BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-term Procurement Plans.	Rulemaking 06-02-013 (Filed February 16, 2006)

PREWORKSHOP PROPOSAL OF CONSTELLATION ENERGY COMMODITIES GROUP, INC., CONSTELLATION GENERATION GROUP, LLC AND CONSTELLATION NEWENERGY, INC.

March 7, 2006

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I. Introduction

On February 16, 2006 the Commission issued an Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-term Procurement Plans ("OIR"). In the OIR, the Commission invited interested parties and respondents to submit proposals on additional policies to support new generation issues and long term contracting by March 2, 2006 ("March Proposals").[1] On February 23, 2006, Administrative Law Judge ("ALJ") Brown issued a ruling setting forth seven specific questions that parties should address in their March Proposals ("February 23 ALJ Ruling"). Constellation Energy Commodities Group, Inc. ("CCG"), Constellation Generation Group, LLC ("CGG"),[2] and Constellation NewEnergy, Inc. ("CNE") (collectively, "Constellation") appreciate the opportunity to submit its proposals and responses to the questions posed in the February 23 ALJ Ruling.

II. Constellation's Responses to Questions in the February 23 ALJ Ruling

Question 1a: Is there a need for the State to adopt additional policies to support the development of new generation and long-term contracts in California?

Response: Yes. The Commission needs new policies to support and promote competitive market structures that will lead to sustainable generation development and the availability of long-term contracts in the State, through market structures that support investment in needed infrastructure without the type of contracts that require regulatory guarantees. Much of the work associated with implementing competitive market structures is underway, including

[1] The filing date was extended to March 7 pursuant to discussion at the February 28, 2006 PHC. See TR 61:4-6.
[2] Constellation Generation Group, LLC did not make an appearance at the fist PHC, but joins this filing with CCG and CNE.

the California Independent System Operation's ("CAISO") implementation of its Market Redesign and Technology Update ("MRTU"), the Commission's establishment of a resource adequacy requirement ("RAR"), tradable capacity markets and reform of the must offer obligation ("MOO"). The Commission's ongoing leadership and support of these market improvements will be critical to their success. However, there are other facets of the Commission's current policy direction that could serve to thwart this progress. Specifically, the Commission's current policies have failed to recognize that the hybrid market structure – where merchant assets that rely on markets to earn their return are subject to "competition" with assets that are assured a regulatory guarantee - creates an uneven playing field in favor of the utilities that are able to amortize their plants over longer periods of time than independent power producers ("IPPs") and that are then able to "price" power from these facilities at what appears to be lower prices than those that are available from IPPs, which are forced to price power from these facilities on the basis of ten year or shorter contracts. This has stymied energy infrastructure investment in California by anyone other than the utilities who have built plants under rate-based accounting mechanisms, bought plants that were in mid-construction at a discount, or have been authorized to spend substantial amounts on their own existing plants to ensure their continued operation. Further, the hybrid market has precluded progress toward competitive wholesale and retail markets, by introducing potentially new competitive transition charges or exit fees, and is on pace to ensure that California returns to the vertically integrated utility model of twenty years ago.

In addition to addressing the problems of the hybrid market, the Commission should monitor much more closely affiliate deals arising out of the utilities' long-term procurement RFOs and should consider reinstating the rules governing affiliate transactions. It is of concern to Constellation, for example, that Southern California Edison ("SCE") pulled its recent Request for Offers ("RFO") and Edison Mission Energy subsequently announced plans to construct 1,000 MW of peaking capacity in SCE's service territory in addition to Edison International's announced plan to build a 500 MW baseload plant, also in SCE's service territory.[3] Since the Commission's announced preference for a "hybrid" market, SCE has announced over 2,500 MW of new capacity (including Mountainview) in addition to announced intentions to spend well

[3] See, e.g., EME's Sun Valley Energy Project proposal, CEC Docket 05-AFC-3 (December 1, 2005), posted at http://www.energy.ca.gov/sitingcases/sunvalley/indx.html.

over half a billion dollars to repower their existing generation. During this time, virtually no IPP power plants have been planned in SCE's service territory. This is just one example of the shortcomings of a hybrid market to get competitively-priced generation built, as well as the problem with having done away with the affiliate rules. In short, this Commission must take action to implement policies that create an even playing field and give IPPs a fair chance at constructing new power plants.

Constellation recognizes that while progress is being made to create sustainable and durable competitive wholesale market structures, it may be necessary for the Commission to permit a very specific amount of new generation to be developed through utility contracts, with some reasonable level of cost allocation to customers who benefit from the projects, unless those customers can demonstrate that they have adequate resources to meet their load. However, the Commission's continued approval of new regulatory-guaranteed investments only will perpetuate the existing uncertainty about the direction in which California's energy industry is headed (*i.e.* supporting competitive markets or returning to regulated structures). Thus it is essential that the Commission recognize that its approval of stop-gap interim procurement by the utilities is a second best solution for consumers, and adopts new policies that eliminate the uncertainty about California's commitment to competitive market structures. While, it appears likely that new investment in the immediate near term will require utility contracts (competitively procured) pursuant to which the utility will recover its costs and allocates the benefits, it is Constellation's premise that it is the ambiguity about California's energy policy direction with respect to both wholesale markets and retail choice that is creating uncertainty for investors and load serving entities relative to forward procurement. If the ambiguities in the Commission's policy are left unchecked, regulated investment will continue to be the predominant infrastructure solution, and as noted above, will likely result in a return to a fully-integrated, vertical monopoly.

Constellation therefore urges the Commission to provide specific information in this proceeding about where, when and how much new supply is needed and by whom. Second, Constellation urges the Commission to abandon, or monitor much more closely, the hybrid market and resulting ability of the utilities to continue to self-build generation to the exclusion of others. Third, Constellation urges the Commission to identify and support continued progress toward competitive market solutions for the next megawatt of required capacity. In order to not

make the interim solution the permanent solution, the Commission should set a specific schedule to discuss various models that will assure this outcome, *e.g.*, the slice of load approach that Constellation described in its 2004 testimony in the prior long-term procurement plan docket (R.04-04-003) and in each of the filings made to date in this proceeding.

Question 1b: If so, describe a policy proposal that serves that goal, such as the consideration of a transitional and/or permanent cost allocation or alternative mechanisms that would serve the same goal. Proposals should include detailed information about how costs and benefits of new generation contracts will be allocated and shared, how the policy will be implemented, over what timeframe, and with what safeguards.

Response: First and foremost, any policies adopted to avoid immediate supply shortfalls must avoid harming the competitive market. Allowing utilities to ratebase newly constructed assets or contracts prior to the time the market reforms mentioned above are implemented must be limited to generation that is needed based on the physical requirements of the system as reflected in the California Energy Commission ("CEC")/CAISO forecast for jurisdictional loads. The duration of any ratebased or cost pass-through treatment should be set to expire when the competitive market structures are completed. Constellation believes that the final design and implementation of those market structures will take no more than two to three years; an additional two years or so should be adequate to allow time for those structures to stabilize. Thus, stop-gap interim procurement arrangements that are unavoidable due to the need to maintain localized supply sufficiency should have a term of approximately five years to coincide with the implementation and stabilization of the competitive market structures, and in no event should they be longer than ten years.

With respect to issues associated with allocating the costs associated with the interim procurement, once the Commission has determined the specific amount of new capacity required in a location, the Commission should conduct a full analysis of the load requirements of all jurisdictional load serving entities ("LSEs") in the location so that the costs related to the new capacity can be allocated to those entities that require the capacity during the duration of the interim procurement. As loads change among suppliers, the allocation of costs will need to change. In addition, entities that pay for the capacity must be credited with their fair share of the capacity for Resource Adequacy Requirement ("RAR") compliance purposes. Finally, entities should have an opportunity to demonstrate that they are sufficiently resourced for the interim

procurement period in which the resource allocation will take place so as to avoid having the costs and benefits of the interim procurement allocated to them.

Constellation recognizes its proposal for a five year term (no longer than ten) for the interim contracts likely will be a shorter time period that the Commission will see in other proposals. However, as noted above, Constellation believes that it is critically important to limit the term of additional investment backed by regulatory guarantee because of the continued investment policy ambiguity that this treatment creates. Ensuring that the term of the contracts that support these interim investments is explicitly tied to the time frame in which competitive market designs are implemented and stabilized will provide strong evidence to investors that the Commission intends future investments to be supported and incentivized by those stable market structures. Constellation also submits that the costs associated with limiting the term are not unreasonable and clearly justifiable in terms of the benefits associated with properly functioning competitive market structures.

Question 2: Is there a need for the Commission to act on the proposal urgently? What are the relevant timelines that will be affected by the Commission's action on this proposal? Are there new generation projects or solicitations that will be delayed if this proposal is not acted upon?

Response: The Commission already has been presented with comprehensive data from the CEC's report that analyzes aggregate and zonal load forecasts and the existing and forecasted resources available to serve the load.[4] In addition, the CAISO completes on an annual basis studies to determine what type of Reliability Must Run ("RMR") contracts it must enter into and maintains information on the existing resource base. The RAR proceeding is also in the process of finalizing the methodologies and procedures that will be used for including locational requirements within the RAR framework. The Commission and its Staff, the CEC, and the CAISO are in the best position to analyze that data and determine the extent to which there is an urgent need for new infrastructure during this interim period. Constellation recognizes and accepts that Southern California may be in need of "stop-gap" interim procurement to assure

[4] See *Transmittal of 2005 Energy Report Range of Need and Policy Recommendations to the California Public Utilities Commission (November 2005 Transmittal and associated with the 2005 Integrated Energy Policy Report (IEPR) available at http://www.energy.ca.gov/2005publications/CEC-100-2005-008/CEC-100-2005-008-CMF.PDF. Specifically, Chapter 7 of the Transmittal and Appendix B (Tables Showing Range of Procurement Need) contain forecasts of necessary procurement. Note, however, it is ambiguous whether these numbers reflect physical resource shortfalls in the utility territories, or instead are a forecast of the open portfolio position over the forecast years that does not identify physical resource sufficiency.*

supply sufficiency, and regulatory guarantees may be needed to get commercial arrangements in place to support that procurement on an urgent basis.

To ensure, however, that near-term stop-gap procurement does not undermine development of competitive market structures, Constellation suggests that the Commission be explicit in its policies with respect to how the stop-gap interim procurement will take place. Specifically, Constellation recommends that the Commission incorporate each of the following critical steps into its interim procurement process:

a. The Commission should adopt a stop-gap procurement strategy that will provide for sufficient physical resources for jurisdictional entities for a period of time necessary to complete the design and implementation of other market features that will allow competitive markets to support infrastructure needs. As noted above, Constellation believes that this market development process should take no longer than five years, and thus recommends that the commercial arrangement subject to the regulatory guarantee should have a five year term, and in no event longer than a ten year term, to allow for both market stabilization and cost effectiveness of the interim commercial arrangements. At the expiration of the five to ten year term of the interim procurement, the resources secured on a stop-gap basis should rely on the then existing market structures and should secure their ongoing revenue needs and cost recovery through those market structures without any continued regulatory guarantees.

b. This interim five to ten year time duration will also be the time frame during which the allocation of cost responsibility for the interim procurement will be applicable. Stated differently, interim procurement costs will be allocated to all customers for the term of the interim procurement, unless the supplier can demonstrate that it has secured resources for the term that are adequate to cover its load. If a supplier cannot demonstrate resource adequacy at the time the interim procurement is committed, its customers will pay their share of the interim procurement costs and receive the resource adequacy benefits, whether they remain with the same supplier, switch to another supplier, or return to utility service during the interim term. If loads migrate among retail suppliers, the cost allocation will need to change to reflect the customer migration. Further, the Commission must ensure that all customers who are allocated the costs receive the commensurate benefits of the capacity for which they are paying, which should include in relation to bundled customers, at a minimum, an allocation of the RAR benefits associated with the resource.

c. The Commission should adopt an all source solicitation, with an independent evaluation of the bids that will allow any generation source (existing or new, renewable or fossil) to compete. This will allow resources with an insecure revenue stream to get revenue security over some term to the extent they do not already have commercial arrangements.

d. The Commission should move expeditiously to develop the other competitive market structures that will allow for supply resources to secure revenues sufficient to maintain the availability of the capacity on an annual basis, plus costs of energy production when needed. Specifically, the Commission should develop a timeline by which the remaining competitive market structures can be completed. In this regard, there are two critical issues: First, critical issue is the need for the Commission, in conjunction with the CAISO, to finalize the RAR rules and implement a capacity market that will facilitate capacity transactions among market participants. As noted above, the path to having competitive market structures that eliminate the need for regulatory guarantees of investment is the formation of stable market structures and market price signals that instill confidence that investment will be fairly rewarded. Right now, there are two distinct and separate regulatory frameworks that are expected to provide investment incentives: (a) the RAR-based procurement obligation mechanism and (b) the utility long term procurement plans under AB 57. The two mechanisms are simply not compatible over the long term. To correct this, policies must be designed to ensure that competitive market structures, including a capacity market, provide the competitive investment framework and eliminate the need for perpetual regulatory guarantees of investment.

   The second critical issue, also as noted above, is for the Commission to set a schedule to fully evaluate and implement reforms to utility procurement practices, such as the slice of load approach. These reforms are necessary to ensure that the flawed hybrid market structure is replaced with mechanisms that provide consumers with reliable service and are more compatible with competitive wholesale markets, while enhancing consumers' ability to exercise meaningful choices among retail supplies. It is important for the commission to acknowledge that any allocation of utility procurement costs to direct access customers creates market distortions that will affect the way that DA customers will evaluate their choices. These effects must be minimized to the extent possible.

Question 3: Why is the existing regulatory authority insufficient to ensure that contracting for new generation occurs?

Response: As noted throughout this filing, Constellation believes that the lack of infrastructure development in California is associated with the lack of regulatory certainty exacerbated by the as yet unfinished work of implementing competitive market structures that would provide clear price signals as to the value of capacity. When such structures are designed, implemented and allowed to operate without risk of major revisions, and those structures provide revenues sufficient for the maintenance of capacity and energy production, along with return, new entry will occur. And the existing process that allows the utilities to self-build, contract with themselves, and spend vast sums upgrading existing generation with little or no market discipline imposed on those investments through competitive solicitations from IPPs will no

longer be necessary. In short, the problem is not one of whether there is sufficient regulatory authority; rather it is the lack of competitive market structures and regulatory certainty that has undermined investments.

Question 4: How will ratepayers be affected by adoption or rejection of the policies proposed?

Response: Adopting the proposals contained herein to limit the terms of interim procurement contracts, and continued efforts to implement and stabilize competitive market structures, will benefit California energy consumers (both IOU ratepayers and ESP customers) by assuring physical supply sufficiency and system reliability during the period of time required to complete the design, implementation and stabilization of a competitive market mechanism. Rejection of the proposal will harm ratepayers and customers by – at best – further delaying of the development of functional competitive market structures and – at worst – causing them to fail.

Question 5: How much new generation would the new policies apply to? If the policies apply to all contracts for new generation, on what date would application begin, and until what date/event would it continue?

Response: Please see the **Question 2 Response.**

Question 6: How does the proposal apply to the need determinations made by the Commission for Pacific Gas and Electric Company and Southern California Edison Company in Ordering Paragraphs ("OP") 4 and 5 in D.04-12-048? Does the proposal apply only to the amount of new generation authorized in D.04-12-048? Does the proposal apply to a larger amount of new generation? If so, how much and how is that larger amount determined?

Response: Constellation is not in a position to address this question because, other than the statements provided in the cited Ordering Paragraphs, the basis for those numbers is not publicly available. The ultimate quantity approved in this proceeding should turn on the anticipated physical resource shortfall during the period of time necessary to complete the design, implementation and shake out of the competitive market structure. As noted above, this analysis should be undertaken by the CPUC with insight from the CEC and CAISO and should be limited to the physical need, not an assessment of the utility open position. Any new commitments that the utilities are allowed to make pursuant to the prior proceeding should be properly reflected in that shortfall analysis.

Question 7: How will the proposal affect the Commission's ability to consider capacity markets in a R.05-12-013? Are there steps the Commission can take to ensure that new policies do not foreclose the possibility of capacity markets?

Response: This answer to these questions gets to the core of Constellation's proposals described herein. The capacity market issue in R.05-12-013 is one of the most important remaining competitive market structures that must be designed and implemented in order for stop-gap procurements to end. Constellation is confident that approximately five years will be sufficient time to fully implement the remaining market structures and allow them to stabilize to the point where they will be capable of supporting investment in the future. If the stop-gap resource needs are articulated clearly (i.e., type of resource characteristics and production capabilities), the resource is secured through an independently administered competitive auction, and the costs and benefits are fairly allocated to all LSEs within the location, the stop-gap procurement should not hinder the subsequent operation of a competitive capacity market design.

III. Conclusion

Constellation looks forward to working with the Commission and other parties in fashioning a means to assure physical resource sufficiency while advancing a viable competitive market structure that will support infrastructure development. Any interim, stop-gap procurement should be limited to a quantity of resources needed to assure supply sufficiency within a specific geographic area. The duration of any interim procurement should be limited to approximately five years to coincide with the implementation and stabilization of a competitive wholesale market structure, and in no event should they exceed ten years in duration. The central concept to be kept in mind as the appropriate term of the interim procurement is established is that regulatory-guaranteed supply undermines a viable competitive market structure, and therefore those extra-market arrangements should be limited as much as possible, consistent with commercial considerations. Revenues needed to maintain the capacity after the interim procurement arrangement will be made available through the existing energy, capacity, and ancillary services markets.

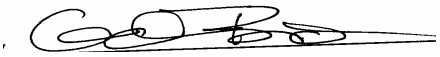
Any interim procurement arrangements must be the product of an all-source competitive solicitation that allows both existing and new capacity of any technology to provide the resources needed to avoid a physical supply shortfall.

Once a structure and duration of the interim procurement period is established, the question of physical supply sufficiency can be addressed consistent with the overarching goal of

minimizing harm to the competitive market structure. The Commission and parties can then focus their resources on completing a capacity market structure that supports the LSEs' RAR procurement obligation, the ability for LSE's to lay-off or acquire capacity consistent with any load migration or load growth, and the development of new capacity when and where needed, and evaluating and implementing new utility procurement practices that bring the benefits of the competitive wholesale markets to consumers.

Dated: March 7, 2006

Respectfully submitted,



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Certificate of Service

I hereby certify that I have this day served a copy of "Pre-workshop Proposal Of Constellation Energy Commodities Group, Inc., Constellation Generation Group LLC And Constellation NewEnergy, Inc." on all known parties to R.06-02-013 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on March 7, 2006 at Sacramento, California

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March 7, 2006

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