

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

Order Instituting Rulemaking to Promote  
Policy and Program Coordination and  
Integration in Electric Utility Resource  
Planning.

Rulemaking 04-04-003  
(Filed April 1, 2004)

**PRE-WORKSHOP COMMENTS OF  
CONSTELLATION ENERGY COMMODITIES GROUP, INC. AND  
CONSTELLATION NEWENERGY, INC.  
ON ASSIGNED COMMISSIONER'S RULING  
REGARDING NEXT STEPS IN PROCUREMENT PROCEEDING**

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Lisa M. Decker, Esq.  
Counsel

Constellation Energy Group, Inc.  
111 Market Place, Suite 500  
Baltimore, Maryland 21202  
Phone: (410) 468-3792  
Fax: (410) 468-3499  
Email: [Lisa.Decker@constellation.com](mailto:Lisa.Decker@constellation.com)

*On behalf of Constellation Energy  
Commodities Group, Inc. and Constellation  
NewEnergy, Inc.*

Andrew B. Brown

Ellison Schneider & Harris L.L.P.  
2015 H Street  
Sacramento, CA 95814  
Tel: (916) 447-2166  
Fax: (916) 447-3512  
Email: [abb@eslawfirm.com](mailto:abb@eslawfirm.com)

*Attorneys for Constellation Energy  
Commodities Group, Inc., and Constellation  
NewEnergy, Inc.*

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**PRE-WORKSHOP COMMENTS OF CONSTELLATION ENERGY COMMODITIES  
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**I. Introduction and Summary**

On December 2, 2005, Commissioner Peevey issued an Assigned Commissioner's Ruling ("ACR") to "begin work on some urgent issues"<sup>1</sup> described in the ACR. The urgent issues identified in the ACR focused on the need to establish:

- New procurement related proceedings.
- Preliminary goals, priorities and schedule for the upcoming Long Term Procurement Plan ("LTPP") cycle.
- Workshops to commence work on the LTPP cycle.

The ACR convenes two initial workshops on December 14, 2005 ("December 14 Workshops"), the first to discuss long term procurement planning and the second to discuss transmission collaboration planning. In preparation for the December 14 Workshops, the ACR invited interested parties to submit pre-workshop comments addressing the following issues:

- The process and timeline proposed in the ACR for addressing the 2006 LTPP.

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<sup>1</sup> See ACR, page 1.

- The critical steps for addressing specific issues raised in the ACR.
- How the Transmittal Report adopted by the California Energy Commission (“CEC”) on November 21, 2005 should be used in the LTPP proceeding.
- Whether the Draft Proposal for Long Term Procurement Planning Proceeding Work Plan, prepared by the Energy Division Staff and included in the ACR, has posed the right questions for discussion during the stakeholder process that will best inform the Commission’s ultimate LTPP decisions.

The ACR specifically directs that “parties are encouraged not to argue the merits of the various issues, but focus exclusively on the upcoming process, content and timing.”<sup>2</sup>

Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. (collectively, “Constellation”) appreciates this opportunity to submit comments in this proceeding. Constellation remains convinced that competitive markets will and do work to bring very real economic benefits to consumers. Constellation believes that the manner in which the Commission addresses utility procurement practices in this proceeding will have a lasting impact on whether and how competitive wholesale and retail markets will develop in California.

Specifically, Constellation believes that utility procurement practices should be reformed so that infrastructure development in California shifts the market and price risk associated with asset development away from consumers (through the construction and/or acquisition of generation that then receives rate base treatment) and toward the investment community. The wholesale market structures should be designed to support asset development through price signals, price signals that will incent market participants, including asset developers, marketing companies and financial intermediaries, to construct and operate new resources when and where they are needed. A continuation of the hybrid market structure that currently exists in California

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<sup>2</sup> See ACR, page 8.

undermines the development of those wholesale markets and precludes the California energy markets from becoming truly competitive, at either the wholesale or the retail level.

Constellation is prepared to work with the Commission and market participants throughout this proceeding to help develop well designed policies and practices that will bring much needed infrastructure to California through competitive markets – markets that will ensure optimal economic and environmental efficiency in resource development.

## **II. Comments**

In general, Constellation supports the process outlined by the Commission for the upcoming LTPP process. In these comments, Constellation presents some additional issues and questions that should be addressed to ensure that a full record is developed to inform the Commission's decisions with respect to LTPP.

### *A. General Comments*

The Commission indicates that it will “establish a successor rulemaking [to R.04-04-003] to consider the next biennial cycle of long-term procurement planning issues.”<sup>3</sup> The Commission also indicates that it will “establish a new rulemaking to consider future RA matters, including implementation issues related to existing requirements, as well as extension of RA mandates to local areas and multi-year requirements.”<sup>4</sup> Constellation believes that the implementation and effectiveness of the Commission's resource adequacy policies will be profoundly impacted by the decisions it makes in the LTPP proceeding. Specifically, as Constellation will argue throughout these proceedings, there must be significant reforms put in place with respect to utility procurement practices to ensure that wholesale market structures under development in the RA proceedings are not undermined by the utility procurement

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<sup>3</sup> See ACR, page 2.

<sup>4</sup> See ACR, page 3.

practices established in the LTPP proceeding. Thus, as Constellation suggests below in its comments on Section 1(b) of Appendix A of the ACR, the discussion of utility long term procurement planning must pay particular attention to how those long term procurement plans impact the market mechanism under development in the RAR.

*B. ESP Procurement Plan Issues*

The ACR indicates that it “expect[s] that the Commission will name all load-serving entities (“LSEs”) as respondents to the long-term procurement planning proceeding, although probably not to all portions of the proceeding.”<sup>5</sup> Similarly, the Energy Division staff has indicated that it “expect[s] that all load serving entities (including IOUs, ESPs, and CCAs) will submit long term procurement plans so that resource planning can be conducted in an integrated fashion.”<sup>6</sup> As an initial matter, Constellation strongly opposes any requirement for ESPs to submit long-term integrated resource plans. Such a requirement would raise issues of CPUC jurisdiction over ESPs that would not be supported by existing AB 380 and AB 57 statutory provisions. Constellation believes that due to certain critical distinctions between the Commission’s regulatory relationship with ESPs versus that of the public utilities subject to AB 57, the Commission should ask how to determine ESP compliance with RAR and Renewable Portfolio Standard (“RPS”) policies, rather than how each ESP would fulfill its specific RAR and RPS obligations.

The ESPs’ procurement practices are largely based on securing from the wholesale markets the products and services that are necessary for them to meet their load serving obligations and dictated by their contractual relationships with individual retail customers. Therefore, the filing of specific ESP procurement plans is not warranted. Constellation believes

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<sup>5</sup> See ACR, pages 7-8, emphasis added.

<sup>6</sup> See ACR, Appendix A, page 7.

that a goal of the upcoming proceeding should be to reform of the utilities' wholesale procurement practices so that the utilities seek wholesale products and services to meet their load obligations, in much the same manner as do the ESPs currently. When and if both the utilities and ESPs look to the wholesale market for products and services to meet their load obligations, the competitive wholesale market should be expected to respond with the necessary infrastructure development.

*C. Comments on Appendix A*

In Appendix A, the Energy Division Staff has prepared a proposed work plan to organize the 2006 LTPP proceeding, and has outlined a series of questions that will be addressed. Staff is soliciting “comments on Appendix A in a format that mirrors the structure of this document; i.e., along the suggested goals of the proceeding.... *Parties should not feel compelled to **answer** the questions asked below; instead, parties should focus on whether we are asking the right questions, in the right order.*”<sup>7</sup> Constellation again appreciates the opportunity to offer these additional questions for consideration during the proceedings.

- **Section III.1.a. Review the Need for New Generation; Establishing Factual Need for New Generation.**

Constellation does not have any comments on the proposed work plan process associated with this topic. Specifically, Constellation agrees that the analyses used to determine the need for new resources should be vetted in a stakeholder workshop.

However, in its comments on the CEC Transmittal Report, Constellation raised issues similar to the ones it is raising here about the extent to which the Commission and the

California Energy Commission (“CEC”) may be developing a resource needs assessment

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<sup>7</sup> See ACR, Appendix A, page 1.

for the purpose of mandating asset development.<sup>8</sup> As Constellation indicated in those comments, alternatives to rate-based asset development should be considered and adopted to promote competition at both the wholesale and retail levels, to ensure the further development of competitive markets in California, and to avoid potential development of regulatory stranded costs that could impede such markets.

- **Section III.1.b. Review the need for New Generation; Temporary and/or Permanent Mechanism (e.g., Cost allocation and benefit Sharing or Other Alternative).**

Constellation agrees that the questions posed by the Energy Division Staff in this section are the right questions to ask, but would suggest that most of the cost allocation issues can be evaluated through a rulemaking proceeding that includes a workshop and subsequent comments and reply comments. If during the course of those discussions, or subsequent to the procurement process, it becomes apparent that an evidentiary proceeding is necessary to address issues of fact, the Commission can initiate an evidentiary proceeding for that limited purpose. Indeed, Constellation believes that the last question posed by the Staff in this section: *“Is it possible to choose an interim cost and benefit allocation mechanism (or some other alternative) that does not foreclose the possibility of capacity markets?”*<sup>9</sup> will be one of the most important issues addressed during this proceeding. It is critical that this question be examined in light of the wholesale market reforms that will be put into place, including application of RAR and development of capacity markets. Constellation therefore believes that this issue should be assigned a high priority for this portion of the proceeding so that the question of how

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<sup>8</sup> See, November 8, 2005 *Comments of Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. on California Energy Commission Draft Transmittal Report*, pages 1-4 and 7-8. This document is available at [http://www.energy.ca.gov/2005\\_energy\\_policy/documents/2005-11-04\\_hearing/comments/2005-11-08\\_Constellation\\_Cmnts.pdf](http://www.energy.ca.gov/2005_energy_policy/documents/2005-11-04_hearing/comments/2005-11-08_Constellation_Cmnts.pdf).

<sup>9</sup> See ACR, Appendix A, page 3.

resources needed urgently can be developed in a way that will not undermine the emerging wholesale structures and eventual reopening of the retail market. As noted in Constellation’s introductory comments, the hybrid market structure that currently exists in California is and will continue to impede the development of competitive markets in California.<sup>10</sup> This proceeding should serve to establish policies and procedures that can over time undo its harmful effects.

- **Section III.2.: A Review of Long-Term Procurement Plans, Including an Integrated Resource Planning Process for All IOU Planning Areas.**

Constellation believes that most of the questions posed in this section are valid, and that a series of workshops to discuss them would be valuable, after the threshold jurisdictional issues regarding ESPs are resolved. Specifically, in the above section of General Comments, Constellation has already stated its strong opposition to the Commission’s proposal to make ESPs subject to the LTPP procurement planning requirements that should only apply to the utilities such as the submission of long-term resource plans. Constellation thus supports the inclusion in this section the issue of whether ESPs and small IOUs should be subject to similar filing requirements, and is appreciative that this important issue is slated for full discussion.

In addition to the questions posed in this section, Constellation requests that the following questions also be included for discussion in the February Workshops to include certain “second generation” issues already identified in earlier Commission decisions:

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<sup>10</sup> Without going extensively into the details of its arguments here, Constellation will argue that the existing hybrid market structure in which the generating resource base contains utility owned and operated rate-based and otherwise regulated generating assets (both physical and contractual) and merchant facilities compromises the development of wholesale and retail market competition and that the harmful effects of the hybrid market structure should be ameliorated by the adoption of “slice of load” competitive procurement by the utilities to meet any short position that they may have. Constellation will argue that (i) the slice of load approach will ensure that consumers are better insulated from market risks, including fuel price risks, and (ii) the slice of load approach will pave the way for meaningful retail competition by transferring customer migration risk away from the utilities.



- **How are “slice of load” utility procurement conducted in other jurisdictions and how could those mechanisms be adapted for use in California as a means for IOUs to satisfy their required procurement needs?**
- **What would the benefits be for consumers, the utilities, and wholesale and retail suppliers, if the slice of load approach to utility procurement is adopted in California?**

In order to fully vet the slice of load approach, Constellation suggests that Staff’s straw proposal on integrated resource planning should include the slice of load approach as an option so that parties can include their views on this approach in their pre-workshop comments that the Staff intends to solicit. Furthermore, Constellation suggests that at least one, and possibly two extra days be added to the workshop process so that the slice of load approach can be fully vetted. Finally, in the follow up workshops to be held in March 2006, the IOUs should be required to include a review of how they would include the slice of load approach in their procurement plans (or if they have not included them, they should describe why they have not).

- **Section 3: Updates to IOU Procurement Policies and Practices; Including Review and Approval of New 10 Year Procurement Plans**

Here too, Constellation agrees that the Staff has posed appropriate issues and questions for discussion during this proceeding with respect to the above topic. As noted at the outset of these comments, Constellation believes that one of the very important issues that needs to be addressed during this proceeding is how the ongoing development of the resource adequacy requirements and the implementation of a capacity market will impact (or be impacted by) the IOU long term procurement plans. Thus, the issue raised in this section: *“Impact of resource adequacy on costs and procurement practices”*<sup>11</sup> should be of prominent importance during the workshops. Furthermore, Constellation

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<sup>11</sup> See ACR, Appendix A, page 11

believes that the issues it has asked the Staff to include and explore with respect to “slice of load” utility procurement practices are also applicable with respect to the issues to be discussed here; specifically including credit risk policies, portfolio risk policies, and the use of the Independent Evaluator in utility procurements. Finally, Constellation believes that several of the questions posed in this section go directly to the issue of the existing hybrid market structure in California.<sup>12</sup> To ensure that this important topic is fully addressed, however, Constellation requests that the following specific questions be added to the discussion topics:

- **Is the existing policy that supports the hybrid market structure, in which the assets owned by vertically integrated utilities receive cost recovery under traditional costs of service rates, appropriate for California?**
- **If not, how can California transition away from this structure?**
- **If so, how can it be maintained without compromising the effectiveness of competitive market structures, such as capacity markets?**
- **How can an independent evaluation of the procurement options be accomplished? Should standardized RFOs be utilized in the procurement process?**

### **III. Conclusion**

Constellation provides these pre-workshop comments to assist the Commission with its next cycle of procurement-related proceedings as described in the December 2, 2005 ACR. As described above, Constellation generally agrees with the procedural structure for addressing substantive issues, but raises here critical substantive issues which directly impact the scope of the anticipated process. Constellation is concerned that a continuation of the hybrid market structure that currently exists in California undermines the development of those wholesale

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<sup>12</sup> Specifically, the following questions listed on Page 11 of Appendix A of the ACR: “Evaluation of the Level Playing Field in IOU Procurement (i.e., contracting for utility owned generation vs. power purchase agreements, Role of Procurement Review Groups IOU Procurement, and Practices and Procedures used by IOUs in their Requests for Offers (RFOs), including use of all source or all party RFOs (open to new only or existing generation).”

markets and precludes the California energy markets from becoming truly competitive, at either the wholesale or the retail level. Constellation also opposes the proposed requirement that ESPs make the same type of procurement planning submissions that jurisdictional public utilities are required to make under AB 57, suggesting instead that the Commission focus on how compliance with RAR and RPS processes will be determined, rather than determining how ESPs should individually procure to meet that regulatory requirement.

Constellation is prepared to work with the Commission and market participants throughout this proceeding to help develop well designed policies and practices that will bring much needed infrastructure to California through competitive markets – markets that will ensure optimal economic and environmental efficiency in resource development.

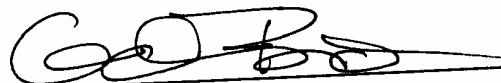
Respectfully submitted,

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Lisa M. Decker, Esq.  
Counsel

Constellation Energy Group, Inc.  
111 Market Place, Suite 500  
Baltimore, Maryland 21202  
Phone: (410) 468-3792  
Fax: (410) 468-3499  
Email: [Lisa.Decker@constellation.com](mailto:Lisa.Decker@constellation.com)

*On behalf of Constellation Energy  
Commodities Group, Inc. and Constellation  
NewEnergy, Inc.*



Andrew B. Brown

Ellison Schneider & Harris L.L.P.  
2015 H Street  
Sacramento, CA 95814  
Tel: (916) 447-2166  
Fax: (916) 447-3512  
Email: [abb@eslawfirm.com](mailto:abb@eslawfirm.com)

*Attorneys for Constellation Energy  
Commodities Group, Inc., and Constellation  
NewEnergy, Inc.*

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “Pre-Workshop Comments of Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. on Assigned Commissioner’s Ruling Regarding Next Steps in Procurement Proceeding” on all known parties to R.04-04-003 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 December 12, 2005 at Sacramento, California

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Eric Janssen

Service List  
R.04-04-003  
December 12, 2005

keith.mccrea@sablaws.com  
lisa.decker@constellation.com  
garson\_knapp@fpl.com  
jimross@r-c-s-inc.com  
toms@i-cpg.com  
lurick@sempra.com  
hchoy@isd.co.la.ca.us  
dhuard@manatt.com  
msnow@manatt.com  
pucservice@manatt.com  
mlennon@whitecase.com  
mcmannes@aol.com  
klatt@energyattorney.com  
kduggan@capstoneturbine.com  
douglass@energyattorney.com  
annette.gilliam@sce.com  
berj.parseghian@sce.com  
beth.fox@sce.com  
case.admin@sce.com  
woodrujb@sce.com  
michael.backstrom@sce.com  
ehull@ci.chula-vista.ca.us  
dgarber@sempra.com  
fortlieb@sandiego.gov  
gbaker@sempra.com  
troberts@sempra.com  
KMelville@sempra.com  
mshames@ucan.org  
bpowers@powersengineering.com  
jkloberdanz@semprautilities.com  
wkeilani@semprautilities.com  
WKeilani@semprautilities.com  
jleslie@luce.com  
keith.fuller@itron.com  
george.hanson@ci.corona.ca.us  
chris@emeter.com  
mdjoseph@adamsbroadwell.com  
jeanne.sole@sfgov.org  
joe.como@sfgov.org  
map@cpuc.ca.gov  
mflorio@turn.org  
armi@smwlaw.com  
ayk@cpuc.ca.gov  
kpp@cpuc.ca.gov  
rmd@cpuc.ca.gov  
filings@a-klaw.com  
nes@a-klaw.com

rsa@a-klaw.com  
scarter@nrdc.org  
evk1@pge.com  
jlk@pge.com  
j0b5@pge.com  
magq@pge.com  
bcragg@gmssr.com  
bcragg@gmssr.com  
chrishilen@dwt.com  
jsqueri@gmssr.com  
jarmstrong@gmssr.com  
jkarp@whitecase.com  
stevegreenwald@dwt.com  
edwardoneill@dwt.com  
lcottle@whitecase.com  
mrh2@pge.com  
ssmyers@att.net  
l\_brown123@hotmail.com  
mecsoft@pacbell.net  
aclark@calpine.com  
sherifl@calpine.com  
moxsen@calpine.com  
rick\_noger@praxair.com  
wbooth@booth-law.com  
eric@strategyi.com  
ramonag@ebmud.com  
rschmidt@bartlewells.com  
gmorris@emf.net  
jgalloway@ucsusa.org  
clyde.murley@comcast.net  
nrader@calwea.org  
tomb@crossborderenergy.com  
pcmcdonnell@earthlink.net  
jennifer.holmes@itron.com  
michaelboyd@sbcglobal.net  
jbradley@svmg.org  
bmcc@mccarthy-law.com  
sberlin@mccarthy-law.com  
joyw@mid.org  
chrism@mid.org  
sarveybob@aol.com  
dkates@sonic.net  
brbarkovich@earthlink.net  
johnredding@earthlink.net  
jweil@aglet.org  
gabriellilaw@sbcglobal.net  
hydro@davis.com  
puma@davis.com  
gtholan@caiso.com  
grosenblum@caiso.com

matt@bradylawus.com  
dcarroll@downeybrand.com  
dkk@eslawfirm.com  
glw@eslawfirm.com  
lmh@eslawfirm.com  
steven@iepa.com  
dmahmud@mwdh2o.com  
rliebert@cfbf.com  
mpa@a-klaw.com  
dws@r-c-s-inc.com  
bjones@mjbradley.com  
carlo.zorzoli@enel.it  
aweller@sel.com  
jbwilliams@mwe.com  
myuffee@mwe.com  
mary.lynch@constellation.com  
eyussman@knowledgeinenergy.com  
brianhaney@useconsulting.com  
tcarlson@reliant.com  
ghinners@reliant.com  
michael.crumley@elpaso.com  
william.tomlinson@elpaso.com  
dsaul@solel.com  
ckmitchell1@sbcglobal.net  
curtis.kebler@gs.com  
npedersen@hanmor.com  
cmlong@earthlink.net  
roger.pelote@williams.com  
frank.cooley@sce.com  
laura.genao@sce.com  
dwood8@cox.net  
tim.hemig@nrgenergy.com  
daking@sempra.com  
rru@sandag.org  
kmelville@sempra.com  
liddell@energyattorney.com  
tcorr@sempra.com  
ygross@sempraglobal.com  
scottanders@sandiego.edu  
amabed@semprautilities.com  
irene.stillings@sdenergy.org  
jennifer.porter@sdenergy.org  
jkloberdanz@semprautilities.com  
kmorton@sempra.com  
mschmidt@semprautilities.com  
susan.freedman@sdenergy.org  
centralfiles@semprautilities.com  
jcervantes@sandiego.gov  
kjk@kjkammerer.com  
marks@alohasys.com

ctoca@utility-savings.com  
mjskowronski@inlandenergy.com  
jskillman@prodigy.net  
rhoffman@anaheim.net  
jmcarthur@elkhills.com  
lcasentini@drintl.com  
diane\_fellman@fpl.com  
freedman@turn.org  
nao@cpuc.ca.gov  
ddowers@sflower.org  
scasey@sflower.org  
Dan.adler@calcef.org  
dwang@nrdc.org  
dickerson05@fscgroup.com  
gxl2@pge.com  
vjw3@pge.com  
rejohnson@att.com  
peterbray@yahoo.com  
cem@newsdata.com  
james.booth@hklaw.com  
jeffgray@dwt.com  
lisa\_weinzimer@platts.com  
cpuccases@pge.com  
mdbk@pge.com  
ell5@pge.com  
nbb2@pge.com  
sscb@pge.com  
rwalth@pacbell.net  
brflynn@flynnrci.com  
service@spurr.org  
keithwhite@earthlink.net  
vhconsult@earthlink.net  
jay.bhalla@intergycorp.com  
jackp@calpine.com  
kena@calpine.com  
sschleimer@calpine.com  
greg.blue@dynegy.com  
mona.tierney@constellation.com  
pthompson@summitblue.com  
bill.chen@constellation.com  
sia2@pwrval.com  
ceyap@earthlink.net  
mrw@mrwassoc.com  
mrw@mrwassoc.com  
dmarcus2@sbcglobal.net  
craigtyler@comcast.net  
elvine@lbl.gov  
rhwiser@lbl.gov  
knotsund@berkeley.edu  
philm@scdenergy.com

janreid@coastecon.com  
bill@jbsenergy.com.  
vwood@smud.org  
cmkehrin@ems-ca.com  
e-recipient@caiso.com  
eleuze@caiso.com  
katherine.gensler@ferc.gov  
ppettingill@caiso.com  
rsparks@caiso.com  
saeed.farrokhpay@ferc.gov  
brian.theaker@williams.com  
edchang@flynnrci.com  
abb@eslawfirm.com  
mclaughlin@braunlegal.com  
dgeis@dolphingroup.org  
kdw@woodruff-expert-services.com  
lkaye@ka-pow.com  
mlgillet@duke-energy.com  
blaising@braunlegal.com  
wwwesterfield@stoel.com  
gbrowne@smud.org  
hcronin@water.ca.gov  
cabaker906@sbcglobal.net  
kmills@cfbf.com  
rlauckhart@globalenergy.com  
jesus.arredondo@nrgenergy.com  
karen@klindh.com  
ntoyama@smud.org  
don.winslow@ppmenergy.com  
alan.comnes@dynegy.com  
mtrexler@climateservices.com  
samuel.r.sadler@state.or.us  
lscott@landsenergy.com  
LAdocket@cpuc.ca.gov  
ajo@cpuc.ca.gov  
bsk@cpuc.ca.gov  
cab@cpuc.ca.gov  
tam@cpuc.ca.gov  
dsh@cpuc.ca.gov  
djh@cpuc.ca.gov  
cpe@cpuc.ca.gov  
jef@cpuc.ca.gov  
jf2@cpuc.ca.gov  
kdg@cpuc.ca.gov  
kms@cpuc.ca.gov  
kl1@cpuc.ca.gov  
lrm@cpuc.ca.gov  
lp1@cpuc.ca.gov  
msw@cpuc.ca.gov  
meb@cpuc.ca.gov

meg@cpuc.ca.gov  
mts@cpuc.ca.gov  
nil@cpuc.ca.gov  
psd@cpuc.ca.gov  
pha@cpuc.ca.gov  
rae@cpuc.ca.gov  
gig@cpuc.ca.gov  
rls@cpuc.ca.gov  
sjl@cpuc.ca.gov  
sed@cpuc.ca.gov  
sst@cpuc.ca.gov  
car@cpuc.ca.gov  
tdp@cpuc.ca.gov  
tcx@cpuc.ca.gov  
tbo@cpuc.ca.gov  
vjb@cpuc.ca.gov  
ztc@cpuc.ca.gov  
info@tobiaslo.com  
Mmesseng@energy.state.ca.us  
JMcMahon@navigantconsulting.com  
meg@cpuc.ca.gov  
bfranklin@eob.ca.gov  
cleni@energy.state.ca.us  
dks@cpuc.ca.gov  
jtachera@energy.state.ca.us  
kgriffin@energy.state.ca.us  
mjaske@energy.state.ca.us  
pduvair@energy.state.ca.us  
trf@cpuc.ca.gov  
tglaviano@energy.state.ca.us  
wsm@cpuc.ca.gov  
dsandino@water.ca.gov  
fdeleon@energy.state.ca.us  
aorchar@smud.org  
aulmer@water.ca.gov  
jpacheco@water.ca.gov  
lharris@water.ca.gov  
kglick@eob.ca.gov  
rwethera@energy.state.ca.us  
rmiller@energy.state.ca.us