

From: Sue Mara

Sent: 2/18/2014 2:21:32 PM

abb@eslawfirm.com (abb@eslawfirm.com); 1040@pacbell.net (1040@pacbell.net); Andrew.Luszcz@GlacialEnergy.com (Andrew.Luszcz@GlacialEnergy.com); AGarza-Beutz@semprautilities.com (AGarza-Beutz@semprautilities.com); aivancovich@caiso.com (aivancovich@caiso.com); abraham.silverman@nrgenergy.com (abraham.silverman@nrgenergy.com); aol@cpuc.ca.gov (aol@cpuc.ca.gov); AKaplan@BrownRudnick.com (AKaplan@BrownRudnick.com); ag2@cpuc.ca.gov (ag2@cpuc.ca.gov); amanda.bergfield@directenergy.com (amanda.bergfield@directenergy.com); Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); bcragg@goodinmacbride.com (bcragg@goodinmacbride.com); blaising@braunlegal.com (blaising@braunlegal.com); atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com); bburns@caiso.com (bburns@caiso.com); APak@SempraUtilities.com (APak@SempraUtilities.com); blyons@TigerNaturalGas.com (blyons@TigerNaturalGas.com); b.bordine@d-e-c-a.org (b.bordine@d-e-c-a.org); barbara@barkovichandyap.com (barbara@barkovichandyap.com); berlin@susieberlinlaw.com (berlin@susieberlinlaw.com); braun@braunlegal.com (braun@braunlegal.com); Berlinski@BeaconPower.com (Berlinski@BeaconPower.com); Wetstone, Brad (/O=PG&E/OU=Corporate/cn=Recipients/cn=B1WA); aw3@cpuc.ca.gov (aw3@cpuc.ca.gov); ariel.lin@sce.com (ariel.lin@sce.com); bcooper@caiso.com (bcooper@caiso.com); clamasbabbini@comverge.com (clamasbabbini@comverge.com); david@nemtzow.com (david@nemtzow.com); CentralFiles@SempraUtilities.com (CentralFiles@SempraUtilities.com); cem@newsdata.com (cem@newsdata.com); case.admin@sce.com (case.admin@sce.com); Middlekauff, Charles (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CRMd); cmkehrrein@ems-ca.com (cmkehrrein@ems-ca.com); davidmorse9@gmail.com (davidmorse9@gmail.com); dgrandy@caonsitegen.com (dgrandy@caonsitegen.com); californiadockets@pacificorp.com (californiadockets@pacificorp.com); cpacc@calpine.com (cpacc@calpine.com); ddavie@wellhead.com (ddavie@wellhead.com); danielle@ceert.org (danielle@ceert.org); brian.theaker@nrgenergy.com (brian.theaker@nrgenergy.com); dbp@cpuc.ca.gov (dbp@cpuc.ca.gov); david@ceert.org (david@ceert.org); cathompson@anaheim.net (cathompson@anaheim.net); dansvec@hdo.net (dansvec@hdo.net); cpuc@primuspower.com (cpuc@primuspower.com); deb@a-klaw.com (deb@a-klaw.com); brflynn@flynnrci.com (brflynn@flynnrci.com); dbr@cpuc.ca.gov (dbr@cpuc.ca.gov); Smith, Christopher (/O=PG&E/OU=Corporate/cn=Recipients/cn=C5SE); dan.patry@recurrentenergy.com (dan.patry@recurrentenergy.com); df1@cpuc.ca.gov (df1@cpuc.ca.gov); chloe.lukins@cpuc.ca.gov (chloe.lukins@cpuc.ca.gov); brc@cpuc.ca.gov (brc@cpuc.ca.gov); cara.goldenberg@grueneich.com (cara.goldenberg@grueneich.com);

To:

David.Weidberg@jci.com (David.Weidberg@jci.com); cpuc-r1110023@olivineinc.com (cpuc-r1110023@olivineinc.com); cho@cpuc.ca.gov (cho@cpuc.ca.gov); cbentley@caiso.com (cbentley@caiso.com); jeanne.sole@sfgov.org (jeanne.sole@sfgov.org); filings@a-klaw.com (filings@a-klaw.com); hayley@turn.org (hayley@turn.org); e-recipient@caiso.com (e-recipient@caiso.com); gmorris@emf.net (gmorris@emf.net); DWTCPUCDOCKETS@dwt.com (DWTCPUCDOCKETS@dwt.com); douglass@energyattorney.com (douglass@energyattorney.com); GloriaB@anzaelectric.org (GloriaB@anzaelectric.org); igoodman@commerceenergy.com (igoodman@commerceenergy.com); Zahariudakis, George (/O=PG&E/OU=Corporate/cn=Recipients/cn=GxZ5); jjg@eslawfirm.com (jjg@eslawfirm.com); jeffgray@dwt.com (jeffgray@dwt.com); dorth@krcd.org (dorth@krcd.org); gbass@noblesolutions.com (gbass@noblesolutions.com); klatt@energyattorney.com (klatt@energyattorney.com); eddyconsulting@gmail.com (eddyconsulting@gmail.com); dws@r-c-s-inc.com (dws@r-c-s-inc.com); jna@speakeasy.org (jna@speakeasy.org); Joni.Templeton@sce.com (Joni.Templeton@sce.com); kdw@woodruff-expert-services.com (kdw@woodruff-expert-services.com); JChamberlin@LSPower.com (JChamberlin@LSPower.com); jwoodwar@energy.state.ca.us (jwoodwar@energy.state.ca.us); julien.dumoulin-smith@ubs.com (julien.dumoulin-smith@ubs.com); kevin.boudreaux@calpine.com (kevin.boudreaux@calpine.com); energy@3phasesrenewables.com (energy@3phasesrenewables.com); Joseph.Phalen@bves.com (Joseph.Phalen@bves.com); jason.lewis@jpmorgan.com (jason.lewis@jpmorgan.com); kgillick@sfwater.org (kgillick@sfwater.org); jf2@cpuc.ca.gov (jf2@cpuc.ca.gov); Ekelly@mceCleanEnergy.org (Ekelly@mceCleanEnergy.org); JWaen@mceCleanEnergy.org (JWaen@mceCleanEnergy.org); jleslie@mckennalong.com (jleslie@mckennalong.com); jleesq@yahoo.com (jleesq@yahoo.com); kfox@kfwlaw.com (kfox@kfwlaw.com); kerry.hattevik@nee.com (kerry.hattevik@nee.com); jderosa@ces-ltd.com (jderosa@ces-ltd.com); kho@cpuc.ca.gov (kho@cpuc.ca.gov); JFriderichs@pilotpowergroup.com (JFriderichs@pilotpowergroup.com); kimjohnson@ebarton.com (kimjohnson@ebarton.com); irene@igc.org (irene@igc.org); ericg@votesolar.org (ericg@votesolar.org); dschlosberg@brightsourceenergy.com (dschlosberg@brightsourceenergy.com); dyana@clean-coalition.org (dyana@clean-coalition.org); dmng@cpuc.ca.gov (dmng@cpuc.ca.gov); dhou@caiso.com (dhou@caiso.com); jhcaldwelljr@gmail.com (jhcaldwelljr@gmail.com); eac@cpuc.ca.gov (eac@cpuc.ca.gov); keene@braunlegal.com (keene@braunlegal.com); justin.boone@sce.com (justin.boone@sce.com); elizabeth.dorman@cpuc.ca.gov (elizabeth.dorman@cpuc.ca.gov); jgoodin@caiso.com (jgoodin@caiso.com); john@dmcadvisors.com (john@dmcadvisors.com); jay.robertson@directenergy.com (jay.robertson@directenergy.com); jbaak@votesolar.org (jbaak@votesolar.org); gkatta@caiso.com (gkatta@caiso.com); Joseph.williams@cwt.com (Joseph.williams@cwt.com); hudsonr@conedsolutions.com

(hudsonr@conedsolutions.com); ericj@eslawfirm.com (ericj@eslawfirm.com);  
hbethel@ormat.com (hbethel@ormat.com); jenchamberlin@earthlink.net  
(jenchamberlin@earthlink.net); joanna.gubman@cpuc.ca.gov  
(joanna.gubman@cpuc.ca.gov); EOlsen@SempraUtilities.com  
(EOlsen@SempraUtilities.com); dweisz@mceCleanEnergy.org  
(dweisz@mceCleanEnergy.org); jaimerose.gannon@cpuc.ca.gov  
(jaimerose.gannon@cpuc.ca.gov); tlong@turn.org (tlong@turn.org);  
RegRelCPUCCases  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases);  
kmills@cfbf.com (kmills@cfbf.com); ssmyers@att.net (ssmyers@att.net); nes@a-  
klaw.com (nes@a-klaw.com); mgo@goodinmacbride.com  
(mgo@goodinmacbride.com); mpa@a-klaw.com (mpa@a-klaw.com); mtierney-  
lloyd@enernoc.com (mtierney-lloyd@enernoc.com); liddell@energyattorney.com  
(liddell@energyattorney.com); mrw@mrwassoc.com (mrw@mrwassoc.com);  
wynne@braunlegal.com (wynne@braunlegal.com); william.sanders@sfgov.org  
(william.sanders@sfgov.org); tdarton@pilotpowergroup.com  
(tdarton@pilotpowergroup.com); thomaspcorr@gmail.com  
(thomaspcorr@gmail.com); Gonzales, Matthew  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRGg); rick\_noger@praxair.com  
(rick\_noger@praxair.com); Huffman, Mark (Law)  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2); lwisland@ucsusa.org  
(lwisland@ucsusa.org); rl@eslawfirm.com (rl@eslawfirm.com);  
sue.mara@RTOadvisors.com (sue.mara@RTOadvisors.com);  
Patrick.VanBeek@CommercialEnergy.net  
(Patrick.VanBeek@CommercialEnergy.net); tomb@crossborderenergy.com  
(tomb@crossborderenergy.com); nrader@calwea.org (nrader@calwea.org);  
spauker@wsgr.com (spauker@wsgr.com); mpryor@energy.state.ca.us  
(mpryor@energy.state.ca.us); lcottle@winston.com (lcottle@winston.com);  
pmaxwell@navigantconsulting.com (pmaxwell@navigantconsulting.com);  
rkmoore@gswater.com (rkmoore@gswater.com); mday@goodinmacbride.com  
(mday@goodinmacbride.com); mary.wiencke@pacificorp.com  
(mary.wiencke@pacificorp.com); tsolomon@winston.com  
(tsolomon@winston.com); VidhyaPrabhakaran@dwt.com  
(VidhyaPrabhakaran@dwt.com); peter.pearson@bves.com  
(peter.pearson@bves.com); skh@cpuc.ca.gov (skh@cpuc.ca.gov);  
smatlock@gswater.com (smatlock@gswater.com);  
RNicholson@SempraUtilities.com (RNicholson@SempraUtilities.com);  
matthew.barmack@calpine.com (matthew.barmack@calpine.com);  
smaye@nappartners.com (smaye@nappartners.com); martin.kadillak@shell.com  
(martin.kadillak@shell.com); NTang@SempraUtilities.com  
(NTang@SempraUtilities.com); wrostov@earthjustice.org  
(wrostov@earthjustice.org); Jarman, Thomas A  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=TAJ8);  
mary.lynch@constellation.com (mary.lynch@constellation.com);  
philm@scdenergy.com (philm@scdenergy.com); mcrane@bluestarenergy.com  
(mcrane@bluestarenergy.com); NILEN@vestas.com (NILEN@vestas.com);

smartinez@nrdc.org (smartinez@nrdc.org); stephen.t.greenleaf@jpmorgan.com (stephen.t.greenleaf@jpmorgan.com); psd@cpuc.ca.gov (psd@cpuc.ca.gov); sswaroop@mceCleanEnergy.org (sswaroop@mceCleanEnergy.org); nguyen.quan@gswater.com (nguyen.quan@gswater.com); matt.vespa@SierraClub.org (matt.vespa@SierraClub.org); TLindl@kfwlaw.com (TLindl@kfwlaw.com); lnavarro@edf.org (lnavarro@edf.org); nicole@braunlegal.com (nicole@braunlegal.com); sean.beatty@nrgenergy.com (sean.beatty@nrgenergy.com); Rachel@largescalesolar.org (Rachel@largescalesolar.org); mstamas@nrdc.org (mstamas@nrdc.org); wtr@cpuc.ca.gov (wtr@cpuc.ca.gov); rshilling@krcd.org (rshilling@krcd.org); mk1@cpuc.ca.gov (mk1@cpuc.ca.gov); whitney@clean-coalition.org (whitney@clean-coalition.org); virinder.singh@edf-re.com (virinder.singh@edf-re.com); willem.fadrhonc@stem.com (willem.fadrhonc@stem.com); Steph@Clean-Coalition.org (Steph@Clean-Coalition.org); sarah.keane@bingham.com (sarah.keane@bingham.com); sbailey@semprausgp.com (sbailey@semprausgp.com); shaun.logue@brookfieldrenewable.com (shaun.logue@brookfieldrenewable.com); SZuretti@seia.org (SZuretti@seia.org); NODonovan@LREnergy.com (NODonovan@LREnergy.com); sahm@clean-coalition.org (sahm@clean-coalition.org); margaret.miller@brookfieldrenewable.com (margaret.miller@brookfieldrenewable.com); TCSaile@SempraUtilities.com (TCSaile@SempraUtilities.com); proceedings@psrec.coop (proceedings@psrec.coop); Greenacre, Wade (/O=PG&E/OU=Corporate/cn=Recipients/cn=WAG9); michael.colvin@cpuc.ca.gov (michael.colvin@cpuc.ca.gov); ygomez@libertypowercorp.com (ygomez@libertypowercorp.com); mhyams@sflower.org (mhyams@sflower.org); Marty.Rogers@nee.com (Marty.Rogers@nee.com); STomec@CapitalPower.com (STomec@CapitalPower.com); winton.kelly@nee.com (winton.kelly@nee.com); pramod@ces-ltd.com (pramod@ces-ltd.com); mcmahon.rachel@gmail.com (mcmahon.rachel@gmail.com); tandy.mcmannes@solar.abengoa.com (tandy.mcmannes@solar.abengoa.com); mike.jaske@energy.state.ca.us (mike.jaske@energy.state.ca.us); mm2@cpuc.ca.gov (mm2@cpuc.ca.gov); michael.evans@shell.com (michael.evans@shell.com); scl@cpuc.ca.gov (scl@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); Mobasheri@ElectricPowerGroup.com (Mobasheri@ElectricPowerGroup.com); Rich.Quattrini@jci.com (Rich.Quattrini@jci.com); Susan.E.Smith@shell.com (Susan.E.Smith@shell.com); mburrows@3phasesRenewables.com (mburrows@3phasesRenewables.com); Tracey.Drabant@bves.com (Tracey.Drabant@bves.com); onmyers@gmail.com (onmyers@gmail.com); rfagan@synapse-energy.com (rfagan@synapse-energy.com); Tex.Wilkins@gmail.com (Tex.Wilkins@gmail.com); mryan@montaukenegy.com (mryan@montaukenegy.com); scott.dayer@ge.com (scott.dayer@ge.com); Taber@PrincetonEnergy.net (Taber@PrincetonEnergy.net); MJacobs@ucsusa.org (MJacobs@ucsusa.org); Robin.Smutny-Jones@IberdrolaRen.com (Robin.Smutny-Jones@IberdrolaRen.com); tam@clean-coalition.org (tam@clean-coalition.org);

ktreleven@gmail.com (ktreleven@gmail.com); scheduling.nwngs@nwnatural.com  
(scheduling.nwngs@nwnatural.com); rc5@cpuc.ca.gov (rc5@cpuc.ca.gov);  
xl2@cpuc.ca.gov (xl2@cpuc.ca.gov); kmeeusen@caiso.com  
(kmeeusen@caiso.com); nlc@cpuc.ca.gov (nlc@cpuc.ca.gov); sioshani.1@osu.edu  
(sioshani.1@osu.edu)

Cc:

Bcc:

Subject: R.11-10-023 (Resource Adequacy) AReM Comments on Energy Division's  
Proposals

TO SERVICE LIST IN R.11-10-023 (Resource Adequacy):

Attached are the comments of the Alliance for Retail Energy Markets (AReM) on  
Energy Division's Proposals in the Resource Adequacy proceeding, R.11-10-  
023. These comments were filed electronically today, February 18, 2014, in portable  
document format at the California Public Utilities Commission. The Certificate of  
Service is also attached.

Regards,

Sue Mara  
On behalf of AReM

**Sue Mara**  
RTOAdvisors, L.L.C.  
164 Springdale Way  
Redwood City, CA 94062  
[sue.mara@rtoadvisors.com](mailto:sue.mara@rtoadvisors.com)  
(415) 902-4108