



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

FILED

10-02-08
04:59 PM

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and
to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**COMMENTS OF THE CENTER FOR RESOURCE SOLUTIONS ON
COMMISSIONER PEEVEY'S PROPOSED DECISION ON GREENHOUSE GAS
REGULATORY MATTERS**

CENTER FOR RESOURCE SOLUTIONS
Arthur O'Donnell, Executive Director

P.O. Box 29512
San Francisco, CA 94129
Telephone: (415) 561-2101
Facsimile: (415) 561-2105
Email: arthur@resource-solutions.org

Dated: October 2, 2008

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

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**COMMENTS ON THE PROPOSED DECISION
ON GREENHOUSE GAS REGULATORY MATTERS**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Center for Resource Solutions (CRS) respectfully offers these comments on the Proposed Decision of Commissioner Peevey issued in the above captioned proceeding on September 12, 2008 ("Proposed Decision or "PD"). CRS will limit its comments to **Section 5.4.3.2. Renewable Energy** in the PD.

I. COMMENTS

Although CRS appreciates and supports the Commission's stated recognition of the importance of continued investment in renewable energy as essential to achieving the State's statutorily mandated greenhouse gas ("GHG") reduction goals, we believe that the Proposed Decision, as currently drafted, misses an opportunity to ensure that such investments continue to be valued under the prospective cap-and-trade mechanisms that may be adopted by the California Air Resources Board (CARB).

In particular, the Proposed Decision considers but rejects proposals from several parties, including the Solar Alliance, Sacramento Municipal Utility District and others, in

¹ The Center for Resource Solutions is a 501 (C) 3 nonprofit organization that works to promote renewable energy markets and consumer protection mechanisms through its Green-e Energy and Green-e Climate certification and verification programs.

support of allocating allowances to be allocated among or set aside for deliverers of renewable electricity.

As discussed in the Proposed Decision, in addition to the GHG-emission reduction value of renewable resources that is captured by the State's Renewables Portfolio Standards, another market exists for renewable energy that also contributes to reducing GHG. This private investment market (a.k.a. the voluntary market) allows individuals, corporations and government entities to prove their commitments to sustainable practices and clean energy via purchases of renewable energy or renewable energy certificates (RECs) or installation of on-site renewable electric generation technologies, such as photovoltaics.

Although the Proposed Decision concludes that there are too many unanswered questions at this time to endorse such a set-aside program, CRS believes that there is ample evidence of its value in promoting renewable energy, and that failure to consider such a program would have adverse consequences for renewable energy development in California and in the West.

At the very least, we would encourage the Commission to forward a recommendation to CARB as part of its Final Decision in the proceeding, that a formalized set-aside program for private investments in renewable energy be considered as part of AB32 compliance rules.

A. Voluntary Commitments to Reducing GHG Could be Negated under a Cap-and-Trade Program, Unless There is a Mechanism for Retiring Allowances on Behalf of Those Investments

When citizens and businesses take voluntary action to purchase renewable electricity, renewable energy certificates (RECs) or to install renewable generation on-

site, their dollars support the growth of new renewable generation facilities, infrastructure, and markets that benefit all of society. In the absence of a greenhouse gas cap, the addition of renewable generation to the electric grid also has the effect of reducing overall greenhouse gas emissions. One of the principal drivers of voluntary purchases of renewable energy is the reduction of greenhouse gas emissions. Yet under a cap on the electricity sector, this reduction in emissions does not take place. When a renewable energy generator produces emissions-free electricity, a fossil-fuel fired plant produces less electricity, *but* the number of pollution allowances in circulation remains unchanged.

Thus, the only way that buyers or sellers of renewable energy can reduce direct emissions under a cap-and-trade program is to take a separate and additional action to reduce the number of pollution allowances in the marketplace.

If the cap-and-trade program does not adequately recognize the carbon-reduction value of these renewable purchases or on-site generation, and nullifies the ability for a voluntary purchaser of renewable energy to reduce GHG emission levels, this will drastically reduce and perhaps eliminate the voluntary market for renewable energy, taking the many societal benefits of this voluntary market with it. The capped emissions level will become the ceiling for greenhouse gas emissions reductions rather than the floor, and going forward we will lose the powerful contributions that voluntary action has thus far made to a clean, domestic renewable energy industry.

At present, the emissions reductions caused by citizens and businesses buying green power are a result of their private investment. When implementing its cap-and-trade policies, the State should continue to take advantage of contributions to our shared

challenge that are paid for by citizens and individuals and not the State. However, for this to continue to take place, the State needs to set up the structure to enable such action.

B. An Approach that Adopts an “Off-the-top” Accounting for Voluntary Purchases of Renewable Energy is Consistent with Policies Being Developed in the West and in Other Regions

Accordingly, we recommend the following approach to preserve the ability for private citizens to invest in clean renewable electricity or renewable energy certificates. This is the approach that was implemented by RGGI, and we feel it will work for the California (and the West) as well.

Prior to allocation of any allowances, renewable generators or marketers/suppliers of renewable energy will notify the cap-and-trade Program Administrators of their projected voluntary demand for RECs, renewable electricity or the output from on-site distributed renewable generation. Program Administrators would convert the MWhs to tons avoided carbon and remove this quantity of allowances from the entire pool of allowances available². These allowances will be held by the Program Administrator in the equivalent of an escrow account. Each year, parties selling renewable generation or RECs to end-users would report their actual MWh sales or generation (for on-site renewable generators), and the Program Administrator would retire a commensurate amount of allowances for the sum total of MWhs associated with the voluntary market. At the end of the allowance compliance period, any difference between projected tons avoided and actual tons avoided would be trued up by either banking excess allowances that were not used, or borrowing from the pool of allowances from the next compliance period.

² Program administrators could choose to calculate such emissions reductions in a number of ways, including replicating the methodology used when factoring in full compliance with the RPS into the emissions baseline.

This “off-the-top” approach differs from a traditional set-aside because the allowances are not allocated to renewable generators directly. Instead, allowances are retired and taken out of circulation *on behalf of* reported voluntary sales. This approach is far superior to a set-aside because it can provide some degree of certainty to the marketplace that all renewable sales in the voluntary market will be able to make carbon reduction claims. This certainty is absolutely critical to the market because customers and project financiers require it. It is also superior to a set-aside because the approach does not pit renewables against energy efficiency or other important special interests in a fight for limited allowances. Currently nine of ten states participating in RGGI have issued final or draft rules implementing a version of this “off-the-top” solution for their regional green power markets.

II. CONCLUSION

CRS welcomes the Commission’s attention to these difficult matters in its attempt to achieve fair and equitable policies for achieving the State’s goals in reducing GHG. And we are gratified that the Proposed Decision recognizes the value of private investment and voluntary markets for renewable energy and the role they may continue to play, even under new compliance mechanisms such as a cap-and-trade system for carbon allowances.

However, there is a pronounced risk that when a cap is placed upon the electricity sector the reductions in electricity demand resulting from a company investing in renewable energy will not result in any net emission reductions, but rather will simply make it cheaper for a capped company to emit more GHG emissions (reduced demand for allowances will reduce the price of allowances). This counterintuitive result of a

CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 2nd day of October 2008 caused a copy of the foregoing

**COMMENTS OF THE CENTER FOR RESOURCE SOLUTIONS ON
COMMISSIONER PEEVEY'S PROPOSED DECISION ON
GREENHOUSE GAS REGULATORY MATTERS**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

Commissioner President Michael R. Peevey
California Public Utilities Commission
State Building, Room 5218
505 Van Ness Avenue
San Francisco, CA 94102

ALJ Charlotte TerKeurst
California Public Utilities Commission
State Building, Room 5117
505 Van Ness Avenue
San Francisco, CA 94102

ALJ Jonathan Lakritz
California Public Utilities Commission
State Building, Room 5020
505 Van Ness Avenue
San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 2nd day of October 2008 at San Francisco, California.

/s/ Melinda LaJaunie
Melinda LaJaunie

Service List – R.06-04-009
(Updated October 1, 2008)

ANDREW BROWN
abb@eslawfirm.com

ASHLEE M. BONDS
abonds@thelen.com

AUDREY CHANG
achang@nrdc.org

Anne Gillette
aeg@cpuc.ca.gov

Andrew Campbell
agc@cpuc.ca.gov

ANN G. GRIMALDI
agrimaldi@mckennalong.com

ARTHUR L. HAUBENSTOCK
ahaubenstock@brightsourceenergy.com

ANNE HENDRICKSON
ahendrickson@commerceenergy.com

Adam Langton
ahl@cpuc.ca.gov

AIMEE BARNES
aimee.barnes@ecosecurities.com

AKBAR JAZAYEIRI
akbar.jazayeri@sce.com

ALEXIA C. KELLY
akelly@climatetrust.org

ALAN COMNES
alan.comnes@nrgenergy.com

ALEX KANG
alex.kang@itron.com

ANDREW L. HARRIS
alho@pge.com

AMBER MAHONE
amber@ethree.com

ANDREW J. VAN HORN
andy.vanhorn@vhcenergy.com

ANITA HART
anita.hart@swgas.com

ANNABELLE MALINS
annabelle.malins@britishconsulatesf.gov.uk

ALVIN PAK
apak@sempraglobal.com

ALLEN K. TRIAL
atrial@sempra.com

ANN L. TROWBRIDGE
atrowbridge@daycartermurphy.com

AUDRA HARTMANN
Audra.Hartmann@Dynegy.com

ANDREA WELLER
aweller@sel.com

Amy C. Yip-Kikugawa
ayk@cpuc.ca.gov

ELIZABETH BAKER
bbaker@summitblue.com

Bishu Chatterjee
bbc@cpuc.ca.gov

BUD BEEBE
bbeebe@smud.org

BRIAN T. CRAGG
bcragg@goodinmacbride.com

BALDASSARO DI CAPO
bdicapo@caiso.com

BILL DOMBROWSKI
BDombrowski@calretailers.com

RYAN BERNARDO
bernardo@braunlegal.com

BETH VAUGHAN
beth@beth411.com

BETTY SETO
Betty.Seto@kema.com

BILL SCHRAND
bill.schrand@swgas.com

BRUNO JEIDER
bjeider@ci.burbank.ca.us

BARRY LOVELL
bjl@bry.com

BRIAN M. JONES
bjones@mjbroadley.com

BRIAN K. CHERRY
bkc7@pge.com

Beth Moore
blm@cpuc.ca.gov

BARRY F. MCCARTHY
bmcc@mccarthylaw.com

BRIAN MCQUOWN
bmcquown@reliant.com

BOB LUCAS
Bob.lucas@calobby.com

ROBERT GEX
bobjex@dwt.com

BRIAN POTTS
bpotts@foley.com

BALWANT S. PUREWAL
bpurewal@water.ca.gov

BARRY RABE
brabe@umich.edu

BARBARA R. BARKOVICH
brbarkovich@earthlink.net

BIANCA BOWMAN
brbc@pge.com

BRIAN BIERING
bsb@eslawfirm.com

BARRY R. WALLERSTEIN
bwallerstein@aqmd.gov

BRAD WETSTONE
bwetstone@hotmail.com

CHRIS MARNAY
C_Marnay@lbl.gov

CATHIE ALLEN
californiadockets@pacificcorp.com

CARLA PETERMAN
carla.peterman@gmail.com

CASE ADMINISTRATION
case.admin@sce.com

CASSANDRA SWEET
Cassandra.sweet@dowjones.com

CATHY A. KARLSTAD
cathy.karlstad@sce.com

CARMEN E. BASKETTE
cbaskette@enernoc.com

CLARE BREIDENICH
cbreidenich@yahoo.com

CLIFF CHEN
cchen@ucsusa.org

CALIFORNIA ENERGY MARKETS
cem@newsdata.com

Cathleen A. Fogel
cf1@cpuc.ca.gov

Charlotte TerKeurst
cft@cpuc.ca.gov

CHARLIE BLAIR
charlie.blair@delta-ee.com

CHRISTOPHER A. HILEN
chilen@sppc.com

CHRISTOPHER J. WARNER
cjw5@pge.com

CYNTHIA MITCHELL
ckmitchell1@sbcglobal.net

CLARENCE BINNINGER
clarence.binninger@doj.ca.gov

CLARK BERNIER
clark.bernier@rlw.com

CLYDE MURLEY
clyde.murley@comcast.net

CAROLYN M. KEHREIN
cmkehrein@ems-ca.com

Eugene Cadenasso
cpe@cpuc.ca.gov

CARL PECHMAN
cpechman@powereconomics.com

CATHY S. WOOLLUMS
cswoollums@midamerican.com

CURT BARRY
curt.barry@iwpnews.com

CURTIS L. KEBLER
curtis.kebler@gs.com

CYNTHIA A. FONNER
Cynthia.A.Fonner@constellation.com

CYNTHIA SCHULTZ
cynthia.schultz@pacificcorp.com

DANIEL A. KING
daking@sempra.com

DAN ADLER
Dan.adler@calcef.org

DAN SILVERIA
dansvec@hdo.net

DAVID L. MODISETTE
dave@ppallc.com

DAVID REYNOLDS
david.reynolds@ncpa.com

DAVID ZONANA
david.zonana@doj.ca.gov

DAVID BRANCHCOMB
david@branchcomb.com

DAVID NEMTZOW
david@nemtzw.com

DOUGLAS BROOKS
dbrooks@nevpa.com

DEREK WALKER
dbwalker@edf.org

DEBORAH SLON
deborah.slon@doj.ca.gov

DENNIS M.P. EHLING
dehling@kling.com

DENNIS DE CUIR
dennis@ddecuir.com

DEREK DENNISTON
derek@evomarkets.com

DAN HECHT
dhecht@sempratrading.com

DAVID L. HUARD
dhuard@manatt.com

DIANE I. FELLMAN
Diane_Fellman@fpl.com

WILLIAM F. DIETRICH
dietrichlaw2@earthlink.net

Diana L. Lee
dil@cpuc.ca.gov

DERIC WITTENBORN
djw@eslawfirm.com

DOUGLAS K. KERNER
dkk@eslawfirm.com

Don Schultz
dks@cpuc.ca.gov

DOUGLAS MACMULLEN
dmacmull@water.ca.gov

DARYL METZ
dmetz@energy.state.ca.us

DESPINA NIEHAUS
dniehaus@semprautilities.com

DANIEL W. DOUGLASS
douglass@energyattorney.com

DIANA SCHWYZER
dschwyze@energy.state.ca.us

DANIELLE MATTHEWS SEPERAS
dseperas@calpine.com

Donald R. Smith
dsh@cpuc.ca.gov

DARRELL SOYARS
dsoyars@sppc.com

DEAN R. TIBBS
dtibbs@aes4u.com

DON WOOD
dwood8@cox.net

DONALD SCHOENBECK
dws@r-c-s-inc.com

ED CHIANG
echiang@elementmarkets.com

Ed Moldavsky
edm@cpuc.ca.gov

EDWARD W. O'NEILL
edwardoneill@dwt.com

ELIZABETH WESTBY
egw@a-klaw.com

ELIZABETH W. HADLEY
ehadley@reupower.com

E.J. WRIGHT
ej_wright@oxy.com

EVELYN KAHL
ek@a-klaw.com

ELSTON K. GRUBAUGH
ekgrubaugh@iid.com

Elizabeth Stoltzfus
eks@cpuc.ca.gov

ED LUCHA
ELL5@pge.com

EDWARD VINE
elvine@lbl.gov

MAHLON ALDRIDGE
emahlon@ecoact.org

ELENA MELLO
emello@sppc.com

EMMA POELSTERL
epoelsterl@sunpowercorp.com

EDWARD G POOLE
epoole@adplaw.com

CALIFORNIA ISO
e-recipient@caiso.com

ETHAN SPRAGUE
esprague@consol.ws

EDWARD J. TIEDEMANN
etiedemann@kmtg.com

ELLEN WOLFE
ewolfe@rezero.com

FIJI GEORGE
fiji.george@elpaso.com

KAREN TERRANOVA
filings@a-klaw.com

F. Jackson Stoddard
fjs@cpuc.ca.gov

FRED WELLINGTON
fred.wellington@navigantconsulting.com

FRANK STERN
fstern@summitblue.com

WES MONIER
fwmonier@tid.org

GARSON KNAPP
garson_knapp@fpl.com

GARY BARCH
gbarch@knowledgeinenergy.com

GREG BLUE
gblue@enxco.com

GARY COLLORD
gcollord@arb.ca.gov

GEORGE HOPLEY
george.hopley@barcap.com

GARY HINNERS
ghinners@reliant.com

GLORIA BRITTON
GloriaB@anzaelectric.org

GREGGORY L. WHEATLAND
glw@eslawfirm.com

GREGG MORRIS
gmorris@emf.net

GORDON PICKERING
gpickering@navigantconsulting.com

GRANT ROSENBLUM, ESQ.
grosenblum@caiso.com

GLORIA D. SMITH
gsmith@adamsbroadwell.com

GRACE LIVINGSTON-NUNLEY
GXL2@pge.com

HARRY SINGH
harry.singh@rbssempra.com

HARVEY EDER
harveyederpspc@hotmail.com

HAYLEY GOODSON
hayley@turn.org

HOLLY B. CRONIN
hcronin@water.ca.gov

HOWARD V. GOLUB
hgolub@nixonpeabody.com

HEATHER LOUIE
hlouie@energy.state.ca.us

J. ANDREW HOERNER
hoerner@redefiningprogress.org

CAROL J. HURLOCK
hurlock@water.ca.gov

HUGH YAO
HYao@SempraUtilities.com

Harvey Y. Morris
hym@cpuc.ca.gov

SUE KATELEY
info@calseia.org

JAIRAM GOPAL
Jairam.gopal@sce.com

JAMES W. KEATING
james.keating@bp.com

JANILL RICHARDS
janill.richards@doj.ca.gov

JEANNE B. ARMSTRONG
jarmstrong@goodinmacbride.com

JASON A. DUBCHAK
jason.dubchak@niskags.com

Jamie Fordyce
jbf@cpuc.ca.gov

JOHN B. WELDON, JR.
jbw@slwplc.com

JENNIFER CHAMBERLIN
jchamberlin@strategicenergy.com

Judith Ikle
jci@cpuc.ca.gov

JONATHAN FORRESTER
JDF1@PGE.COM

JEFFERY D. HARRIS
jdh@eslawfirm.com

JEFFREY DOLL
jdoll@arb.ca.gov

JEANNE M. SOLE
jeanne.sole@sfgov.org

JEFFREY P. GRAY
jeffreyGray@dwt.com

JEN MCGRAW
jen@cnt.org

JENINE SCHENK
jenine.schenk@apses.com

JENNIFER PORTER
jennifer.porter@energycenter.org

GERALD L. LAHR
JerryL@abag.ca.gov

JESUS ARREDONDO
jesus.arredondo@nrgenergy.com

Julie A. Fitch
jf2@cpuc.ca.gov

JOSEPH GRECO
jgreco@terra-genpower.com

JEFFREY L. HAHN
jhahn@covantaenergy.com

JAMES A. HOLTkamp
jholtkamp@hollandhart.com

JAMES ROSS
jimross@r-c-s-inc.com

JJ PRUCNAL
jj.prucnal@swgas.com

Jason R. Salmi Klotz
jk1@cpuc.ca.gov

JOSEPH M. KARP
jkarp@winston.com

JOSEPH R. KLOBERDANZ
jkloberdanz@semprautilities.com

JOHN LAUN
jlaun@apogee.net

JOHN W. LESLIE
jleslie@luce.com

JANE E. LUCKHARDT
jluckhardt@downeybrand.com

Jaclyn Marks
jm3@cpuc.ca.gov

JESSICA NELSON
jnelson@psrec.coop

Jacqueline Greig
jnm@cpuc.ca.gov

JODY S. LONDON
jody_london_consulting@earthlink.net

JOSEPH PAUL
joe.paul@dynegey.com

JOHN P. HUGHES
john.hughes@sce.com

JOHN R. REDDING
johnredding@earthlink.net

Jonathan Lakritz
jol@cpuc.ca.gov

JOSE CARMONA
jose@ceert.org

JOSEPH HENRI
josephhenri@hotmail.com

JOY A. WARREN
joyw@mid.org

JUSTIN RATHKE
jrathke@capstoneturbine.com

JUDITH B. SANDERS
jsanders@caiso.com

JANINE L. SCANCARELLI
jscancarelli@flk.com

JAMES D. SQUERI
jsqueri@gmssr.com

George S. Tagnipes jst@cpuc.ca.gov	KENNY SWAIN kenneth.swain@navigantconsulting.com	LEILANI JOHNSON KOWAL leilani.johnson@ladwp.com
Joel T. Perlstein jtp@cpuc.ca.gov	KERRY HATTEVIK kerry.hattevik@nrgenergy.com	LEAH FLETCHER lfletcher@nrdc.org
JULIE L. MARTIN julie.martin@bp.com	KEVIN BOUDREAUX kevin.boudreaux@calpine.com	DONALD C. LIDDELL liddell@energyattorney.com
JOSEPH F. WIEDMAN jwiedman@goodinmacbride.com	KASSANDRA GOUGH kgough@calpine.com	LISA SCHWARTZ lisa.c.schwartz@state.or.us
JAMES W. TARNAGHAN jwmctarnaghan@duanemorris.com	KRISTIN GRENFELL kgrenfell@nrdc.org	LISA WEINZIMER lisa_weinzimer@platts.com
JAMES W. MCTARNAGHAN jwmctarnaghan@duanemorris.com	KAREN GRIFFIN kgriffin@energy.state.ca.us	LYNELLE LUND llund@commerceenergy.com
JAMES B. WOODRUFF jwoodruff@nextlighttp.com	KENNETH C. JOHNSON kjinnovation@earthlink.net	LYNN HAUG lmh@eslawfirm.com
JASMIN ANSAR jxa2@pge.com	KEVIN J. SIMONSEN kjsimonsen@ems-ca.com	LOULENA A. MILES lmiles@adamsbroadwell.com
Jonathan J. Reiger jzr@cpuc.ca.gov	KHURSHID KHOJA kkhoja@thelenreid.com	LORRAINE PASKETT Lorraine.Paskett@ladwp.com
WILLIAM KARAMBELAS karambelas@fce.com	GREGORY KLATT klatt@energyattorney.com	LAURIE PARK lpark@navigantconsulting.com
KAREN LINDH karen@klindh.com	KEITH W. MELVILLE kmelville@sempra.com	Lainie Motamedi lrm@cpuc.ca.gov
KARLA DAILEY karla.dailey@cityofpaloalto.org	KAREN NORENE MILLS kmills@cfbf.com	STEVE RAHON lschavrien@semprautilities.com
KATHRYN WIG Kathryn.Wig@nrgenergy.com	KARLEEN O'CONNOR koconnor@winston.com	LAURIE TEN HOPE ltenhope@energy.state.ca.us
KENNETH A. COLBURN kcolburn@symbioticstrategies.com	AVIS KOWALEWSKI kowalewskia@calpine.com	Lana Tran ltt@cpuc.ca.gov
KIRBY DUSEL kdusel@navigantconsulting.com	Kristin Ralff Douglas krd@cpuc.ca.gov	LAURA WISLAND lwisland@ucsusa.org
KEVIN WOODRUFF kdw@woodruff-expert-services.com	KARI SMITH ksmith@sunpowercorp.com	MARCEL HAWIGER marcel@turn.org
KATE BEARDSLEY KEBD@pge.com	KYLE L. DAVIS kyle.l.davis@pacificorp.com	MARCIE MILNER marcie.milner@shell.com
KEITH LAYTON keith.layton@swgas.com	KYLE SILON kyle.silon@ecosecurities.com	MARY LYNCH mary.lynych@constellation.com
KEITH R. MCCREA keith.mccrea@sablaw.com	KYLE D. BOUDREAUX kyle_boudreaux@fpl.com	Michael Colvin mc3@cpuc.ca.gov
KELLIE SMITH kellie.smith@sen.ca.gov	LARS KVALE lars@resource-solutions.org	BRUCE MCLAUGHLIN mclaughlin@braunlegal.com
KELLY BARR kelly.barr@srpnet.com	LISA A. COTTLE lcottle@winston.com	MICHAEL B. DAY mday@goodinmacbride.com
BILL LOCKYER ken.alex@doj.ca.gov	LISA DECARLO ldecarlo@energy.state.ca.us	MARC D. JOSEPH mdjoseph@adamsbroadwell.com
KEN ALEX ken.alex@doj.ca.gov	LEE WALLACH LeeWallach@SolelUS.com	MELISSA DORN mdorn@mwe.com

MICHEL FLORIO mflorio@turn.org	S. NANCY WHANG nwhang@manatt.com	JOHN DUTCHER ralf1241a@cs.com
MELANIE GILLETTE mgillette@enernoc.com	OBADIAH BARTHOLOMY obartho@smud.org	Richard A. Myers ram@cpuc.ca.gov
MICHAEL A. HYAMS mhyams@sflower.org	OLOF BYSTROM obystrom@cera.com	RANDY S. HOWARD randy.howard@ladwp.com
MIKE LAMOND Mike@alpinenaturalgas.com	PATRICIA R. THOMPSON Patricia.R.Thompson@gmail.com	RANDY SABLE randy.sable@swgas.com
Matthew Deal mjd@cpuc.ca.gov	PANAMA BARTHOLOMY pbarthol@energy.state.ca.us	RICHARD COWART rapcowart@aol.com
MARTIN A. MATTES mmattes@nossaman.com	PAM BURMICH pburmich@arb.ca.gov	RAY WELCH ray.welch@navigantconsulting.com
MICHAEL MAZUR mmazur@3phasesRenewables.com	PIERRE H. DUVAIR pduvair@energy.state.ca.us	RICHARD HELGESON rhelgeson@scppa.org
MONA TIERNEY-LLOYD mona.lloyd@att.net	JAN PEPPER pepper@cleanpowermarkets.com	RYAN WISER rhwiser@lbl.gov
MONICA A. SCHWEBS, ESQ. monica.schwebs@bingham.com	PETER W. HANSCHEN phansch@mofo.com	RICHARD SMITH richards@mid.org
MICHAEL P. ALCANTAR mpa@a-klaw.com	PHIL CARVER Philip.H.Carver@state.or.us	RICK C. NOGER rick_noger@praxair.com
MARC PRYOR mpryor@energy.state.ca.us	PHILLIP J. MULLER philm@scdenergy.com	RITA NORTON rita@ritanortonconsulting.com
MRW & ASSOCIATES, INC. mrw@mrwassoc.com	PAUL D. MAXWELL pmaxwell@navigantconsulting.com	RANDALL W. KEEN rkeen@manatt.com
MICHAEL SCHEIBLE mscheibl@arb.ca.gov	ARNO HARRIS policy@recurrentenergy.com	RONALD MOORE rkmoore@gswater.com
MICHAEL A. YUFFEE myuffee@mwe.com	PAT PEREZ pperez@energy.state.ca.us	RICHARD MCCANN, PH.D rmccann@umich.edu
NANCY ALLRED Nancy.Allred@sce.com	PHILIP D. PETTINGILL ppettingill@caiso.com	ROSS A. MILLER rmiller@energy.state.ca.us
NADAV ENBAR nenbar@energy-insights.com	Paul S. Phillips psp@cpuc.ca.gov	Rahmon Momoh rmm@cpuc.ca.gov
NORA SHERIFF nes@a-klaw.com	PAUL DELANEY pssed@adelphia.net	RICHARD J. MORILLO rmorillo@ci.burbank.ca.us
NICHOLAS LENSSEN nlenssen@energy-insights.com	PATRICK STONER pstoner@lgc.org	ROBERT L. PETTINATO robert.pettinato@ladwp.com
NORMAN J. FURUTA norman.furuta@navy.mil	PATRICIA THOMPSON pthompson@summitblue.com	ROBERT K. ROZANSKI Robert.Rozanski@ladwp.com
NORMAN A. PEDERSEN npedersen@hanmor.com	PETER V. ALLEN pvallen@thelen.com	ROGER C. MONTGOMERY roger.montgomery@swgas.com
NANCY RADER nrader@calwea.org	Pamela Wellner pw1@cpuc.ca.gov	ROGER VAN HOY rogerv@mid.org
NINA SUETAKE nsuetake@turn.org	Pearlie Sabino pzs@cpuc.ca.gov	RONALD F. DEATON ron.deaton@ladwp.com
NANCY TRONAAS ntronaas@energy.state.ca.us	RACHEL MCMAHON rachel@ceert.org	RASHA PRINCE rprince@semprautilities.com

ROBERT J. REINHARD rreinhard@mofo.com	SHARON FIROOZ sfirooz@firstwind.com	SOUMYA SASTRY svs6@pge.com
ROBERT R. TAYLOR rrtaylor@srpnet.com	STEPHEN GILLETTE sgillette@capstoneturbine.com	TANDY MCMANNES tandy.mcmannes@solar.abengoa.com
DONALD BROOKHYSER rsa@a-klaw.com	Scott Murtishaw sgm@cpuc.ca.gov	THERESA BURKE tburke@sflower.org
REED V. SCHMIDT rschmidt@bartlell.com	STEVEN G. LINS slins@ci.glendale.ca.us	TRENT A. CARLSON tcarlson@reliant.com
ROBIN SMUTNY-JONES rsmutny-jones@caiso.com	SEEMA SRINIVASAN sls@a-klaw.com	TOM CORR tcorr@sempraglobal.com
REID A. WINTHROP rwinthrop@pilotpowergroup.com	PATRICK M. ROSVALL smalllecs@cwclaw.com	Theresa Cho tcx@cpuc.ca.gov
RYAN FLYNN ryan.flynn@pacificcorp.com	STEVEN S. MICHEL smichel@westernresources.org	THOMAS DARTON tdarton@pilotpowergroup.com
STEPHANIE LA SHAWN S1L7@pge.com	SAMARA MINDEL smindel@knowledgeinenergy.com	TOM DELFINO tdelfino@earthlink.net
SAEED FARROKHPAY saeed.farrokhpay@ferc.gov	Sara M. Kamins smk@cpuc.ca.gov	TREVOR DILLARD tdillard@sppc.com
SAM SADLER samuel.r.sadler@state.or.us	SID NEWSOM snewsom@semprautilities.com	TAMLYN M. HUNT thunt@cecmil.org
SANDRA ELY Sandra.ely@state.nm.us	SHERIDAN J. PAUKER spauker@wsgr.com	TIFFANY RAU tiffany.rau@bp.com
ANNIE STANGE sas@a-klaw.com	SEBASTIEN CSAPO sscb@pge.com	TIM HEMIG tim.hemig@nrgenergy.com
SAKIS ASTERIADIS sasteriadis@apx.com	SARA STECK MYERS ssmyers@att.net	TIMOTHY R. ODIL todil@mckennalong.com
C. SUSIE BERLIN sberlin@mccarthylaw.com	STEPHEN G. KOERNER, ESQ. steve.koerner@elpaso.com	THOMAS ELGIE Tom.Elgie@powerex.com
SARAH BESERRA sbeserra@sbcglobal.net	STEVEN SCHILLER steve@schiller.com	R. THOMAS BEACH tomb@crossborderenergy.com
SHERYL CARTER scarter@nrhc.org	STEVE KROMER stevek@kromer.com	THOMAS S. KIMBALL tomk@mid.org
STEVEN M. COHN scohn@smud.org	STEVEN HUHMANN steven.huhmann@morganstanley.com	THOMAS DILL trdill@westernhubs.com
SCOTT TOMASHEFSKY scott.tomashefsky@ncpa.com	STEVEN S. SCHLEIMER steven.schleimer@barclayscapital.com	THEODORE ROBERTS troberts@sempra.com
Steve Roscow scr@cpuc.ca.gov	STEVEN KELLY steven@iepa.com	UDI HELMAN UHelman@caiso.com
SETH HILTON sdhilton@stoel.com	STEVEN A. LIPMAN steven@lipmanconsulting.com	VERONIQUE BUGNION vb@pointcarbon.com
SEAN P. BEATTY sean.beatty@mirant.com	STEVEN MOSS steven@moss.net	VITALY LEE vitaly.lee@aes.com
SHAUN HALVERSON SEHC@pge.com	Sean A. Simon svn@cpuc.ca.gov	VALERIE J. WINN vjw3@pge.com
SEPHRA A. NINOW sephra.ninow@energycenter.org	STEPHAN C. VOLKER svolker@volkerlaw.com	VIDHYA PRABHAKARAN vprabhakaran@goodinmacbride.com

VIRGIL WELCH
vwelch@arb.ca.gov

WAYNE AMER
wamer@kirkwood.com

WILLIAM H. BOOTH
wbooth@booth-law.com

RAYMOND J. CZAHAR, C.P.A.
westgas@aol.com

BRAD WETSTONE
wetstone@alamedapt.com

W. WAYNE TOMLINSON
william.tomlinson@elpaso.com

Wade McCartney
wsm@cpuc.ca.gov

WEBSTER TASAT
wtasat@arb.ca.gov

WILLIAM W. WESTERFIELD III
wwester@smud.org

JUSTIN C. WYNNE
wynne@braunlegal.com

Zach Church
zac@cpuc.ca.gov

JEANNE ZAIONTZ
zaiontj@bp.com

CINDY ADAMS
COVANTA ENERGY CORPORATION
40 LANE ROAD
FAIRFIELD, NJ 7004

STEPHEN E. DOYLE
EXECUTIVE VICE PRESIDENT
CLEAN ENERGY SYSTEMS, INC.
3035 PROSPECT PARK DRIVE, STE
150
RANCHO CORDOVA, CA 95670-6071

DOWNEY BRAND
Sacramento Municipal
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-4686

MATTHEW MOST
EDISON MISSION MARKETING &
TRADING, INC.
160 FEDERAL STREET
BOSTON, MA 02110-1776

THOMAS MCCABE
EDISON MISSION ENERGY
18101 VON KARMAN AVE., SUITE
1700
IRVINE, CA 92612

MARY MCDONALD
DIRECTOR OF STATE AFFAIRS
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MELISSA JONES
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

PUC/X103730.v1