ABERDEEN LANE  
EL DORADO HILLS, CA 95762  
FOR: J.P. MORGAN VENTURES ENERGY  
CORPORATION (JPMVEC) / BE CA LLC

RONALD LIEBERT  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVENUE, STE. 400  
SACRAMENTO, CA 95816  
FOR: THE VOTE SOLAR INITIATIVE

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

DONALD BROOKHYSER  
ALCANTAR & KAHL  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97210  
FOR: COGENERATION ASSOCIATION OF  
CALIFORNIA

INFORMATION ONLY

ANDRA PLIGAVKO  
FIRST SOLAR DEVELOPMENT, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

BARBARA GEORGE  
WOMEN'S ENERGY MATTERS  
PO BOX 548  
FAIRFAX, CA 94978-0548  
FOR: WOMEN'S ENERGY MATTERS

DAVID KATES  
DAVID MARK & COMPANY  
3510 UNOCAL PLACE, SUITE 200  
SANTA ROSA, CA 95403  
FOR: THE NEVADA HYDRO COMPANY

MARGARET MILLER  
BROOKFIELD RENEWABLE ENERGY GROUP  
513 SAN MARCO PLACE  
EL DORADO HILLS, CA 95762  
FOR: BROOKFIELD RENEWABLE ENERGY GROUP

DOUGLAS E. DAVIE  
V.P.  
WELLHEAD ELECTRIC COMPANY, INC.  
650 BERECUT DRIVE, STE. C  
SACRAMENTO, CA 95811  
FOR: WELLHEAD ELECTRIC COMPANY

CHRISTOPHER T. ELLISON  
ATTORNEY  
ELLISON, SCHNEIDER & HARRIS, L.L.P  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905  
FOR: PATHFINDER RENEWABLE WIND ENERGY,  
LLC

DANIEL SILVERIA  
GEN MGR  
SURPRISE VALLEY ELECTRIC CORP.  
516 US HIGHWAY 395 E  
ALTURAS, CA 96101-4228  
FOR: SURPRISE VALLEY ELECTRIC  
CORPORATION

GIFFORD JUNG  
POWEREX CORPORATION  
666 BURRARD STREET, SUITE 1400  
VANCOUVER, BC V5R 4Y2  
CANADA  
FOR: POWEREX CORPORATION

ARMANDO INFANZON  
SMART GRID POLICY MANAGER  
SAN DIEGO GAS & ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

BRAD MEIKLE  
SOVEREIGN ENERGY, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

CATHIE ALLEN  
REGULATORY MGR.  
PACIFICORP  
EMAIL ONLY  
EMAIL ONLY, OR 00000

DANIEL PATRY  
RECURRENT ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID FELIX  
DIR - DEVELOPMENT  
NORTHLIGHT POWER  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID HICKS  
DIAMOND GENERATING CORPORATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID WEIDBERG  
JOHNSON CONTROLS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DIANE FELLMAN  
DIR - GOVERNMENTAL & REGULATORY AFFAIRS  
NRG ENERGY, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DYANA MARIE DELFIN-POLK  
CLEAN COALITION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ERIN GRIZARD  
BLOOM ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

GEORGE ZAHARIUDAKIS  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JAMIE L. MAULDIN  
ADAMS BROADWELL JOSEPH & CARDOZO, PC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JERRY BROWN  
WORLD BUSINESS ACADEMY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JIMMY NELSON  
KENDALL SCIENCE FELLOW IN ELECTRICITY  
UNION OF CONCERNED SCIENTISTS  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JODY S. LONDON  
JODY LONDON CONSULTING  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOHN W. LESLIE, ESQ.  
MCKENNA LONG & ALDRIDGE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JULIEN DUMOULIN-SMITH  
UBS INVESTMENT RESEARCH  
EMAIL ONLY  
EMAIL ONLY, NY 00000

KATY ROSENBERG  
ALCANTAR & KAHL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

KELSEY SOUTHERLAND  
DIR OF GOV'T RELATIONS  
TAS ENERGY  
EMAIL ONLY  
EMAIL ONLY, TX 00000

LYNN HAUG  
ELLISON SCHNEIDER & HARRIS L.L.P.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MATT KLOPFENSTEIN  
GONZALEZ QUINTANA & HUNTER LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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MATTHEW BARMACK  
CALPINE CORPORATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MIKE CADE  
ALCANTAR & KAHL, LLP  
EMAIL ONLY  
EMAIL ONLY, OR 00000

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

RANDY KELLER  
DIRECTOR OF DEVELOPMENT  
CALENERGY OPERATING CORPORATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ROBIN SMUTNY-JONES  
DIR. - CALIFORNIA POLICY & REGULATION  
IBERDROLA RENEWABLES, LLC  
EMAIL ONLY  
EMAIL ONLY, OR 00000

STEPHANIE WANG  
DIRECTOR  
CLEAN COALITION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SUJATA PAGEDAR  
PACIFIC GAS & ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

VIDHYA PRABHAKARAN  
DAVIS WRIGHT & TREMAINE, LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

AES SOUTHLAND  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

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

MIKE BERLINSKI  
BEACON POWER, LLC  
65 MIDDLESEX ROAD  
TYNGSBORO, MA 01879

MICHAEL EVANS  
SHELL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MIYUKI IWASHI  
PACIFIC GAS & ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

RACHEL MCMAHON  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ROBERT GEX  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SHALINI SWAROOP  
REGULATORY COUNSEL  
MARIN ENERGY AUTHORITY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

STEVE ZURETTI  
MANAGER, CALIFORNIA  
SOLAR ENERGY INDUSTRIES ASSOCIATION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

TAM HUNT  
CLEAN COALITION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

WILLIAM J. KEESE  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ALICE GONG  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000-0000

ERIC HSIEH  
A 123 SYSTEMS INC.  
155 FLANDERS RD  
WESTBOROUGH, MA 01581-1032

RACHEL WILSON  
SYNAPSE ENERGY ECONOMIS, INC.  
485 MASSACHUSETTS AVE., 2ND FLOOR  
CAMBRIDGE, MA 02129

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PATRICK LUCKOW  
SYNAPSE ENERGY ECONOMICS, INC.  
485 MASSACHUSETTS AVE., 2ND FL.  
CAMBRIDGE, MA 02139

ROBERT FAGAN  
SYNAPSE ENERGY & ECONOMICS  
485 MASSACHUSETTS AVE., 2ND FLOOR  
CAMBRIDGE, MA 02139

THOMAS J. VITOLO  
SYNAPSE ENERGY ECONOMICS, INC.  
485 MASSACHUSETTS AVENUE, STE. 2  
CAMBRIDGE, MA 02139

ALEXANDER DABERKO  
CALPEAK POWER, LLC  
591 PUTNAM AVENUE  
GREENWICH, CT 06830

ADAM FAIRBANKS  
DIR - REGULATORY AND RETAIL STRUCTURING  
CONEDISON SOLUTIONS, INC.  
100 SUMMIT LAKE DRIVE, STE. 410  
VALHALLA, NY 10595

RICHARD J. HUDSON, JR.  
DIR. - REGULATORY & LEGISLATIVE AFFAIRS  
CONEDISON SOLUTIONS, INC.  
100 SUMMIT LAKE DR., STE. 410  
VALHALLA, NY 10595

KENDRA ULRICH  
NUCLEAR CAMPAIGNER  
FRIENDS OF THE EARTH  
1100 15TH STREET, NW, 11TH FL.  
WASHINGTON, DC 20005

S.DAVID FREEMAN  
C/O FRIENDS OF THE EARTH  
1100 15HT STREET, NW, 11TH FLOOR  
WASHINGTON, DC 20005

YANIRA M. GOMEZ  
LIBERTY POWER CORP.  
1901 W. CYPRESS CREEK RD., STE. 600  
FORT LAUDERDALE, FL 33309

KIM L. JOHNSON  
EVP AND AGENT  
RIVERBANK PUMPED STORAGE, LLC  
2000 S. OCEAN BLVD., STE. 703  
DELRAY BEACH, FL 33483  
FOR: RIVERBANK PUMPED STORAGE, LLC

SHAWN NICHOLS  
SUMMIT POWER GROUP  
1324 CLARKSON CLAYTON CENTER, STE. 119  
BALLWIN, MO 63011-2145

JIM ROSS  
RCS, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017

CHRIS HENDRIX  
TEXAS RETAIL ENERGY  
2001 SE 10TH STREET  
BENTONVILLE, AR 72716

ERIN SZALKOWSKI  
CORPORATE COUNSEL  
CLEAN LINE ENERGY PARTNERS, LLC  
1001 MCKINNEY STREET, SUITE 700  
HOUSTON, TX 77002  
FOR: CENTENNIAL WEST CLEAN LINE LLC

CHARLES PURSHOUSE  
CAMCO INTERNATIONAL GROUP, INC.  
390 INTERLOCKEN CRESCENT, SUITE 490  
BROOMFIELD, CO 80021

CAROLINE SCHNEIDER  
PROLOGIS  
4545 AIRPORT WAY  
DENVER, CO 80239

DREW TORBIN  
V.P.- RENEWABLE ENERGY  
PROLOGIS  
4545 AIRPORT WAY  
DENVER, CO 80239

PUNEET PASRICH  
COLORADO STATE UNIVERSITY  
350 N. COLLEGE AVE.  
FORT COLLINS, CO 80524

CAITLIN COLLINS LIOTIRIS  
ENERGY STRATEGIES, LLC  
215 SOUTH STATE STREET, STE 200  
SALT LAKE CITY, UT 84111

GIANCARLO ESTRADA  
KIS MAYES LAW FIRM  
ONE EAST CAMELBACK ROAD, STE. 550  
PHOENIX, AZ 85012



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PAUL THOMSEN  
DIR. - POLICY & BUSINESS DEVELOPMENT  
ORMAT TECHNOLOGIES INC.  
6225 NEIL ROAD  
RENO, NV 89511  
FOR: ORMAT TECHNOLOGIES

RON KNECHT  
1009 SPENCER ST  
CARSON, NY 89703-5422

STEVEN HRUBY  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. FIFTH ST., GT14D6  
LOS ANGELES, CA 90013

SARAH FRIEDMAN  
SIERRA CLUB  
714 W. OLYMPIC BLVD., STE. 1000  
LOS ANGELES, CA 90015

TOUSSAINT.S BAILEY  
RICHARDS WATSON GERSHON  
355 S. GRAND AVENUE, 40TH FLOOR  
LOS ANGELES, CA 90071

DARIUSH SHIRMOHAMMADI  
CALIFORNIA WIND ENERGY ASSOCIATION  
10208 CIELO DRIVE  
BEVERLY HILLS, CA 90210

MICHAEL W. WEBB  
CITY ATTORNEY  
CITY OF REDONDO BEACH  
415 DIAMOND STREET  
REDONDO BEACH, CA 90277

ADAM GREEN  
SOLARRESERVE  
2425 OLYMPIC BLVD., STE. 500E  
SANTA MONICA, CA 90404

MARILYN LYON  
SOUTH BAY CITIES COUNCIL OF GOVERNMENTS  
SOUTH BAY ENVIRONMENTAL SERVICES CTR.  
20285 S. WESTERN AVE., STE. 100  
TORRANCE, CA 90501

GREGORY KLATT  
DOUGLASS & LIDDELL  
411 E. HUNTINGTON DR., STE. 107-356  
ARCADIA, CA 91006  
FOR: TIGER NATURAL GAS, INC.

FRED MOBASHERI  
CONSULTANT  
ELECTRIC POWER GROUP, LLC  
201 SOUTH LAKE AVE., SUITE 400  
PASADENA, CA 91101

CAROL SCHMID-FRAZEE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91765

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

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, RM. 321  
ROSEMEAD, CA 91770

MELISSA A. HOVSEPIAN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. / PO BOX 800  
ROSEMEAD, CA 91770

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

HAL ROMANOWITZ  
CEO  
ALTON ENERGY, INC.  
4039 ALTON WAY  
ESCONDIDO, CA 92025  
FOR: ALTON ENERGY, INC.

TY TOSDAL  
TOSDAL LAW FIRM  
777 S. HIGHWAY 101, SUITE 215  
SOLANA BEACH, CA 92075  
FOR: SAN DIEGO ENERGY DISTRICT  
FOUNDATION

CHRISTOPHER SUMMERS  
REGULATORY AFFAIRS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92101

SHAWN BAILEY  
DIRECTOR - PLANNING & ANALYSIS  
SEMPRA US GAS AND POWER  
101 ASH STREET  
SAN DIEGO, CA 92101-3017

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CENTRAL FILES  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP31-E  
SAN DIEGO, CA 92123

JENNIFER PIERCE  
CALIFORNIA REGULATORY AFFAIRS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123

REMEDIOS SANTOS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT., CP31E  
SAN DIEGO, CA 92123

DESPINA NIEHAUS  
REGULATORY CASE MGR.  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32D  
SAN DIEGO, CA 92123-1530

THOMAS C. SAILE  
ENERGY CONTRACTS ORIGINATOR  
SAN DIEGO GAS & ELECTRIC COMPANY  
8315 CENTURY PARK COURT, CP21D  
SAN DIEGO, CA 92123-1548

CATHERINE SULLIVAN  
EZZBGREEN  
27479 VIA RAMONA  
SAN JUAN CAPISTRANO, CA 92675

CRAIG POSPISIL  
EDISON MISSION ENERGY  
3 MACARTHUR PLACE, STE. 100  
SANTA ANA, CA 92707

JEFF HIRSCH  
JAMES J. HIRSCH & ASSOCIATES  
12185 PRESILLA ROAD  
SANTA ROSA VALLEY, CA 93012-9243

RINALDO BRUTUCO  
WORLD BUSINESS ACADEMY  
308 E. CARRILLO STREET  
SANTA BARBARA, CA 93101

RON DICKERSON  
CALIFORNIA CONSUMERS ALLIANCE  
PO BOX 3751  
CLOVIS, CA 93613

RANDY SHILLING  
4886 EAST JENSEN AVENUE  
FRESNO, CA 93725

WILLEM FADRHONC  
STEM, INC.  
100 ROLLINS RD.  
MILLBRAE, CA 94030  
FOR: STEM, INC.

NICOLAI SCHLAG  
ENERGY & ENVIRONMENTAL ECONOMICS, INC.  
101 MONTGOMERY ST., STE 1600  
SAN FRANCISCO, CA 94101

DENNIS J. HERRERA  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, ROOM 234  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102

JEANNE M. SOLE  
DEPUTY CITY ATTORNEY  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PLACE, RM. 234  
SAN FRANCISCO, CA 94102-4682

BREWSTER BIRDSALL, P.E.  
ASPEN ENVIRONMENTAL GROUP  
235 MONTGOMERY STREET, STE. 935  
SAN FRANCISCO, CA 94104

JIM BAAK  
DIRECTOR-POLICY FOR UTILITY SCALE SOLAR  
THE VOTE SOLAR INITIATIVE  
101 MONTGOMERY ST., STE. 2600  
SAN FRANCISCO, CA 94104

AHMAD FARUQUI  
THE BRATTLE GROUP  
201 MISSION ST., STE. 2800  
SAN FRANCISCO, CA 94105

BARNEY SPECKMAN  
VP - GRID MANAGEMENT  
NEXANT  
101 SECOND STREET, 11TH FLOOR  
SAN FRANCISCO, CA 94105

CARA GOLDENBERG  
DIAN GRUENEICH CONSULTING, LLC  
201 MISSION STREET, SUITE 1200  
SAN FRANCISCO, CA 94105

FRED WELLINGTON  
NAVIGANT CONSULTING, INC.  
1 MARKET ST., SPEAR ST. TOWER, STE 1200  
SAN FRANCISCO, CA 94105

KIMBERLY C. JONES  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B9A, ROOM 904  
SAN FRANCISCO, CA 94105

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MATHEW VESPA  
SIERRA CLUB  
85 SECOND STREET, 2ND FLOOR  
SAN FRANCISCO, CA 94105

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
33 NEW MONTGOMERY STREET, SUITE 1850  
SAN FRANCISCO, CA 94105

TOM JARMAN  
ENERGY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, RM. 909, MC B9A  
SAN FRANCISCO, CA 94105-1814

JAMES J. CORBELLI  
STAFF ATTORNEY  
ENVIRONMENTAL LAW AND JUSTICE CLINIC  
GOLDEN GATE UNIVERSITY SCHOOL OF LAW  
536 MISSION STREET  
SAN FRANCISCO, CA 94105-2968

ADENIKE ADEYEYE  
EARTHJUSTICE  
50 CALIFORNIA ST., STE. 500  
SAN FRANCISCO, CA 94111

PAUL R. CORT  
EARTHJUSTICE  
50 CALIFORNIA ST., STE. 500  
SAN FRANCISCO, CA 94111

SARAH BARKER-BALL  
BINGHAM MCCUTCHEN LLP  
3 EMBARCADERO CENTER  
SAN FRANCISCO, CA 94111

WILL MITCHELL  
COMPETITIVE POWER VENTURES, INC.  
505 SANSOME STREET, STE. 475  
SAN FRANCISCO, CA 94111

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

DONNA BARRY  
ENERGY PROCEEDINGS  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MC B9A  
SAN FRANCISCO, CA 94120-7442

MATTHEW GONZALES  
SENIOR CASE MANAGER  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE ST., RM. 918, B9A  
SAN FRANCISCO, CA 94105

WADE GREENACRE  
REGULATORY CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE ST., MC B9A  
SAN FRANCISCO, CA 94105

DAVID A. ZIZMOR  
GRADUATE FELLOW  
ENVIRONMENTAL LAW & JUSTICE CLINIC  
536 MISSION STREET  
SAN FRANCISCO, CA 94105-2968

STEVEN MOSS  
SAN FRANCISCO COMMUNITY POWER  
2325 THIRD STREET, STE. 344  
SAN FRANCISCO, CA 94107

MONICA A. SCHWEBS  
BINGHAM MCCUTCHEN LLP  
THREE EMBARCADERO CENTER  
SAN FRANCISCO, CA 94111

ROSICELI VILLARREAL  
EARTHJUSTICE  
50 CALIFORNIA STREET, SUITE 500  
SAN FRANCISCO, CA 94111

SUZY HONG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

IRENE K. MOOSEN  
ATTORNEY AT LAW  
CITY AND COUNTY OF SAN FRANCISCO  
53 SANTA YNEZ AVE.  
SAN FRANCISCO, CA 94112

CHARLES R. MIDDLEKAUFF  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442, MC-B30A-2475  
SAN FRANCISCO, CA 94120

MEGAN M. MYERS  
LAW OFFICES OF SARA STECK MYERS  
122 - 28TH AVENUE  
SAN FRANCISCO, CA 94121

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CHRISTOPHER SMITH  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177

ED LUCHA  
CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

ANDY SCHWARTZ  
SOLARCITY  
3055 CLEARVIEW WAY  
SAN MATEO, CA 94402

BETH VAUGHN  
CALIFORNIA COGENERATION COUNCIL  
4391 N. MARSH ELDER COURT  
CONCORD, CA 94521

SEAN BEATTY  
DIRECTOR - WEST REGULATORY AFFAIRS  
NRG WEST  
PO BOX 192  
PITTSBURG, CA 94565

AVIS KOWALEWSKI  
VP - GOV'T & REGULATORY AFFAIRS  
CALPINE CORPORATION  
4160 DUBLIN BLVD, SUITE 100  
DUBLIN, CA 94568

ROBERT ANDERSON  
OLIVINE, INC  
2010 CROW CANYON PLACE, STE. 100  
SN RAMON, CA 94583

SCOTT DAYER  
REGION SALES MGR.- GE POWER & WATER  
GE PACKAGED POWER, INC.  
6140 STONERIDGE MALL RD.  
PLEASANTON, CA 94588

GREGORY BLUE  
PRINCIPAL  
GTB CONSULTING  
3161 WALNUT BLVD  
WALNUT CREEK, CA 94596

ANTHONY HARRISON  
CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL  
436 14TH ST., SUITE 1020  
OAKLAND, CA 94612

SHANA LAZEROW  
ATTORNEY  
COMMUNITIES FOR A BETTER ENVIRONMENT  
1904 FRANKLIN STREET, STE 600  
OAKLAND, CA 94612  
FOR: CALIFORNIA ENVIRONMENTAL JUSTICE  
ALLIANCE

THADEUS B. CULLEY  
KEYES, FOX & WIEDMAN LLP  
436 14TH STREET, STE. 1305  
OAKLAND, CA 94612  
FOR: FRIENDS OF THE EARTH

TIM LINDL  
.  
INTERSTATE RENEWABLE ENERGY COUNCIL, INC  
436 14TH ST., STE. 1305  
OAKLAND, CA 94612

DAVID MARCUS  
PO BOX 1287  
BERKELEY, CA 94701

LINDA AGERTER  
LARGE-SCALE SOLAR ASSOCIATION  
51 PARKSIDE DRIVE  
BERKELEY, CA 94705

ERIC G. GIMON  
TECHNICAL CONSULTANT  
THE VOTE SOLAR INITIATIVE  
2727 MARIN AVE.  
BERKELEY, CA 94708

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

CARLOS LAMAS-BABBINI  
CEN-CA PROGRAM MGR.  
COMVERGE, INC.  
58 MT. TALLAC CT.  
SAN RAFAEL, CA 94903

PHILIP MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

RICH QUATTRINI  
DIR. PRODUCT MANAGEMENT  
JOHNSON CONTROLS  
901 CAMPISI WAY, STE 260  
CAMPBELL, CA 95008-2348

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PUSHKAR G. WAGLE  
FLYNN RESOURCE CONSULTANTS, INC.  
2900 GORDON AVENUE, SUITE 100-3  
SANTA CLARA, CA 95051

DEVRA WANG  
STAFF SCIENTIST  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 95104

JEFFREY SHIELDS  
GEN MGR.  
SOUTH SAN JOAQUIN IRRIGATION DISTRICT  
PO BOX 747  
RIPON, CA 95366-0747

JAMES CALDWELL  
1650 E NAPA STREET  
SONOMA, CA 95476

DOUGLAS M. GRANDY, P.E.  
CA ONSITE GENERATION  
1220 MACAULAY CIRCLE  
CARMICHAEL, CA 95608

MARTIN HOMEC  
PO BOX 4471  
DAVIS, CA 95617

DELPHINE HOU  
CALIF. INDEPENDENT SYSTEMS OPERATOR  
250 OUTCROPPING WAY  
FOLSOM, CA 95630

JACQUELINE M. DEROSA  
DIRECTOR OF REGULATORY AFFAIRS - CA  
CUSTOMIZED ENERGY SOLUTIONS  
101 PARKSHORE DRIVE SUITE 100  
FOLSOM, CA 95630

SHUCHENG LIU  
CALIFORNIA ISO  
250 OUTCROPPING WAY  
FOLSOM, CA 95630

CAL. INDEPENDENT SYSTEM OPERATOR CORP.  
250 OUTCROPPING WAY  
FOLSOM, CA 95630

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

PAUL D. MAXWELL  
NAVIGANT CONSULTING, INC.  
3100 ZINFANDEL DRIVE, SUITE 600  
RANCHO CORDOVA, CA 95670-6078

DANIEL KIM  
WESTLANDS SOLAR PARK  
PO BOX 582844  
ELK GROVE, CA 95757

DAVID MILLER, PHD  
CTR. FOR ENERGY EFFECIENCY & RENEWABLE  
1100 ELEVENTH ST., STE. 311  
SACRAMENTO, CA 95814

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
FOR: THE UTILITY REFORM NETWORK

LAUREN NAVARRO  
ATTORNEY  
ENVIRONMENTAL DEFENSE FUND  
1107 9TH ST., STE. 1070  
SACRAMENTO, CA 95814  
FOR: ENVIRONMENTAL DEFENSE FUND

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

STEVE KEENE  
BRAUN BLAISING MCLAUGHLIN P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

STEVEN KELLY  
POLICY DIRECTOR  
INDEPENDENT ENERGY PRODUCERS ASSOCIATION  
1215 K STREET, STE. 900  
SACRAMENTO, CA 95814

SAMANTHA G. POTTENGER  
ELLISON, SCHNEIDER AND HARRIS L.L.P.  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON & SCHNEIDER  
2600 CAPITOL AVE, SUITE 400  
SACRAMENTO, CA 95816-5905

CHASE B. KAPPEL  
ELLISON SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905

Revised September 2013

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905

GREGGORY L. WHEATLAND  
ATTORNEY  
ELLISON SCHNEIDER & HARRIS L.L.P.  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905

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

SHANNON EDDY  
EXECUTIVE DIRECTOR  
LARGE SCALE SOLAR ASSOCIATION  
2501 PORTOLA WAY  
SACRAMENTO, CA 95818

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

JACK ELLIS  
1425 ALPINE WAY / PO BOX 6600  
LAKE TRAHOE, CA 96145-6600

LISA SCHWARTZ  
REGULATORY ASSISTANCE PROJECT  
429 NE NORTH NEBERGALL LOOP  
ALBANY, OR 97321

DONALD SCHOENBECK  
RCS INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660

ROBIN FRASER  
INTERNATIONAL EMISSIONS TRADING ASSN.  
100 KING STREET WEST, SUITE 5700  
TORONTO, ON M5X 1C7  
CANADA  
FOR: IETA

DANIEL JURIJEW  
SR. MGR - REGULATORY AFFAIRS WEST  
CAPITAL POWER CORPORATION  
1200 - 10423 101 ST. NW  
EDMONTON, AB T5H 0E9  
CANADA

PETER CAVAN  
PULSE ENERGY  
576 SEYMOUR ST., STE. 600  
VANCOUVER, BC V6B 3K1  
CANADA

STATE SERVICE

CHRIS UNGSON  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID PECK  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JORDAN PARRILLO  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING AND POLICY BRANCH  
EMAIL ONLY  
EMAIL ONLY, CA 00000

LILY CHOW  
REGULATORY ANALYST  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

VALERIE KAO  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

WILLIAM DIETRICH  
SR. ANALYST - ENERGY DIV.  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

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

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

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

BRIAN STEVENS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

CHRIS UNGSON  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DAMON A. FRANZ  
CALIF PUBLIC UTILITIES COMMISSION  
PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DAVID M. GAMSON  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5019  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

EDWARD F. RANDOLPH  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
ROOM 4004  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

IRYNA KWASNY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

JULIE A. FITCH  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5214  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KARIN M. HIETA  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KE HAO OUYANG  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY & PAYPHONE ENFORCEMENT BRANCH  
AREA 2-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

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MARCELO POIRIER  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5025  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MATT MILEY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5135  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MEGHA LAKHCHAURA  
CALIF PUBLIC UTILITIES COMMISSION  
PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
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  
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

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

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

PATRICK L. YOUNG  
CALIF PUBLIC UTILITIES COMMISSION  
INFRASTRUCTURE PLANNING AND PERMITTING B  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PETER SPENCER  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RACHEL MCMAHON  
CALIF PUBLIC UTILITIES COMMISSION  
DEMAND SIDE PROGRAMS BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

SEPIDEH KHOSROWJAH  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5201  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

STEPHEN ST. MARIE  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5203  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

XIAN "CINDY" LI  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PRICING AND CUSTOMER PROGRAM  
ROOM 4104  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

CONSTANCE LENI  
CALIFORNIA ENERGY COMMISSION  
MS-20  
1516 NINTH STREET  
SACRAMENTO, CA 95814

MARC S. PRYOR  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET  
SACRAMENTO, CA 95814



Revised September 2013

MICHAEL JASKE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-20  
SACRAMENTO, CA 95814

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

KEVIN S. NAKAMURA  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN  
180 Promenade Circle, Suite 115  
Sacramento, CA 95834

Executed this 10<sup>th</sup> day of October, 2013, at Santa Cruz,  
California.

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/s/ L. Jan Reid

L. Jan Reid  
3185 Gross Road  
Santa Cruz, CA 95062