

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

Order Instituting Rulemaking to Develop a  
Risk-Based Decision-Making Framework to  
Evaluate Safety and Reliability  
Improvements and Revise the General Rate  
Case Plan for Energy Utilities

R.13-11-006

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2014, I served a true and correct copy of SOUTHERN CALIFORNIA GENERATION COALITION OPENING COMMENT ON REFINED STRAW PROPOSAL, by electronic mail to the persons on the service list, and to Administrative Law Judge Douglas Long, California Public Utilities Commission, 505 Van Ness Ave., Room 5021, San Francisco, CA 94102.

DATED as of May 23, 2014, at Los Angeles, California.

/s/

---

Susanne Osborne  
HANNA AND MORTON LLP  
444 South Flower Street, Suite 1500  
Los Angeles, California 90071-2916  
Telephone: (213) 430-2505  
[sosborne@hanmor.com](mailto:sosborne@hanmor.com)



California Public  
Utilities Commission

[CPUC Home](#)

**A. CALIFORNIA PUBLIC UTILITIES COMMISSION  
Service Lists**

- 1. Proceeding: R1311006 - CPUC - OIR TO DEVELO  
Filer: CPUC  
List Name: LIST  
Last changed: May 19, 2014**

a.

[DOWNLOAD THE COMMA-DELIMITED FILE  
ABOUT COMMA-DELIMITED FILES](#)

**2.**

a. [Back to Service Lists Index](#)

---

**B. Parties**

DIANE CONKLIN  
SPOKEPERSON  
MUSSEY GRADE ROAD ALLIANCE  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: MUSSEY GRADE ROAD ALLIANCE

JOHN LATHROP  
DIRECTOR  
DECISION STRATEGIES, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: DECISION STRATEGIES, LLC

STEVE GREENWALD  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC

CATHERINE M. MAZZEO  
ASSOCIATE GEN. COUNSEL  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150  
FOR: SOUTHWEST GAS CORPORATION

SID NEWSOME  
REGULATORY MGR.  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST FIFTH STREET, GT14D6  
LOS ANGELES, CA 90013-1011  
FOR: SOUTHERN CALIFORNIA GAS COMPANY

NORMAN A. PEDERSEN  
HANNA AND MORTON LLP  
444 S FLOWER ST., SUITE 1500  
LOS ANGELES, CA 90071-2916  
FOR: SOUTHERN CALIFORNIA GENERATION  
COALITION (SCGC)

JANE LEE COLE, ESQ.  
ATTORNEY  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800 / 2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY  
(SCE)

KEITH MELVILLE  
ATTORNEY  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ-12B  
SAN DIEGO, CA 92101  
FOR: SOUTHERN CALIFORNIA GAS COMPANY /  
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 (SDCAN)

MARC D. JOSEPH  
ATTORNEY  
ADAMS BROADWELL JOSEPH & CORDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
FOR: COALITION OF CALIFORNIA UTILITY  
EMPLOYEES (CCUE)

HAYLEY GOODSON  
STAFF ATTORNEY  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103  
FOR: THE UTILITY REFORM NETWORK (TURN)

RITA WHITTEN  
ATTORNEY  
MANATT, PHELPS & PHILLIPS, LLP  
ONE EMBARCADERO CENTER, 30TH FLOOR  
SAN FRANCISCO, CA 94111  
FOR: EXXONMOBIL POWER & GAS SERVICES

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

DONALD KELLY  
EXE. DIR.  
UTILITY CONSUMERS' ACTION NETWORK  
3405 KENYON STREET, SUITE 401  
SAN DIEGO, CA 92110  
FOR: UTILITY CONSUMERS' ACTION NETWORK  
(UCAN)

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

LAURA J. TUDISCO  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5032  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: ORA

DAVID L. HUARD  
MANATT, PHELPS & PHILLIPS, LLP  
ONE EMBARCADERO CENTER, 30TH FL.  
SAN FRANCISCO, CA 94111  
FOR: TESORO REFINING & MARKETING  
COMPANY LLC

TARA S. KAUSHIK  
HOLLAND & KNIGHT, LLP  
50 CALIFORNIA STREET, 28TH FLOOR  
SAN FRANCISCO, CA 94111  
FOR: EXXONMOBIL POWER & GAS SERVICES,  
INC.

ROGER LIN  
STAFF ATTORNEY  
COMMUNITIES FOR A BETTER ENVIRONMENT  
1904 FRANKLIN ST., STE. 600  
OAKLAND, CA 94612

WILLIAM JULIAN II  
UTILITY WORKERS UNION OF AMERICA  
43556 ALMOND LANE  
DAVIS, CA 95618  
FOR: UTILITY WORKER'S UNION OF AMERICA  
(UWUA)

FOR: COMMUNITIES FOR A BETTER  
ENVIRONMENT

RONALD LIEBERT  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVENUE, STE. 400  
SACRAMENTO, CA 95816  
FOR: CALIFORNIA MANUFACTURERS &  
TECHNOLOGY ASSOCIATION

JEDEDIAH J. GIBSON  
ATTORNEY AT LAW  
ELLISON SCHNEIDER & HARRIS LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5905  
FOR: BEAR VALLEY ELECTRIC SERVICE

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

CATHIE ALLEN  
REGULATORY AFFAIRS MGR.  
PACIFICORP  
825 NE MULTNOMAH ST., STE 2000  
PORTLAND, OR 97232  
FOR: PACIFICORP

### **C. Information Only**

AMANDA PHILLIPS  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

ELIZABETH KELLY  
LEGAL DIRECTOR  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JAMES BIRKELUND  
PRESIDENT  
SMALL BUSINESS UTILITY ADVOCATES  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: SMALL BUSINESS UTILITY ADVOCATES

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

JEREMY WAEN  
REGULATORY ANALYST  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOSEPH MITCHELL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

MARTIN HOMECEC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MCE REGULATORY  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

RICHARD LO  
DIRECTOR  
UTILITYCONSULTING GROUP, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SHALINI SWAROOP  
MARIN CLEAN ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

VIDHYA PRABHAKARAN  
ATTORNEY  
DAVIS WRIGHT & TREMAINE, LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: LIBERTY UTILITIES (CALPECO  
ELECTRIC) LLC

DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

JUDY PAU  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000-0000

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

JIM O'REILLY  
MCKINSEY & COMPANY  
1200 19TH ST., N.W.  
WASHINGTON, DC 20036

PAUL J. WOOD  
CONSULTANT  
CYCLA CORP.  
211 SOMERVELLE ST.  
ALEXANDRIA, VA 22304

DOUGLAS E. MILLER  
VP - STRATEGY & BUSINESS DEVELOPMENT  
TESORO COMPANIES, INC.  
19100 RIDGEWOOD PARKWAY  
SAN ANTONIO, TX 78259

EDWARD B. GIESEKING  
DIR - PRICING AND TARIFFS  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150

VALERIE J. ONTIVEROZ  
STATE REGULATORY AFFAIRS  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150

JEFFREY SALAZAR  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST FIFTH STREET, GT14D6  
LOS ANGELES, CA 90013

MIKE FRANCO  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. FIFTH STREET, GT14D6  
LOS ANGELES, CA 90013

RASHA PRINCE  
SAN DIEGO GAS & ELECTRIC COMPANY  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

SHARON TOMKINS  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. FIFTH ST., GT14E7  
LOS ANGELES, CA 90013

JOHNNY J. PONG  
SOUTHERN CALIFORNIA GAS COMPANY  
555 W. 5TH ST. GT14E7, SUITE 1400  
LOS ANGELES, CA 90013-1034

HUBERT SHEN  
MANAGER  
BAIN & COMPANY  
1901 AVENUE OF THE STARS, STE. 200  
LOS ANGELES, CA 90067

MAYA GOLDEN-KRASNER  
COMMUNITIES FOR A BETTER ENVIRONMENT  
6325 PACIFIC BLVD., STE. 300  
HUNTINGTON PARK, CA 90255

FRED YANNEY  
YANNEY LAW OFFICE  
17409 MARQUARDT AVE., UNIT 4-C  
CERRITOS, CA 90703

DANIEL A. DELL'OSA  
DIR - RATES & REVENUE  
SAN GABRIEL VALLEY WATER COMPAAANY  
11142 GARVEY AVENUE  
EL MONTE, CA 91733-2425

MIKE MARELLI  
DIRECTOR  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE./PO BOX 800  
ROASEMEAD, CA 91770

MILISSA MARONA  
PINCIPAL ADV.-REG AFFAIRS & COMPLIANCE  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800 / 2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

KEITH SWITZER  
VP - REGULATORY AFFAIRS  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BOULEVARD  
SAN DIMAS, CA 91773-9016

CARL WOOD  
NATIONAL REGULATORY AFFAIRS DIRECTOR  
UTILITY WORKERS UNION OF AMERICA  
2021 S. NEVADA ST  
OCEANSIDE, CA 92054

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

CENTRAL FILES  
SDG&E/SOCALGAS  
8330 CENTURY PARK COURT, CP31-E  
SAN DIEGO, CA 92123

PETE GIRARD  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK CT., CP 32C  
SAN DIEGO, CA 92123

CHUCK MANZUK  
DIR. - RATES & REVENUE REQUIREMENTS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT, CP32D  
SAN DIEGO, CA 92123-1530

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

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

ROBERT FINKELSTEIN  
GENERAL COUNSEL  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103

THOMAS LONG  
LEGAL DIR.  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103

JOHN MCINTYRE  
ALCANTAR & KAHL  
33 NEW MONTGOMERY STREET, SUITE 1850  
SAN FRANCISCO, CA 94105

PATTY COOK  
ICF INTERNATIONAL  
620 FOLSOM ST., STE. 200  
SAN FRANCISCO, CA 94105

STEVEN W. FRANK  
ATTORNEY  
PACIFIC GAS AND ELECTRIC CO  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

F. JACKSON STODDARD  
MANATT, PHELPS & PHILLIPS, LLP  
ONE EMBARCADERO CENTER, 30TH FL  
SAN FRANCISCO, CA 94111

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

SHELLY SHARP  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

AMRIT SINGH  
SATVICK  
526 WYCOMBE COURT  
SAN RAMON, CA 94583

JOYCE STEINGASS  
GAS TRANSMISSION SYSTEMS, INC.  
575 LENNON LN, SUITE 250  
WALNUT CREEK, CA 94598

CARMELITA L. MILLER  
LEGAL FELLOW  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

C. SUSIE BERLIN  
LAW OFFICES OF SUSIE BERLIN  
1346 THE ALAMEDA, STE. 7, NO. 141  
SAN JOSE, CA 95126

SCOTT BLAISING  
ATTORNEY  
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.  
915 L STREET, STE. 1270  
SACRAMENTO, CA 95814

TANYA DERIVI  
SO. CALIFORNIA PUBLIC POWER AUTHORITY  
915 L STREET, STE. 1410  
SACRAMENTO, CA 95814

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

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

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER & MURPHY LLC  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864

MIKE LONG  
DIR - FINANCE & MGR  
LIBERTY UTILITIES  
933 ELOISE AVE.  
SO. LAKE TAHOE, CA 96150  
FOR: LIBERTY UTILITIES

MIKE CADE  
ALCANTAR & KAHL  
1300 SW 5TH AVENUE, STE. 1750  
PORTLAND, OR 97201

DAVE WEBER  
GILL RANCH STORAGE, LLC  
220 NW SECOND AVENUE  
PORTLAND, OR 97209

ETTA LOCKEY  
ATTORNEY  
PACIFICORP  
825 NE MULTNOMAH ST., STE. 1800  
PORTLAND, OR 97232

MICHELLE R. MISHOE  
SR. COUNSEL  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 1800  
PORTLAND, OR 97232

CHARLES MAGEE  
VP / GEN. COUNSEL  
TESORO REFINING & MARKETING COMPANY LLC  
3450 S. 344TH WAY, STE. 201  
AUBURN, WA 98001

#### **D. State Service**

CAROLINA CONTRERAS, P.E.  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MICHAEL COLVIN  
ADVISOR - ENERGY  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

NANCY GONZALES  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

RICHARD MYERS  
ENERGY  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SCOTT MURTISHAW  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

TONY MARINO  
OFFICE OF SENATOR JERRY HILL  
EMAIL ONLY  
EMAIL ONLY, CA 00000

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

BELINDA GATTI  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214



BISHU CHATTERJEE  
CALIF PUBLIC UTILITIES COMMISSION  
GAS SAFETY AND RELIABILITY BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER PARKES  
CALIF PUBLIC UTILITIES COMMISSION  
GAS SAFETY AND RELIABILITY BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CLAYTON K. TANG  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4205  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DONALD J. LAFRENZ  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ELAINE LAU  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ELIZAVETA I. MALASHENKO  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY AND ENFORCEMENT DIVISION  
ROOM 455  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOHN S. WONG  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5106  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KENNETH BRUNO  
CALIF PUBLIC UTILITIES COMMISSION  
GAS SAFETY AND RELIABILITY BRANCH  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARC MONBOUQUETTE  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
ROOM 4006  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARZIA ZAFAR  
CALIF PUBLIC UTILITIES COMMISSION  
POLICY & PLANNING DIVISION  
ROOM 5119  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

NIKI BAWA  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5038  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RICHARD WHITE  
CALIF PUBLIC UTILITIES COMMISSION  
POLICY & PLANNING DIVISION  
ROOM 5-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY COST OF SERVICE & NATURAL GAS BRA  
ROOM 4205  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TRACI BONE  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5027  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LYNN MARSHALL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-20  
SACRAMENTO, CA 95814

---