

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

Rulemaking to implement the provisions of
Public Utilities Code § 761.3 enacted by
Chapter 19 of the 2001-02 Second
Extraordinary Legislative Session.

Rulemaking 02-11-039
(Filed November 21, 2002)

**SUBMISSION OF
THE JOINT GENERATING ASSET OWNERS
REGARDING PROPOSED
OPERATION PLAN SUMMARY**

January 18, 2005

Andrew B. Brown

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

On Behalf Of Joint GAOs

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Pursuant to Ordering Paragraph No. 2 of D.04-12-049, the Joint Generating Asset Owners (“Joint GAOs”) hereby present their proposal for the Operation Plan Summary. The GAOs participating in this joint effort include: Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AES Alamos LLC, AES Huntington Beach LLC, AES Redondo Beach LLC, Calpine Corporation, Duke Energy North America (on behalf of Duke Oakland, LLC, Duke Energy Moss Landing, LLC, Duke Energy Morro Bay, LLC and Duke Energy South Bay, LLC), Elk Hills Power, LLC, FPL Energy, GWF Energy, LLC, High Desert Power Project, LLC, Mirant California, LLC, West Coast Power LLC (on behalf of El Segundo Power, LLC, Cabrillo Power I LLC, and Cabrillo Power II LLC), Reliant Energy Coolwater, Inc., Reliant Energy Etiwanda, Inc., Reliant Energy Mandalay, Inc., and Reliant Energy Ormond Beach, Inc.¹

¹ The listed entities have authorized the undersigned to represent their support for the Joint GAO submission. The non-jurisdictional GAOs, including all Exempt Wholesale Generators, reserve all rights to challenge actions by the CPUC with respect to the applicability or scope of proposed regulations and the statute, and hereby reiterate all their prior assertions of rights. By voluntarily participating before the Committee and the CPUC, these non-jurisdictional GAOs in no way waive any rights or arguments, and hereby reiterate all their prior statements in this respect. The jurisdictional public utility electrical corporations express no opinion with respect to this reservation of rights.

The Joint GAOs believe the attached Operation Plan Summary document complies with the requirements of General Order 167, as revised by D.04-12-049. The document simultaneously provides a common framework for submission of information to the Commission and provides substantial flexibility for GAOs to individually tailor the substance of the document to the conditions at their facilities. Included within the initial framework of the document is the identification of the specific generating units covered by the submission, the lead and back-up contact persons, and a description of the expected operating profile of the generators to give some context to the summary. The operation plan summary portion of the document then runs through each of the applicable Operation Standards and provides space for the GAO to summarize how they comply and to identify any shortcomings. Lastly, a verification is included within the document consistent with the requirements of D.04-12-047, page 23-24 and GO §15.3.

The Joint GAOs request that any action the Executive Director takes in adopting the Operation Plan Summary document be specifically timed such that those GAOs requiring the additional 90 day compliance period after filing an Initial Certification of Noncompliance (GO §8.2.3.2) not be required to file the Operation Plan Summary before the actual Operation Plan must be completed. It would be more efficient to allow the GAO to complete the Operation Plan prior to requiring submission of the Operation Plan Summary.

Although Ordering Paragraph No. 2 of D.04-12-049 did not request comments or suggestions with respect to the Maintenance Plan Summary at this time, page 26 of that decision did discuss the interaction of a Maintenance Plan Summary with the already developed Maintenance Matrix. While the Executive Director may address this issue in more detail at a later time, the Joint GAOs take this opportunity to make two observations: (1) the basic structure

of the Operation Plan Summary submitted here could be modestly revised by replacing the applicable standards and certain references to the GO to achieve a uniform approach for the plan summaries (Maintenance and Operation); and (2) because GAOs have already undertaken the substantial maintenance standard work, and because D.04-12-049 expressly states a desire not to impose unreasonable burdens on GAOs, the Joint GAOs suggest that the “new” Maintenance Plan Summary not be required until subsequent recertification for existing generators, or the initial certification for new generation. This staggered approach would avoid unnecessary burdens on the GAOs as well as the Commission staff, and is consistent with the sentiments expressed by the Commission.

The Joint GAOs respectfully submit the attached Operation Plan Summary and request that it be adopted by the Executive Director at a time that would assure that the 120 day period falls after the period provided by GO §8.2.3.2.

Dated: January 18, 2005

Respectfully submitted,

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

On Behalf of the Joint GAOs

**Before The Public Utilities Commission
Of The State Of California**

Operation Plan Summary Template

This Operation Plan Summary Template is a standardized form, verified by the Generating Asset Owner (“GAOs”), that complies with the requirements of California Public Utilities Commission (“CPUC”) General Order 167 (“GO”), § 8.3 (effective December 19, 2004). The Operation Plan Summary provides an executive summary of the GAO’s adopted Operation Plan developed pursuant to GO § 8.2.

This Verified Operation Plan Summary Template was filed with the CPUC on:

_____ [date] _____.

I. Generating Facility Information.

Generating Facility Name and Address	Units Covered By Plan Summary

II. Contact Information.

Lead Contact Information	Backup Contact Information
Name:	Name:
Title:	Title:
Address:	Address:
Telephone:	Telephone:
Email:	Email:

III. Generating Facility Operational Profile Information.

GAOs to provide information regarding the expected operational profile for the Units covered by the Plan Summary. The operation profile information can include the expected years the plant will remain in operation, whether the plant is regarded as a baseload plant or peaking plant (or some intermediate designation), what level of availability the GAO intends for the plant, whether the plant will operate year-round or only seasonally, and whether the GAO views the plant as a long-term resource that requires continued maintenance and investment.

(Attach additional sheets if needed.)

IV. Operation Plan Summary.

The Operation Plan Summary summarizes the GAO's adopted Operation Plan that is available at the generating facility pursuant to GO § 8.2. The GAO should summarize below how its operation complies with each Operation Standard. Where the GAO's operation does not satisfy an Operation Standard, the GAO should summarize how and when operation will be brought into compliance.

1. OS 1 - Safety

The protection of life and limb for the work force is paramount. GAOs have a comprehensive safety program in place at each site. The company behavior ensures that personnel at all levels of the organization consider safety as the overriding priority. This is manifested in decisions and actions based on this priority. The work environment and the policies and procedures foster such a safety culture, and the attitudes and behaviors of personnel are consistent with the policies and procedures.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

2. OS 2 - Organizational Structure and Responsibilities

The organization with responsibility and accountability for establishing and implementing an operation strategy to support company objectives for reliable plant operation is clearly defined, communicated, understood and is effectively implemented. Reporting relationships, control of resources, and individual authorities support and are clearly defined and commensurate with responsibilities.

Summary of GAO's Compliance With Standard
Identification of Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

3. OS 3 - Operations Management and Leadership

Operations management establishes high standards of performance and aligns the operations organization to effectively implement and control operations activities.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

4. OS 4 - Problem Resolution and Continuing Improvement

The GAO values and fosters an environment of continuous improvement and timely and effective problem resolution.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

5. OS 5 - Operations Personnel Knowledge and Skills

Operations personnel are trained and qualified to possess and apply the knowledge and skills needed to perform operations activities that support safe and reliable plant operation.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

6. OS 6 - Training Support

A systematic approach to training is used to achieve, improve, and maintain a high level of personnel knowledge, skill, and performance. Each GAO provides a site-specific training program including on-the-job training, covering operations, including reasonably anticipated abnormal and emergency operations. Personnel are trained commensurate with their duties.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

7. OS 7 - Operation Procedures and Documentation

Operation procedures exist for critical systems and states of those systems necessary for the operation of the unit including startup, shutdown, normal operation, and reasonably anticipated abnormal and emergency conditions. Operation procedures and documents are clear and technically accurate, provide appropriate direction, and are used to support safe and reliable plant operation. Procedures are current to the actual methods being employed to accomplish the task and are comprehensive to ensure reliable energy delivery to the transmission grid.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

8. OS 8 - Plant Status and Configuration

Station activities are effectively managed so plant status and configuration are maintained to support safe, reliable and efficient operation.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

9. OS 9 - Engineering and Technical Support

Engineering activities are conducted such that equipment performance supports reliable plant operation. Engineering provides the technical information necessary for the plant to be operated and maintained within the operating parameters defined by plant design. Engineering provides support, when needed, to operations and maintenance groups to resolve operations and maintenance problems.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

10. OS 10 - Environmental Regulatory Requirements

Environmental regulatory compliance is paramount in the operation of the generating asset. Each regulatory event is identified, reported and appropriate action taken to prevent recurrence.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

11. OS 11 - Operations Facilities, Tools and Equipment

Facilities and equipment are adequate to effectively support operations activities.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

12. OS 12 - Operations Conduct

To ensure safety, and optimize plant availability, the GAO conducts operations systematically, professionally, and in accordance with approved policies and procedures. The GAO takes responsibility for personnel actions, assigns personnel to tasks for which they are trained, and requires personnel to follow plant and operation procedures and instructions while taking responsibility for safety. Among other things:

- A. All personnel follow approved policies and procedures. Procedures are current, and include a course of action to be employed when an adopted procedure is found to be deficient.
- B. All operations are performed in a professional manner. Basic rules of conduct apply throughout the plant at all times.
- C. All personnel on-duty are trained, qualified, and capable of performing their job functions. Personnel are assigned only to duties for which they are properly trained and qualified.
- D. Personnel take immediate actions to prevent or correct unsafe situations.

Summary of GAO's Compliance With Standard

**Identification of Any Areas of Non-Compliance , Description of Corrective Actions,
and Estimation of When Compliance Will Be Achieved.**

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13. OS 13 - Routine Inspections

Routine inspections by plant personnel ensure that all areas and critical parameters of plant operations are continually monitored, equipment is operating normally, and that routine maintenance is being performed. Results of data collection and monitoring of parameters during routine inspections are utilized to identify and resolve problems, to improve plant operations, and to identify the need for maintenance. All personnel are trained in the routine inspections procedures relevant to their responsibilities. Among other things, the GAO creates, maintains, and implements routine inspections by:

- A. Identifying systems and components critical to system operation (such as those identified in the guidelines to Standard 28).
- B. Establishing procedures for routine inspections that define critical parameters of these systems, describe how those parameters are monitored, and delineate what action is taken when parameters meet alert or action levels.
- C. Training personnel to conduct routine inspections.
- D. Monitoring routine inspections.

Summary of GAO's Compliance With Standard

Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

15. OS 15 - Communications and Work Order Meetings

The availability of the generating asset and safety of personnel is ensured during the execution of work orders by adequate communications and meetings, which may be scheduled or as needed, to review work plans with all affected personnel before work begins. Clear lines of communication exist between personnel responsible for operations, maintenance and engineering groups. Among other things:

- A. The GAO prepares and maintains a procedure for review of work plans through communications and work order meetings at the facility.
- B. Work is analyzed to determine what personnel, components, and systems are affected.
- C. Affected personnel meet before work begins to define the work, identify safety issues, to minimize the impact on plant operation, and to determine the need for further meetings.
- D. Personnel are trained in and follow the procedure.

Summary of GAO's Compliance With Standard

Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

16. OS 16 - Participation by Operations Personnel in Work Orders

Operations personnel identify potential system and equipment problems and initiate work orders necessary to correct system or equipment problems that may inhibit or prevent plant operations. Operations personnel monitor the progress of work orders affecting operations to ensure timely completion and closeout of the work orders, so that the components and systems are returned to service. Among other things:

- A. Operations personnel identify problems requiring work orders, and initiate work orders to correct those problems
- B. The operations manager or other appropriate operating personnel periodically review work orders that affect operations to ensure timely completion and closeout of the work orders, so that components and systems are returned to service.
- C. Personnel responsible for prioritizing work orders consult operations personnel to assure that work orders affecting the operations of the plant are properly prioritized.
- D. Appropriate personnel are trained in and follow procedures applicable to work orders.

Summary of GAO's Compliance With Standard

Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

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17. OS 17 - Records of Operation

The GAO assures that data, reports and other records reasonably necessary for ensuring proper operation and monitoring of the generating asset are collected by trained personnel and retained for at least five years, and longer if appropriate.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

18. OS 18 - Unit Performance Testing

The GAO conducts periodic performance tests as appropriate to identify trends and possible improvements in unit operation. The GAO responds to test results with changes to equipment, policies, routines, or procedures necessary to maintaining unit availability and the unit's ability to support grid operations consistent with the Unit Plan.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

19. OS 19 - Emergency Grid Operations

The GAO prepares for conditions that may be reasonably anticipated to occur during periods of stress or shortage on the state’s electric grid. During such periods of stress or shortage, the GAO makes operational decisions to maximize each unit’s availability and ability to support grid operations. Among other things the GAO:

- A. Takes reasonable steps to maintain the ability to communicate with the Control Area Operator all times.
- B. In preparing for periods of stress or shortage, takes steps to clarify the regulatory requirements, such as emissions, water discharge temperature, etc., which will apply during emergencies.
- C. When emergencies appear imminent, seeks regulatory relief from those regulatory requirements that reduce output.
- D. Assists the Control Area Operator in responding to the various kinds of possible problems on the electrical grid, including restoration of service after a disturbance.
- E. When practical, during periods of stress or shortage, consults with the Control Area Operator before derating a unit or taking a unit off line and defers outages and derates at the Control Area Operator’s request when continued operation is
 - 1. Possible and practical,
 - 2. Safe to plant personnel and to the public,
 - 3. In accordance with applicable law and regulations, and
 - 4. Will not cause major damage to the plant.

Summary of GAO’s Compliance With Standard

**Identification of Any Areas of Non-Compliance , Description of Corrective Actions,
and Estimation of When Compliance Will Be Achieved.**

20. OS 20 - Preparedness for On-Site and Off-Site Emergencies

The GAO plans for, prepares for, and responds to reasonably anticipated emergencies on and off the plant site, primarily to protect plant personnel and the public, and secondarily to minimize damage to maintain the reliability and availability of the plant. Among other things, the GAO:

- A. Plans for the continuity of management and communications during emergencies, both within and outside the plant,
- B. Trains personnel in the emergency plan periodically, and
- C. Ensures provision of emergency information and materials to personnel.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

21. OS 21 - Plant Security

To ensure safe and continued operations, each GAO provides a prudent level of security for the plant, its personnel, operating information and communications, stepping up security measures when necessary.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

22. OS 22 - Readiness

Until a change in a unit's long-term status, except during necessary maintenance or forced outages, the GAO is prepared to operate the unit at full available power if the Control Area Operator so requests, after reasonable notice, when such operation is permitted by law and regulation. Among other things, the GAO:

- A. Maintains contingency plans to secure necessary personnel, fuel, and supplies, and
- B. Prepares facilities for reasonably anticipated severe weather conditions.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

23. OS 23 - Notification of Changes in Long-Term Status of a Unit

The GAO notifies the Commission and the Control Area Operator in writing at least 90 days prior to a change in the long-term status of a unit. The notification includes a description of the planned change.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

24. OS 24 - Approval of Changes in Long-Term Status of a Unit

The GAO maintains a unit in readiness for service in conformance with Standard 22 unless the Commission, after consultation with the Control Area Operator, affirmatively declares that a generation facility is unneeded during a specified period of time. This standard is applicable only to the extent that the regulatory body with relevant ratemaking authority has instituted a mechanism to compensate the GAO for readiness services provided.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

25. OS 25 - Transfer of Ownership

The GAO notifies the Commission and the Control Area Operator in writing at least 90 days prior to any change in ownership.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

26. OS 26 - Planning for Long-Term Unit Storage

At least 90 days before a change in the long-term status of an electric generation unit, other than permanent shutdown and/or decommissioning, the GAO shall submit to the Commission plans and procedures for storage, reliable restart, and operation of the unit.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

27. OS 27 - Flow Assisted Corrosion

Where circumstances require it, the GAO has a flow-assisted corrosion program, which identifies vulnerable equipment, provides for regular testing of that equipment, and responds appropriately to prevent high energy pipe failures.

Summary of GAO's Compliance With Standard
Identification of Any Areas of Non-Compliance , Description of Corrective Actions, and Estimation of When Compliance Will Be Achieved.

28. OS 28 - Equipment and Systems

GAO complies with these Operation Standards (1-27) considering the design bases (as defined in the Appendix) of plant equipment and critical systems. The GAO considers the design basis of power plant equipment when as required by other standards it, among other things:

- A. Establishes procedures for the operation of critical systems at each unit (Ref. Standard No. 7).
- B. For each system, identifies critical parameters that require monitoring (Ref. Standard No. 8 and 13).
- C. For each critical parameter, establishes values at which to increase observation of the system or take actions to protect it (Ref. Standard No. 8 and 13).
- D. Assures that systems are monitored and actions are taken (Ref. Standard 8 and 13).
- E. Establishes parameters for operation during periods of stress or shortage on the state's electric grid (Ref. Standard No. 9 and 19).
- F. Assures that personnel operating critical systems are trained and qualified (Ref. Standard No. 6).

Summary of GAO's Compliance With Standard

**Identification of Any Areas of Non-Compliance , Description of Corrective Actions,
and Estimation of When Compliance Will Be Achieved.**

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V. Verification.

Verification by Officer or Attorney

(California Public Utilities Commission, Rules of Practice & Procedure, Rule 2.4)

Verification by officer:

I am an officer of the GAO identified above. I am authorized to make this verification on behalf of the GAO's Units for which this Operation Plan Summary applies and am familiar with the contents of this Operation Plan Summary. The statements contained herein are true of my own knowledge, except as to matters that are stated on information or belief, and as to those matters, I believe them to be true. I have prepared or supervised the preparation of the Operation Plan Summary, and in doing so have exercised due diligence and reasonable care in determining the truth, or believed truth, of the matters herein.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ at _____, California.
(date) (Name of City)

(Signature)

(Type or Print Name)

Title (if applicable)

Alternative verification by attorney:

(Where employee/officer is absent from County of Attorney's office or otherwise unable to verify)

I am the attorney for the GAO identified above. An authorized employee or officer of the above facility is absent from the County of _____, California, where I have my office, or otherwise unable to verify this document. I make this verification for that reason, and I am authorized to do so. The above statements are true of my own knowledge, except as to matters that are stated on information or belief, and as to those matters, I believe them to be true. I have exercised due diligence and reasonable care in determining the truth, or believed truth, of these matters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ at _____, California.
(date) (Name of City)

(Signature)

(Type or Print Name)

Title (if applicable)

CERTIFICATE OF SERVICE

I, Deric Wittenborn, am over the age of 18 years and employed in the City and County of Sacramento. My business address is 2015 H Street, Sacramento.

On January 18, 2005, I served the within document, *Submission Of The Joint Generating Asset Owners Regarding Proposed Operation Plan Summary* in R.02-11-039, with electronic mail service, as prescribed in R.02-11-039, and with personal service on the Assigned Commissioner and Assigned Administrative Law Judges, at San Francisco, California.

Executed on January 18, 2005, at Sacramento, California.

Deric Wittenborn

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abb@eslawfirm.com
abb@eslawfirm.com
aclark@calpine.com
alex.goldberg@williams.com
alex.goldberg@williams.com
aln2@pge.com
anja.irwin@aes.com
azasso@water.ca.gov
bcragg@gmssr.com
bfields@reliant.com
bj2@cpuc.ca.gov
bjorkpvcc@aol.com
blaising@braunlegal.com
bmcc@mccarthylaw.com
boilrdoc@pacbell.net
bspeckman@nexant.com
bwm@cpuc.ca.gov
caj@cpuc.ca.gov
case.admin@sce.com
ccl@cpuc.ca.gov
cek@cpuc.ca.gov
Cem@newsdata.com
centralfiles@semprautilities.com
chh@cpuc.ca.gov
christine.nguyen@lw.com
CJHajovsky@reliant.com
clu@cpuc.ca.gov
cmkehrein@ems-ca.com
cxw@cpuc.ca.gov
daking@sempra.com
difellman@fellmanlaw.com
dkk@eslawfirm.com
dnorris@sppc.com
douglass@energyattorney.com
dpf@cpuc.ca.gov
ek@a-klaw.com
emaddox@seawestwindpower.com
e-recipient@caiso.com
gloria.ing@sce.com
greg.blue@dynegy.com
hamid.nejad@ladwp.com
j1lc@pge.com
JCR4@pge.com

jcrossen@apx.com
jennifer.lehmann@aes.com
jet@cpuc.ca.gov
jkarp@whitecase.com
jklein@energy.state.ca.us
jkloberdanz@semprautilities.com
jleslie@luce.com
joel_newton@fpl.com
jtachera@energy.state.ca.us
kdw@woodruff-expert-
services.com
kjohnson@caiso.com
kjsimonsen@ems-ca.com
kmorton@sempra.com
kms@cpuc.ca.gov
larry.cope@sce.com
lau@cpuc.ca.gov
lbrowy@semprautilities.com
lcottle@whitecase.com
lindseyhowdowning@dwt.com
lisaweinzimer@sbcglobal.net
lurick@sempra.com
mark.minick@sce.com
mark_j_smith@fpl.com
maz@cpuc.ca.gov
mclaughlin@braunlegal.com
mcmannes@aol.com
mdjoseph@adamsbroadwell.com
meallen@sempra.com
mkahn@flk.com
mlgillette@duke-energy.com
mpa@a-klaw.com
mrw@mrwassoc.com
mshames@ucan.org
nes@a-klaw.com
npedersen@hanmor.com
omh@cpuc.ca.gov
paul.klapka@sce.com
phanschen@mofo.com
ppettingill@caiso.com
pvanmidde@earthlink.net
rcosta@turn.org
rmccann@umich.edu
rsa@a-klaw.com
rsa@a-klaw.com
rst@cpuc.ca.gov
rtp1@pge.com
rwc@cpuc.ca.gov
rwheeler@caiso.com
sberlin@mccarthylaw.com
sdg6@pge.com

shilton@mofo.com
smith@braunlegal.com
ssmyers@att.net
steve.huhman@mirant.com
steven@iepa.com
tcorr@sempra.com
terry.houlihan@bingham.com
tim.muller@williams.com
tim.muller@williams.com
tom.barnett@constellation.com
tom.romesberg@neg.pge.com
vitaly.lee@aes.com

DAVE BOWARD
GENERAL MANAGER
HIGH DESERT POWER
PROJECT LLC
19000 PERIMETER ROAD
VICTORVILLE, CA 92394

PAUL CAPELL
PACIFIC POWER AND
LIGHT
825 NORTHEAST
NULTNOMAH, RM 1600
PORTLAND, OR 97232