



**Pacific Gas and
Electric Company**[®]

Charles R. Middlekauff
Attorney at Law

Mailing Address:
P. O. Box 7442
San Francisco, CA 94120

Street/Courier Address:
Law Department
77 Beale Street, B30A
San Francisco, CA 94105

415.973.6971
Fax: 415.973.5520
Internet: CRMd@pge.com

July 18, 2007

HAND DELIVERED

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

Re: Application of Pacific Gas and Electric Company (U 39-E) and
San Diego Gas & Electric Company (U 902-E) for
Approval of the Emerging Renewable Resource Program

Dear Docket Clerk:

Enclosed for filing in the above-referenced proceeding are an original and eight (8) copies of the *Application Of Pacific Gas And Electric Company (U 39-E) And San Diego Gas & Electric Company (U 902-E) For Approval Of Their Separate Emerging Renewable Resource Programs.*

Please return two file-stamped copies in the self-addressed envelope enclosed for your convenience. Thank you.

Sincerely,

CHARLES R. MIDDLEKAUFF

cc: Michael R. Peevey, Commission President
Dian M. Grueneich, Commissioner
John Bohn, Commissioner
Rachelle B. Chong, Commissioner
Timothy Alan Simon, Commissioner
Service List for R.06-05-027, R.06-02-012, R.06-02-013, and I.05-09-005

Enclosures

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

Application of Pacific Gas and Electric
Company and San Diego Gas & Electric
Company for Approval of Their Separate
Emerging Renewable Resource Programs.

(U 39-E)
(U 902-E)

Application 07-07-_____

**APPLICATION OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) AND
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF THEIR SEPARATE EMERGING
RENEWABLE RESOURCE PROGRAMS**

WILLIAM V. MANHEIM
EVELYN C. LEE
CHARLES R. MIDDLEKAUFF

Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-6971
Facsimile: (415) 973-5520
E-mail: CRMd@pge.com

Attorneys for

PACIFIC GAS AND ELECTRIC COMPANY on
behalf of Pacific Gas and Electric Company and San
Diego Gas & Electric Company

July 17, 2007

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I. INTRODUCTION

Pacific Gas and Electric Company (“PG&E”) and San Diego Gas & Electric Company (“SDG&E”) request that the California Public Utilities Commission (“Commission”) approve their proposed Emerging Renewable Resource Programs (“ERRP”) that are designed to bring the next generation of renewable resources into the California marketplace. The ERRP is intended to support emerging renewable energy technologies and resources at critical phases of development and to assist promising technologies and resources in overcoming the barrier between product introduction and viable commercial development. By investing in ERRP, utility customers will be able to accelerate renewable resource development and mitigate cost increases that occur due to product scarcity. The ERRP will benefit customers in the long-run by providing more and lower cost renewable resources, while facilitating state and Commission goals to expand renewable energy development in California.

Under the proposed ERRP, PG&E and SDG&E may expend up to \$30 million and \$15 million, respectively, on external costs over a two-year period to facilitate the

development of new renewable resources and technologies. The cost of approved ERRP projects would constitute indirect costs associated with the purchase of eligible renewable energy resources and would be recovered through PG&E's and SDG&E's Energy Resource Recovery Accounts ("ERRA"). PG&E and SDG&E each propose to establish an ERRP line item within their respective ERRA where each utility will record their actual expenditures. Recovering these expenses through the ERRA mechanism is appropriate as they will be used to support the utilities' electric procurement portfolio. Pursuant to Decision ("D.") 02-10-062 and D. 02-12-074, the purpose of the ERRA is to provide full recovery of the utilities' energy procurement costs associated with fuel and purchased power (including renewable resources), utility electric generation, ISO-related costs and costs associated with the residual net short procurement requirements. The ERRA is recovered through electric commodity rates charged to bundled-service customers.

In addition to the ERRP proposal included in this Application, PG&E and SDG&E are also proposing three specific ERRP projects – two of which are sponsored by PG&E and one by SDG&E. Rather than delay these projects while waiting for the ERRP proposal to be reviewed and approved by the Commission, PG&E and SDG&E are concurrently including these projects in this application. These projects are good examples of the types of projects the utilities intend to propose under ERRP, and highlight the benefits of the ERRP program for ensuring that promising new technologies overcome the barriers between product introduction and viable commercial development.

II. SUMMARY OF APPLICATION

A. Background

For more than four years, PG&E and SDG&E have been aggressively seeking eligible renewable energy supplies to fulfill California's Renewable Portfolio Standard ("RPS") policies. However, as more renewable energy supply is procured by the investor-owned utilities ("IOUs"), as well as municipal entities, energy service providers

(“ESPs”) and Community Choice Aggregators (“CCAs”), the available supply will likely decline if new renewable technologies and resources are not developed. In order to address the challenge of declining supply, the Commission must adopt a long-term strategy that promotes demand for renewable energy supplies, while simultaneously replenishing and expanding the pool of renewable resources. The ERRP proposal, which is intended to cultivate emerging renewable resources and technologies, is a key element of such a long-term strategy. PG&E and SDG&E will use the ERRP to help introduce and demonstrate promising new renewable resources and technologies in order to move the resources and technologies towards commercialization. More specifically, the ERRP will focus on three target areas of activity: (1) resource and technology identification and evaluation; (2) resource validation and commercialization support; and, (3) technology demonstration and commercialization support. PG&E and SDG&E believe that the ERRP, funded for two years with a budget of \$30 million for PG&E and \$15 million for SDG&E, will assist in maintaining the momentum of California’s RPS program.

To ensure that funds are well-spent, ERRP-funded projects will be selected based on a two-tiered screening and evaluation process described in detail in Appendix 1 to this Application. Projects will also be reviewed with PG&E’s and SDG&E’s respective Procurement Review Groups (“PRG”). Those projects that meet the project selection criteria and move through the project selection process will be submitted to the Commission for approval through a Tier 1 Advice Letter. Following Commission approval, actual ERRP project expenditures will be recorded and recovered in ERA. The ERRP proposal is both sufficiently streamlined to allow PG&E and SDG&E to respond to changing market conditions and new opportunities for renewable resource development, and sufficiently transparent to ensure that ERRP-funded projects are carefully reviewed by PG&E or SDG&E, non-market participants and the Commission to ensure that limited funds are being well used. The ERRP will provide long-term benefits

to customers by facilitating the introduction of the next generation of renewable resources and technologies to the California market.

B. Relief Sought

PG&E and SDG&E seek authorization to implement the ERRP and to recover the costs associated with their respective programs in rates. Appendix 1 describes the ERRP in terms of its objectives, methodology, governance, and regulatory oversight and explains how the cost of approved ERRP projects should be deemed to constitute indirect costs of energy procurement and recorded in the ERRA for recovery. In addition to the ERRP proposal, PG&E and SDG&E are also seeking approval of three specific ERRP-funded projects. Two of these projects are being sponsored by PG&E and would be included in PG&E's ERRP funding. One project is being sponsored by SDG&E and would be included in SDG&E's ERRP funding. The PG&E ERRP projects are described in Appendices 2 and 3 of this Application and the SDG&E ERRP project is described in Appendix 4.

In this Application, PG&E and SDG&E request the following specific relief:

1. PG&E and SDG&E should be authorized to establish the ERRP as a component of their respective renewable energy resource procurement programs.
2. The Commission should find that ERRP costs are an indirect cost of renewables procurement thus should be recovered in commodity rates.
3. The Commission should find that the expenditure of up to \$30 million for PG&E and \$15 million for SDG&E on the external ERRP costs over an initial two-year period is reasonable, provided that such costs have been incurred to implement an emerging renewable resource project that meets the ERRP eligibility criteria fully detailed in Appendix 1.
4. The Commission should approve the proposed up-front criteria for selecting and determining the reasonableness of ERRP project expenditures; those

expenditures should be recoverable so long as they were incurred in accordance with the ERRP project plan criteria approved by the Commission.

5. PG&E and SDG&E should be authorized to obtain ERRP project approval through the Tier 1 advice letter process thereby delegating authority to its staff to determine whether a proposed ERRP project meets the adopted up-front criteria for ERRP project acceptability and eligibility for rate recovery.
6. PG&E and SDG&E should be authorized to include approved ERRP project expenditures in their respective ERRA.
7. PG&E and SDG&E should be authorized to establish an Emerging Renewable Resources Coordinating Council (“ERRCC”) to best advance the principles of ERRP. The ERRCC would meet quarterly and as needed to facilitate information-sharing, coordination and potential cost-sharing of projects among its members in a manner similar to the Emerging Technologies Coordinating Council (“ETCC”), which facilitates the Energy Efficiency Emerging Technologies (“ET”) program. Its members would include representatives of the California Energy Commission (“CEC”), including the CEC’s Public Interest Energy Research (“PIER”) group, the Energy Division, The Utility Reform Network (“TURN”), and the Division of Ratepayer Associates (“DRA”).
8. PG&E should be authorized to recover costs related to the University of California-Merced (“UC Merced”) Solar Energy Testing Center project (*see* Appendix 2) and the WaveConnect project (*see* Appendix 3) through the ERRP program.
9. SDG&E should be authorized to recover costs related to the Wastewater Facility Biomethane Demonstration project (*see* Appendix 4) through the ERRP program.

C. Statutory and Other Authority for Relief Sought

A number of California statutes and Commission decisions support, and in fact encourage, the identification and development of promising new renewable resources and technologies, including Public Utilities Code Sections 399.15, 454, and 701 and Commission decisions D. 03-06-071, D. 04-07-029, and D. 06-07-039. These authorities are discussed in more detail below.

1. Statutory Authority

The Commission has the authority to approve ERRP under Public Utilities Code Section 701, which states that “the commission may supervise and regulate every public utility in the state and may do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction.” This plenary authority extends to authorizing PG&E and SDG&E to recover costs incurred in connection with efforts to obtain renewable electric power to fulfill the state’s RPS, Energy Action Plan II (“EAP II”) and California Global Warming Solutions Act of 2006 goals.

Section 399.15 directs the Commission to implement an RPS program, which requires each utility to increase its procurement from renewable energy resources each year until renewable power serves 20% of its electric sales. Section 399.15(d) specifically states that the indirect costs associated with the purchase of eligible renewable energy resources are recoverable in rates, as authorized by the Commission. PG&E and SDG&E are asking for authorization to encourage the development of additional renewable resources. The ERRP proposal is consistent with California’s and the Commission’s overall goal to promote and develop renewable energy. Moreover, the Commission has clear statutory authority to allow PG&E and SDG&E to recover indirect costs for renewable energy, such as those that would be incurred under the ERRP.

PG&E’s and SDG&E’s request for authorization to recover ERRP costs seeks a change that may result in increased rates. Among other things, Public Utilities Code

Section 454 describes a utility's obligation to notify its customers of proposed rate increases. PG&E gave notice of the potential rate increase due to the ERRP in PG&E's Long Term Procurement Plan in R. 06-12-013 and the forecast of costs resulting from ERRP were accounted for in the 2008 ERRA Forecast Application (A.07-06-006), which was filed on June 1, 2007. Even though PG&E now seeks approval of the ERRP by application, its recovery of costs will still occur through the ERRA, so the bill notice related to the June 1, 2007 ERRA Forecast Application satisfies the bill notice requirements of Section 454. SDG&E has provided customer notice in the manner required by statute and in a format approved by the Commission's Public Advisor.

Commission Rule 3.2 also requires that applications seeking to increase rates include an applicant's most recent balance sheets, income statements, and present electric rates and proposed electric rates. PG&E has met this requirement through its 2008 ERRA Forecast Application (A.07-06-006). SDG&E provides the required information in Appendix 5 of this Application.

2. Commission Decisions

This Application is also supported by the Commission decisions that establish rules for RPS compliance (D.03-06-071), adopt "least-cost best-fit" principles for renewable resource selection, and approve PG&E's and SDG&E's respective renewables procurement plans (D.04-07-029). PG&E's and SDG&E's ERRP proposal is intended to accelerate the development of new renewable energy resources that may be needed to sustain the actual delivery of renewable resources.

D.04-07-029 describes how renewable resources will be selected using least-cost/best-fit criteria. Even though it may be desirable to diversify the technological base of PG&E's and SDG&E's respective renewables portfolios, it is infeasible because the high costs of many technologies are prohibitive. These policies direct the utilities to take a pro-active role in facilitating the continual and robust development of the renewable energy technology sector. The ERRP will enable PG&E and SDG&E to gather useful

and reliable information that will inform subsequent decisions to support the development of potentially promising renewable energy resources. PG&E and SDG&E intend their investigation of emerging renewable technologies to reduce their costs and result in greater diversity of supply.

III. INFORMATION REQUIRED BY THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE

A. Legal Name Of Applicant And Related Information (Rule 2.1(a))

Pacific Gas and Electric Company is, and has been since October 10, 1905, an operating public utility corporation organized under the laws of the State of California. PG&E's principal place of business is 77 Beale Street, San Francisco, California 94105.

San Diego Gas & Electric Company is a public utility corporation organized and existing under the laws of the State of California, with its principal place of business at 8306 Century Park Court, San Diego, California, 92123.

B. Correspondence And Communications (Rule 2.1(b))

Correspondence and communications regarding this application should be addressed to the following:

Evelyn C. Lee
Charles R. Middlekauff
Law Department
Pacific Gas and Electric Company
P.O. Box 7442 (B30A)
San Francisco, CA 94120
Telephone: (415) 973-6971
Facsimile: (415) 973-5520
E-mail: CRMd@pge.com

Valerie Winn
Kate Beardsley
Energy Revenue Requirements
Pacific Gas and Electric Company
P.O. Box 770000 (B9A)
San Francisco, CA 94177
Telephone: (415) 973-3839
Facsimile: (415) 973-3574
E-mail: vjw3@pge.com; kebd@pge.com

Steven Patrick
Law Department
Sempra Energy
555 West 5th Street, GT14E7
Los Angeles, CA 90013
Telephone: (213) 244-2954
Facsimile: (213) 629-9620

Rasha Prince
Regulatory Affairs
San Diego Gas & Electric
555 West 5th Street, GT14D6
Los Angeles, CA 90013
Telephone: (213) 244-5141
Facsimile: (213) 244-4957

C. Category, *Ex Parte* Treatment, Issues and Proposed Schedule (Rule 2.1(c))

This Application seeks authorization for PG&E and SDG&E to spend up to \$30 million and \$15 million, respectively, to provide assistance to promising renewable resources at the product demonstration stage of development. PG&E and SDG&E propose that the Commission categorize this proceeding as “ratesetting” within its authority under Rule 7.1(e)(2).¹

1. The issues presented by this application are limited to the following:

- a. Will the ERRP serve customer interests by supporting promising eligible renewable resources and technologies with the goal of accelerating the availability of more renewable energy?
- b. Should PG&E and SDG&E be authorized to recover their respective external costs of an ERRP project if the project fits within the ERRP selection criteria?
- c. Should authority to approve ERRP projects be delegated to Commission staff so that ERRP projects are approved through the Tier 1 Advice Letter process?
- d. Should the ERRP be approved, with an initial project period of two years and initial budget of \$30 million and \$15 million for PG&E and SDG&E, respectively, subject to extension as requested through an advice letter?
- e. Should all approved ERRP project costs be recovered as reasonable indirect costs of renewable energy procurement, through each utility’s respective ERRRA?
- f. Should PG&E be authorized to recover its external costs related to the UC Merced Solar Energy Testing Center Project and the WaveConnect Project, described in Appendices 2 and 3, respectively?

¹ PG&E reflected the 2008 estimated costs of this program in its June 1, 2007 ERRRA forecast application. Because that application is separately noticed, PG&E is not required to provide a separate customer notice of a proposed rate increase with this filing. *See* Pub. Util. Code § 454(a).

- g. Should SDG&E be authorized to recover its external costs related to the Wastewater Facility Biomethane Demonstration Project described in Appendix 4?

Each of these questions should be answered in the affirmative for reasons presented in more detail in Appendices 1-4.

2. Evidentiary Hearings Are Not Necessary

There is no requirement for evidentiary hearing to support a decision of the Commission. The Commission commonly relies on pleadings and affidavits to provide the record for a decision.² In this case, PG&E and SDG&E have provided detailed information and facts in the Application and the Appendices, which are sufficient for the Commission to make a reasoned decision. Moreover, since many of the issues raised by this Application concern policies that have been recently developed by the Commission, such as the RPS program, there is no need for the Commission to receive duplicative or additional information, or to conduct hearings, before making a decision. The record necessary to resolve the foregoing issues can be compiled through affidavits and briefing; time-consuming evidentiary hearings are not needed.

3. Request for Expedited Schedule

California's ambitious RPS goals require resources in addition to those that have responded to the utility RPS solicitations. Based upon the results of solicitations, PG&E and SDG&E believe that new resources must be identified and developed as soon as possible to maintain California's growth of renewable generation. Under the timelines provided in the Commission's rules, approval of this Application would take up to 18 months or more. Given the public interest in increasing renewable generation, the need for new technological advancement and new resources, and the competition of other retail sellers, the Commission should consider this application on an *ex parte* basis according to the following expedited schedule:

² See e.g. D. 06-04-075, 2006 Cal.PUC LEXIS at *79-83 (hearing not required in ratesetting proceeding if "record is sufficient for Commission to make a reasoned decision.")

PG&E's and SDG&E's Proposed Expedited Schedule

Event/Deadline	Interval (in Rules)	Interval (Proposed)	Date
Application Filed			Filed July 17, 2007 Noticed July 18, 2007
Protest or Response	30	20-25 days	August 9, 2007
Reply by PG&E and SDG&E	10	7	August 16, 2007
Commissioner's Scoping Memo ¹	--	20	September 5, 2007
Pre-Hearing Conference/Workshop Discussion		20	September 25, 2007
Opening Briefs	--	15	October 10, 2007
Reply Briefs	--	5	October 15, 2007
Proposed Decision	30-90	36	November 20, 2007
Opening Comments on PD	20	20	December 10, 2007
Reply Comments on PD	5	5	December 15, 2007
Decision on Application			December 20, 2007

Notes:

¹ The Assigned Commissioner's Scoping Memo should provide for a staff-directed workshop where questions about the Application can be answered. Parties should be encouraged to issue their data requests sufficiently in advance of the workshop so that material questions about ERRP can be answered thoroughly at the workshop.

The deadline for resolving the proceeding is less than 18 months, as required by Rule 2.1(C).

D. Organization and Qualification to Transact Business (Rule 2.2)

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. PG&E's Restated Articles of Incorporation, effective April 12, 2004, were filed with the Secretary of State of the State of California on the same date. A certified copy of that filing was filed with the Commission on May 3, 2004 with PG&E's A.04-05-005. These articles are incorporated

herein by reference pursuant to Rule 2.2 of the Commission's Rules.

A certified copy of SDG&E's Restated Articles of Incorporation presently in effect and certified by the California Secretary of State was filed with the Commission on December 4, 1997, in connection with A.97-12-012, and is incorporated herein by reference.

E. Notice and Service of Application

PG&E and SDG&E will electronically serve copies of this Application on all parties to R.06-02-012, R.06-05-027, R.06-02-013, and I.05-09-006.

IV. REQUESTED RELIEF

Wherefore, PACIFIC GAS AND ELECTRIC COMPANY and SAN DIEGO GAS & ELECTRIC COMPANY respectfully request that the Commission issue an order providing that:

1. PG&E and SDG&E should be authorized to establish the ERRP as a component of their respective renewable energy resource procurement programs.
2. The Commission should find that ERRP costs are an indirect cost of renewables procurement and thus should be recovered in commodity rates.
3. The Commission should find that the expenditure of up to \$30 million for PG&E and \$15 million for SDG&E on the external ERRP costs over an initial two-year period is reasonable, provided that such costs have been incurred to implement an emerging renewable resource project that meets the ERRP eligibility criteria fully detailed in Appendix 1.
4. The Commission should approve the proposed up-front criteria for selecting and determining the reasonableness of ERRP project expenditures; those expenditures should be recoverable so long as they were incurred in accordance with the ERRP project plan criteria approved by the Commission.

5. PG&E and SDG&E should be authorized to obtain ERRP project approval through the Tier 1 advice letter process thereby delegating authority to Commission Staff to determine whether a proposed ERRP project meets the adopted up-front criteria for ERRP project acceptability and eligibility for rate recovery.
6. PG&E and SDG&E should be authorized to include approved ERRP project expenditures in their respective ERRA.
7. PG&E and SDG&E should be authorized to establish a ERRCC. The ERRCC will meet quarterly, and as needed, and facilitate information-sharing, coordination and potential cost-sharing of projects among its members in a manner similar to the ETCC, which facilitates the Energy Efficiency Emerging Technologies program. Each ERRCC would include representatives of the CEC, including the CEC's PIER group, the CPUC's Energy Division, TURN, and the DRA.
8. PG&E should be authorized to recover costs related to the UC-Merced Solar Energy Testing Center Project (*see* Appendix 2) and the WaveConnect Projects (*see* Appendix 3) through the ERRP program.
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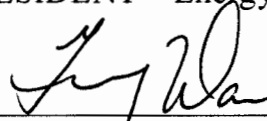
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Respectfully Submitted,

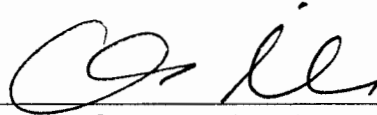
FONG WAN
VICE PRESIDENT – Energy Procurement

By: _____


FONG WAN

CHARLES R. MIDDLEKAUFF
EVELYN C. LEE

By: _____



CHARLES R. MIDDLEKAUFF

Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120
Telephone: (415) 973-6971
Facsimile: (415) 973-5520
E-mail: CRMd@pge.com

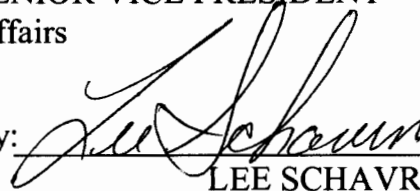
Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: July 17, 2007

Respectfully Submitted,

LEE SCHAVRIEN
SENIOR VICE PRESIDENT – Regulatory
Affairs

By: _____



LEE SCHAVRIEN

STEVE PATRICK

By: _____

STEVE PATRICK

San Diego Gas and Electric
555 West 5th Street, GT14E7
Los Angeles, CA 90013
Telephone: (213) 244-2954
Facsimile: (213) 629- 9620
E-mail: spatrack@sempra.com

Attorney for
SAN DIEGO GAS AND ELECTRIC
COMPANY

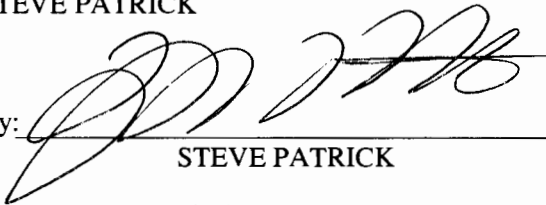
Dated: July 17, 2007

Respectfully Submitted,

LEE SCHAVRIEN
SENIOR VICE PRESIDENT – Regulatory
Affairs

By: _____
LEE SCHAVRIEN

STEVE PATRICK

By:  _____
STEVE PATRICK

San Diego Gas and Electric
555 West 5th Street, GT14E7
Los Angeles, CA 90013
Telephone: (213) 244-2954
Facsimile: (213) 629- 9620
E-mail: spatrack@sempra.com

Attorney for
SAN DIEGO GAS AND ELECTRIC
COMPANY

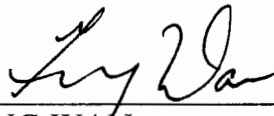
Dated: July 17, 2007

VERIFICATION

I, the undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for and on behalf of said corporation, and I make this verification for that reason; I have read the foregoing Application and am informed and believe that the matters contained therein are true and on that ground I allege that the matters stated herein are true. I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California, this 17th day of July, 2007.



FONG WAN

VICE PRESIDENT – Energy Procurement

VERIFICATION

I, the undersigned, say:

I am an officer of SAN DIEGO GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for and on behalf of said corporation, and I make this verification for that reason; I have read the foregoing Application and am informed and believe that the matters contained therein are true and on that ground I allege that the matters stated herein are true. I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Diego, California, this 17th day of July, 2007.



LEE SCHAVRIEN

SENIOR VICE PRESIDENT – Regulatory Affairs

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 18th day of July 2007, I caused to be served a true copy of:

**APPLICATION OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) AND
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR APPROVAL OF THEIR SEPARATE EMERGING
RENEWABLE RESOURCE PROGRAMS**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.06-05-027, R.06-02-012, R.06-02-013, and I.05-09-005 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for R.06-05-027, R.06-02-012, R.06-02-013, and I.05-09-005 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 18th day of July, 2007 at San Francisco, California.


STEPHANIE LOUIE

APPENDIX 1

**EMERGING RENEWABLE RESOURCE PROGRAM
DETAILED PROGRAM DESCRIPTION**

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EXECUTIVE SUMMARY

For more than four years, Pacific Gas and Electric Company (“PG&E”) and San Diego Gas & Electric Company (“SDG&E”) have been aggressively seeking eligible renewable energy supplies to fulfill California’s Renewable Portfolio Standard (“RPS”) policies. As more renewable energy is procured by PG&E and SDG&E, as well as other load-serving entities and publicly-owned utilities with similar requirements, the available supply will decline if the existing renewable technologies and resources are not augmented. This requires the adoption of a long-term strategy to meet California’s renewable energy and environmental goals, one that will simultaneously promote demand and replenish and expand the pool of renewable energy supply. To maintain the momentum of California’s successful RPS program, it is necessary to: (1) expand renewable energy supplies, which will ultimately lower the long-term cost of renewable energy; (2) accelerate the time to market of promising renewable technologies and resources; and (3) collect feedback about the availability of new technologies and resources.

In keeping with their pivotal role in stimulating and sustaining renewable energy generation in the state, PG&E and SDG&E propose to help develop emerging renewable resources and technologies through an Emerging Renewable Resource Program (“ERRP”). PG&E’s and SDG&E’s ERRPs are designed to help introduce and demonstrate promising new renewable resources and technologies to move the resources and technologies toward commercialization. More specifically, both ERRPs will focus on three target areas of activity: (1) resource and technology identification and evaluation; (2) resource validation and commercialization support; and (3) technology demonstration and commercialization support.

PG&E and SDG&E propose to fund their ERRPs for two years with a budget of \$30 million for the two-year period for PG&E and \$15 million for the same period for

SDG&E. PG&E and SDG&E will use their ERRPs to support the expansion of renewable energy generation and undertake specific projects such as the identification and evaluation of new, emerging resources and technologies, resource validation and commercialization support, and technology demonstration and commercialization support. Projects will be selected using a two-tiered screening and evaluation process that requires potential projects to be at a certain stage of technological development, compatible with RPS requirements, exhibit technical viability, and portfolio fit.

The proposed ERRP is an integral element of PG&E's and SDG&E's respective long-term renewables strategy and should provide long-term benefits to their customers by facilitating the introduction of the next generation of renewable resources and technologies to the California market.

I. PROGRAM DESCRIPTION

A. Program Overview

The ERRP will play a critical role in PG&E's and SDG&E's fulfillment of their respective RPS goals by:

- Expanding the existing renewable energy supply and potentially lowering the long-term cost of renewable energy;
- Accelerating the time to market of promising renewable technologies and resources; and
- Providing feedback about the availability of new renewable technologies and resources.

The ultimate goal of the ERRP is to support the commercialization of emerging technologies or resources and thereby facilitate the availability of additional cost-competitive and reliable renewable power to California over the long-term. PG&E and SDG&E will pursue innovative and promising pre-commercial technologies and resources that, otherwise, may take longer to reach the market or even fail to reach commercial availability. Through their respective ERRPs, PG&E and SDG&E will

target projects utilizing emerging resources or technologies that are in the early stages of development, which have not yet advanced sufficiently down the cost reduction curve and can benefit from inclusion in the program.

PG&E and SDG&E have already identified some promising emerging technologies and resources that warrant further investigation and possible support, including the three projects proposed in this Application in Appendices 2-4. However, without the ERRP, PG&E and SDG&E do not have a mechanism through which they can provide assistance to these projects. Commission approval of this Application will allow PG&E and SDG&E to be actively involved with the three proposed projects, as well as others that satisfy the ERRP criteria and are approved by the Commission.

Initially, the ERRP will be a 2-year program with a maximum program budget of \$30 million over the program period for PG&E and \$15 million over the same period for SDG&E. These funds will be used to pay for external costs related to the development and introduction of emerging renewable resources. PG&E and SDG&E do not seek to recover any incremental internal costs associated with ERRP-related activities.

To enhance coordination of ERRP activities, PG&E and SDG&E will establish an Emerging Renewable Resources Coordinating Council (“ERRCC”), consisting of representatives of PG&E, SDG&E, other California investor-owned utilities (“IOUs”) that elect to implement an ERRP, representatives of the California Energy Commission’s (“CEC”) Public Interest Energy Research (“PIER”), the Energy Division, The Utility Reform Network (“TURN”), and the Division of Ratepayer Advocates (“DRA”).

PG&E and SDG&E recognize the need for an open, objective process for the public review of projects supported by an innovative program such as the ERRP. Thus, the ERRP proposal includes up-front criteria for ERRP project selection, and projects selected for ERRP-funding will be reviewed with PG&E’s and SDG&E’s respective Procurement Review Groups (“PRG”) and submitted to the Commission for approval through the Tier 1 Advice Letter process. PG&E and SDG&E will also report semi-

annually on the achievements of their overall ERRP programs as requested by the Commission.

Over the long term, the ERRP is expected to facilitate PG&E's and SDG&E's procurement of additional renewable energy that will better enable them to meet California's renewable energy and environmental goals. Customers will ultimately benefit as more renewable technologies are developed, increasing overall renewable energy supplies and decreasing costs. Since the ERRP will not actually procure renewable electricity, but will indirectly enable the future delivery of renewable energy, ERRP costs should be found to constitute "indirect costs associated with the purchase of eligible renewable energy resources" and be recoverable in rates pursuant to Public Utilities Code Section 399.15(d). Like other approved energy procurement costs, ERRP expenses should be booked to the Energy Resource Recovery Accounts ("ERRA") for recovery. The ratemaking treatment proposed and described in further detail in Section II is for the initial 2-year phase of ERRP.

PG&E and SDG&E are initially proposing a two-year ERRP. At the end of that time, the utilities will review the success of the ERRP program and seek to extend it, if appropriate, through an advice letter process. PG&E and SDG&E will also propose changes to the ERRP after the initial two-year period based on lessons learned. These changes will be included in PG&E's and SDG&E's advice letter filing to renew the program.

1. Public And Private Information

PG&E and SDG&E propose to operate and administer their ERRPs in a transparent fashion to demonstrate accountability for the use of customer funds, while protecting confidential information regarding new technologies or resources. Information about the design and operation of the ERRP, ERRP-related solicitation documents, project selection criteria, and public notice of signed agreements or contracts

will be available as public information. Information deemed to be proprietary by project participants must be protected, however, to avoid discouraging participation in ERRP. Project participants may be harmed if their unique processes, operational hurdles, cost barriers, or other information is publicly revealed. The disclosure of this type of information may also diminish the value of utility expenditures on a project and overall participation in the ERRP. Thus, commercially sensitive information about emerging technology or resource projects will not be publicly available, but may be shared within the confidential parameters of PG&E's or SDG&E's respective PRG and confidential advice letter filings. PG&E and SDG&E intend to comply with all applicable Commission rules, decisions and orders on confidentiality when making advice letter filings or other filings under the ERRP.

2. ERRP Fits Within The Framework of Future Environmental Goals

The ERRP will provide useful information and opportunities for expanding renewable energy resources in California. Expanding renewable resources is consistent with state policy and Commission decisions on renewable energy, as well as recent state legislation such as Assembly Bill ("AB") 32, which calls for a reduction in greenhouse gases in California. Because many renewable resources have low to zero greenhouse gas emissions, expanding the type and number of available renewable resources will help California achieve both its renewable energy and climate change goals.

PG&E's and SDG&E's short-term renewable strategies are to meet their respective 20 percent renewable energy mandate through annual RPS solicitations and bilateral negotiations. However, as more resources come under contract, the lack of technological alternatives and proven resource areas means that deliveries in the post-2010 period will be increasingly expensive and may lack desirable least-cost/best-fit characteristics. For PG&E and SDG&E to procure cost-effective renewable resources to achieve broader environmental goals after 2010, they will need to examine new

technologies and resources through a program such as ERRP, and work with other companies to bring these technologies and resources to market.

B. Program Rationale

1. Compatibility with RPS and Broader Environmental Goals

The ERRP is an important vehicle for achieving the state’s renewable energy goals. This program provides a mechanism for the California utilities to better communicate with the market, informing developers of the types of technologies and resources the utilities would like to see in the future. It is also designed to expand the pool of new renewable resources and technologies that will enhance the implementation of RPS and broader environmental goals. The utilities have met with companies with promising technologies that are not mature enough for commercial deployment. ERRP would allow for some of these technologies to be demonstrated on a limited scale so that they may ultimately become commercially available. Finally, various studies conducted by third parties similarly demonstrate the need for programs such as the ERRP.¹ These studies highlight the early stage funding gap that leads to start-up failure and may prevent the deployment of new technologies. They suggest that California could improve the development and adoption of emerging renewable technologies by establishing programs like the ERRP.

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¹ See e.g., Burtis, Patrick R. and Bob Epstein, *Creating Cleantech Clusters, 2006 Update, How Innovation and Investment Can Promote Job Growth and a Healthy Environment*, Section 5.2, published by Cleantech Venture Network LLC, May 2006; Rosenfeld, Arthur; Jenkins, Nancy; and Robert Shelton, *Emerging Technologies Whitepaper*, published by the California Energy Commission, CEC-999-2005-002, February, 2005 (although this study pertains to energy efficiency, its findings are applicable to renewable resources); *Experience Curves for Energy Technology Policy*, published by the International Energy Agency, 2000 (this study relates to experience curves in renewable energy technologies, and the resulting price reductions achieved through a competitive market. The report cites the need to deploy “learning investments,” to bring new technologies into the market, accelerate their development, and ultimately lower costs).

2. Sources of Funding

The ERRP is intended as a complement to, and not substitute for, existing sources of funding for new renewable technology and resource development. Therefore, PG&E and SDG&E will seek out joint funding and partnership opportunities for ERRP projects, such as funding from the PIER program administered by the CEC and funding from the United States Department of Energy (“DOE”). However, where ERRP support is needed, its costs should be deemed to constitute indirect costs of renewable resource procurement that can be recovered by PG&E and SDG&E through their respective ERRAs. ERRP costs will not include utility personnel and their related costs, given that those costs are recovered elsewhere in utility rates. Instead, ERRP seeks to recover external costs incurred to facilitate the development of new renewable technologies and resources.

3. Benefits to Customers

By investing a relatively small amount today, PG&E and SDG&E customers can potentially reduce the cost of future renewable energy procurement. Customer benefits are primarily expected to accrue through three mechanisms: (1) an expansion of RPS-eligible technologies and resources at low prices; (2) a better informed RPS selection process; and (3) a market more informed to the needs of California utilities. While ERRP is primarily focused on achieving the first, ERRP activities will also likely yield the second and third benefits.

The ERRP will give promising emerging renewable technologies and resources an opportunity to demonstrate their commercial viability. Once commercial viability has been demonstrated, it is expected that more conventional and less costly sources of funding will become available. This will allow new renewable technologies to enter the market sooner and potentially at lower prices, which will lower costs for customers.

The implementation of the ERRP program is expected to provide the utilities with increased knowledge and information about both the current market for renewable

technologies and resources as well as increased information about what technologies and resources are expected to come online in the near future. With increased knowledge, each utility can conduct a more-informed selection process in its renewable RFOs. In turn, this should yield a better selection within the utility's least-cost/best-fit model and lower overall costs.

The outreach activities conducted by each utility that make up part of the ERRP program will allow the utility to inform the market of both current and anticipated needs. This active dissemination of information to the marketplace is expected to shape the market and allow renewable technology developers to better shape their offerings to fit the needs of the utilities.

4. Coordination With Other IOUs, Government Entities And Non-Market Participants

To assure coordination with government agencies involved in new renewable technologies and other non-market participants, PG&E and SDG&E will establish a coordinating council referred to as the Emerging Renewable Resource Coordinating Council or "ERRCC." Members of the ERRCC will include representatives of PG&E, SDG&E, other IOUs that elect to implement an ERRP, the PIER program of the CEC, the Energy Division, TURN, and DRA. PIER staff was very receptive to participating in the proposed ERRCC when this concept was shared with them. The ERRCC would meet quarterly, and as needed to, facilitate information-sharing and coordination among its members. This is similar to some of the functions of the Emerging Technologies Coordinating Council ("ETCC"), which is part of the energy efficiency Emerging Technologies ("ET") program.

C. Current Utility Demonstration Experience

1. Historical Utility Demonstration Programs in California

California utilities have previously supported energy development programs and currently support the development of energy efficiency. Some of the earliest

development programs were created in the 1970's following the oil embargo and natural gas shortages. The Energy Exploration and Development Adjustment ("EEDA") and the Gas Exploration and Development Adjustment ("GEDA") were created to secure additional supplies of energy, which would not otherwise be available to California, or to obtain needed supplies of energy at an earlier date than such supplies would otherwise become available or at an advantageous price.² The goals were analogous to the goals of ERRP. However, the execution of EEDA and GEDA were very different from the way that ERRP will be executed. EEDA and GEDA required that utility subsidiaries be formed to conduct all the activities of the programs. Once formed, the subsidiaries received minimal Commission oversight and it was almost ten years before the programs were terminated. In the interim, the gas industry was deregulated and the market took over, creating a "gas bubble" where there had been a shortage. EEDA and GEDA were terminated in 1984 and 1985, respectively. The ERRP is different from EEDA and GEDA in that it will be the subject of oversight through Tier 1 advice filings, semi-annual reports, PRG advisory involvement, and ERRCC coordination.

California utility investment in renewable energy development and demonstration during the "energy shortage" did result in long-term benefits. The results included an expansion of the Geysers Geothermal Resource Area to world-leading capacity levels, the demonstration of the Solar One and Solar Two solar power towers, the testing and demonstration of large-scale photovoltaics, the creation of the first Stirling solar generator, and the deployment of the Boeing Mod-2 large-scale wind turbine, among other achievements.

The California IOUs' renewable energy leadership started in the 1980s, and the impact of this pioneering work is still felt today. For example:

² Decision ("D.") 88121.

- Although the Geysers peaked at more than 2,000 MW when the last unit was added in 1989, it is still producing renewable power.
- The technology demonstrated in 1981 by Solar One and improved in 1996 by Solar Two is being used today by Solar Tres, under construction in Spain.
- The PV for Utility Scale Applications project created in 1989 to evaluate photovoltaic technologies and provide manufacturers with a test bed for their products is still in operation today at the 800-kW level.
- The Stirling solar technology that is key to contracts signed by SCE and SDG&E in 2005 was first tested by SCE from 1982 to 1988.
- The 2.5 MW Boeing Mod-2 wind generator tested from 1982 to 1986 was the first wind turbine with a 300-foot blade diameter, now considered the most economically-sized wind turbine in commercial windfarms.

While the utilities exited the renewables demonstration arena in the mid-1990s as the electric industry was restructuring, much of the technology developed with customer support in the 1980s and 1990s is productive today.

2. CPUC’s Energy Efficiency Emerging Technology Program in California

PG&E’s and SDG&E’s current ratepayer-funded energy efficiency Emerging Technology (“ET”) programs³ have goals that are conceptually similar to those of ERRP.⁴ As the next generation of energy efficient technologies and applications emerge,

³ The current definition of ‘energy efficiency emerging technologies’ is: “New energy efficiency technologies, systems, or practices that have been identified as having significant energy savings potential but have not yet achieved sufficient market share (for a variety of reasons) to be considered self sustaining or commercially viable. As a result, these technologies are included in emerging technology programs that attempt to remove barriers to their accelerated market penetration using public funds. These strategies include highly visible product demonstrations, beta tests of software with target user groups, or product tests designed to promulgate needed performance data or experience to target groups. Emerging technology programs strive to increase the visibility and credibility of these new technologies in the market place.”

⁴ The deployment of new and improved energy efficiency products and applications can help sustain or

they could face market hurdles that may either delay their introduction or consign them to failure. The ET program seeks to accelerate the introduction of innovative technologies that are not widely adopted in California. The ET program accelerates a product's market acceptance through a variety of approaches, but mainly by reducing the performance uncertainties associated with new products and applications.

However, the manner in and the point at which the ET program and ERRP would engage technology developers is different. The ET program focuses on analysis of promising, near-commercial or commercially available technologies which have not yet obtained adequate penetration or acceptance in the marketplace. ERRP would engage earlier in the product life cycle to assist in proving the efficacy of emerging generation technologies before they gain market acceptance.

Recent success stories from PG&E's ET program include Auto Demand Response and Bi-level Stairwell Dimming. Auto Demand Response is a web-based program that enables communication with a customer's building energy management system regarding demand response needs instead of requiring action by the building's facility manager. Representatives of the PIER and PG&E's ET program participated in research by the Lawrence Berkeley Laboratory in this area, which resulted in an Auto Demand Response pilot project in 2006 and program implementation in 2007. Bi-level Stairwell Dimming

increase current savings yields from program dollars, and serves to create a new generation of technologies available to tap the cost-effective potential of energy efficiency in ways we cannot predict today. In order to provide higher levels of bridging between available upstream innovations and the marketplace, annual funding for emerging technologies programs should increase. Program Administrators should work with the CEC and other appropriate stakeholders to include appropriate levels of funding to demonstrate and commercialize emerging technologies funded through the California PIER program and other sources that otherwise would not receive funding for pre-commercialization demonstration. In their program planning applications, the Program Administrators shall jointly propose emerging technologies programs and increases to current funding levels for these programs. The main purpose of these programs should be to increase the probability that promising technologies will be commercialized within 6 years of program funding and thereby increase the chance of obtaining additional energy savings from these technologies in the long run. Program strategies should focus on reducing both the performance uncertainties associated with new products and applications and the institutional barriers to introducing them into the market. *See D. 05-04-051.*

involves fixtures incorporating an occupancy sensor that dims stairwell lighting to a minimal level when no one is present (and provides full strength lighting when someone is present). This technology was initially explored by the New York State Energy Research and Development Authority (“NYSERDA”), was subsequently investigated by PIER which communicated information regarding the technology to PG&E’s ET program through the ETCC. PG&E’s ET program screened and assessed the technology using its ET program procedures, which resulted in the statewide adoption of Bi-level Stairwell Lighting as a presumed energy efficiency measure in 2006.

Recent accomplishments from SDG&E’s ET program include the successful demonstration of the wet cleaning system for dry cleaners which result in significant energy savings by eliminating the cooling system requirement of traditional solvent systems. SDG&E has demonstrated this new technology at two different sites and has generated interest among dry cleaners since the California Air Resources Board is requiring a complete phase out of solvent systems in dry cleaners by 2009. Another example is the successful demonstration of the Hybrid Solar Lighting System at the facilities engineering department of San Diego State University. This technology has great potential to reduce commercial building lighting energy use by as much as 30% using a solar concentrator and fiber optic cables. Further analysis of the technology is currently being done by the California Lighting Technology Center with funding from SDG&E, PG&E, SCE and SMUD.

SDG&E is involved in assessments and demonstration of a number of promising technologies the results of which will become available in the next 2-4 years. Technologies include state-of-the-art cooling technologies, latest lighting technologies, control technologies, space and water heating technologies and demand response technologies.

SDG&E and PG&E recognize that the utility companies are a pillar of support of accelerated introduction of new and emerging technologies into the market. In this effort

SDG&E and PG&E work closely with CEC’s PIER Program and other utilities in leveraging funding and resources. SDG&E and PG&E also support CEC PIER by agreeing to demonstrate many of the technologies developed by PIER. SDG&E is currently considering demonstration of the Integrated Classroom Lighting System, the bi-level vanity and walkway lighting system, day lighting controls, FDD systems, all developed through PIER and which have great energy efficiency potential.

SDG&E has also recently signed a memorandum of understanding with San Diego State University and the University of California San Diego to establish a Research and Educational Consortium in the area of emerging energy technologies. The consortium will explore cooperative and synergistic projects to include the areas of renewable energy technologies, distributed generation, storage, and transportation, among others.

3. Other Utility Demonstration Programs in the United States

California has some of the most aggressive renewable energy goals in the nation. As a result, there are very few other programs in place to serve as a reference point for ERRP. However, the NYSERDA has an active research, development and demonstration (“RD&D”) program in place. Some of its programs have similarities with ERRP.⁵ NYSERDA has funded some biomass and wind demonstration projects that may help California, but the characteristics of many of California’s resources, such as solar and wave, are very different from the same type of resource in New York

D. Gap Analysis

There are four distinct phases of product development:

- (1) Research and Development;
- (2) Product Introduction/Demonstration;

⁵ PON 1124, Clean Energy Business Growth & Development: “NYSERDA will partner with companies to reduce the financial and market risk of commercializing innovative technologies, supporting entrepreneurial enterprise and implementing new business models that will enable adoption and diffusion of clean energy technologies.”

- (3) Commercial Introduction; and
- (4) Mature Product.

In each of these phases, a company faces different challenges.

The primary aim of the ERRP is to provide assistance to promising emerging renewable energy opportunities at the Product Introduction/Demonstration phase (Phase 2) or at the bridge into Commercial Introduction (Phase 3), which is a critical time in which conditions must be satisfied to attract capital to make the technology viable on a commercial scale. Typically, operational feasibility must be successfully demonstrated for the product to obtain financing and other support necessary for the full-scale product development and marketing needed for Commercial Introduction. The ERRP will focus on providing resources to move companies, technologies, and resources from product introduction into the demonstration phase of product development or to transition from Research and Development (Phase 1) into Commercial Introduction (Phase 3). Although there are other programs currently available for renewable technologies, as described in more detail below, these programs do not address the need for companies to move from Phase 1 to Phase 3 in development. This gap is where the ERRP is critical.

1. Current RPS Program

The current RPS program and annual IOU solicitations are targeted at more mature technologies. Emerging renewable technologies are at a significant disadvantage. First, their higher cost of capital (driven by their unproven nature) leads to higher energy prices. Second, their unproven nature places them at a disadvantage when being selected against more proven technologies with substantial track records behind them. This is not to say that new and emerging technologies will not be selected. For some, the RPS program can be a viable vehicle. Companies that are emerging, but are relatively far along can and have been selected to receive Power Purchase Agreements (“PPAs”) and the utilities expect this to continue. The ERRP program simply provides an alternative

avenue to help bring new technologies forward. Whether an emerging technology best fits within the ERRP program or within a PPA structure will be decided on an individual basis. The decision will be driven by a combination of examining the project's needs and understanding the most cost-effective way to develop an emerging technology.

It is also important to note that the RPS program provides no mechanism for investigating new emerging renewable resources, a key component of the ERRP program. ERRP anticipates work on resource investigation that will be non-project specific. This will allow for the better understanding of new emerging resources and the ability to potentially utilize these new resources for future projects. There currently is no mechanism to do this type of work within the RPS program.

2. National Laboratories

The DOE has historically funded a number of renewable energy technology research programs in areas such as geothermal, solar, wind, and hydropower. These renewable energy programs are generally implemented by National Laboratories, of which the National Renewable Energy Laboratory ("NREL") plays a central role. NREL and the other National Laboratories focus on research and development within program areas. One of NREL's objectives is the transfer of technologies to renewable energy markets. A NREL Technology Transfer team works with private and public sector agencies to move NREL-developed technologies and expertise into products and businesses. The ERRP would work with and complement DOE efforts by partnering with businesses that may need assistance in demonstrating the commercial viability of NREL-developed products and services.

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3. Existing Funds Available in California

Existing funds available within California to support emerging renewable resources or technologies include the CEC's PIER Program and the California Clean Energy Fund ("CalCEF"). However, these programs have functions and goals that are distinct from ERRP.

The main purpose of the PIER program is research and development. Going forward, PIER funds will likely be stretched to cover new programs, including transportation and greenhouse gas ("GHG")-related projects. Its funding is limited and derived from the Public Goods Charge. PIER grants usually require matching funds. Thus, while PIER mainly concentrates on Research, Development and Demonstration ("RD&D"), the ERRP aims to provide assistance with the next phase of product development, the product introduction and demonstration stage. As discussed earlier, the proposed ERRCC could help coordinate PIER and ERRP efforts.

CalCEF, for which PG&E provided \$30 million in shareholder funding in 2004 as part of PG&E's bankruptcy settlement, is a non-profit entity that makes for-profit equity investments in emerging clean energy technology companies located in PG&E's service territory and elsewhere. CalCEF's investments are for developing technology or products that could benefit the region. Profits are reinvested in the Fund. As an equity investor, CalCEF focuses more on companies in earlier stages than intended for ERRP. However, PG&E and SDG&E would welcome CalCEF's input on potential projects.

4. Private Sector RD&D

Funding for RD&D typically exists in the private sector in two forms: venture capital and internal corporate RD&D. Generally, venture capital targets small private companies or start-ups. The funding is provided in the form of an equity investment at the parent (not project) level, with companies usually attracting venture capital as early as the concept development phase and receiving heavy investment as the technology is developed. Venture capitalists are willing to invest at the parent company level because,

while the risk of technology failure is high, the potential return if successful is also quite high. In fact, venture capitalists expect to receive many times their initial investment in order to compensate them for the high risk they assume.

Corporate RD&D is typically focused at the laboratory and prototype stage. The funding for a particular technology is derived from the overall corporate RD&D budget, and the challenge for many technologies developed in corporations is to “graduate” from R&D ownership to ownership and deployment by the commercial group of the company. This critical phase again gives rise to the concept of the chasm, where many promising technologies fail because they cannot cross over from the laboratory to commercial deployment.

At the project-level, funding usually takes the form of bank debt or various forms of project financing, which have a lower risk tolerance than venture capital. Given the technology risk associated with projects related to emerging technologies, more traditional forms of project finance may be unavailable or require significant risk premiums. Furthermore, high-risk/high-reward venture capital funding does not work as well at the project level, as there is less potential for high returns at the project-level, which must consider the cost of the power within a given market, although risks still remain if the project deals with an emerging technology. This makes finding funding for the first commercial or demonstration deployment extremely challenging.

Clearly, the existence of ongoing RD&D efforts does not mean that ERRP is redundant. In fact, ERRP can improve the success rate of RD&D by helping technologies cross the chasm. Establishing partnerships with prospective customers who participate in final demonstration and commercialization activities can significantly improve the likelihood of new technology success. This support can greatly enhance the ability of promising technologies to secure the financing necessary to complete final commercialization activities (such as cost reduction efforts) and the construction of initial projects.

5. Gap Analysis And Role of ERRP

The major challenges in the Research and Development phase (Phase 1) are basic research, concept origination, proof of the technology, the funding/manpower needed to conduct these activities, and the skill needed to overcome technical challenges. PG&E and SDG&E are currently not positioned to conduct basic R&D, but can contribute at this phase by advising companies about what resource characteristics might be preferred by the market or an IOU. Phase 1 is often better addressed by PIER or by venture capitalists with a more compatible risk profile. PG&E and SDG&E do not plan to participate in the R&D phase through the ERRP.

In the Product Introduction and Demonstration phase (Phase 2), the key challenges include financing and completing a demonstration of the commercial viability of the technology or product and obtaining a commercial contract with the first customer. That “first” customer must be willing to assume the risk of a new product and higher prices to prove the technology can work in the field, in exchange for potentially lower costs in the future. Phase 2 is where PG&E and SDG&E propose to focus their respective ERRPs.

As noted in the section above, Phase 2 is where many promising technologies and companies fail. Often, customers will not order a new product unless the technology has been proven in the field, but reliability cannot be demonstrated without the first customer. Among the ERRP activities, PG&E and SDG&E will work to develop resources and demonstrate technologies, which could include obtaining control of sites on which companies can test their technologies and which PG&E and SDG&E could eventually commercialize. This will allow PG&E and SDG&E to offer the prospect of being the first customer for pre-commercial technologies and resources while staying within the risk profile of the electric procurement process. Thus, the ERRP will help move technologies and resources from pre-commercial to commercial status, enabling them to cross the chasm, and replenish the future supply of renewable technologies and resources.

PG&E and SDG&E do not plan to use the ERRP for the two final stages of product development – Commercial Introduction and Mature Product (Phases 3 and 4). In the Commercial Introduction phase (Phase 3), the challenge is ramping up sales. In the Mature Product stage (Phase 4), the challenge is to maintain sales of a technology. PG&E’s and SDG&E’s renewable solicitations or Requests for Offers (“RFOs”) are primarily targeted at fully commercial companies, those that are ramping up sales or are offering mature products. Support from the ERRP is unnecessary once a technology has been commercially proven.

E. Proposed Strategy

1. Strategy Principles

PG&E’s and SDG&E’s key principles for the ERRP include:

- Focusing on emerging technologies and resources that are eligible for California’s RPS and consistent with Senate Bill (“SB”) 107;
- Overcoming barriers to emerging renewable resource commercialization to promote future supply;
- Structuring ERRP projects to address the needs specific to the targeted emerging technology and/or resource; and,
- Spending ERRP funds in accordance with the general RD&D guidelines listed at Public Utilities Code section 740.1.

2. Target Areas of Activity

As described above, the purpose of ERRP is to support emerging renewable resources and technologies in the Introduction and Demonstration phase of the product development cycle. More specifically, ERRP will target three areas of activities within the phase:

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a. Identification and Evaluation of Promising Renewable Resources and Technologies

The ERRP will identify and evaluate emerging renewable technologies and resources for potential support. PG&E and SDG&E have already identified some promising technology and resource areas, but with the approval of ERRP, will provide ongoing identification and evaluation effort. This will entail extensive market outreach to identify promising resources and analysis of how development of these resources on a commercial-scale could be encouraged and accelerated through the ERRP. This information will lead to the design and development of ERRP projects.

b. Resource Validation and Commercialization Support

As the need for renewable energy generation grows, new resources to which emerging renewable technologies can be applied will need to be identified, validated, and developed. This will most likely require looking beyond the geographic areas where well-established infrastructure currently exists. For example, undertaking the necessary site acquisition processes and conducting the needed feasibility studies and environmental studies represents a barrier to emerging technologies in need of a demonstration site. Through the ERRP, PG&E and SDG&E can assist in securing and/or studying potential resources in which emerging renewable technologies could be deployed.

The identification and validation of prime solar energy sites for the purpose of testing and demonstration of emerging solar technologies is an example of such a project. This activity could involve conducting solar radiation measurements on the site over the course of several months. While the cost of such a study may be prohibitive for an individual developer, the potential benefit of facilitating a new cluster of solar energy generation may justify the use of ERRP funding.

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c. Technology Demonstration and Commercialization Support

Beyond identifying, validating, and securing resources, the ERRP could help to demonstrate emerging technologies through various means of support. This could involve funding a demonstration project, purchasing equipment to be tested, or a range of other technology-oriented activities. For example, the ERRP could allow PG&E or SDG&E to purchase and operate prototype equipment, provide access to testing facilities, or provide other forms of technology demonstration assistance, which would vary based on the specific needs of each technology.

3. Forms of support in target areas of activity

PG&E and SDG&E are examining a number of mechanisms through which the ERRP can support projects. The ultimate choice will be made by evaluating the needs of each emerging technology or resource and structuring the support to best serve those needs and the best interests of customers. Some possible forms of support are suggested for each target area of activity.

a. Identification and Evaluation of Promising Renewable Resources and Technologies

Resource and Technology Analysis: Outreach and analysis to be performed on resources and/or emerging renewable technologies to identify those that may be considered through the ERRP. Furthermore, evaluating technologies and resources, given ERRP criteria (detailed further below), to guide ERRP project development.

b. Various Forms of Resource Development and Commercialization Support

Acquisition of Site Control: Identifying, validating, and securing a site to which emerging renewable technologies can be applied. This could include the leasing or purchase of a site and/or completing the necessary permitting and/or licensing procedures that will allow for technology demonstration and eventual commercialization of the site.

Project or Enterprise Funding: Providing some or all of the financial support to a resource development project, including equity investment, that could assist the demonstration of emerging renewable resources or technologies and that could be beneficial to customers.

Resource Validation: The study of a resource's potential or feasibility related to the deployment of emerging renewable technologies. This could factor into acquisition of site control activities, identifying or assisting in the development of a site potentially accessible, locating a demonstration project within a site, or assessing California resource attributes that will factor into technology selection or development.

Environmental Analysis: Conducting environmental analyses to understand the potential impact of the deployment of emerging renewable technologies, determine potential mitigants, and comply with processes related to site control for technology demonstration and eventual commercialization.

Equipment Purchase: Expensing equipment to be used in validating a resource, conducting environmental analyses, or other necessary feasibility or site control needs.

c. Various Types of Technology Demonstration and Commercialization Support

Project or Enterprise Funding: Providing some or all of the financial support to a technology demonstration project, including equity investment.

Equipment Purchase: Expensing equipment to be used in technology demonstration, which may include generation devices and testing equipment.

Technology Testing and Demonstration: These are activities needed to document the performance of an emerging renewable technology and may be technology-specific. In general, they could include the provision of access to testing facilities and resources for conducting studies, and the analysis of results.

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4. Project Benefits

While the structure and form of support of each ERRP project will be different, PG&E and SDG&E will work to secure each ERRP project's benefits for their customers. In many cases, the primary benefit of ERRP projects will be knowledge. However, to the extent possible, PG&E and SDG&E will attempt to position their customers to benefit from the ability to commercially develop successful sites used for emerging technology demonstrations.

5. Joint Funding or Partnership Arrangements.

PG&E and SDG&E plan to coordinate with the Commission and the CEC so the ERRP may complement PIER to the maximum extent possible, particularly to avoid any redundancy between PIER and ERRP. This should be accomplished through the establishment and operation of the ERRCC.

6. Project Selection

a. Potential Project Identification

PG&E and SDG&E will use various means of identifying potential ERRP projects, including solicitations, bilateral discussions and agreements, and other means related to resource development. PG&E and SDG&E will also expand their current outreach efforts with additional coverage at trade shows, conferences, working groups, and other programs. PG&E and SDG&E will use these venues to discuss customer and market needs in addition to identifying new and emerging renewable resources and technologies. PG&E and SDG&E will work further with the CEC, the California Clean Energy Fund, venture capitalists, and conduct additional literature reviews on promising technologies.

As appropriate, PG&E and SDG&E may also conduct Requests for Information ("RFI") or conduct an Emerging Renewable Resource RFO to generate additional leads and interest. Solicitations, which may or may not be technology-specific, will likely

follow the principles of other solicitations. Potential opportunities resulting from these outreach and market development efforts will be evaluated by screening metrics.

b. Resource/Technology Screening and Evaluation Metrics

ERRP opportunities would be evaluated by using the following two tiered approach:

Initial Screening Metrics:

- The opportunity must be an emerging technology or resource that: (a) has not been proven to be commercially viable; or (b) is not currently deployed on a significant commercial scale;
- The technology must have completed demonstrable initial research and development activities leading to near term or completed proof of the concept; and
- The opportunity must be compatible with California RPS guidelines or related to technologies that enable RPS technologies (*e.g.*, energy storage).

Detailed Evaluation Metrics:

If a technology or resource opportunity passes the initial screen, PG&E or SDG&E will conduct a more in-depth evaluation to determine its eligibility for development support and what support would be appropriate. This will often require the retention of external consultants who have expertise in key areas, such as specific technologies, financial markets, commercial transactions, site evaluation, or other development activities. While the ERRP is designed to help promising technologies to demonstrate their potential for commercial introduction, it generally shares a common purpose with utility RD&D programs, which is to increase the energy resources available to consumers. Accordingly, PG&E and SDG&E adopt the relevant statutory criteria for evaluating the effectiveness of customer-funded utility RD&D programs as guidance for

evaluating ERRP projects.⁶ Every project under consideration will be evaluated on the basis of each of the following factors; additional factors may be considered depending on the characteristics of a particular proposal:

- Project Terms and Economics: What are the potential costs and benefits to the customers of this project? Do terms and conditions with counterparties allow for satisfactory demonstration?
- Ability to Accelerate Time to Market: How will this demonstration project assist in refining the technology and accelerate bringing commercial technology to market, particularly in California?
- Technical Viability: How likely is the project to be able to meet commercial performance standards and be successfully developed and constructed?
- Potential for Future Cost Reductions: What is the potential for future cost reductions in this technology? How does this ERRP project facilitate future cost reductions?
- Addressable Market Size and Long-Term Resource Potential: How large a market can this technology address? How large is the potential resource (that would be RPS eligible) to which this technology can be applied?
- Portfolio Fit: How will this technology and resource fit within the broader portfolio of energy sources for the sponsoring IOU?
- Community Impact: Is the project likely to yield tangible demonstrable benefits to communities with a plurality of minority or low-income populations?
- Supplier Diversity: Does the project contribute to achievement of PG&E's supplier diversity policy, which requires that Women-, Minority- and

⁶ These guidelines include those listed at Public Utilities Code section 740.1.

Disabled Veteran-owned Business Enterprises (“WMDVBEs”) shall have the maximum practicable opportunity to participate in the performance of Agreements resulting from this solicitation? The good faith effort of participants to subcontract with WMDVBEs is a factor that will be considered in the bid evaluation process.

c. Project Development Plan

If a development opportunity passes the detailed evaluation, a specific development plan will be established. This plan would include project objectives, timing, and milestones. The IOUs have used their PRGs extensively for advice in determining which renewable resource projects best meet customers’ needs. It is expected that the PRGs will be equally valuable in advising PG&E and SDG&E on ERRP projects to be proposed to the Commission. Upon Commission approval of a project, PG&E and SDG&E will supervise their respective projects’ performance to ensure that the objectives and milestones of the project development plans are met.

7. Project Eligibility

PG&E and SDG&E intend to propose projects that will mature into commercially feasible renewable resources that are fully consistent with the requirements of California’s RPS program. However, due to the constant evolution of RPS eligibility requirements, projects may be proposed that may be on the cutting edge of resource eligibility, that enable RPS technologies (*e.g.*, energy storage) or for which eligibility criteria have not been finalized. For example, digester gas, or biogas from the decomposition of organic waste, was not identified in the original RPS statute as an eligible resource, but the March 2007 amendments to the CEC’s Eligibility Guidelines now specify the criteria by which electric generation using methane derived from biogas will qualify towards RPS requirements. If the eligibility of a proposed project is subject to interpretation, it will be discussed within the ERRCC and with the IOU’s respective PRG.

a. Project Location

Proposed projects will meet the project location criteria for eligible renewable energy resources provided by statute and the CEC’s Eligibility Guidelines.

b. Timing of Projects

Projects will be initiated within two years of the Commission’s approval of the ERRP application, but expenditures within the scope of approved projects may be made after the two-year period.

c. Size of Projects

Individual project costs may range from \$100,000 to \$7 million per project.

F. Evaluation

Each ERRP project will be regularly monitored by the sponsoring utility (*i.e.*, PG&E or SDG&E) for compliance with its scope of work, milestones, and deliverables specified in the project’s development plan. While some technologies or demonstration efforts will not achieve commercial operation, valuable lessons may still be learned. PG&E and SDG&E will report to the Commission as requested and communicate the progress of projects.

PG&E and SDG&E will also evaluate their own ERRP programs on a semi-annual basis according to the following general metrics of program effectiveness:

- Number of ERRP project applicants and selections for any solicitations conducted through the ERRP;
- Project outcomes (based on project-specific metrics contained in project development plans); and,
- Ability to obtain co-funding from or coordinate efforts with CEC PIER or other sources.

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G. Program Administration

1. Administration Rationale

PG&E and SDG&E are uniquely well-qualified to administer their individual programs. Because the purpose of the program is to fulfill their renewable portfolio needs, they should identify, select, and monitor projects to ensure the most cost-effective and best portfolio fit.

2. Program Administrator Functions

ERRP administrator functions include:

- Outreach and market development
- Initial screening (eligibility)
- In-depth screening and evaluation
- Selection and project planning
- Development and monitoring of projects
- Reporting and evaluation, as required
- Advice letter filings for project approval and associated cost recovery

3. Personnel Qualifications, Experience, and Resources

PG&E does not conduct research and development to address the viability and commercialization of renewable energy technology. For technical expertise in new energy technologies, PG&E relies on third-party experts and consultants. SDG&E has Technology Development staff that can assist in the viability and commercialization potential of renewable energy technologies, in conjunction with external resources. Both PG&E and SDG&E also have in-house development staffs that are capable of providing expertise and assistance in terms of project management and contract negotiations, along with coordinating project-related siting, permitting, engineering, and environmental work. As stated previously, the cost of these employees will not be included in any ERRP project budgets.

Currently, third-party consultants present a more practical alternative for renewable technologies than hiring regular employees. Renewable energy technologies are quite diverse in both their characteristics and in their stages of development. Commercialization efforts require highly specialized personnel, with detailed knowledge of the specific technology undergoing commercialization efforts. Therefore, PG&E and SDG&E anticipate engaging consultants that possess the appropriate skill sets for only for as long as the project requires. These third-party consultants would be overseen by the utility's own project development group, which is responsible for energy procurement-related and emerging technology development efforts, including project management, evaluation and assessment, and negotiation and contract structuring. In the longer term and as these projects develop, the utilities will determine the most cost effective way to manage the projects which may entail the hiring of regular employees if more cost effective than third party consultants.

4. Commission Oversight and Utility Accountability

The Commission will exercise project identification oversight over the ERRP process through the Energy Division's participation in the consultative and advisory roles played by the IOUs' respective PRGs and the ERRCC. The Commission will exercise direct authority over the ERRP through the process for approving the funding of each specific project. PG&E and SDG&E also offer to host a meeting of all interested stakeholders to discuss the ERRP process. Interested stakeholders may indicate the type of information they would like to receive via the workshop process.

Once the ERRP has been approved, PG&E and SDG&E anticipate that specific projects will be developed and submitted to the Commission for approval through the Tier 1 Advice Letter process. The purpose of submitting each individual ERRP project by advice letter is to demonstrate that the project meets the criteria for acceptability and

eligibility for rate recovery of a proposed ERRP project prior to the utility commitment to the project.⁷

The criteria for project selection under the ERRP are sufficiently comprehensive and objective that reviewing the utility's project selection can be delegated to the staff. The issues of project eligibility, project location, timing, funding, and compliance with initial metrics can all be resolved in a nondiscretionary manner with objective information. Likewise, in addition to adopting the ERRP, the Commission should delegate authority to its staff to determine each project's consistency with the adopted ERRP project eligibility criteria. This will avoid subsequent uncertainty over whether it is necessary for the Commission to exercise its discretion to permit utility expenditure of funds as little as \$100,000.

Advice Letter filings which the staff has been delegated authority to review and resolve are known as Tier 1 Advice Letters under the revisions promulgated by General Order 96-B. ERRP projects should be proposed by Tier 1 Advice Letters because this form of advice letter poses the least potential for unwarranted delay. Assuming that the staff concurs with the utility's proposal and no protest is made, Tier 1 Advice Letters become effective upon submittal pending disposition by Energy Division Staff. Several months' delay in ERRP project approval would be extremely burdensome during the course of product introduction and demonstration, and could substantially undermine the ERRP program, itself, which is proposed for only a 24-month period.

After Commission approval of the ERRP project, actual project expenditures will be recorded and recovered in the ERRA like any other energy resource receiving up-front approval. To ensure that PG&E and SDG&E do not exceed its ERRP funding limit, expenditures for approved projects will be reported in each utility's ERRP report.

⁷ The ERRP is an integral part of a long-term RPS implementation plan. As such, utility expenditures under the ERRP should be entitled to the same considerations as other electric renewable power procurement expenditures, particularly the recovery in rates if the procurement complies with upfront acceptance and eligibility criteria, provided by Pub. Util. Code section 454.5(b).

5. Role of PRG

PG&E and SDG&E will periodically consult with their respective PRGs about ERRP. Each utility would offer to brief its PRG on overall strategy for promoting renewables development, current ERRP projects, and proposed ERRP projects to solicit PRG advisory input. The discussion may include progress-to-date, issues encountered or anticipated, next steps, and current and projected expenditures.

H. Budget

1. Total Budget

The ERRP should be authorized as a two-year program with a maximum program budget of \$30 million and \$15 million for PG&E and SDG&E, respectively, for two years. The funding request is based on PG&E and SDG&E conducting an estimated three to six projects per year at a cost of \$100,000 to \$7 million per project. The budget will cover only non-utility costs, such as the cost of third-party or external costs associated with a project, including temporary external consultant costs as necessary. Administrative and internal costs would be funded through existing revenue requirements.

II. PROPOSED ERRP COST RECOVERY

A. Regulatory Process

PG&E and SDG&E will seek Commission approval of each ERRP project before undertaking project development. Project approval will be sought based upon the proposal's compliance with the two-tier screening and evaluation criteria proposed in this application and adopted when the ERRP is approved. Because the criteria are comprehensive and objective, and no other criteria are needed to evaluate a proposed project for consistency with the ERRP, the approval of ERRP projects does not require the exercise of discretion by the Commission. The Commission should expressly delegate the authority to approve ERRP projects to its staff.

Projects that meet the screening and evaluation metrics defined in the Project Selection section will be submitted to the Commission for approval via the Tier 1 advice letter process. The Tier 1 process provides for approval of advice letters by the staff, effective upon submittal, pending disposition by Energy Division staff.

Commission approval of an ERRP project finds that the project meets the upfront standards and criteria for acceptability and eligibility for rate recovery. Thus, when expenditures pursuant to the approved project are made, they are booked directly into the ERRA for recovery in rates. PG&E and SDG&E will provide semi-annual detailed reporting of the approved projects and expenditures to ensure that they do not exceed the authorized ERRP funding limit.

B. Ratemaking

PG&E and SDG&E propose to record actual ERRP expenditures over a two-year period, up to the requested \$30 million and \$15 million for PG&E and SDG&E, respectively, in the ERRA. Approval of the ERRP in and of itself will not trigger recording of expenditures; rather, once specific projects are approved and monies are expended on the activities set forth in the request for project approval, PG&E and SDG&E will record those amounts in the ERRA for recovery from customers on a dollar-for-dollar basis.

PG&E originally proposed a program to support emerging renewables in its December 11, 2006 Long Term Procurement Plan in R.06-02-013. As proposed in that filing, ERRP costs would be recovered through the ERRA. To appropriately reflect the costs of ERRP in the total ERRA revenue requirement, PG&E and SDG&E will forecast that they will spend one half of its respective ERRP budget in the 2008 ERRA forecast revenue requirement. To the extent PG&E or SDG&E actually spends less in that calendar year, any overcollection for ERRP will be reflected in amortization of the ERRA balancing account in 2009.

PG&E has reflected one-half of its ERRP request, or \$15 million, in its 2008 ERRA Forecast Application (A.07-06-006), which was filed on June 1, 2007. Should the ERRP be approved by Commission prior to January 1, 2008, PG&E proposes to record any costs incurred after the ERRP decision but before January 1, 2008 to the ERRA. Such amounts would count towards the \$30 million ERRP budget and, in the short-term, either reduce any ERRA overcollection or modestly increase any undercollection. SDG&E will request one-half of its ERRP request, or \$7.5 million, in its 2008 ERRA Forecast Application to be filed on October 1, 2007.

To implement this ratemaking, PG&E and SDG&E propose that a new line item be added to Electric Preliminary Statement Part CP – Energy Resource Recovery Account authorizing:

- (i) A debit or credit entry equal to actual ERRP expenses.

The addition of this line item to the ERRA Preliminary Statement will yield transparency in tracking ERRP actual expenditures against the budgeted amounts. In the event that any of the outputs from the ERRP-funded activities such as site-development work products, facilities or equipment are later used to support a commercial project owned by PG&E, SDG&E or a 3rd party, the owner of the project will be required to acquire the material at the higher of cost (or appropriate share thereof) or market value. The proceeds will be credited to the ERRA account.

APPENDIX 2

**UNIVERSITY OF CALIFORNIA-MERCED
EMERGING RENEWABLE RESOURCE PROGRAM PROPOSAL**

A. Introduction

Pacific Gas and Electric Company (“PG&E”) requests that the California Public Utilities Commission (“Commission”) approve PG&E’s proposal to collaborate with the University of California – Merced (“UC Merced”) to support the development of the California Solar Energy Testing Center (“Center”) as one of PG&E’s first Emerging Renewable Resource Program (“ERRP”) projects. PG&E is requesting this approval, concurrent with its request for approval of the ERRP, to expeditiously initiate projects and begin to provide assistance for the development of promising solar technologies and resources. In approving this proposal, PG&E also asks the Commission to authorize PG&E to expend up to \$2.0 million of the authorized ERRP budget to implement this project.

PG&E’s collaboration with UC Merced to support the Center is consistent with the ERRP objectives and goals in that it will help expand the existing renewable energy supply and potentially lower the long-term cost of renewable energy. The Center will accelerate the commercialization of promising solar technologies and resources, and provide necessary feedback about the availability of new solar technologies and resources. PG&E’s collaboration with UC Merced on this project is targeted primarily at the “Technology Demonstration and Commercialization Support,” “Area of Activity,” described in Appendix 1, Section I.E.2.c, by providing access to testing facilities.

PG&E’s support through the ERRP will provide a portion of the total funding necessary to launch and operate the Center over the first few years of its operation. PG&E’s ERRP funding proposal for this project is split into two phases to ensure that critical project milestones are met: Initial Launch Support (Phase 1) and Center Operations (Phase 2). With PG&E’s support, the Center will target activities related to emerging solar photovoltaic—primarily Concentrating Photovoltaic (“PV”) and Thin Film PV-- and thermal technologies. In return for its support, PG&E will receive solar testing services from the Center, written reports regarding solar system performance, reliability, and safety, written reports regarding industry trends, and expert consultation on solar technology.

Commission approval of this proposal will allow PG&E to support the development of a unique California solar testing facility that would work with

emerging solar technologies to ensure high performance, safety, and reliability with the ultimate goal of broader solar development, to the benefit of PG&E customers.

B. Background and Project Evaluation

As described in the ERRP Application, the ERRP is a mechanism through which PG&E can help support the commercialization of emerging renewable technologies and resources. The proposed collaboration between PG&E and UC Merced is intended to support the launch and initial operations of a solar testing center which will provide technology testing and technical assistance. The proposed ERRP project will be referred to as the “ERRP UC Merced Project.”

The ERRP UC Merced Project was evaluated using the Initial Screening Metrics¹ and determined to be a good candidate in that it is: (1) focused on solar technologies that are not yet currently deployed on a significant commercial scale; (2) focused on solar technologies which have completed initial research and development activities; and (3) targets solar energy which is compatible with California RPS guidelines. In particular, many of the Concentrating PV and Thin Film PV technologies that the ERRP UC Merced Project will target are showing promising results in the laboratory, but have not been demonstrated commercially. For example, there are a wide variety of Concentrating PV designs, each with a unique combination of concentration intensity, concentrator design (*e.g.*, lens, reflector), and tracking design, that would benefit from additional testing before being deployed commercially. Similarly, there are a wide variety of Thin Film PV technologies, each with its own materials (*e.g.*, amorphous, copper indium gallium selenide CIGS), manufacturing process (*e.g.*, sputtering, printing), and other design elements, that have shown promising results in the laboratory but have not been more widely tested under commercial conditions. The current need for testing solar technologies that have not been deployed on a significant commercial scale made the UC Merced Project a good candidate for the ERRP.

¹ See Appendix 1, Section I.E.6.b.

The UC Merced Project was also evaluated using the Detailed Evaluation Metrics² and determined to be a good ERRP candidate because it: (1) could accelerate the commercialization of new solar technologies; (2) targets technology with a large resource potential in California; (3) targets technologies that are technically viable and show promise of future cost reductions. More specifically, the ERRP UC Merced Project meets the detailed evaluation metrics in the following way:

- Project Terms and Economics: The potential customer costs and benefits of this project are described in detail in Sections C and D, below. Because this project involves a testing center, which will be capable of testing a wide variety of technologies, it allows its customers to test a wide variety of emerging solar technologies at a low cost. ERRP funding will help launch and sustain the Center for the first few years and will provide testing services to PG&E over the first five years. This timeframe is adequate to allow for substantial testing of emerging solar technologies.
- Ability to Accelerate Time to Market: As described in more detail in Section C, there is currently a bottleneck in solar testing services in the United States (“US”). The Center will reduce the bottleneck in accomplishing the testing that is needed prior to commercial deployment, speed up the testing of new technologies, and accelerate market entry of viable technologies.
- Technical Viability: The ERRP UC Merced Project will target Concentrating PV and Thin Film PV technologies which have shown promise in the laboratory, or which have a similar design to a

² *Id.*

technology that has shown promise in a laboratory, but have not yet had significant commercial deployment.

- Potential for Future Cost Reductions: The potential for cost reductions of Concentrating PV technology is its ability to concentrate the sun on less PV material. By doing so, manufacturers can use more expensive, higher efficiency cells and can reduce the space requirements of the installation, without reducing the amount of solar energy generated. The potential for cost reductions of Thin Film PV technology is its ability to reduce the manufacturing, materials, and installation costs of PV modules significantly. Since many of these technologies have not been commercially demonstrated, they are expensive to manufacture because they are manufactured on a very limited scale. They also are likely to carry an investment risk premium because investors will require higher returns where they perceive a higher risk of a product successfully reaching the marketplace. Successful testing of these technologies will lower risk and provide independent verification of performance. Once customers such as utilities and developers are more confident in system performance, they are more likely to execute contracts and develop projects using those technologies, therefore allowing expanded manufacturing.
- Addressable Market Size and Long-Term Resource Potential: The market size for solar energy is significant given California's RPS and environmental goals.
- Portfolio Fit: While solar is an intermittent renewable resource, its production is fairly well matched to California's load.

- Community Impact: The Project is expected to provide economic development benefits to this region.
- Supplier Diversity: UC Merced reflects the community in which it operates and has the highest fraction of minority student enrollment of any University of California campus. PG&E anticipates that many of its activities at the Center will incorporate PG&E's supplier diversity goals. For example, PG&E will consider supplier diversity when evaluating new technologies that will be tested at the center.

The examination of various solar energy technologies and their specific application in California is critical at this time because of the significant potential this resource holds for the future of renewable energy in California. If generating electric power from California's solar resources were to become increasingly economically and technically feasible, it could expand the future pool of renewable technologies available to the California market and mitigate the upward pressure on renewable energy prices.

Approval of the ERRP UC Merced Project will allow PG&E to explore the performance of various pre-commercial solar technologies that would otherwise be unavailable within the same timeframe and would provide PG&E with critical feedback about the commercial feasibility of larger-scale deployment.

C. Description of Project

With increased interest in renewable and solar energy, PG&E anticipates dramatic growth in the number of new solar energy technologies. However, commercial development of these new technologies depends on accurate measurements of performance, reliability, and durability. Many manufacturers, investors and equipment providers require independent and accredited performance tests before investing in a new technology or project. In California, a number of certifications and standards, such as United Laboratories ("UL") certification, must be met before a solar module can be sold, and other standards and tests are available to manufacturers but are not required. Positive testing results in increased confidence in the technology and thus reduces the cost of

financing because successful technology testing lowers the risk that the technology will not prove technologically feasible, while increasing the potential for successful commercial deployment.

There are few locations in the world that can assess and provide independent evaluations of the effectiveness of solar equipment systems. California does not have an accredited solar testing facility. The four available accredited solar testing centers in North America are facing a significant backlog for testing services.³ Businesses that require solar equipment testing have to wait up to one year to receive the testing results.⁴ These delays cause a bottleneck in solar supply and can drive up the price of solar equipment.

UC Merced combines many important characteristics to make it a good location to site the Center. It is a new campus with the flexibility to expand and accommodate the needs of the Center. UC Merced has a young and growing faculty that is eager to collaborate with the Center on many activities. In fact, UC Merced is the only UC campus that offers a dedicated solar research program, a site with superb solar radiation and ample, affordable space (including the reuse of the nearby, former Castle Air Force Base). This is important for long-term outdoor exposure tests and monitoring. The location will also allow for growth of the Center. Additionally, the cost of living in the San Joaquin Valley is very attractive compared to many other, especially coastal, regions in California. As a valuable resource for the growing renewable energy industry in California, the Center is expected to attract new businesses to the Merced region and enhance the economic development in this area.

³ There are several PV testing laboratories in operation worldwide for testing of PV modules and components. However, only a small number are accredited to ISO/IEC 17025. At this time, there is not an accredited PV test center located in California. The following test centers are accredited to ISO/IEC 17025 to perform module testing: Arizona State University Photovoltaic Testing Laboratory, Mesa, Arizona and Florida Solar Energy Center, Cocoa, Florida. In addition, the following solar test centers are accredited to ISO 9001. They are not accredited to ISO/IEC 17025 to perform PV module tests (however, some of those are accredited to ISO/IEC 17025 to perform PV component testing): National Renewable Energy Laboratory (NREL), Golden, Colorado and Sandia National Laboratories, Albuquerque, New Mexico.

⁴ The backlog was determined in primary and secondary research conducted by the UC Merced team, and consultants to the project. PG&E also validated the research with informal conversations with a few solar technology companies.

The Center will be operated as an accredited and independent solar energy testing laboratory. The Center's goal will be to become accredited, as soon as possible, by the American Association for Laboratory Accreditation ("A2LA") according to International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 to conduct PV testing. It is expected that this will happen by the end of 2009. The Center will provide safety, performance and reliability testing for crystalline silicon PV modules, thin-film PV modules, concentrating PV modules, and solar thermal collectors and systems. The Center will collaborate with the Solar Rating and Certification Corporation ("SRCC") to establish accredited solar thermal testing procedures. All these services will be offered at a fee to system manufacturers, solar energy businesses, utilities, and solar equipment users. In addition, the Center will evaluate the long-term performance degradation, seasonal performance variation, stability, reliability, and durability of PV and solar thermal modules and systems. The Center will monitor and record solar radiation (global and direct insolation) in a dense network of measurement stations throughout California. On request, the Center will conduct specific site evaluation using state-of-the-art monitoring equipment. This information will be collected and analyzed for its customers' and solar technology providers' use.

The Center will also evaluate providing the following additional services:

- Establish a public-private partnership to allow manufacturers to quickly test changes or modifications to existing solar products intended for cost reductions or higher performance or to evaluate new advanced technologies. This will reduce the potential for failures and obviate unnecessary capital investments.
- Provide engineering evaluation and prototyping services to solar system manufacturers and developers.
- Collaborate with standards organizations to advance testing standards for emerging concepts of solar energy technology and to develop quality codes for solar system applications.
- Develop guidelines for integration of solar energy systems into buildings, monitor energy consumption, and evaluate energy savings potential for building integrated solar solutions.

- Provide appropriate and unbiased information on solar technologies for businesses, governmental organizations, and the interested public.
- Engage in testing and monitoring collaborations with other leading test centers, both nationally and internationally.
- Perform, for interested customers, monitoring and performance evaluation services for existing solar installations in California.
- Provide a professional training component for a proposed curriculum to train solar installation technicians in collaboration with Merced College.

In summary, UC Merced plans to establish the California Solar Energy Test Center to accomplish the following objectives:

- Establish the first independent solar testing center in California serving the State through unbiased testing, evaluation, certification and information services.
- Reduce the cost of solar energy generation by supporting the development of more efficient and cost effective equipment and by reducing the financing risks for new technologies that has been proven to work.
- Substantially reduce the backlog that currently exists for testing solar equipment at accredited test facilities. This will reduce the delay in new and more efficient energy generation products entering the market.
- Support the California Solar Initiative (“CSI”). As the rebate level of the CSI will gradually decrease over time, the need for reliable, lower cost solar technologies will increase. Independent equipment testing and evaluation will help to improve the system efficiency and to reduce the system cost.
- Contribute to the implementation of the Renewable Portfolio Standard (“RPS”).
- Support the California Climate Action Initiative as the accelerated deployment of solar technology will reduce greenhouse gas emissions.
- Construct high-performance testing infrastructure in the San Joaquin Valley that will provide the foundation for new product development,

co-operation with local businesses, and the creation of new high-tech solar companies.

- Produce trained bachelors and masters degree students that will be available to fill solar energy positions and to start solar businesses of their own.

In return for PG&E's financial and technical assistance through the ERRP, UC Merced and the Center will provide PG&E's customers solar testing services, including priority rights to a limited number of solar tests, technology reports and analysis, industry reports and analysis, and expert consultation. PG&E's ERRP funding will be done in two phases to ensure that critical milestones are met and that the funding is limited to activities that support the purchase of testing equipment or the operational expenses associated with Center.

While PG&E will collaborate with UC Merced to support the Center, PG&E will also work directly with the solar industry to identify promising technologies. Once PG&E identifies promising technologies and technology providers, it can refer them to the Center for testing. While there are a number of types of arrangements that PG&E may pursue with technology providers, PG&E's goal will be create multiple benefits to PG&E customers, solar technology providers, and the Center.

D. Benefits of Projects

Solar technology is a promising technology for expanding renewables supply in California. However, as previously described, it is important that solar equipment be tested before being deployed at commercial scale. A California Solar Testing Center and the testing services it provides should accelerate the entrance of new technology into the market, and ultimately increase the supply of lower cost renewable energy over the long-term. The Center would provide a state-of-the-art testing facility that would be easy for California's solar industry to access and would provide needed solar testing capacity. PG&E would benefit by having a broader range of validated solar energy technologies from which it could choose to meet its renewable energy procurement needs. More specifically, PG&E customers will receive five primary benefits from the collaboration between PG&E and UC Merced:

- Credit for solar testing services, redeemable by PG&E once the Center is operational;
- Priority rights for a limited number of solar testing services, exercisable over the first 5 years of Center operations;
- Written reports regarding system performance, reliability, and safety;
- Written reports regarding industry trends; and,
- Expert consultation—as desired and appropriate—on solar technology.

By contributing ERRP funding, PG&E customers help provide essential start-up funding for the Center and, at the same time, are ensured that some of the funding is recovered in the form of future services. By being assigned priority rights, PG&E is guaranteed access to testing capacity should demand for testing services exceed the supply of those services. Finally, by receiving periodic reports from UC Merced and access to consultation from solar industry researchers, PG&E will have the best and most current solar information.

E. Scope of Work

PG&E’s portion of the ERRP UC Merced Project will cost up to \$2,000,000, paid over two years. The funding is divided into two phases: Initial Launch Support (Phase 1) and Ongoing Operations (Phase 2). In Phase 1, PG&E will contribute \$500,000 towards the initial Center launch. This funding will support acquisition of initial Concentrating PV, Thin Film PV, and solar thermal testing equipment and hiring of Center staff, including possibly a Center Director. A more detailed description of Phase 1 expenses is provided in the Preliminary Budget, Phase 1, Attachment A.

While there are many types of testing equipment, several critical items are expected to be acquired first because they will establish the framework for assessing the scope of desired testing activities, as well as what will be required to “scale-up” the Center’s operations and services. Essential components include those needed for development of a basic solar module testing subsystem, a basic solar module safety testing subsystem, a crystalline module performance and reliability testing subsystem, a thin film module performance and reliability testing

subsystem, a solar thermal qualification test subsystem, and a comprehensive prototype solar insolation unit with data acquisition system. A list of the types of solar testing equipment which may be acquired through this collaboration is included in Attachment B. Disbursements of funds for these activities is contingent on three primary milestones:

- UC Merced initiates outreach to key industry stakeholders and others to ensure industry concerns are adequately reflected in the foundational structure and function of the Center; and,
- UC Merced provides letters of support from key industry associations, including the Solar Electric Power Association (“SEPA”) and Solar Energy Industries Association (“SEIA”) as determined by PG&E;
- UC Merced responds in a timely manner to questions that are raised by the Commission, or any other party, as part of the Application approval process.
- PG&E and UC Merced execute an agreement setting forth terms of PG&E’s customer support of the Center

In Phase 2, PG&E will provide funding equal to the non-PG&E funding that UC Merced secures through written commitments, up to \$1,500,000. Phase 2 funding will support the hiring of additional staff and the acquisition of additional testing equipment. The total \$3,500,000 (\$2,000,000 from PG&E and \$1,500,000 in additional funding) is sufficient to support the Center’s capital and operations needs in the early years of the project.

PG&E’s total contribution of \$2,000,000 is approximately 20 percent of the estimated total funding required for the Center over the first 5 years and will support the acquisition of solar testing equipment and the initial operating budget. UC Merced has identified a number of other funding sources for the estimated additional \$8,000,000.

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The following is a proposed schedule for the ERRP UC Merced Project:

Year 1	<p style="text-align: center;"><u>Center Planning and Launch</u></p> <ul style="list-style-type: none"> • UC Merced continues discussions with stakeholders <ul style="list-style-type: none"> a. Industry Associations b. Solar companies c. California Energy Commission d. IOUs e. Solar experts • UC Merced refines scope of Center • UC Merced begins hiring staff • UC Merced continues fundraising • UC Merced forms and launches Center • Center begins purchasing testing equipment
Year 2	<p style="text-align: center;"><u>Center Ongoing Operations</u></p> <ul style="list-style-type: none"> • Center receives A2LA accreditation • Center conducts first test • Center purchases additional equipment

F. Procurement Review Group & CEC Review

PG&E provided its PRG with a report on the UC Merced Project on July 11, 2007 and has also discussed the project with the CEC.

G. Request for Commission Approval

PG&E respectfully requests the Commission to approve the ERRP UC Merced Project when it approves the Application by ordering the following:

1. PG&E shall proceed with the ERRP UC Merced Project as outlined in this proposal.
2. The costs incurred for the ERRP UC Merced Project constitute reasonable indirect costs associated with the purchase of eligible renewable energy resources, and PG&E shall recover up to \$2 million

for ERRP UC Merced Project expenses pursuant to Public Utilities Code section 399.15(d).

3. PG&E may record and recover up to \$2 million incurred to implement the ERRP UC Merced Project in its ERRRA.

Attachment A
Preliminary Budget
Phase 1 UC Merced California Solar Testing Center

UC Merced Estimated Expenditures
January 1 – June 30, 2008
California Solar Testing Center

1. Salaries (Director, Senior Solar Engineer, Administrative Support)	\$121,800
2. Equipment (including service contracts)	190,000
3. Renovations	75,000
4. Travel	4,000
5. Lease of Building Space	25,000
6. Other (including Information Technology (IT) services, promotional costs, recruitment, supplies)	40,900
7. F&A	<u>43,300</u>
	Estimated Total: \$500,000

Attachment B
List of Solar Testing Equipment and Function

1. Thin Film PV and Concentrating PV Testing

A. Indoor single flash sun simulator (3 meters (m) x 4 m)

Description: Allows performance characterization of PV modules indoors under controlled conditions independent of outdoor weather conditions. The sun simulator provides homogenous and temporal stable irradiance on a flat large area with the spectral distribution of the sun. Simulator should be capable of handling the largest anticipated Building Integrated Photovoltaics (BIPV) modules, approximately 3 m x 2 m.

B. Indoor flash sun simulator for concentrating PV

Description: Allows performance characterization of concentrating PV modules indoors under controlled conditions independent of outdoor weather conditions. The sun simulator provides highly collimated, uniform and temporal stable irradiance on a flat area with the spectral distribution of the sun. Irradiance: 1000 W/m². Extended size of the light source: $\pm 0.4^\circ$. Illumination area: 24 cm diameter at 310 suns. Class A uniformity ($\pm 2\%$).

C. Environmental chambers (at least 3m x 2m)

Description: For reliability testing by exposing modules to constant and fluctuating temperatures and humidity conditions (damp heat: 85°C, 85% RH; temperature cycling: -40°C to + 85°C; humidity freeze: -40°C to + 85°C, 85% RH). Chambers should be capable of handling the largest anticipated BIPV modules, approximately 3 m x 2 m.

D. IV curve tracer

Description: Accurately measures the voltage, current and power of PV modules.

E. Hail machine including hail speed meter

Description: Exposes the PV module to hail (25 mm diameter ice balls with speed of up to 50 m/s).

F. Spray machine

Description: To evaluate the electrical isolation properties of the PV modules under wet conditions.

G. Data acquisition and processing

Description: Output signals from various measurement instruments will be digitalized, amplified, recorded in data logger, and securely transmitted via internet to allow data analysis.

H. Weather station

Description: To monitor and record direct normal, diffuse, and global solar irradiance, ambient temperature, wind speed, humidity, air pressure, precipitation.

I. IR camera

Description: To determine thermal performance of PV cells and modules and to check cracked cells after temperature and HF cycling.

J. UV preconditioning chamber

Description: To expose PV modules to a prescribed dose of UV radiation before applying the thermal cycling, humidity-freeze and damp heat tests.

K. Power supplies for current injections

Description: Individual power supplies to inject current into modules that are undergoing TC 200 when temperature is above 0°C. Current injected is normally equal to I_{sc} of the module under test.

L. Mounting equipment for modules

Description: Vacuum cups and forklift with fork extensions to place modules into chambers.

M. Solar tracker (includes pole and installation)

Description: Dual axis sun tracker to position concentrating PV modules at normal incidence to the sun.

N. Spectrometer with integrating sphere

Description: For the quantitative and wavelength-dependent characterization of the optical properties (transmissivity, reflectivity, scattering) of the components of a concentrating PV module.

O. Other equipment for thin film PV testing

Description: Insulation resistance, voltage withstand, wet leakage resistance test equipment; digital multimeters, digital thermometers for use with thermocouples, constant current supply, impulse voltage generator, oscilloscope, test finger (type 11) according to figure 7 of IEC 61032.

P. Other equipment for concentrating PV testing

Test equipment that is specific for concentrating PV modules, *e.g.*, optical performance measurement, pointing accuracy of trackers, thermal performance of solar cells under high flux.

2. Solar Thermal Testing

A. Indoor continuous sun simulator (2m x 2m)

Description: Allows performance characterization of thermal collectors indoors under controlled conditions independent of outdoor weather conditions. The sun simulator provides homogenous and temporal stable irradiance on the collector area with the spectral distribution of the sun. Simulator should be capable of handling the typical collector size, approximately 2 m x 2 m.

B. Other equipment for solar thermal testing

Description: Test equipment that is needed for measuring the thermal and fluidodynamic performance of solar collectors, such as the collector efficiency and pressure drop (*e.g.*, circulation heater, circulation pump, flow meter, thermocouples, calorimeter, etc.).

3. Solar Radiation Monitoring

A. Monitoring station with PSP, NIP, anemometer, sun tracker

Description: Each monitoring station will include a dual-axis sun tracker, a Precision Spectral Pyranometer to measure global sun and sky radiation, a Normal Incidence Pyrheliometer to measure solar radiation at normal incidence, thermometers, anemometer, hygrometers and data recording and transmitting devices.

4. Machine shop

Description: Lathe, milling machine, grinder, drill press, rotating cutting saw, battery operated hand drills, drill bits, wrenches, hammers, hack saws, pliers, channel locks, vise grips, C-clamps, nuts, washers, long nose pliers, dikes, wire strippers, crimping tools, etc.

APPENDIX 3

**WAVECONNECT PROJECTS
EMERGING RENEWABLE RESOURCE PROGRAM PROPOSAL**

A. Introduction

Pacific Gas and Electric Company (“PG&E”) requests that the California Public Utilities Commission (“Commission”) approve the first stage of PG&E’s WaveConnect projects as one of PG&E’s first Emerging Renewable Resource Program (“ERRP”) projects. PG&E is requesting this approval, concurrent with its request for approval of the ERRP, to expeditiously initiate projects and begin to provide assistance for the development of promising wave-powered renewable technologies and resources. In approving this proposal, PG&E also asks the Commission to authorize PG&E to expend up to \$6.0 million of the authorized ERRP budget to implement this project.

PG&E’s WaveConnect projects comprise two distinct wave power projects situated off the coast of Northern California. The primary objective of the WaveConnect projects is to accelerate the development of wave energy in California as cost effectively as possible, specifically with the goal of increasing renewable energy supply available to PG&E customers. The hurdles facing wave power developers, including the wave energy conversion (“WEC”) device manufacturers themselves, may delay or prevent the large-scale commercialization of wave energy projects in California. Successful development of the WaveConnect projects could confirm the feasibility of extracting power from ocean waves in California, reduce early development hurdles, and lead to additional wave power project development.

PG&E’s WaveConnect projects will use WEC devices to transform the clean, renewable energy of ocean waves into electricity. A number of different device concepts are being pursued by independent device manufacturers, and there is no industry consensus at this time on the optimal or commercially viable energy conversion technology(ies). PG&E’s WaveConnect projects will provide infrastructure to deploy and evaluate a number of different WEC devices to identify the best technology solutions, consider environmental effects, and estimate development costs associated with that site. As technical, environmental, and economic considerations are understood and addressed, PG&E may then build-out each site to a grid-connected, installed capacity of up to 40 megawatts (“MW”), with the technology(ies) best suited for each California location.

PG&E’s WaveConnect projects target three ERRP activity areas: (1) Resource Development and Commercialization Support; (2) Technology Demonstration and Commercialization Support; and (3) Areas of Activity, as described in Appendix 1, Section I.E.2.b and 2.c.

It is envisioned that there will be three major stages of the WaveConnect projects:

- Stage 1 – Feasibility and Licensing
- Stage 2 – Demonstration
- Stage 3 – Commercial Deployment

At this time, PG&E seeks Commission approval of Stage 1 WaveConnect Project activities (“ERRP WaveConnect Project”) only and authorization to expend up to \$6 million of the ERRP-approved budget on those activities. The authorization to pursue Stage 1 activities will provide PG&E with the funding to investigate the feasibility of commercial scale development of this unique RPS-eligible renewable energy source and secure access to a resource that can be used for technology demonstration and eventual commercial development.

PG&E’s ERRP WaveConnect Project includes various types of “Forms of Support,” as described in Appendix 1, Section I.E.3.b. Specific information regarding the ERRP WaveConnect Project’s scope of work is detailed below.

B. Background and Project Evaluation

As described in the Application, the ERRP is a mechanism through which PG&E can help to demonstrate the commercial viability of emerging renewable technologies and resources. The ERRP WaveConnect Project is intended to facilitate the evaluation of the commercial feasibility of generating electric power from ocean waves at two sites off the coast of California and perform the tasks needed to obtain project development licenses for these sites (including environmental studies). Later stages in the WaveConnect projects will provide infrastructure to support the demonstration of wave energy conversion devices in California’s wave environment and ultimately build commercial wave power projects.

The ERRP WaveConnect Project was evaluated using ERRP’s Initial Screening Metrics¹ and determined to be a good candidate in that: (1) wave energy conversion is a heretofore untapped renewable resource with high potential for California; (2) the projects are focused on advancing emerging renewable technologies that are not yet currently deployed on a significant commercial scale; (3) the wave technologies most likely to be demonstrated have completed initial research and development activities; and, (4) wave energy is considered a clean, renewable energy that is compatible with California RPS guidelines.

The ERRP WaveConnect Project was also evaluated based on the Detailed Evaluation Metrics² and meets the detailed evaluation metrics in the following ways:

- Project Terms and Economics: The ERRP WaveConnect Project is the first step in developing and testing wave energy technology and facilitating the commercialization of this technology. Commercial development of wave energy technology will expand the renewable resources in California and provide a new supply of renewable power with California’s abundant coastline. Customers are expected to benefit from the potential for increased future supply of renewable energy and future cost reductions.
- Ability to Accelerate Time to Market: The ERRP WaveConnect Project will likely reduce the time to market for wave energy conversion in California by reducing some of the barriers to entry for WEC project developers, such as responsibility for permitting requirements and bearing the full cost for site development.
- Technical Viability: The ERRP WaveConnect Project harnesses an emerging renewable energy resource, wave energy, which has not yet been proven commercially viable, but which has had proof of concept of the technologies for energy extraction. There are currently a number of

¹ See Appendix 1, Section I.E.6.

² *Id.*

promising WEC technologies that require further demonstration before commercial deployment.

- Potential for Future Cost Reductions: The ERRP WaveConnect Project could prompt significant cost reductions as current state-of-the-art technologies and their application to California wave resources are refined to move down the cost curve through the achievement of learning and scale.
- Addressable Market Size and Long-Term Resource Potential: The ERRP WaveConnect Project investigates a large potential resource in California and the western region of the United States, which allows for the possibility of increased future renewable energy supplies. The examination of various WEC technologies and their specific application in California is critical at this time because of the immense potential wave resources hold for the future of renewable energy in California. If generating electric power from California's wave resources were to become commercially viable, it could significantly expand the pool of renewable technologies available to the California market. The Electric Power Research Institute ("EPRI") recently estimated that there is approximately 5,500 MW³ of wave energy capacity that could be converted into useful electricity off of California's coastline.
- Portfolio Fit: While wave energy is an intermittent renewable resource, it is less intermittent and more predictable than some other renewable energy sources, such as wind energy.
- Community Impact: The two sites for which PG&E has already applied for Federal Energy Regulatory Commission ("FERC") preliminary permits are in Humboldt and Mendocino counties, where there are significant low-income communities. The ERRP WaveConnect Project

³ "California Wave Power Demonstration Project: Bridging the Gap Between the Completed Phase 1 Project Definition Study and the next Phase – Phase 2 Detailed Design and Permitting" EPRI, 2007

is expected to have a positive community impact, if it proves feasible and eventually results in commercial wave farms in the areas.

- Supplier Diversity: PG&E anticipates that the specific activities of the ERRP WaveConnect Project will take into account PG&E's supplier diversity goals. For example, PG&E will consider supplier diversity when evaluating proposals from consultants, developers and manufacturers.

In short, the ERRP WaveConnect Project, which will facilitate the commercialization of wave energy conversion, is an excellent fit with the criteria and will fulfill the objectives of the ERRP.

The feasibility studies to be conducted at the two sites during the Stage 1 of the ERRP WaveConnect Project will begin to identify some of the operating parameters for achieving commercial viability and will add to the knowledge base for developing wave energy as a renewable resource. Commission approval of this project will allow PG&E to explore the application of various emerging WEC technologies to California's wave resources that would otherwise not occur within the same timeframe and provide critical feedback about the commercial feasibility of larger-scale deployment.

C. Description of the WaveConnect Projects

It is envisioned that there will be three major stages of the WaveConnect projects. PG&E is requesting that the Commission approve the use of ERRP funds for Stage 1 at this time. All three stages are described below.

Stage 1 –Feasibility and Licensing (within scope of this ERRP proposal)

This stage includes all of the feasibility and licensing work that will be required if FERC issues an order granting PG&E preliminary permits for two waves sites off the California coast. PG&E is hopeful that FERC will issue the preliminary permits in 2007. Under current FERC regulations, a preliminary permit gives the holder a priority right to apply for a development license with FERC if the license application is submitted within the three-year term of the permit. Stage 1 of the ERRP WaveConnect Projects is expected to be

approximately five years in duration comprising the three year preliminary permit period, followed by a period (expected to be approximately two years) of responding to additional data requests related to the FERC license application. FERC is currently reviewing the licensing process for ocean power technologies and it is possible the time to obtain a license could be reduced. PG&E will pursue discussions and activities to reduce the time required for receiving a license grant from FERC.

If the projects prove feasible during this time, all of the work required to successfully file the project development license applications with FERC will be completed, including detailed feasibility analyses and permitting studies. It is possible that a limited number of wave energy devices may be deployed for testing purposes during Stage 1 to provide information in support of the licensing activities. Activities during the preliminary permit period (years 1 to 3) will vary based on the requirements put forth by relevant agencies, as part of the development license application process, but it is expected that extensive environmental studies will be included. The cost of activities starting from the filing of the project development license application until the grant of the license (years 4 to 5) will be determined during the preliminary permit period.

PG&E is requesting a total of \$6 million in ERRP funds, which it currently estimates will cover the costs associated with years 1 to 3 and possibly years 4 to 5 of Stage 1. Recovery for costs in excess of \$6 million, if any, would be requested through subsequent ERRP advice filings, or through a subsequent ERRP application if beyond the initial program term. In addition, costs associated with the deployment of WEC devices for testing purposes during Stage 1 would be funded from the \$6 million currently being requested, to the extent possible.

PG&E also plans to seek California Energy Commission (“CEC”) Public Interest Energy Research (“PIER”) funding for a subset of the activities in Stage 1 (expected to be primarily environmental studies), which, if awarded, would reduce the amounts being requested from the ERRP budget by the amount awarded by CEC PIER.

Stage 2 – Demonstration (not within scope of this ERRP proposal)

Assuming FERC grants the development licenses, PG&E or its designated third party will deploy infrastructure, including a junction box and subsea/land cable to bring power to shore and deliver it to PG&E's grid (see Attachment A: WaveConnect Project Illustrative Diagram). At this time, the initial WEC devices will be deployed in demonstration quantities (estimated up to 5 MW at each site). The duration of this stage is expected to be approximately 2 to 4 years for deployment, testing, and demonstration. Stage 2 would build upon knowledge gained through the deployment of any WEC devices for testing purposes in Stage 1. The costs of deploying generation assets in this stage are expected to be recovered through a separate application(s) filed at the Commission or through subsequent ERRP advice filings.

Stage 3 – Commercial Deployment (not within scope of this ERRP proposal)

During this stage, the most promising WEC devices will continue to be deployed in larger quantities up to 40 MW at each site, which would be grid-connected.

D. Benefits of the WaveConnect Projects

The major hurdles to developing wave power projects in California include the uncertainty in the activities and timeframes associated with permitting and the technology risk of initial deployments. These hurdles ultimately impose increased costs on potential wave power project developers. Lack of a clear permitting path and associated uncertainty may affect the availability of capital or increase the risk and cost of capital for financing the projects. Furthermore, as each wave power project has to undertake the same studies during the permitting process as another, and since no entity has yet permitted a wave power project in California, there is the potential for redundant work and redundant costs being borne by the early project developers. Given the newness of the wave power market in the US, and the limited number of qualified wave power project developers, WEC device manufacturers face the challenging prospect of not only having to support their own product development but also to bear the cost of permitting projects in an unknown environment. Thus, WEC device manufacturers, on their own, will face

significant challenges in bringing wave power to fruition in California in the near term without assistance.

PG&E is in a unique position to help the wave energy industry move forward in California by taking on the role of the lead developer on its WaveConnect projects. PG&E, as the lead developer, will encourage the participation of various WEC technologies and would carry the burden of permitting both WaveConnect projects while facilitating an acceleration down the learning and cost curves for multiple promising WEC technologies. By selecting the most promising WEC device manufacturers to deploy their devices on a common, permitted infrastructure, PG&E can distribute the overall permitting costs among those various manufacturers, potentially reducing their barriers to entry and providing a platform for demonstration of commercial, post-research and development (R&D) viability.

By attracting multiple WEC device manufacturers to participate in the WaveConnect projects, PG&E would be instrumental in launching California's wave energy industry and establishing a productive new renewable resource for the benefit of PG&E's customers.

E. ERRP WaveConnect Project Activities Scope of Work

PG&E estimates that third-party ERRP WaveConnect Project activities will cost approximately \$6 million and it requests authorization to spend up to this amount for third-party costs, such as:

- Fees paid to external engineering and technical consultants for feasibility studies, including the evaluation of wave resources and WEC technologies, and analysis of the overall technical viability of the projects;
- Fees paid to external consultants and legal service providers to perform assessments of regulatory and environmental requirements and to complete the permitting and licensing needed to advance the project;
- Fees paid to external consultants and other service providers to conduct studies of the environment and other factors;
- Fees paid to external consultants for economic and financial feasibility studies;

- Fees paid to external parties for design and planning related to the deployment of wave energy conversion devices for demonstration purposes; and
- Potentially, costs associated with the deployment of a limited number of WEC devices for testing purposes in Stage 1.

The following is a proposed schedule for the PG&E’s WaveConnect Projects:

Year 1	<p style="text-align: center;"><u>Initial Assessment</u></p> <ul style="list-style-type: none"> • Begin discussions with stakeholders • Begin competitive selection of third-party service providers • Begin wave resource studies • Perform initial siting analysis including bathymetry studies and identification of other constraints • Identify preliminary short list of deployment sites within permitted area • Identify early environmental studies and begin preliminary work on those <p style="text-align: center;"><u>Detailed Assessment (subsequent)</u></p> <ul style="list-style-type: none"> • Continue detailed discussions with stakeholders • Conduct detailed resource analysis • Identify and quantify site constraints • Develop construction and interconnection strategy for potential sites • Begin WEC device evaluation • Continue and expand environmental studies • Develop energy yield analysis • Develop initial financial models • Compile information for and file NOI/PAD
Years 2-3	<p style="text-align: center;"><u>License Application Development</u></p> <ul style="list-style-type: none"> • Continue discussions with stakeholders • Finalize technology selection and designs • Perform technology testing • Possibly install limited number of test devices to support licensing activities • Continue environmental and other studies needed for license application • File license application

Years 4-5	<ul style="list-style-type: none"> • Continue environmental and other studies to support license application • Assume FERC development license grant
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F. Procurement Review Group and CEC Review

PG&E provided its Procurement Review Group (“PRG”) with a report on the various wave energy electric generation technologies and the potential WaveConnect projects on September 25, 2006. PG&E provided an update to its PRG on March 30, 2007. Most recently, PG&E discussed the ERRP and the WaveConnect Projects with the PRG on July 11, 2007. PG&E has also discussed the WaveConnect Projects with the CEC.

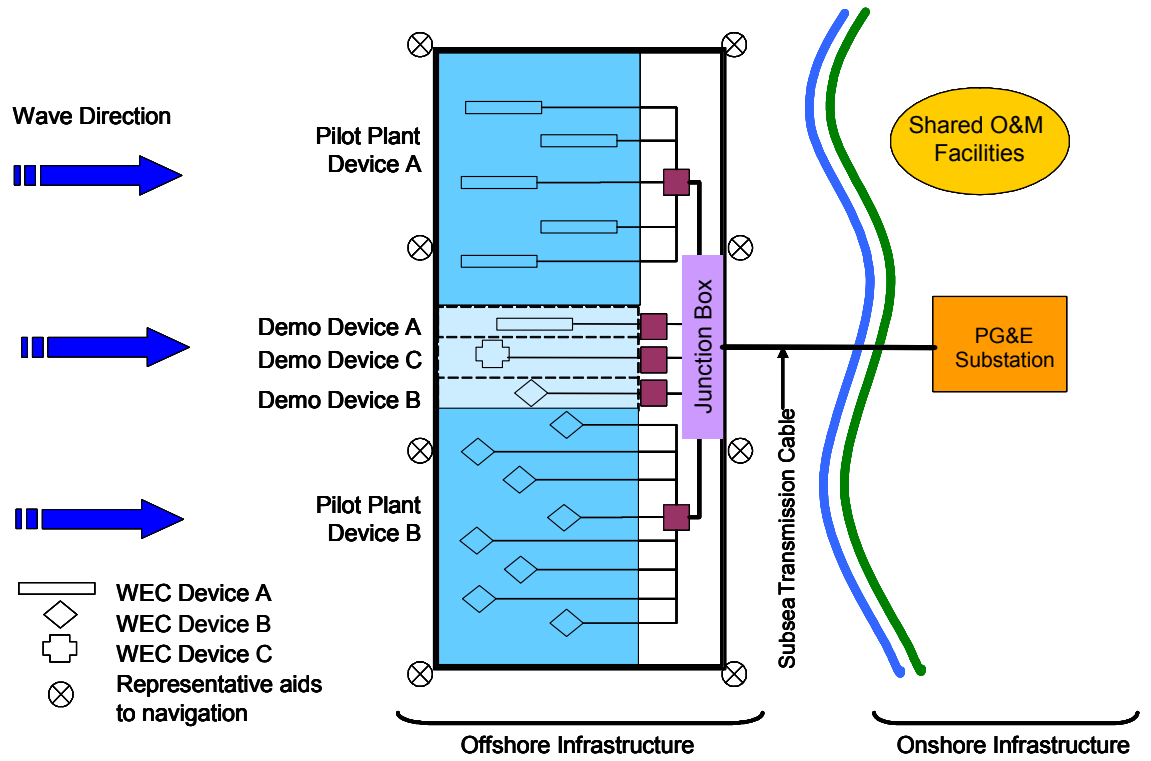
G. Request for Commission Approval

PG&E respectfully request the Commission to approve the ERRP WaveConnect Project when it approves the ERRP by ordering the following:

1. PG&E shall proceed with the ERRP WaveConnect Project as outlined in this proposal.
2. The costs incurred for third-party studies described in ERRP WaveConnect Project constitute reasonable indirect costs associated with the purchase of eligible renewable energy resources, and PG&E shall recover up to \$6 million of third-party project expenses pursuant to Public Utilities Code section 399.15(d).
3. PG&E may record and recover up to \$6 million of third party costs incurred to implement ERRP WaveConnect Project in its ERRA.

Attachment A

WaveConnect Project Illustrative Diagram



APPENDIX 4

**WASTEWATER FACILITY BIOMETHANE DEMONSTRATION
PROJECT**

EMERGING RENEWABLE RESOURCE PROGRAM PROPOSAL

SAN DIEGO GAS & ELECTRIC

A. Introduction

San Diego Gas & Electric Company (“SDG&E”) requests that the California Public Utilities Commission (Commission) approve SDG&E’s proposal to work with one or more public wastewater agencies located in SDG&E’s service territory to develop a demonstration wastewater biogas treatment project to support the development of pipeline quality renewable biomethane. SDG&E requests this approval, concurrent with its request for approval of the ERRP, in order to expeditiously initiate a project and begin to provide assistance for the development of promising emerging renewable technologies and resources.

Over the past six months, SDG&E has been in discussion with a local public wastewater agency regarding the need to develop, demonstrate and pilot larger scale projects that emphasize emerging technologies in the renewable biomethane domain. During this time SDG&E has also been in consultation with local and Swedish process and technology consultants to evaluate feasibility of biomethane production processes. Based on initial feedback from experts, SDG&E believes that significant development and commercialization is possible through these demonstration projects. Such work will help to reduce technology risk perception and help in developing momentum to create scale economies for a sustainable biomethane industry. SDG&E is interested in assisting the development of diverse RPS-eligible generation, and with this proposed project, SDG&E will advance Governor Schwarzenegger’s Executive Order S-06-06 and resulting BioEnergy Action Plan for California by maximizing “the contributions of bioenergy toward achieving the state’s petroleum reduction, climate change, renewable energy, and environmental goals.” as well as facilitating “market entry for new applications of bioenergy including electricity, biogas, and biofuels.” This type of demonstration project also supports the MOU between State of California and Government of Sweden to encourage mutual research and development around biofuels.

SDG&E proposes to provide, through ERRP, up to \$4 million to design, test and commission biogas cleaning equipment at one or more installations in order to produce pipeline quality biomethane that will interconnect to the SDG&E

gas delivery system. The project development and implementation activity is estimated to take approximately 18-24 months upon completion of the permitting and approval process. Although SDG&E is currently in discussion with a water agency in San Diego County, the project scope and economics are transferable to any other potential facility or facilities of similar size and configuration. Approval for this project at this juncture will allow SDG&E to dedicate resources to fast track project development activities and negotiate the best terms while still having a clearly defined project and objectives.

B. Background

As described in the ERRP Application, the ERRP is a mechanism through which SDG&E can help to demonstrate the commercial viability of emerging renewable technologies and resources. The Wastewater Facility Biomethane Demonstration Project is intended to:

- Demonstrate the economic and technical feasibility of capturing and transporting waste water based biomethane
- Address gas quality concerns and further the development of quality control standards for waste water based renewable biomethane
- Advance process optimization for biodigestion and gas cleaning

The Wastewater Facility Biomethane Demonstration Project was evaluated using the Initial Screening Metrics and determined to be a good candidate for the ERRP in that: (1) it is not currently deployed in CA on a significant commercial scale; (2) the project is focused on applying an advanced stage technology to the relatively untapped biomethane resource of wastewater; and (3) biogas injected into the natural gas transmission and distribution system for use in a combined cycle power plants in WECC is deemed RPS compliant by the California Energy Commission.

The Wastewater Facility Biomethane Demonstration Project was also evaluated based on the detailed evaluation metrics and determined to be a good ERRP candidate because it:

- **Ability to Accelerate Time to Market:** It potentially reduces the acceptance of this technology with other wastewater facilities in CA through a viable demonstration. This is a particularly attractive target market for ERRP funding given California's emphasis on bioenergy, the BioEnergy Action Plan's lack of specific objectives for biomethane from wastewater facilities and the universal potential for biomethane wastewater technology irrespective of region.
- **Technical Viability:** While biomethane production from a variety of substrates and its use is quite advanced in Europe, the current state of development in segments other than manure is quite limited in the United States. This is due to several reasons including: (1) a lack of local demonstrations addressing regional environmental regulations; (2) underdeveloped quality and monitoring standards pertaining to biogas; and (3) a high level of fragmentation in the market.
- **Potential for Future Cost Reductions:** Along with cost reductions through increased economies of scale, greater certainty and expedition in the permitting, quality control and monitoring standards there is potential value in greater utilization of existing utility assets which results in downward pressure on rates.
- **Addressable Market Size & Long-Term Resource Potential:** Doing a pilot demonstration project on waste water biomethane recovery is an important step in determining the resource potential.
- **Portfolio Fit:** Biogas is a valuable asset within California's portfolio. It utilizes traditional utility assets (e.g. the natural gas distribution network) and can be consumed like traditional natural gas if the gas quality can meet the established standard. This is beneficial for several reasons including: (1) there is no technical restriction on the level of penetration biomethane can achieve; (2) biogas has the potential to help reduce the transition cost to

reach California's GHG targets; and (3) California's potential level of overall renewable penetration is limited only by the volume of biogas available. By utilizing existing utility assets biogas can provide ancillary services which intermittent renewable resources cannot.

- Community Impact: All communities have the potential to benefit from wastewater biomethane in that it is a resource that all communities have.

Resource Description

Biomethane is renewable natural gas produced after cleaning the "raw biogas". It is a product of anaerobic digestion of organic materials such as dairy manure, landfill waste, forestry and agricultural processing byproducts, the organic fraction of municipal solid waste, food processing byproducts, and energy crop. Cleaning biogas involves removing the bulk of carbon dioxide, water, hydrogen sulfide and other impurities. Biomethane may meet pipeline quality gas standards depending on the process used to remove impurities, local gas specifications and monitoring requirements.

Biomethane Production Process

Anaerobic digestion is the first step in producing biogas. It is a biochemical process whereby organic biomass is broken down via microorganisms in a low-oxygen environment. Different biological polymers have different gas yield. Fat can generate twice as much biogas as carbon hydrate and proteins. Producers in Sweden use co-digestion of multiple substrates to increase digester output and efficiency. It is also found that pasteurization to 70° C for one hour can yield four times more methane than non-pasteurized animal byproducts due to increased access to lipids after heat treatment. The major types of anaerobic digesters include:

- Covered lagoon (least expensive, <2% solids)
- Complete mix (2-10% solids, above or under ground tank with built-in mixing and gas collection system)
- Plug-flow (11-14% solids, above and under ground tank w/o mixing system, less efficient than complete mix)

- Multiple-tank (high temperature 55C complete mix followed by a low temperature 35C phase).

Biogas is a low quality gas (60-70% of methane) with limited use. Upgrading biogas not only increases the energy content but also removes the trace components such as hydrogen sulfide, carbon dioxide, nitrogen, oxygen, particles, halogenated hydrocarbons, ammonia and organic silicon compounds which are harmful to the natural gas delivery infrastructure. The output of the biogas upgrading process is biomethane which has more than 97% methane, meeting pipeline quality requirement.

The main task of cleaning up biomethane is to remove carbon dioxide and other impurities. Pipeline quality gas requires less than 3% carbon dioxide content. The most common methods of carbon dioxide removal are as follows:

- Membrane separation: Use of one or several thin (<1mm) physical membranes to filter out carbon dioxide and hydrogen sulfide based on different diffusion rate;
- Pressure Swing Adsorption (PSA): Biogas is fed into the bottom of a vessel that contains zeolites or activated carbon. The carbon dioxide is removed via adsorption as the biogas rises to the top;
- Water scrubbing: Biogas is fed into the bottom of a vertical column and water is fed into the top of the column. Carbon dioxide is dissolved in the water flowing through the column;
- Selexol: Similar to water scrubbing, water is replaced by Selexol, a polyglycol liquid that readily absorbs carbon dioxide, hydrogen sulfide, and water. No further drying of output gas is needed; and
- Cryogenic Separation: Involves liquefying and separating out carbon dioxide and other impurities.

Emerging areas in Biomethane Capture/Production

Optimal digester loading and use of new technology for enhanced

biodigestion: There is significant progress being made in the biodigestion science particularly in the area of process improvement and control. One of the major

value drivers is finding the right recipe and digester loading to maximize the biogas production. This reduces the volume of digestate that has to be transported.

Biogas cleaning process: While biogas cleaning is not a new concept, the older methods described above tend to be expensive. In addition they loose methane into the atmosphere. For example the only known plant in the US that makes pipeline quality gas from waste water on (King County, Water Treatment Plant – Seattle) utilizes an older technology that looses 6-10% methane into the atmosphere. Some of the newer technologies like amine scrubbing and cryogenic separation are not only more efficient from energy consumption perspective but have far fewer methane losses. These technologies will need demonstration in California to enter into the mainstream.

Quality and Service Standards: While there are currently quality standards for pipeline quality gas, the standards need to be modified to specifically address biomethane. One of the issues requiring attention is Siloxane limits and the technology to control it. Currently Siloxane is a contaminant in landfill gas and wastewater gas that can cause maintenance issues with rotating or reciprocating equipment. Setting optimal limits and specifications around monitoring such compounds requires further development and study.

Substrates and Byproducts Testing, Development and Commercialization: As mentioned previously, the substrates for production of biogas and byproducts from the process can be diverse. Evaluating the value of energy in specific substrates is an emerging area. Currently only a handful of companies in Europe have that capability. The biodigestion process also produces byproducts like ammonium sulphate, carbon dioxide or biofertilizer. Testing and evaluating nutrient value and commercial value of the byproducts is an emerging area that can make the overall economics competitive.

C. Description of the Wastewater Facility Biomethane Demonstration Project

The proposed demonstration project will be a full scale demonstration facility designed to capture approximately 70,000 MMBTU of raw biogas and to clean the gas to pipeline quality standards and to interconnect the output with the gas delivery system. The demonstration project will cover many of the emerging technologies and topics mentioned in the previous sections. The specific set of activities may be summarized as follows:

1. Evaluate the raw biogas quality at the wastewater plant.
2. Review environmental requirements for wastewater gas capture and processing.
3. Process design, optimization and technology selection for a full scale demonstration project.
4. Substrates and byproducts testing.
5. Complete permitting process and all necessary approvals for commencement of civil work.
6. Procurement of demonstration equipment.
7. Collaborate with gas quality experts, equipment manufacturers, to develop gas quality monitoring requirements for interconnecting gas output to natural gas delivery infrastructure.
8. All necessary process design, equipment sizing and procurement activities necessary to physically interconnect the facility to SDG&E's natural gas delivery infrastructure and validate the projects performance.
9. Recommend further resource optimizations that will enable significant improvements through technology and process changes. The following improvement categories may include but are not limited to:
 - Increase in biogas gas production including codigestion;
 - Reduction of sludge;
 - Reduction of electricity consumption;
 - Reduction of polymer;
 - Reduction in heat requirements at the wastewater plant;
 - Improved digester loading to extend equipment life; and
 - Internal treatment of screenings

D. Benefits of the Wastewater Facility Biomethane Demonstration Project

A significant barrier to the commercial acceptance of biomethane into California's resource mix is a viable demonstration of the technology. The Wastewater Facility Biomethane Demonstration Project will provide valuable experience from which wastewater facilities throughout the state can draw on. Essentially all areas of the project cycle will have greater certainty due to the implementation of this project including the approval and permitting process, technology application and advancement, process optimization and quality control and monitoring. This project will also address the utilization of untapped byproducts of the biomethane cleaning process such as fertilizer and carbon dioxide that will enhance the economics of this technology.

The State and utility customers stand to benefit significantly from advances in biogas in general. It is an important component in California's resource portfolio in that it furthers many of the State's policy objectives for GHG, RPS and bioenergy targets while at the same time utilizes existing infrastructure. The state will benefit from utilizing the ERRP to address biomethane from wastewater facilities in that biomethane is not specifically addressed by any of the states current policies. The Bioenergy Action Plan for California largely focuses on transportation and biomass technologies. In the case of biogas the greatest emphasis is on landfill gas recovery. The current RPS process is largely, and rightfully, focused on procurement of renewable MWh. Biogas and biomethane is implicitly supported and furthers these policy objectives and will now have a vehicle through which it can be exploited. By developing this project SDG&E will benefit not only it's ratepayers but the state and technology as a whole by providing a tangible demonstration project to be held up as an example to be viewed and learned from. It is a project that not only focuses on the technology but implementation hurdles in the development of standards and monitoring requirements that will be required for this technology to be commercially accepted.

E. Scope of Work

The scope of work proposed for this project involves all work related to design, testing and commissioning of biogas cleaning equipment, production of pipeline quality biomethane and interconnecting the output to the gas delivery system. Byproducts of the demonstration project include the development of standards and specifications for quality and monitoring as well as performance enhancement recommendations.

The work will largely include detailed process design, technology selection, civil work, commissioning, process optimization, technical data acquisition and publication of findings and proposals for future work.

The demonstration project is expected to be completed in approximately 18-24 months once all necessary permits and approvals have been granted. The estimated cost of the project is outlined below. These costs are preliminary and will be refined through the design process. SDG&E will work with the host customers on a mutually acceptable set of terms and conditions including appropriate cost sharing.

<u>Item</u>	<u>Est. Cost (\$000)</u>
Customized gas treatment package	\$2,200
Power supply	\$34
Electrical installation	\$26
Mechanical installation	\$60
Connecting pipes, gas, water, air	\$120
Quality control equipment	\$77
Supervisory control system	\$100
Civil/Structural work	\$170
Valve arrangement, Flow measurement, Pipeline Tap	\$120
Inspections	\$34
Modification of equipment to US standard	\$68
Equipment Transportation to Facility	\$20
Commissioning including consultant travel	\$100

Project design & management, local consultants	\$150
Training	\$9
Documentation, and future study recommendations	\$50
Standards/Specifications Development	\$75
Subtotal	<u>\$3413</u>
Contingency 15%	\$512
Total	\$3,925

F. Request for Commission Approval

SDG&E respectfully requests the Commission to approve the biomethane demonstration project when it approves the ERRP Application by ordering the following:

1. SDG&E shall proceed with the biomethane project(s) as outlined in this proposal;
2. The costs incurred for the ERRP biomethane project constitute reasonable indirect costs associated with the purchase of eligible renewable energy resources, and SDG&E shall recover up to \$4 million in expenses for this project pursuant to Public Utilities Code section 399.15(d);
3. SDG&E may record up to \$4 million incurred to implement the ERRP biomethane project in its ERRR and may recover those costs upon their inclusion in its ERRR filing.

APPENDIX 5

EMERGING RENEWABLE RESOURCE PROGRAM

Articles of Incorporation - Rule 2.2

A copy of SDG&E's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on December 4, 1997 in connection with SDG&E's Application No. 97-12-012, and is incorporated herein by reference.

Financial Statement, Balance Sheet, and Income Statement – Rule 3.2(a)(1)

SDG&E's Financial Statement and Balance Sheet and Income Statement are attached to this Appendix as Section A.

Present and Proposed Rates - Rules 3.2(a)(2) and (3)

SDG&E's current rates and charges for unbundled electric and gas service are contained in its electric and gas tariffs and schedules on file with the Commission. These tariffs and schedules are filed with, and made effective by, the Commission in its decision, orders, resolutions, and approvals of advice letter filings made pursuant to Commission General Order 96-A.

Description of Property and Equipment - Rule 3.2(a)(4)

A general description of SDG&E's property was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of account of the original cost and depreciation reserve attributable thereto is attached to this Application as Section B.

Summary of Earnings - Rules 3.2(a)(5) and (6)

SDG&E's summary of earnings is included herein as Section C.

Depreciation - Rule 3.2(a)(7)

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plant properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, "flow through accounting" has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

Illustrative change in class average rates due to proposed emerging renewable resource program

A rate table comparing average rates from January 1, 2007 to the proposed rates as affected by the ERRP project is attached to this application as Section D.

Section A

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2007

1. UTILITY PLANT		<u>2007</u>
101	UTILITY PLANT IN SERVICE	\$7,965,999,367
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	4,404,749
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	286,851,122
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(3,756,971,402)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(196,326,273)
118	OTHER UTILITY PLANT	494,555,509
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(130,931,348)
120	NUCLEAR FUEL - NET	<u>31,401,617</u>
TOTAL NET UTILITY PLANT		<u>\$ 4,698,983,341</u>

2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	\$ 3,674,646
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(414,498)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	3,290,000
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>709,858,478</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>\$ 716,408,626</u>

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
MARCH 31, 2007**

3. CURRENT AND ACCRUED ASSETS

		2007
131	CASH	\$ 17,637,579
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	75,800
136	TEMPORARY CASH INVESTMENTS	24,919,181
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	164,386,698
143	OTHER ACCOUNTS RECEIVABLE	21,467,920
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(2,200,013)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	13,957,003
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	20,452,740
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	54,449,653
156	OTHER MATERIALS AND SUPPLIES	3,851
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	19,309,420
165	PREPAYMENTS	10,860,585
171	INTEREST AND DIVIDENDS RECEIVABLE	11,021
173	ACCRUED UTILITY REVENUES	47,018,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	16,104,996
175	DERIVATIVE INSTRUMENT ASSETS	23,617,401
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 432,071,835

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	\$ 19,074,256
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,231,496,837
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	31,069,811
184	CLEARING ACCOUNTS	(25,111)
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	5,449,405
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	37,413,043
190	ACCUMULATED DEFERRED INCOME TAXES	205,907,406
	TOTAL DEFERRED DEBITS	1,530,385,647

	\$7,377,849,449
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**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2007**

5. PROPRIETARY CAPITAL

	2007
201 COMMON STOCK ISSUED	\$291,458,395
204 PREFERRED STOCK ISSUED	78,475,400
207 PREMIUM ON CAPITAL STOCK	592,222,753
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	279,618,042
214 CAPITAL STOCK EXPENSE	(25,990,045)
216 UNAPPROPRIATED RETAINED EARNINGS	857,287,086
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	(18,453,984)
TOTAL PROPRIETARY CAPITAL	\$ 2,054,617,647

6. LONG-TERM DEBT

221 BONDS	\$ 1,386,905,000
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	267,470,000
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(2,214,205)
TOTAL LONG-TERM DEBT	\$ 1,652,160,795

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	-
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	\$ 27,148,321
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	2,621,000
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	530,589,916
TOTAL OTHER NONCURRENT LIABILITIES	\$ 560,359,237

**SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
MARCH 31, 2007**

8. CURRENT AND ACCRUED LIABILITES		2007
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	\$ 217,857,794
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	41,657,786
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	831,425
235	CUSTOMER DEPOSITS	48,611,400
236	TAXES ACCRUED	32,826,704
237	INTEREST ACCRUED	25,568,457
238	DIVIDENDS DECLARED	1,204,917
241	TAX COLLECTIONS PAYABLE	1,376,713
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	153,041,520
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	-
244	DERIVATIVE INSTRUMENT LIABILITIES	397,871,296
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
TOTAL CURRENT AND ACCRUED LIABILITIES		\$ 920,848,012
9. DEFERRED CREDITS		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 26,139,488
253	OTHER DEFERRED CREDITS	419,707,000
254	OTHER REGULATORY LIABILITIES	1,042,447,605
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	30,585,406
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	5,201,256
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	496,417,574
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	169,365,429
TOTAL DEFERRED CREDITS		2,189,863,758
TOTAL LIABILITIES AND OTHER CREDITS		\$ 7,377,849,449

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2007

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$723,661,158
401	OPERATING EXPENSES	484,881,778	
402	MAINTENANCE EXPENSES	30,716,198	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	75,009,617	
408.1	TAXES OTHER THAN INCOME TAXES	15,513,352	
409.1	INCOME TAXES	42,286,707	
410.1	PROVISION FOR DEFERRED INCOME TAXES	20,451,701	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(22,507,026)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(697,103)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	<u>(1,875,781)</u>	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>643,779,443</u>
	NET OPERATING INCOME		79,881,715

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(180,464)	
418	NONOPERATING RENTAL INCOME	135,508	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	3,474,932	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	4,562,885	
421	MISCELLANEOUS NONOPERATING INCOME	1,008,473	
421.1	GAIN ON DISPOSITION OF PROPERTY	<u>-</u>	
	TOTAL OTHER INCOME	<u>9,001,334</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>476,753</u>	
	TOTAL OTHER INCOME DEDUCTIONS	<u>476,753</u>	
408.2	TAXES OTHER THAN INCOME TAXES	85,692	
409.2	INCOME TAXES	(1,673,163)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	369,761	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	<u>-</u>	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>(1,217,710)</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>10,695,797</u>
	INCOME BEFORE INTEREST CHARGES		90,577,512
	NET INTEREST CHARGES*		<u>27,852,946</u>
	NET INCOME		<u><u>\$62,724,566</u></u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (1,807,272)

**SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
THREE MONTHS ENDED MARCH 31, 2007**

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$797,169,413
NET INCOME (FROM PRECEDING PAGE)	62,724,566
DIVIDEND TO PARENT COMPANY	0
DIVIDENDS DECLARED - PREFERRED STOCK	(1,204,918)
OTHER RETAINED EARNINGS ADJUSTMENTS	<u>(1,401,975)</u>
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$857,287,086</u></u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2007

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value \$27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		\$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK

5.0%	375,000	shares	\$7,500,000
4.50%	300,000	shares	6,000,000
4.40%	325,000	shares	6,500,000
4.60%	373,770	shares	7,475,400
\$1.7625	550,000	shares	13,750,000
\$1.70	1,400,000	shares	35,000,000
\$1.82	640,000	shares	16,000,000

COMMON STOCK

116,583,358 shares 291,458,395

(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 AND 06-05-015, to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application No. 06-05-015 to which reference is hereby made.

(d) Number and Amount of Bonds Authorized and Issued:

<u>First Mortgage Bonds:</u>	<u>Nominal Date of Issue</u>	<u>Par Value Authorized and Issued</u>	<u>Outstanding</u>	<u>Interest Paid in 2006</u>
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.9% Series PP, due 2018	04-29-93	70,795,000	0	3,413,801
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
5.9% Series SS, due 2018	07-29-93	92,945,000	0	4,645,959
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	913,556
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	837,548
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	724,406
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	584,727
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	780,278
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	2,057,658
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	8,750,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	1,521,702
 <u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
MARCH 31, 2007

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2006</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$998,278

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

<u>Preferred Stock</u>	<u>Shares Outstanding</u>	<u>Dividends Declared</u>				
	<u>12-31-06</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	650,000	1,762,500	1,674,375	1,498,125	1,321,875	1,145,625
\$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000
\$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800
	<u>4,063,770</u>	<u>\$6,582,168</u>	<u>\$6,494,043</u>	<u>\$6,317,793</u>	<u>\$6,141,543</u>	<u>\$5,965,293</u> [2]

Common Stock

Amount	\$150,000,000	\$200,000,000	\$200,000,000	\$75,000,000	\$0 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the three months ended March 31, 2007, are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.

[2] Includes \$1,145,625 of interest expense related to redeemable preferred stock.

Section B

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2007

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	\$ 222,841	\$ 202,900
303	Misc. Intangible Plant	25,021,883	19,527,826
	TOTAL INTANGIBLE PLANT	25,244,725	19,730,726
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	40,032,392	8,923,388
312	Boiler Plant Equipment	115,423,771	14,735,936
314	Turbogenerator Units	97,654,822	10,512,186
315	Accessory Electric Equipment	33,364,110	3,202,632
316	Miscellaneous Power Plant Equipment	18,800,982	841,657
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	319,802,595	38,262,318
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	268,112,935	265,305,505
322	Boiler Plant Equipment	393,571,884	393,571,884
323	Turbogenerator Units	135,444,115	135,444,115
324	Accessory Electric Equipment	166,879,734	166,725,053
325	Miscellaneous Power Plant Equipment	247,435,766	202,980,364
107	ICIP CWIP	0	5,759,071
	TOTAL NUCLEAR PRODUCTION	1,211,728,110	1,170,069,670
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	4,421,921	220,815
342	Fuel Holders, Producers & Accessories	15,295,980	542,084
343	Prime Movers	20,824,413	1,425,477
344	Generators	161,414,029	5,337,964
345	Accessory Electric Equipment	8,780,970	477,996
346	Miscellaneous Power Plant Equipment	359,058	24,578
	TOTAL OTHER PRODUCTION	211,242,275	8,031,342
	TOTAL ELECTRIC PRODUCTION	1,742,772,981	1,216,363,331

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 21,562,097	\$ 0
350.2	Land Rights	59,666,724	9,017,239
352	Structures and Improvements	76,950,227	26,012,613
353	Station Equipment	508,796,045	117,215,918
354	Towers and Fixtures	101,378,219	74,821,286
355	Poles and Fixtures	109,127,405	39,805,509
356	Overhead Conductors and Devices	203,726,169	142,630,305
357	Underground Conduit	44,437,676	7,649,109
358	Underground Conductors and Devices	32,517,825	10,679,677
359	Roads and Trails	18,532,751	4,887,616
	TOTAL TRANSMISSION	1,176,695,139	432,719,271
360.1	Land	16,848,098	0
360.2	Land Rights	65,164,907	25,275,242
361	Structures and Improvements	3,288,725	1,857,582
362	Station Equipment	289,547,194	68,265,480
364	Poles, Towers and Fixtures	350,699,443	186,080,934
365	Overhead Conductors and Devices	285,240,734	97,297,866
366	Underground Conduit	751,331,514	287,408,832
367	Underground Conductors and Devices	993,373,484	522,212,895
368.1	Line Transformers	354,284,270	59,828,939
368.2	Protective Devices and Capacitors	22,346,475	1,766,381
369.1	Services Overhead	93,160,620	115,886,075
369.2	Services Underground	255,726,259	149,611,009
370.1	Meters	84,942,798	31,287,738
370.2	Meter Installations	40,801,816	9,860,866
371	Installations on Customers' Premises	6,012,620	8,764,637
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	23,474,931	16,630,271
	TOTAL DISTRIBUTION PLANT	3,636,243,888	1,582,034,746
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	28,928,993	10,404,605
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	175,979	128,313
393	Stores Equipment	54,331	46,020
394.1	Portable Tools	11,830,923	3,944,975
394.2	Shop Equipment	572,160	319,730
395	Laboratory Equipment	438,662	83,580
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	96,871,583	42,733,090
398	Miscellaneous Equipment	431,093	(66,372)
	TOTAL GENERAL PLANT	146,906,924	57,792,961
101	TOTAL ELECTRIC PLANT	6,727,863,657	3,308,641,036

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	\$ 86,104	\$ 86,104
303	Miscellaneous Intangible Plant	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
360.1	Land	0	0
361	Structures and Improvements	43,992	43,995
362.1	Gas Holders	0	6
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	1,815
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	407,546	345,452
	TOTAL STORAGE PLANT	451,538	391,267
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	985,658
366	Structures and Improvements	10,874,587	7,268,091
367	Mains	121,968,866	45,674,729
368	Compressor Station Equipment	60,472,965	36,638,226
369	Measuring and Regulating Equipment	16,747,371	9,656,374
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	216,930,119	100,223,078
374.1	Land	102,187	0
374.2	Land Rights	7,850,875	4,811,484
375	Structures and Improvements	43,447	61,253
376	Mains	485,228,128	260,452,812
378	Measuring & Regulating Station Equipment	8,412,790	5,463,481
380	Distribution Services	226,403,381	245,492,968
381	Meters and Regulators	70,972,742	30,776,849
382	Meter and Regulator Installations	57,900,756	22,232,802
385	Ind. Measuring & Regulating Station Equipm	1,516,811	734,391
386	Other Property On Customers' Premises	0	0
387	Other Equipment	4,545,427	3,985,742
	TOTAL DISTRIBUTION PLANT	862,976,544	574,011,783

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	\$ 0	\$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	6,533,779	1,984,801
394.2	Shop Equipment	84,597	218
395	Laboratory Equipment	344,813	(123,954)
396	Power Operated Equipment	246,939	65,368
397	Communication Equipment	2,950,836	1,488,576
398	Miscellaneous Equipment	310,534	44,006
	TOTAL GENERAL PLANT	10,545,999	3,559,019
101	TOTAL GAS PLANT	1,091,703,863	678,846,010
COMMON PLANT			
303	Miscellaneous Intangible Plant	167,576,458	135,485,163
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,654,409	0
389.2	Land Rights	1,489,409	27,275
390	Structures and Improvements	134,632,927	48,546,230
391.1	Office Furniture and Equipment - Other	23,541,132	10,596,753
391.2	Office Furniture and Equipment - Computer E	45,462,485	23,794,872
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	41,567	(87,130)
393	Stores Equipment	140,123	(187,094)
394.1	Portable Tools	168,535	(3,508)
394.2	Shop Equipment	313,717	129,386
394.3	Garage Equipment	2,624,818	607,370
395	Laboratory Equipment	2,001,015	861,230
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	78,332,401	46,290,186
398	Miscellaneous Equipment	3,061,525	963,998
118.1	TOTAL COMMON PLANT	465,074,462	266,492,823
	TOTAL ELECTRIC PLANT	6,727,863,657	3,308,641,036
	TOTAL GAS PLANT	1,091,703,863	678,846,010
	TOTAL COMMON PLANT	465,074,462	266,492,823
101 & 118.1	TOTAL	8,284,641,981	4,253,979,868
101	PLANT IN SERV-SONGS FULLY RECOVER	\$ (1,167,685,825)	\$ (1,167,685,825)

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	Accrual for Retirements		
	Electric	\$ (8,714,114)	\$ (8,714,114)
	Gas	(83,490)	(83,490)
	TOTAL PLANT IN SERV-NON RECON ACC	<u>(8,797,604)</u>	<u>(8,797,604)</u>
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	4,404,749	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>4,404,749</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	291,733,161	
	Gas	(1,131,442)	
	Common	29,273,660	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>319,875,379</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	7,824,474
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	282,501
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	609,011,438
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>609,011,438</u>
120	NUCLEAR FUEL FABRICATION	<u>68,199,160</u>	<u>40,548,140</u>
143	FAS 143 ASSETS - Legal Obligation	112,254,030	(546,935,434)
	FIN 47 ASSETS - Legal Obligation	34,385,204	14,561,787
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,036,117,646)
	TOTAL FAS 143	146,639,234	(1,568,491,293)
	UTILITY PLANT TOTAL	<u>\$ 7,647,277,075</u>	<u>\$ 2,166,671,700</u>

Section C

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
THREE MONTHS ENDED MARCH 31, 2007
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$724
2	Operating Expenses	<u>644</u>
3	Net Operating Income	<u><u>\$80</u></u>
4	Weighted Average Rate Base	\$3,644
5	Rate of Return*	8.23%

*Authorized Cost of Capital

Section D

EFFECT ON ELECTRIC RATES AND BILLS

SDG&E is not proposing an electric rate change solely from this filing. These program costs will be combined with other forecasted Energy Resources Recovery Account (ERRA) costs that will be filed with the Commission in the ERRA Forecast proceeding on October 1, 2007 for rates effective in 2008.

The rate changes below are for illustrative purposes only to show the bill impact of this ERRP filing and not for purposes of predicting 2008 rates. If the Commission approves SDG&E's request, a typical residential customer living in the inland climate zone and using 500 kWh per month will see a monthly winter bill increase in 2008 of 0.1%, or \$0.07. A typical monthly electric bill will increase from \$71.21 to \$71.28. The percentages shown do not necessarily reflect the changes that you may see in your bill. Changes in individual bills will depend on how much energy each customer uses.

SAN DIEGO GAS AND ELECTRIC COMPANY – ELECTRIC DEPARTMENT

ILLUSTRATIVE CHANGE IN CLASS AVERAGE RATES DUE TO PROPOSED EMERGING RENEWABLE RESOURCE PROGRAM

	1/1/2007 Class Average Rates	Class Average Rates Reflecting ERRP	Total Rate Change	Percentage Rate Change
Customer Class	(¢/kWh)	(¢/kWh)	(¢/kWh)	(%)
Residential*	15.960	16.006	0.046	0.29%
Small Commercial	16.795	16.843	0.048	0.28%
Med. & Large C&I	13.152	13.197	0.046	0.35%
Agriculture	15.881	15.925	0.045	0.28%
Lighting	15.175	15.207	0.031	0.21%
System Total	14.505	14.551	0.046	0.32%

*Pursuant to California Assembly Bill 1X, electric rates for residential usage up to 130% of baseline allowances will not exceed rate levels in effect February 1, 2001.

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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Total number of addressees: 586

ABBAS M. ABED ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
402 WEST BROADWAY, STE 400
SAN DIEGO CA 92101
Email: aabed@navigantconsulting.com
Status: INFORMATION

JASON ABIECUNAS BLACK & BEATCH GLOBAL
RENEWABLE ENERGY
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK KS 66211
FOR: RENEWABLE ENERGY CONSULTANT
Email: abiecunasjp@bv.com
Status: INFORMATION

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE
SAN FRANCISCO CA 94110
Email: CEM@newsdata.com
Status: INFORMATION

MRW & ASSOCIATES, INC.
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: e-recipient@caiso.com
Status: INFORMATION

ENERGY AMERICA, LLC
ONE STAMFORD PLAZA, 8TH FLOOR
263 TRESSER BLVD.
STAMFORD CT 6901
Email: cindy.sola@directenergy.com
Status: APPEARANCE

NEW WEST ENERGY
ISB665
BOX 61868
PHOENIX AZ 85082-1868
Email: rsnichol@srpnet.com
Status: APPEARANCE

3 PHASES ENERGY SERVICES
2100 SEPULVEDA BLVD., STE 37
MANHATTAN BEACH CA 90266
Email: energy@3phases.com
Status: APPEARANCE

SOCAL WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773
Email: kswitzer@gswater.com
Status: APPEARANCE

STRATEGIC ENERGY, LTD.
7220 AVENIDA ENCINAS, STE 120
CARLSBAD CA 92009
Email: customerrelations@sel.com
Status: APPEARANCE

SEMPRA ENERGY SOLUTIONS
101 ASH ST, HQ09
SAN DIEGO CA 92101-3017
Email: email@semprasolutions.com
Status: APPEARANCE

AOL UTILITY CORP.
12752 BARRETT LANE
SANTA ANA CA 92705
Email: lalehs101@hotmail.com
Status: APPEARANCE

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE
SAN FRANCISCO CA 94110
Email: cem@newsdata.com
Status: INFORMATION

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO CA 94110-1431
FOR: CALIFORNIA ENERGY MARKETS
Email: cem@newsdata.com
Status: INFORMATION

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MRW & ASSOCIATES, INC.
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CALIFORNIA ISO
Email: e-recipient@caiso.com
Status: INFORMATION

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CALIFORNIA ISO
Email: e-recipient@caiso.com
Status: APPEARANCE

LOCAL POWER
4281 PIEDMONT AVE
OAKLAND CA 94611
Status: APPEARANCE

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE
SAN FRANCISCO CA 94110
Email: cem@newsdata.com
Status: INFORMATION

MRW & ASSOCIATES, INC.
1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

ENERGY AMERICA, LLC
ONE STAMFORD PLAZA, 8TH FLOOR
263 TRESSER BLVD.
STAMFORD CT 6901
Email: cindy.sola@directenergy.com
Status: APPEARANCE

PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, STE 400
WILMINGTON DE 19808
Email: rick_noger@praxair.com
Status: APPEARANCE

OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, STE 110
HOUSTON TX 77046
Email: ej_wright@oxy.com
Status: APPEARANCE

APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN ST, STE 750
PHOENIX AZ 85004
Email: stacy.aguayo@apses.com
Status: APPEARANCE

NEW WEST ENERGY
ISB665
BOX 61868
PHOENIX AZ 85082-1868
Email: rsnichol@srpnet.com
Status: APPEARANCE

CONSTELLATION NEW ENERGY, INC.
TWO CALIFORNIA PLAZA
350 SOUTH GRAND AVE, STE 3800
LOS ANGELES CA 90071
Email: bill.chen@constellation.com
Status: APPEARANCE

3 PHASES ENERGY SERVICES
2100 SEPULVEDA BLVD., STE 37
MANHATTAN BEACH CA 90266
Email: energy@3phases.com
Status: APPEARANCE

AMERICAN UTILITY NETWORK
10705 DEER CANYON DRIVE
ALTA LOMA CA 91737
Email: pssed@adelphia.net
Status: APPEARANCE

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630 EAST FOOTHILL BLVD.

SAN DIMAS CA 91773

Email: kswitzer@gswater.com

Status: APPEARANCE

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7220 AVENIDA ENCINAS, STE 120

CARLSBAD CA 92009

Email: customerrelations@sel.com

Status: APPEARANCE

SEMPRA ENERGY SOLUTIONS

101 ASH ST, HQ09

SAN DIEGO CA 92101-3017

Email: email@semprasolutions.com

Status: APPEARANCE

CORAL POWER, LLC

4445 EASTGATE MALL, STE 100

SAN DIEGO CA 92121

Email: hharris@coral-energy.com

Status: APPEARANCE

PILOT POWER GROUP, INC.

9320 CHESAPEAKE DRIVE, STE 112

SAN DIEGO CA 92123

Email: tdarton@pilotpowergroup.com

Status: APPEARANCE

AOL UTILITY CORP.

12752 BARRETT LANE

SANTA ANA CA 92705

Email: lalehs101@hotmail.com

Status: APPEARANCE

CALIFORNIA ENERGY MARKETS

517-B POTRERO AVE

SAN FRANCISCO CA 94110

Email: cem@newsdata.com

Status: INFORMATION

CALIFORNIA ENERGY MARKETS

517-B POTRERO AVE.

SAN FRANCISCO CA 94110-1431

FOR: CALIFORNIA ENERGY MARKETS

Email: cem@newsdata.com

Status: INFORMATION

MRW & ASSOCIATES, INC.

1814 FRANKLIN ST, STE 720

OAKLAND CA 94612

Email: mrw@mrwassoc.com

Status: INFORMATION

LEGAL AND REGULATORY DEPARTMENT

CALIFORNIA ISO

151 BLUE RAVINE ROAD

FOLSOM CA 95630

FOR: CALIFORNIA ISO

Email: e-recipient@caiso.com

Status: INFORMATION

KENNETH E. ABREU

853 OVERLOOK COURT

SAN MATEO CA 94403

Email: k.abreu@sbcglobal.net

Status: INFORMATION

DAN ADLER DIRECTOR, TECH AND POLICY DEVELOPMENT

CALIFORNIA CLEAN ENERGY FUND

5 THIRD ST, STE 1125

SAN FRANCISCO CA 94103

Email: Dan.adler@calcef.org

Status: INFORMATION

CASE ADMINISTRATION

SOUTHERN CALIFORNIA EDISON COMPANY

2244 WALNUT GROVE AVE

ROSEMEAD CA 91770

FOR: SOUTHERN CALIFORNIA EDISON COMPANY

Email: case.admin@sce.com

Status: INFORMATION

STACY AGUAYO

APS ENERGY SERVICES COMPANY, INC.

400 E. VAN BUREN ST, STE 750

PHOENIX AZ 85004

FOR: APS Energy Company

Email: stacy.aguayo@apses.com

Status: APPEARANCE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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Commissioner Assigned: Michael R. Peevey on May 26, 2006; ALJ Assigned: Burton Mattson on May 26, 2006

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CPUC DOCKET NO. R0605027-R0602012-R0602013-I0509005 CPUC REV 07-16-07

Total number of addressees: 586

MICHAEL ALCANTAR ATTORNEY
ALCANTAR & KAHL, LLP
1300 SW FIFTH AVE, STE 1750
PORTLAND OR 97201
FOR: Cogeneration Association of California
Email: mpa@a-klaw.com
Status: APPEARANCE

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVE
CORTE MADERA CA 94925
Email: lynn@lmaconsulting.com
Status: INFORMATION

CATHIE ALLEN CA STATE MGR.
PACIFICORP
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
Email: californiadockets@pacificorp.com
Status: INFORMATION

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: gary.allen@sce.com
Status: INFORMATION

Wendy Al-Mukdad
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: wmp@cpuc.ca.gov
Status: STATE-SERVICE

SCOTT J. ANDERS RESEARCH/ADMINISTRATIVE
DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO CA 92110
Email: scottanders@sandiego.edu
Status: INFORMATION

FRANK ANNUNZIATO PRESIDENT
AMERICAN UTILITY NETWORK INC.
10705 DEER CANYON DR.
ALTA LOMA CA 91737-2483
Email: allwazeready@aol.com
Status: INFORMATION

ROD AOKI ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Cogeneration Association of California
Email: rsa@a-klaw.com
Status: APPEARANCE

ROD AOKI ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Occidental Power Services, Inc.
Email: rsa@a-klaw.com
Status: APPEARANCE

JEANNE ARMSTRONG ATTORNEY
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: South San Joaquin Irrigation District
Email: jarmstrong@gmsr.com
Status: APPEARANCE

JESUS ARREDONDO
NRG ENERGY INC.
4600 CARLSBAD BLVD.
CARLSBAD CA 92008
Email: jesus.arredondo@nrgenergy.com
Status: INFORMATION

Nilgun Atamturk
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5303
SAN FRANCISCO CA 94102-3214
Email: nil@cpuc.ca.gov
Status: STATE-SERVICE

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK CA 94598
Email: philha@astound.net
Status: INFORMATION

Kathryn Auriemma
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: kdw@cpuc.ca.gov
Status: STATE-SERVICE

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Total number of addressees: 586

MICHAEL A. BACKSTROM ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: michael.backstrom@sce.com
Status: INFORMATION

Amanda C. Baker
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA
SAN FRANCISCO CA 94102-3214
Email: ab1@cpuc.ca.gov
Status: STATE-SERVICE

ELIZABETH BAKER
SUMMIT BLUE CONSULTING
1722 14TH ST, STE 230
BOULDER CO 80304
Email: bbaker@summitblue.com
Status: INFORMATION

STEPHEN D. BAKER SENIOR REGULATORY ANALYST
FELLON-MCCORD AND ASSOCIATES
CONSTELLATION NEW ENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, STE. 2000
LOUISVILLE KY 40223
Email: stephen.baker@constellation.com
Status: INFORMATION

WHITNEY BARDWICK
MP2 CAPITAL
1101 5TH AVE, STE 360
SAN RAFAEL CA 94901
Email: whitney@mp2capital.com
Status: INFORMATION

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
FOR: BARKOVICH AND YAP INC.
Email: brbarkovich@earthlink.net
Status: INFORMATION

E. GREGORY BARNES ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST, HQ 13D
SAN DIEGO CA 92101
FOR: San Diego Gas & Electric
Email: gbarnes@sempra.com
Status: APPEARANCE

JAMES BARTRIDGE TRANSMISSION SPECIALIST
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-46
SACRAMENTO CA 95814
Email: jbartrid@energy.state.ca.us
Status: STATE-SERVICE

GREG BASS
SEMPRA ENERGY SOLUTIONS
101 ASH ST. HQ09
SAN DIEGO CA 92101-3017
FOR: Sempra Energy Solutions
Email: gbass@semprasolutions.com
Status: APPEARANCE

R. THOMAS BEACH PRINCIPAL
CROSSBORDER ENERGY
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
FOR: California Cogeneration Council (CCC)
Email: tomb@crossborderenergy.com
Status: APPEARANCE

R. THOMAS BEACH PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
FOR: CROSSBORDER ENERGY
Email: tomb@crossborderenergy.com
Status: APPEARANCE

KATE BEARDSLEY
PG&E
MAILCODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: kebd@pge.com
Status: INFORMATION

JANELLE BELAND CHIEF OF STAFF
OFFICE OF SENATOR LELAND Y. YEE
STATE CAPITOL
SACRAMENTO CA 95814
Email: janelle.beland@sen.ca.gov
Status: STATE-SERVICE

C. SUSIE BERLIN
MCCARTHY & BERLIN LLP
100 PARK CENTER PLAZA, STE. 501
SAN JOSE CA 95113
Email: sberlin@mccarthyllp.com
Status: INFORMATION

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RYAN BERNARDO
BRAUN & BLAISING, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
Email: bernardo@braunlegal.com
Status: INFORMATION

DAVID A. BISCHER PRESIDENT
CALIFORNIA FORESTRY ASSOCIATION
1215 K ST, STE 1830
SACRAMENTO CA 95814
FOR: California Forestry Association
Email: davidb@cwo.com
Status: APPEARANCE

THOMAS BLAIR
CITY OF SAN DIEGO
9601 RIDGEHAVEN COURT, STE. 120/MS11
SAN DIEGO CA 92123
Email: tblair@sandiego.gov
Status: INFORMATION

SCOTT BLAISING ATTORNEY
BRAUN & BLAISING, P.C.
915 L ST, STE. 1420
SACRAMENTO CA 95814
FOR: CALIFORNIA MUNICIPAL UTILITIES ASSN.
Email: blaising@braunlegal.com
Status: INFORMATION

Billie C. Blanchard
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: bcb@cpuc.ca.gov
Status: STATE-SERVICE

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVE, STE 2060
SAN FRANCISCO CA 94102
FOR: SDG&E/SoCal Gas
Email: wblattner@semprautilities.com
Status: INFORMATION

GREGORY T. BLUE
140 MOUNTAIN PARKWAY
CLAYTON CA 94517
Email: greg.blue@sbcglobal.net
Status: INFORMATION

ASHLEE M. BONDS
THELEN REID BROWN RAYSMAN&STEINER LLP
SUITE 1800
101 SECOND ST
SAN FRANCISCO CA 94105
Email: abonds@thelen.com
Status: INFORMATION

Traci Bone
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5206
SAN FRANCISCO CA 94102-3214
Email: tbo@cpuc.ca.gov
Status: STATE-SERVICE

WILLIAM H. BOOTH ATTORNEY
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVE, 5TH FLR
WALNUT CREEK CA 94596
FOR: CA Large Energy Consumers Association
Email: wbooth@booth-law.com
Status: APPEARANCE

WILLIAM H. BOOTH ATTORNEY
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL AVE., 5TH FLR
WALNUT CREEK CA 94556
FOR: Ridgewood Renewable Power, LLC and Ridgewood
Olinda, LLC/CLECA
Email: wbooth@booth-law.com
Status: APPEARANCE

KEVIN BOUDREAUX MANAGER-RETAIL OPERATIONS
CALPINE POWERAMERICA CA, LLC
717 TEXAS AVE, STE 1000
HOUSTON TX 77002
FOR: Calpine
Email: kevin.boudreaux@calpine.com
Status: APPEARANCE

KEVIN BOUDREAUX
CALPINE CORPORATION
717 TEXAS AVE.
HOUSTON TX 77002
Email: boudreauxk@calpine.com
Status: INFORMATION

KAREN E. BOWEN
WINSTON & STRAWN LLP
101 CALIFORNIA ST, 39TH FLR
SAN FRANCISCO CA 94111
FOR: California Wind Energy Association
Email: jkarp@winston.com
Status: APPEARANCE

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Total number of addressees: 586

KAREN E. BOWEN

WINSTON & STRAWN LLP

101 CALIFORNIA ST, 39TH FLR

SAN FRANCISCO CA 94111

FOR: Mirant California, LLC, Mirant Delta, LLC and Mirant Potrero, LLC

Email: jkarp@winston.com

Status: APPEARANCE

MICHAEL E. BOYD

CALIFORNIANS FOR RENEWABLE ENERGY, INC.

5439 SOQUEL DRIVE

SOQUEL CA 95073

Email: michaelboyd@sbcglobal.net

Status: APPEARANCE

ROBERT T. BOYD

GE WIND ENERGY

6130 STONERIDGE MAIL ROAD, STE 300B

PLEASANTON CA 94588-3287

FOR: GE WIND ENERGY

Email: robert.boyd@ps.ge.com

Status: INFORMATION

STEVE BOYD

TURLOCK IRRIGATION DISTRICT

333 EAST CANAL DRIVE

TURLOCK CA 95381-0949

Email: seboyd@tid.org

Status: INFORMATION

Kirk Bracht

CALIF PUBLIC UTILITIES COMMISSION

RATEMAKING BRANCH

505 VAN NESS AVE AREA 4-A

SAN FRANCISCO CA 94102-3214

Email: kwb@cpuc.ca.gov

Status: STATE-SERVICE

JUSTIN D. BRADLEY DIRECTOR

SILICON VALLEY LEADERSHIP GROUP

224 AIRPORT PARKWAY, STE 620

SAN JOSE CA 95110

Email: jbradley@svlg.net

Status: INFORMATION

DAVID BRANCHCOMB

BRANCHCOMB ASSOCIATES, LLC

9360 OAKTREE LANE

ORANGEVILLE CA 95662

Email: david@branchcomb.com

Status: INFORMATION

PETER BRAY

PETER BRAY AND ASSOCIATES

3566 17TH ST, STE 2

SAN FRANCISCO CA 94110-1093

Email: peterbray@yahoo.com

Status: INFORMATION

CLARE BREIDENICH

224 1/2 24TH AVE. EAST

SEATTLE WA 98112

Email: cbreidenich@yahoo.com

Status: INFORMATION

STEVE BRINK

CALIFORNIA FORESTRY ASSOCIATION

1215 K ST, STE 1830

SACRAMENTO CA 95814

FOR: California Forestry Association

Email: steveb@cwo.com

Status: INFORMATION

ADAM BRIONES

THE GREENLINING INSTITUTE

1918 UNIVERSITY AVE, 2ND FLR

BERKELEY CA 94704

Email: adamb@greenlining.org

Status: INFORMATION

GLORIA BRITTON

ANZA ELECTRIC COOPERATIVE, INC.

58470 HWY 371

PO BOX 391909

ANZA CA 92539

FOR: Anza Electric Cooperative

Email: GloriaB@anzaelectric.org

Status: APPEARANCE

DEBORAH BROCKETT CONSULTANT

NAVIGANT CONSULTING, INC.

SPEAR STREE TOWER, SUITE 1200

ONE MARKET ST

SAN FRANCISCO CA 94105

Email: dbrockett@navigantconsulting.com

Status: INFORMATION

Donald J. Brooks

CALIF PUBLIC UTILITIES COMMISSION

ENERGY DIVISION

505 VAN NESS AVE AREA 4-A

SAN FRANCISCO CA 94102-3214

FOR: Energy Division

Email: dbr@cpuc.ca.gov

Status: STATE-SERVICE

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Total number of addressees: 586

ANDREW BROWN ATTORNEY

ELLISON & SCHNEIDER, LLP

2015 H ST

SACRAMENTO CA 95811

FOR: Constellation Energy Commodities Group, Inc. etc.

Email: abb@eslawfirm.com

Status: APPEARANCE

Carol A. Brown

CALIF PUBLIC UTILITIES COMMISSION

DIVISION OF ADMINISTRATIVE LAW JUDGES

505 VAN NESS AVE RM 5103

SAN FRANCISCO CA 94102-3214

Email: cab@cpuc.ca.gov

Status: STATE-SERVICE

LYNNE M. BROWN

CALIFORNIANS FOR RENEWABLE ENERGY INC.

24 HARBOR ROAD

SAN FRANCISCO CA 94124

Email: l_brown246@hotmail.com

Status: APPEARANCE

ANDREW B. BROWN ATTORNEY

ELLISON, SCHNEIDER & HARRIS, LLP

2015 H ST

SACRAMENTO CA 95814

FOR: Constellation New Energy, Inc./Praxair Plainfield, Inc.

Email: abb@eslawfirm.com

Status: APPEARANCE

Kenneth Bruno

CALIF PUBLIC UTILITIES COMMISSION

UTILITY AUDIT, FINANCE & COMPLIANCE BRANCH

505 VAN NESS AVE RM 3-C

SAN FRANCISCO CA 94102-3214

Email: kab@cpuc.ca.gov

Status: STATE-SERVICE

NINA BUBNOVA CASE MANAGER

PACIFIC GAS AND ELECTRIC COMPANY

PO BOX 770000, MAIL CODE B9A

SAN FRANCISCO CA 94177

FOR: PACIFIC GAS AND ELECTRIC COMPANY

Email: nbb2@pge.com

Status: INFORMATION

CRAIG M. BUCHSBAUM ATTORNEY

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE ST, B30A

SAN FRANCISCO CA 94105

Email: cmb3@pge.com

Status: APPEARANCE

JACK BURKE LEGISLATIVE AFFAIRS MANAGER

CALIFORNIA CENTER FOR SUSTAINABLE ENERGY

8690 BALBOA AVE., STE 100

SAN DIEGO CA 92123

Email: jack.burke@energycenter.org

Status: STATE-SERVICE

ROBERT E. BURT

INSULATION CONTRACTORS ASSN.

4153 NORTHGATE BLVD., NO.6

SACRAMENTO CA 95834

FOR: Insulation Contractors Association

Email: rburt@macnexus.org

Status: INFORMATION

JAMES H. CALDWELL JR.

PPM ENERGY, INC.

1650 E NAPA ST

SONOMA CA 95476

FOR: PPM Energy, Inc.

Email: james.caldwell@ppmenergy.com

Status: APPEARANCE

Andrew Campbell

CALIF PUBLIC UTILITIES COMMISSION

EXECUTIVE DIVISION

505 VAN NESS AVE RM 5203

SAN FRANCISCO CA 94102-3214

Email: agc@cpuc.ca.gov

Status: STATE-SERVICE

TRENT A. CARLSON

RELIANT ENERGY

1000 MAIN ST

HOUSTON TX 77001

Email: tcarlson@reliant.com

Status: INFORMATION

DAN L. CARROLL ATTORNEY

DOWNEY BRAND, LLP

555 CAPITOL MALL, 10TH FLR

SACRAMENTO CA 95814

FOR: Mountain Utilities

Email: dcarroll@downeybrand.com

Status: APPEARANCE

SEAN CASEY

SAN FRANCISCO PUBLIC UTILITIES COMMISSIO

1155 MARKET ST, 4TH FLR

SAN FRANCISCO CA 94103

Email: scasey@sflower.org

Status: APPEARANCE

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TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND ST
VANCOUVER WA 98683
Email: castille@landsenergy.com
Status: INFORMATION

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION ST
PASADENA CA 91103
Email: steve@energyinnovations.com
Status: INFORMATION

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
2633 WELLINGTON CT.
CLYDE CA 94520
FOR: Strategic Energy, LLC
Email: jchamberlin@strategicenergy.com
Status: APPEARANCE

AUDREY CHANG STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: achang@nrdc.org
Status: APPEARANCE

ED CHANG
FLYNN RESOURCE CONSULTANTS, INC.
2165 MOONSTONE CIRCLE
EL DORADO HILLS CA 95762
Email: edchang@flynnrci.com
Status: INFORMATION

Laurence Chaset
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5131
SAN FRANCISCO CA 94102-3214
Email: lau@cpuc.ca.gov
Status: INFORMATION

Bishu Chatterjee
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 3-E
SAN FRANCISCO CA 94102-3214
Email: bbc@cpuc.ca.gov
Status: STATE-SERVICE

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVE, STE 203
BERKELEY CA 94704
Email: cchen@ucsusa.org
Status: INFORMATION

WILLIAM H. CHEN
CONSTELLATION NEW ENERGY, INC.
SPEAR TOWER, 36TH FLOOR
ONE MARKET ST
SAN FRANCISCO CA 94105
FOR: Constellation New Energy, Inc.
Email: bill.chen@constellation.com
Status: APPEARANCE

BRIAN K. CHERRY DIRECTOR REGULATORY
RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B10C
SAN FRANCISCO CA 94106
Email: bkc7@pge.com
Status: INFORMATION

ED CHIANG
ELEMENT MARKETS, LLC
ONE SUGAR CREEK CENTER BLVD., STE 250
SUGAR LAND TX 77478
Email: echiang@elementmarkets.com
Status: INFORMATION

KRIS G. CHISHOLM STAFF COUNSEL
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
770 L ST, STE 1250
SACRAMENTO CA 95831
Email: kris.chisholm@eob.ca.gov
Status: APPEARANCE

MARY COLLINS POLICY ADVISOR TO COMMISSIONER
LIEBERMAN
ILLINOIS COMMERCE COMMISSION
160 NORTH LASALLE ST, STE. C-800
CHICAGO IL 60601
FOR: ILLINOIS COMMERCE COMMISSION
Email: mcollins@icc.illinois.gov
Status: INFORMATION

G. ALAN COMES
NRG ENERGY, INC.
1819 ASTON ST, STE 105
CARLSBAD CA 92008
FOR: NRG Energy, Inc.
Email: alan.comes@nrgenergy.com
Status: APPEARANCE

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Total number of addressees: 586

ALAN COMNES

WEST COAST POWER

3934 SE ASH ST

PORTLAND OR 97214

FOR: West Coast Power

Email: alan.comnes@nrgenergy.com

Status: APPEARANCE

Joe Como

CALIF PUBLIC UTILITIES COMMISSION

LEGAL DIVISION

505 VAN NESS AVE RM 5033

SAN FRANCISCO CA 94102-3214

Email: joc@cpuc.ca.gov

Status: STATE-SERVICE

David Console

CALIF PUBLIC UTILITIES COMMISSION

ENERGY DIVISION

505 VAN NESS AVE AREA 4-A

SAN FRANCISCO CA 94102-3214

Email: dkc@cpuc.ca.gov

Status: STATE-SERVICE

THOMAS P. CORR

SEMPRA ENERGY GLOBAL ENTERPRISES

101 ASH ST, HQ16C

SAN DIEGO CA 92101

Email: tcorr@sempra.com

Status: INFORMATION

LISA A. COTTLE ATTORNEY

WINSTON & STRAWN LLP

101 CALIFORNIA ST, 39TH FLR

SAN FRANCISCO CA 94111

FOR: Mirant California,LLC, Mirant Delta,LLC,and Mirant Potrero,LLC

Email: lcottle@winston.com

Status: APPEARANCE

DOUGLAS E. COVER

ENVIRONMENTAL SCIENCE ASSOCIATES

225 BUSH ST, STE 1700

SAN FRANCISCO CA 94104

Email: dcover@esassoc.com

Status: INFORMATION

RORY COX

RATEPAYERS FOR AFFORDABLE CLEAN ENERGY

311 CALIFORNIA ST, STE 650

SAN FRANCISCO CA 94104

FOR: Local Power

Email: rcox@pacificenvironment.org

Status: APPEARANCE

DAVID J. COYLE

ANZA ELECTRIC COOPERATIVE, INC

58470 HIGHWAY 371

ANZA CA 92539-1909

Status: INFORMATION

BRIAN CRAGG ATTORNEY

GOODIN, MAC BRIDE, SQUERI, RITCHIE & DAY

505 SANSOME ST, STE 900

SAN FRANCISCO CA 94111

FOR: Independent Energy Producers Association (IEPA)/Caithness Corporation

Email: bcragg@goodinmacbride.com

Status: APPEARANCE

BRIAN T. CRAGG ATTORNEY

GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY

505 SANSOME ST, STE 900

SAN FRANCISCO CA 94111

FOR: Independent Energy Producers Association

Email: bcragg@goodinmacbride.com

Status: APPEARANCE

HOLLY B. CRONIN STATE WATER PROJECT OPERATIONS DIV

CALIFORNIA DEPARTMENT OF WATER RESOURCES

3310 EL CAMINO AVE., LL-90

SACRAMENTO CA 95821

Email: hcronin@water.ca.gov

Status: STATE-SERVICE

WILLIAM CRONIN

ENERGY AMERICA, LLC

ONE STAMFORD FPLAZA, 8TH FLOOR

263 TRESSER BLVD.

STAMFORD CT 6901

FOR: Energy America, LLC

Status: APPEARANCE

JOHN CROSSON

PACIFIC GAS & ELECTRIC COMPANY

MC N13R

245 MARKET ST

SAN FRANCISCO CA 94105

Email: J0Cf@pge.com

Status: INFORMATION

SEBASTIEN CSAPO PROJECT MANAGER

PACIFIC GAS AND ELECTRIC COMPANY

MAIL CODE B9A

PO BOX 770000

SAN FRANCISCO CA 94177

Email: sscb@pge.com

Status: INFORMATION

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Total number of addressees: 586

FRANCISCO DA COSTA
ENVIRONMENTAL JUSTICE ADVOCACY
4909 3RD ST
SAN FRANCISCO CA 94124
FOR: Bayview Hunters Point Community
Status: APPEARANCE

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
FOR: South San Joaquin Valley/Kings River Conservation
District
Email: jdalessi@navigantconsulting.com
Status: APPEARANCE

Christopher Danforth
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ctd@cpuc.ca.gov
Status: STATE-SERVICE

THOMAS DARTON
PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, STE 112
SAN DIEGO CA 92123
FOR: Pilot Power Group, Inc.
Email: tdarton@pilotpowergroup.com
Status: APPEARANCE

THOMAS R. DARTON
PILOT POWER SERVICES, INC.
SUITE 112
9320 CHESAPEAKE DRIVE
SAN DIEGO CA 92123
FOR: Pilot Power Group, Inc.
Email: tdarton@pilotpowergroup.com
Status: APPEARANCE

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS CA 95762
Email: dougdpuccmail@yahoo.com
Status: INFORMATION

DOUG DAVIE
WELLHEAD ELECTRIC COMPANY
650 BERGUT DRIVE, STE C
SACRAMENTO CA 95814
Email: ddavie@wellhead.com
Status: INFORMATION

KEVIN DAVIES
SOLAR DEVELOPMENT INC.
2424 PROFESSIONAL DR.
ROSEVILLE CA 95661-7773
Email: kevin@solardevelop.com
Status: INFORMATION

KYLE DAVIS
PACIFICORP
825 NE MULNOMAH, STE 2000
PORTLAND OR 97232
Email: kyle.l.davis@pacificorp.com
Status: INFORMATION

KYLE L. DAVIS
PACIFICORP
825 NE MULNOMAH,
PORTLAND OR 97232
Email: kyle.l.davis@pacificorp.com
Status: INFORMATION

MICHAEL B. DAY ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: PV Now
Email: mday@gmssr.com
Status: APPEARANCE

NEAL DE SNOO ENERGY OFFICE
CITY OF BERKELEY
2180 MILVIA AVE
BERKELEY CA 94704
FOR: East Bay Power Authority/City of Berkeley
Email: ndesnoo@ci.berkeley.ca.us
Status: APPEARANCE

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: mjd@cpuc.ca.gov
Status: STATE-SERVICE

MICHAEL DEANGELIS
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST
SACRAMENTO CA 95817-1899
FOR: SACRAMENTO MUNICIPAL UTILITY DISTRICT
Email: mdeange@smud.org
Status: INFORMATION

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LISA DECKER COUNSEL
CONSTELLATION ENERGY GROUP, INC.
111 MARKET PLACE, STE 500
BALTIMORE MD 21202
FOR: Constellation Energy Commodities , etc
Email: lisa.decker@constellation.com
Status: APPEARANCE

LISA M. DECKER
CONSTELLATION ENERGY GROUP, INC.
111 MARKET PLACE, STE 500
BALTIMORE MD 21202
FOR: Constellation New Energy, Inc.
Email: lisa.decker@constellation.com
Status: APPEARANCE

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA CA 91737
FOR: American Utility Network
Email: pssed@adelphia.net
Status: APPEARANCE

RALPH DENNIS DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE KY 40223
Email: rdennis@knowledgeinenergy.com
Status: INFORMATION

RALPH E. DENNIS DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES
CONSTELLATION NEWENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE KY 40223
Email: ralph.dennis@constellation.com
Status: INFORMATION

DEREK DENNISTON
THE DENNISTON GROUP, LLC
101 BELLA VISTA AVE
BELVEDERE CA 94920
FOR: THE DENNISTON GROUP, LLC
Email: DCDG@pge.com
Status: INFORMATION

BALDASSARO DI CAPO, ESQ.
CALIFORNIA ISO
LEGAL AND REGULATORY DEPARTMENT
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: bdi capo@caiso.com
Status: APPEARANCE

JEFF DIAMOND
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
770 L ST, STE 1250
SACRAMENTO CA 95814
Email: jdiamond@eob.ca.gov
Status: STATE-SERVICE

CHRIS ANN DICKERSON, PHD
FREEMAN, SULLIVAN & CO.
100 SPEAR ST., 17/F
SAN FRANCISCO CA 94105
FOR: FREEMAN, SULLIVAN & CO.
Email: dickerson07@fscgroup.com
Status: INFORMATION

WILLIAM F. DIETRICH ATTORNEY
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, 613
WALNUT CREEK CA 94598-3535
Email: dietrichlaw2@earthlink.net
Status: INFORMATION

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO NV 89520
Email: tdillard@sierrapacific.com
Status: INFORMATION

CHI DOAN
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., RM LL94
SACRAMENTO CA 95821
Email: chi@water.ca.gov
Status: STATE-SERVICE

PAMELA DOUGHMAN
CALIFORNIA ENERGY COMMISSION
TECHNOLOGY SYSTEMS DIVISION
1516 9TH ST, MS 45
SACRAMENTO CA 95814
Email: pdoughma@energy.state.ca.us
Status: STATE-SERVICE

MICHAEL DOUGHTON STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS-14
SACRAMENTO CA 95814
Email: mdoughto@energy.state.ca.us
Status: APPEARANCE

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Paul Douglas
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
FOR: Energy Division
Email: psd@cpuc.ca.gov
Status: STATE-SERVICE

DANIEL W. DOUGLASS ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367
FOR: Alliance For Retail Energy Markets, Energy America,
LLC, Commerce Energy, Inc.
Email: douglass@energyattorney.com
Status: APPEARANCE

DANIEL W. DOUGLASS ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367
FOR: Western Power Trading Forum
Email: douglass@energyattorney.com
Status: APPEARANCE

ELIZABETH DOUGLASS STAFF WRITER
LOS ANGELES TIMES
202 WEST FIRST ST
LOS ANGELES CA 90012
Email: elizabeth.douglass@latimes.com
Status: INFORMATION

TRACEY DRABANT ENERGY RESOURCE MANAGER
BEAR VALLEY ELECTRIC SERVICE
PO BOX 1547
BIG BEAR LAKE CA 92315-1547
Email: traceydrabant@bves.com
Status: INFORMATION

Tim G. Drew
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: zap@cpuc.ca.gov
Status: STATE-SERVICE

Dorothy Duda
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5109
SAN FRANCISCO CA 94102-3214
Email: dot@cpuc.ca.gov
Status: STATE-SERVICE

Kevin R. Dudney
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: kd1@cpuc.ca.gov
Status: STATE-SERVICE

KEVIN DUGGAN
CALPINE COPORATION
3875 HOPYARD ROAD, STE 345
PLEASANTON CA 94588
Email: duggank@calpine.com
Status: INFORMATION

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
FOR: San Joaquin Valley Power Authority
Email: kdusel@navigantconsulting.com
Status: INFORMATION

JOHN DUTCHER VICE PRESIDENT - REGULATORY
AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD CA 94534-7875
FOR: MOUNTAIN UTILITIES
Email: ralf1241a@cs.com
Status: INFORMATION

PIERRE H. DUVAIR, PH.D
CALIFORNIA ENERGY COMISSION
1516 NINTH ST
SACRAMENTO CA 95814
Email: pduvair@energy.state.ca.us
Status: INFORMATION

Shannon Eddy
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: sed@cpuc.ca.gov
Status: STATE-SERVICE

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA CA 90401
Email: harveyederpspc.org@hotmail.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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Total number of addressees: 586

DENNIS M.P. EHLING ATTORNEY
KIRKPATRICK & LOCKHART NICHOLSON GRAHAM
10100 SANTA MONICA BLVD., 7TH FLR
LOS ANGELES CA 90067
Email: dehling@kng.com
Status: INFORMATION

Robert Elliott
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: rae@cpuc.ca.gov
Status: STATE-SERVICE

CHRISTOPHER T. ELLISON ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
Email: cte@eslawfirm.com
Status: INFORMATION

RICHARD D. ELY
DAVIS HYDRO
27264 MEADOWBROOK DRIVE
DAVIS CA 95618
FOR: Northern California Small Hydro Assn.
Email: hydro@davis.com
Status: APPEARANCE

BARRY H. EPSTEIN
FITZGERALD, ABBOTT & BEARDSLEY, LLP
1221 BROADWAY, 21ST FLR
OAKLAND CA 94612
FOR: FITZGERLAND, ABBOTT & BEARDSLEY, LLP
Email: bepstein@fablaw.com
Status: INFORMATION

MICHAEL D. EVANS
CORAL POWER L.L.C.
4445 EASTGATE MALL, STE 100
SAN DIEGO CA 92120
FOR: Coral Power L.L.C.
Email: michael.evans@shell.com
Status: APPEARANCE

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., STE 107
FOLSOM CA 95630
Email: saeed.farrokhpay@ferc.gov
Status: INFORMATION

DIANE I. FELLMAN ATTORNEY
FPL ENERGY, LLC
234 VAN NESS AVE
SAN FRANCISCO CA 94102
Email: diane_fellman@fpl.com
Status: INFORMATION

PAUL FENN
LOCAL POWER
4281 PIEDMONT AVE.
OAKLAND CA 94611
Email: paulfenn@local.org
Status: INFORMATION

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120-7442
Email: cpucases@pge.com
Status: INFORMATION

REGULATORY FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
Email: lawcpucases@pge.com
Status: INFORMATION

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO CA 92123
FOR: SAN DIEGO GAS & ELECTRIC
Email: centralfiles@semprutilities.com
Status: INFORMATION

ROBERT FINKELSTEIN ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO CA 94102
FOR: The Utility Reform Network
Email: bfinkelstein@turn.org
Status: APPEARANCE

Julie A. Fitch
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: jf2@cpuc.ca.gov
Status: STATE-SERVICE

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MICHEL PETER FLORIO ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
FOR: TURN
Email: mflorio@turn.org
Status: APPEARANCE

RYAN FLYNN ATTORNEY
PACIFICORP
825 NE MULTNOMAH, STE 1800
PORTLAND OR 97232
Email: ryan.flynn@pacificorp.com
Status: APPEARANCE

Thomas Flynn
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: trf@cpuc.ca.gov
Status: STATE-SERVICE

BRUCE FOSTER VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVE, STE. 2040
SAN FRANCISCO CA 94102
Email: bruce.foster@sce.com
Status: APPEARANCE

BETH A. FOX ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE, GO1, RM 351C
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: beth.fox@sce.com
Status: APPEARANCE

DALE E. FREDERICKS
DG POWER LLC
PO BOX 4400
WALNUT CREEK CA 94596-0400
Email: dale@dgpowers.com
Status: INFORMATION

MATTHEW FREEDMAN ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
FOR: TURN
Email: freedman@turn.org
Status: APPEARANCE

SUSAN FREEDMAN SENIOR REGIONAL ENERGY
PLANNER
SAN DIEGO ASSOCIATION OF GOVERNMENTS
401 B ST, STE 800
SAN DIEGO CA 92101
Email: sfr@sandag.org
Status: INFORMATION

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, STE 110
SAN DIEGO CA 92123
Email: susan.freedman@sdenergy.org
Status: INFORMATION

ROBERT FREEHLING LOCAL POWER RESEARCH
DIRECTOR
LOCAL POWER
PO BOX 606
FAIR OAKS CA 95628
FOR: Women's Energy Matters/Local Power
Email: rfreeh123@sbcglobal.net
Status: APPEARANCE

David K. Fukutome
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5042
SAN FRANCISCO CA 94102-3214
Email: dkf@cpuc.ca.gov
Status: STATE-SERVICE

NORMAN J. FURUTA ATTORNEY
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., STE 1744
SAN FRANCISCO CA 94103-1399
FOR: Federal Executive Agencies
Email: norman.furuta@navy.mil
Status: APPEARANCE

CLARE LAUFENBER GALLARDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-46
SACRAMENTO CA 95814
Email: claufenb@energy.state.ca.us
Status: STATE-SERVICE

DAN GEIS
THE DOLPHIN GROUP
925 L ST, STE 800
SACRAMENTO CA 95814
FOR: Inland Empire Utilities Agency
Email: dgeis@dolphingroup.org
Status: APPEARANCE

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LAURA GENAO ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: laura.genao@sce.com
Status: APPEARANCE

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX CA 94978
Email: wem@igc.org
Status: APPEARANCE

ROBERT B. GEX ATTORNEY,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
Email: bobgex@dwt.com
Status: INFORMATION

JEDEDIAH J. GIBSON
ELLISON SCHNEIDER & HARRIS LLP
2015 H ST
SACRAMENTO CA 95814
Email: jjg@eslawfirm.com
Status: INFORMATION

Anne Gillette
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: aeg@cpuc.ca.gov
Status: STATE-SERVICE

MELANIE GILLETTE
DUKE ENERGY NORTH AMERICA
980 NINTH ST, STE 1420
SACRAMENTO CA 95814
Email: mlgillette@duke-energy.com
Status: INFORMATION

MICHAEL J. GILMORE
INLAND ENERGY
SOUTH TOWER SUITE 606
3501 JAMBOREE RD
NEWPORT BEACH CA 92660
Email: michaelgilmore@inlandenergy.com
Status: INFORMATION

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH ST, M/S NO. 205
OAKLAND CA 94607
Email: ramonag@ebmud.com
Status: INFORMATION

JUDY GRAU
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST MS-46
SACRAMENTO CA 95814-5512
Email: jgrau@energy.state.ca.us
Status: STATE-SERVICE

JEFFREY P. GRAY ATTORNEY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: Calpine Corporation
Email: jeffgray@dwt.com
Status: APPEARANCE

JEFFREY P. GRAY ATTORNEY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: CalpinePowerAmerica-CA, LLC/Firends of Kirkwood
Association
Email: jeffgray@dwt.com
Status: APPEARANCE

JOE GRECO
CAITHNESS OPERATING COMPANY
9590 PROTOTYPE COURT, STE 200
RENO NV 89521
Email: jgreco@caithnessenergy.com
Status: INFORMATION

KAREN GRIFFIN EXECUTIVE OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 39
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: kgriffin@energy.state.ca.us
Status: STATE-SERVICE

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA ST, 41ST FLR
SAN FRANCISCO CA 94111
FOR: Center for Energy and Economic Development
Email: agrimaldi@mckennalong.com
Status: APPEARANCE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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[I0509005] Downloaded July 17, 2007, last updated on May 15, 2007

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Total number of addressees: 586

YVONNE GROSS
SEMPRA GLOBAL
101 ASH ST, HQ08C
SAN DIEGO CA 92101
Email: ygross@sempraglobal.com
Status: INFORMATION

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVE
RIDGEWOOD NJ 7450
FOR: RIDGEWOOD POWER MANAGEMENT, LLC
Email: dgulino@ridgewoodpower.com
Status: APPEARANCE

ROB GUNNIN VICE PRESIDENT SUPPLY
COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA CA 92626
Email: rgunnin@commerceenergy.com
Status: APPEARANCE

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
505 VAN NESS AVE RM 2203
SAN FRANCISCO CA 94102-3214
Email: jmh@cpuc.ca.gov
Status: STATE-SERVICE

TOM HAMILTON MANAGING PARTNER
ENERGY CONCIERGE SERVICES
321 MESA LILA RD
GLENDALE CA 91208
Email: THAMILTON5@CHARTER.NET
Status: INFORMATION

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PRESIDIO BUILDING 97
PO BOX 29512
SAN FRANCISCO CA 94129
FOR: CENTER FOR RESOURCE SOLUTIONS
Email: jhamrin@resource-solutions.org
Status: APPEARANCE

PETER W. HANSCHEN ATTORNEY
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, STE 450
WALNUT CREEK CA 94596
Email: phansch@mofo.com
Status: INFORMATION

ANGELA HAREN
CALIFORNIA COASTKEEPER ALLIANCE
2419 42ND AVE
SAN FRANCISCO CA 94116
Email: aharen@cacoastkeeper.org
Status: INFORMATION

ARNO HARRIS
RECURRENT ENERGY, INC.
220 HALLECK ST., STE 220
SAN FRANCISCO CA 94129
Email: arno@recurrentenergy.com
Status: INFORMATION

FRANK W. HARRIS REGULATORY ECONOMIST
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE
ROSEMEAD CA 91770
FOR: SOUTHERN CALIFORNIA EDISON
Email: frank.w.harris@sce.com
Status: INFORMATION

JEFFERY D. HARRIS ATTORNEY
ELLISON, SCHNEIDER & HARRIS
2015 H ST
SACRAMENTO CA 95814-3109
Email: jdh@eslawfirm.com
Status: APPEARANCE

AUDRA HARTMANN
DYNEGY, INC.
980 NINTH ST, STE 2130
SACRAMENTO CA 95814
FOR: LS Power Generation, LLC
Email: Audra.Hartmann@Dynergy.com
Status: APPEARANCE

KERRY HATTEVIK
MIRANT CORPORATION
696 WEST 10TH ST
PITTSBURG CA 94565
FOR: Mirant Corporation
Email: kerry.hattevik@mirant.com
Status: APPEARANCE

ARTHUR HAUBENSTOCK ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: alhj@pge.com
Status: APPEARANCE

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ARTHUR L. HAUBENSTOCK
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
Email: alhj@pge.com
Status: APPEARANCE

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95816
Email: lmh@eslawfirm.com
Status: INFORMATION

LYNN M. HAUG ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814-3512
FOR: Corona Department of Water and Power
Email: lmh@eslawfirm.com
Status: APPEARANCE

DANIEL M. HECHT ASSOCIATE GENERAL COUNSEL
SEMPRA ENERGY TRADING CORP.
58 COMMERCE ROAD
STAMFORD CT 6902
Email: dhecht@sempratrading.com
Status: INFORMATION

TIM HEMIG
NRG ENERGY, INC.
1819 ASTON AVE, STE 105
CARLSBAD CA 92008
Email: tim.hemig@nrgenergy.com
Status: INFORMATION

ANN HENDRICKSON
COMMERCE ENERGY, INC.
222 WEST LAS COLINAS BLVD., STE 950E
IRVING TX 75039
Email: ahendrickson@commerceenergy.com
Status: INFORMATION

PHILIP HERRINGTON REGIONAL VP, BUSINESS
MANAGEMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVE, STE 1700
IRVINE CA 92612-1046
Email: pherrington@edisonmission.com
Status: INFORMATION

CHRISTOPHER HILEN ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89511
FOR: CalpinePowerAmerica-CA,LLC
Email: chilen@sppc.com
Status: APPEARANCE

SETH D. HILTON
STOEL RIVES
111 SUTTER ST., STE 700
SAN FRANCISCO CA 94104
Email: sdhilton@stoel.com
Status: INFORMATION

Donna J. Hines
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: djh@cpuc.ca.gov
Status: STATE-SERVICE

GARY HINNERS
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON TX 77001-0148
Email: ghinners@reliant.com
Status: INFORMATION

LENNY HOCHSCHILD EVOLUTION MARKETS, LLC
RENEWABLE ENERGY MARKETS
425 MARKET ST, STE 2200
SAN FRANCISCO CA 94105
FOR: RENEWABLE ENERGY MARKETS
Email: lennyh@evomarkets.com
Status: INFORMATION

JOHN B. HOFMANN
REGIONAL COUNCIL OF RURAL COUNTIES
801 12TH ST, STE 600
SACRAMENTO CA 95814
FOR: Regional Council of Rural Counties
Email: jhofmann@rcrcnet.org
Status: APPEARANCE

CARYN HOLMES
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-14
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: cholmes@energy.state.ca.us
Status: APPEARANCE

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Total number of addressees: 586

DAVID L. HUARD ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD
LOS ANGELES CA 90064
FOR: MANATT, PHELPS & PHILLIPS, LLP
Email: dhuard@manatt.com
Status: APPEARANCE

STEVEN HUHMAN
MORGAN STANLEY CAPITAL GROUP INC.
2000 WESTCHESTER AVE
PURCHASE NY 10577
Email: steven.huhman@morganstanley.com
Status: INFORMATION

TRACY K. HUNCKLER
DAY CARTER AND MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE 205
SACRAMENTO CA 95864
Email: thunckler@daycartermurphy.com
Status: INFORMATION

TAMLYN M. HUNT ENERGY PROGRAM DIRECTOR
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2/F
SANTA BARBARA CA 93101
FOR: COMMUNITY ENVIRONMENTAL COUNCIL
Email: thunt@cecmail.org
Status: APPEARANCE

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
3310 EL CAMINO AVE. RM 300
SACRAMENTO CA 95821
Email: hurlock@water.ca.gov
Status: INFORMATION

MICHAEL A. HYAMS POWER ENTERPRISE-
REGULATORY AFFAIRS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4TH FLR
SAN FRANCISCO CA 94103
Email: mhyams@sfwater.org
Status: INFORMATION

MWIRIGI IMUNGI
THE ENERGY COALITION
15615 ALTON PARKWAY, STE 245
IRVINE CA 92618
Email: imungi@energycoalition.org
Status: INFORMATION

Louis M. Irwin
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: lmi@cpuc.ca.gov
Status: STATE-SERVICE

STEVE ISSER VP, GENERAL COUNSEL
GOOD COMPANY ASSOCIATES
816 CONGRESS AVE., STE 1400
AUSTIN TX 78701
FOR: Good Company Associates
Email: sisser@goodcompanyassociates.com
Status: APPEARANCE

JONATHAN JACOBS
PA CONSULTING GROUP
390 INTERLOCKEN CRESCENT, STE 410
BROOMFIELD CO 80021
Email: jon.jacobs@paconsulting.com
Status: INFORMATION

TODD JAFFE ENERGY BUSINESS BROKERS AND
CONSULTANTS
3420 KEYSER ROAD
BALTIMORE MD 21208
Email: tjaffe@energybusinessconsultants.com
Status: INFORMATION

JOHN JENSEN PRESIDENT
MOUNTAIN UTILITIES
PO BOX 205
KIRKWOOD CA 95646
Email: jjensen@kirkwood.com
Status: INFORMATION

Aaron J. Johnson
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
505 VAN NESS AVE RM 4202
SAN FRANCISCO CA 94102-3214
Email: ajo@cpuc.ca.gov
Status: STATE-SERVICE

KEITH G. JOHNSON SENIOR MARKET AND PRODUCT
DEVELOPER
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: kjohnson@caiso.com
Status: INFORMATION

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Total number of addressees: 586

MARC D. JOSEPH ATTORNEY

ADAMS, BROADWELL, JOSEPH & CARDOZO

601 GATEWAY BLVD., STE. 1000

SOUTH SAN FRANCISCO CA 94080

FOR: Coalition of California Utility Employees and California Unions for Reliable Energy

Email: mdjoseph@adamsbroadwell.com

Status: APPEARANCE

MARC D. JOSEPH ATTORNEY

ADAMS, BROADWELL, JOSEPH & CARDOZO

601 GATEWAY BLVD., STE. 1000

SOUTH SAN FRANCISCO CA 94080

FOR: ADAMS BROADWELL JOSEPH & CARDOZO

Email: mdjoseph@adamsbroadwell.com

Status: INFORMATION

EVELYN KAHL ATTORNEY

ALCANTAR & KAHL, LLP

120 MONTGOMERY ST, STE 2200

SAN FRANCISCO CA 94104

FOR: Energy Producers & Users Coalition

Email: ek@a-klaw.com

Status: APPEARANCE

EVELYN KAHL ATTORNEY

ALCANTAR & KAHL, LLP

120 MONTGOMERY ST, STE 2200

SAN FRANCISCO CA 94104

FOR: Occidental Power Services, Inc.

Email: ek@a-klaw.com

Status: APPEARANCE

Sara M. Kamins

CALIF PUBLIC UTILITIES COMMISSION

ENERGY RESOURCES BRANCH

505 VAN NESS AVE AREA 4-A

SAN FRANCISCO CA 94102-3214

Email: smk@cpuc.ca.gov

Status: STATE-SERVICE

KURT KAMMERER DIRECTOR OF PROGRAMS

SAN DIEGO REGIONAL ENERGY OFFICE

PO BOX 60738

SAN DIEGO CA 92166-8738

Email: kjk@kjkammerer.com

Status: INFORMATION

CATHY A. KARLSTAD

SOUTHERN CALIFORNIA EDISON COMPANY

2244 WALNUT GROVE AVE.

ROSEMEAD CA 91770

FOR: Southern California Edison Company

Email: cathy.karlstad@sce.com

Status: APPEARANCE

JOSEPH M. KARP ATTORNEY

WINSTON & STRAWN LLP

101 CALIFORNIA ST

SAN FRANCISCO CA 94111-5802

FOR: California Wind Energy Association

Email: jkarp@winston.com

Status: APPEARANCE

ADAM J. KATZ

MCDERMOTT WILL & EMERY LLP

600 13TH ST, NW.

WASHINGTON DC 20005

Email: ajkatz@mwe.com

Status: INFORMATION

CURTIS KEBLER

J. ARON & COMPANY(GOLDMAN SACHS)

2121 AVE OF THE STARS

LOS ANGELES CA 90067

Email: curtis.kebler@gs.com

Status: APPEARANCE

RANDALL W. KEEN ATTORNEY

MANATT PHELPS & PHILLIPS, LLP

11355 WEST OLYMPIC BLVD.

LOS ANGELES CA 90064

FOR: MANATT PHELPS & PHILLIPS, LLP

Email: rkeen@manatt.com

Status: APPEARANCE

CAROLYN KEHREIN

ENERGY MANAGEMENT SERVICES

1505 DUNLAP COURT

DIXON CA 95620-4208

FOR: Energy Users Forum

Email: cmkehrein@ems-ca.com

Status: APPEARANCE

WENDY KEILANI

SAN DIEGO GAS & ELECTRIC

8330 CENTURY PARK COURT, CP32D

SAN DIEGO CA 92123

Email: wkeilani@semprautilities.com

Status: APPEARANCE

STEVEN KELLY POLICY DIRECTOR

INDEPENDENT ENERGY PRODUCERS ASSN

1215 K ST, STE 900

SACRAMENTO CA 95814

FOR: IEP

Email: steven@iepa.com

Status: APPEARANCE

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Total number of addressees: 586

KEVIN KENNEDY SUPERVISOR, SPECIAL PROJECTS
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-48
SACRAMENTO CA 95814
Email: kkennedy@energy.state.ca.us
Status: STATE-SERVICE

DOUGLAS K. KERNER ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
FOR: ELLISON, SCHNEIDER & HARRIS LLP
Email: dkk@eslawfirm.com
Status: INFORMATION

KHURSHID KHOJA ASSOCIATE
THELEN REID BROWN RAYSMAN & STEINER
101 SECOND ST, STE 1800
SAN FRANCISCO CA 94105
Email: kkhoja@thelenreid.com
Status: INFORMATION

Sepideh Khosrowjah
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4101
SAN FRANCISCO CA 94102-3214
Email: skh@cpuc.ca.gov
Status: STATE-SERVICE

KIM KIENER
504 CATALINA BLVD.
SAN DIEGO CA 92106
Email: kmkiener@fox.net
Status: INFORMATION

KIMBERLY KIENER
IMPERIAL IRRIGATION DISTRICT
PO BOX 937
333 E. BARIONI BLVD.
IMPERIAL CA 92251
Email: kmkiener@iid.com
Status: INFORMATION

DANIEL A. KING
SEMPRA ENERGY
101 ASH ST, HQ 12
SAN DIEGO CA 92101
Email: daking@sempra.com
Status: INFORMATION

DOUGLAS R. KIVIAT EXECUTIVE DIRECTOR
MORGAN STANLEY / COMMODITIES
2000 WESTCHESTER AVE
PURCHASE NY 10577
Email: doug.kiviat@morganstanley.com
Status: INFORMATION

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B9A
SAN FRANCISCO CA 94105-1814
Email: nxk2@pge.com
Status: INFORMATION

GREGORY KLATT ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, NO.1030
WOODLAND HILLS CA 91367
FOR: Alliance for Retail Energy Markets/The Filing Parties
Email: klatt@energyattorney.com
Status: APPEARANCE

GREGORY S. G. KLATT
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367-8102
FOR: Alliance for Retail Energy Markets/APS Energy Services
Email: klatt@energyattorney.com
Status: APPEARANCE

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH FL 33408
Email: garson_knapp@fpl.com
Status: APPEARANCE

BILL KNOX
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS 45
SACRAMENTO CA 95814-5504
Email: bknox@energy.state.ca.us
Status: STATE-SERVICE

STEVE KOERNER SENIOR CONSEL
EL PASO CORPORATION
2 NORTH NEVADA AVE
COLORADO SPRINGS CO 80903
Email: steve.koerner@elpaso.com
Status: INFORMATION

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Total number of addressees: 586

DAVID X. KOLK, PH.D.
COMPLETE ENERGY SERVICE, INC.
41422 MAGNOLIA ST
MURRIETA CA 92562
Email: Dkolk@compenergy.com
Status: INFORMATION

SUZANNE KOROSEC
CALIFORNIA ENERGY COMMISSION
MS-31
1516 9TH ST
SACRAMENTO CA 95184
Email: skorosec@energy.state.ca.us
Status: STATE-SERVICE

Kenneth L. Koss
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5041
SAN FRANCISCO CA 94102-3214
Email: klk@cpuc.ca.gov
Status: STATE-SERVICE

LAWRENCE KOSTRZEWA REGIONAL VP,
DEVELOPMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVE., STE 1700
IRVINE CA 92612-1046
Email: lkostrzewa@edisonmission.com
Status: INFORMATION

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, STE 345
PLEASANTON CA 94588
FOR: CalpinePowerAmerica-CA,LLC
Email: kowalewskia@calpine.com
Status: APPEARANCE

DAVID T. KRASKA ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120
FOR: Pacific Gas and Electric Company
Email: dtk5@pge.com
Status: APPEARANCE

JAMES G. KRITIKSON
1997 VIA ARROYO
LA VERNE CA 91750
Email: jkritikson@yahoo.com
Status: INFORMATION

EDWARD V. KURZ ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
77 BEALE ST., MAIL CODE B30A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: evk1@pge.com
Status: APPEARANCE

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: S1L7@pge.com
Status: INFORMATION

PAUL LACOURCIERE ATTORNEY
THELEN REID BROWN RAYSMAN & STEINER LLP
101 SECOND ST, STE 1800
SAN FRANCISCO CA 94105
Email: placourciere@thelen.com
Status: INFORMATION

PAUL C. LACOURCIERE
THELEN REID BROWN RAYSMAN & STEINER
SUITE 1800
101 SECOND ST
SAN FRANCISCO CA 94105
Email: placourciere@thelenreid.com
Status: INFORMATION

BERNARD LAM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B10C
SAN FRANCISCO CA 94105
Email: bxlcl@pge.com
Status: INFORMATION

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
949 EAST ANNADALE AVE., A210
FRESNO CA 93706
FOR: Central California Power
Email: Joe.Langenberg@gmail.com
Status: APPEARANCE

ERIC LARSEN ENVIRONMENTAL SCIENTIST
RCM INTERNATIONAL
PO BOX 4716
BERKELEY CA 94704
FOR: RCM International
Email: elarsen@rcmdigesters.com
Status: APPEARANCE

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Total number of addressees: 586

J. RICHARD LAUCKHART
GLOBAL ENERGY
2379 GATEWAY OAKS DRIVE, STE 200
SACRAMENTO CA 95833
Email: rlauckhart@globalenergy.com
Status: INFORMATION

RICH LAUCKHART
GLOBAL ENERGY
SUITE 200
2379 GATEWAY OAKS DR.
SACRAMENTO CA 95833
Email: rlauckhart@globalenergy.com
Status: INFORMATION

CLARE LAUFENBERG
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS 46
SACRAMENTO CA 95814
Email: claufenb@energy.state.ca.us
Status: STATE-SERVICE

JUDE LEBLANC
BAKER & HOSTETLER LLP
600 ANTON BLVD., STE 900
COSTA MESA CA 92626
FOR: BAKER & HOSTETLER LLP
Email: jleblanc@bakerlaw.com
Status: INFORMATION

EVELYN C. LEE ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL DROP 30A
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: ecl8@pge.com
Status: APPEARANCE

VITALY LEE
AES ALAMITOS, LLC
690 N. STUDEBAKER ROAD
LONG BEACH CA 90803
Email: vitaly.lee@aes.com
Status: INFORMATION

YAREK LEHR DEPARTMENT OF WATER
CITY OF CORONA DEPARTMENT OF WATER & POW
730 CORPORATION YARD WAY
CORONA CA 92880
Email: yarek.lehr@ci.corona.ca.us
Status: APPEARANCE

BRENDA LEMAY DIRECTOR OF PROJECT
DEVELOPMENT
HORIZON WIND ENERGY
1600 SHATTUCK, STE 222
BERKELEY CA 94709
Email: brenda.lemay@horizonwind.com
Status: INFORMATION

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
MS-20
1516 NINTH ST
SACRAMENTO CA 95814
Email: cleni@energy.state.ca.us
Status: STATE-SERVICE

CONTANCE LENI
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST., MS-20
SACRAMENTO CA 95814
Email: cleni@energy.state.ca.us
Status: INFORMATION

MAUREEN LENNON
CALIFORNIA COGENERATION COUNCIL
595 EAST COLORADO BLVD., STE 623
PASADENA CA 91101
FOR: California Cogeneration Council (CCC)
Email: maureen@lennonassociates.com
Status: APPEARANCE

JOHN W. LESLIE ATTORNEY
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, STE 200
SAN DIEGO CA 92130
Email: jleslie@luce.com
Status: INFORMATION

JOHN W. LESLIE ATTORNEY
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, STE 200
SAN DIEGO CA 92130-2592
Email: jleslie@luce.com
Status: INFORMATION

Ellen S. LeVine
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5028
SAN FRANCISCO CA 94102-3214
Email: esl@cpuc.ca.gov
Status: STATE-SERVICE

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Total number of addressees: 586

DONALD C. LIDDELL ATTORNEY
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
FOR: Stirling Energy Systems
Email: liddell@energyattorney.com
Status: APPEARANCE

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
Email: liddell@energyattorney.com
Status: INFORMATION

RONALD LIEBERT ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: rliebert@cfbf.com
Status: INFORMATION

JANICE LIN MANAGING PARTNER
STRATEGEN CONSULTING LLC
146 VICENTE ROAD
BERKELEY CA 94705
Email: janice@strategenconsulting.com
Status: INFORMATION

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE CA 95843
Email: karen@klindh.com
Status: INFORMATION

GRACE LIVINGSTON-NUNLEY ASSISTANT PROJECT
MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: gx12@pge.com
Status: INFORMATION

James Loewen
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
320 WEST 4TH ST STE 500
LOS ANGELES CA 90013
Email: loe@cpuc.ca.gov
Status: STATE-SERVICE

Scott Logan
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
FOR: ORA
Email: sjl@cpuc.ca.gov
Status: STATE-SERVICE

JODY LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
FOR: Sustainable Conservation and RCM International
Email: jody_london_consulting@earthlink.net
Status: APPEARANCE

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
FOR: FOR Sustainable Conservation
Email: jody_london_consulting@earthlink.net
Status: APPEARANCE

Mark R. Loy
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRANCH
505 VAN NESS AVE RM 4205
SAN FRANCISCO CA 94102-3214
Email: mrl@cpuc.ca.gov
Status: STATE-SERVICE

ED LUCHA PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: ELL5@pge.com
Status: INFORMATION

JANE E. LUCKHARDT ATTORNEY
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLR
SACRAMENTO CA 95814
Email: jluckhardt@downeybrand.com
Status: INFORMATION

GUSTAVO LUNA
AES CORPORATION
690 N. STUDEBAKER RD.
LONG BEACH CA 90803
Email: gustavo.luna@aes.com
Status: INFORMATION

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Total number of addressees: 586

LYNELLE LUND

COMMERCE ENERGY, INC.

600 ANTON BLVD., STE 2000

COSTA MESA CA 92626

Email: llund@commerceenergy.com

Status: INFORMATION

MARY LYNCH VP - REGULATORY AND LEGISLATIVE AFFAIRS

CONSTELLATION ENERGY COMMODITIES GROUP

2377 GOLD MEDAL WAY, STE 100

GOLD RIVER CA 95670

FOR: CECG

Email: mary.lynch@constellation.com

Status: APPEARANCE

BILL LYONS

CORAL POWER, LLC

4445 EASTGATE MALL, STE 100

SAN DIEGO CA 92121

Email: Bill.Lyons@shell.com

Status: INFORMATION

LYNNE MACKKEY

LS POWER DEVELOPMENT

400 CHESTERFIELD CTR., STE 110

ST. LOUIS MO 63017

Email: lmackey@lspower.com

Status: INFORMATION

MICHAEL D. MACKNESS ATTORNEY

SOUTHERN CALIFORNIA EDISON COMPANY

2244 WALNUT GROVE AVE

ROSEMEAD CA 91770

FOR: Southern California Edison Company

Email: mike.mackness@sce.com

Status: APPEARANCE

WILLIAM V. MANHEIM ATTORNEY

PACIFIC GAS AND ELECTRIC COMPANY

PO BOX 7442, LAW DEPT.

SAN FRANCISCO CA 94120

Email: wvm3@pge.com

Status: INFORMATION

CHARLES MANZUK

SAN DIEGO GAS & ELECTRIC

8330 CENTURY PARK COURT, CP 32D

SAN DIEGO CA 92123

Email: cmanzuk@semprautilities.com

Status: INFORMATION

DAVID MARCUS

PO BOX 1287

BERKELEY CA 94701

Email: dmarcus2@sbcglobal.net

Status: INFORMATION

Jaclyn Marks

CALIF PUBLIC UTILITIES COMMISSION

EXECUTIVE DIVISION

505 VAN NESS AVE RM 5306

SAN FRANCISCO CA 94102-3214

Email: jm3@cpuc.ca.gov

Status: STATE-SERVICE

JULIE L. MARTIN WEST ISO COORDINATOR

NORTH AMERICA GAS AND POWER

BP ENERGY COMPANY

501 WESTLAKE PARK BLVD.

HOUSTON TX 77079

Email: julie.martin@bp.com

Status: INFORMATION

BILL MASON SENIOR ASSET ADMINISTRATOR

ENXCO, INC.

PO BOX 581043

N. PALM SPRINGS CA 92258

Email: billm@enxco.com

Status: INFORMATION

TIM MASON

1000 FRESNO AVE.

BERKELEY CA 94707

Email: timmason@comcast.net

Status: INFORMATION

MARTIN A. MATTES ATTORNEY

NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP

50 CALIFORNIA ST, 34TH FLR

SAN FRANCISCO CA 94111-4799

FOR: Tejon Ranch

Email: mmattes@nossaman.com

Status: INFORMATION

DANIELLE MATTHEWS SEPERAS

CALPINE CORPORATION

1125 11TH ST, STE 242

SACRAMENTO CA 95814

Email: dmatthews@calpine.com

Status: INFORMATION

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Burton Mattson
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5104
SAN FRANCISCO CA 94102-3214
Email: bwm@cpuc.ca.gov
Status: STATE-SERVICE

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO CA 95352-4060
Email: chrism@mid.org
Status: INFORMATION

MICHAEL MAZUR CHIEF TECHNICAL OFFICER
3 PHASES ENERGY SERVICES, LLC
2100 SEPULVEDA BLVD., STE 38
MANHATTAN BEACH CA 90266
Email: mmazur@3phases.com
Status: INFORMATION

KEITH MC CREA ATTORNEY
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVE, NW
WASHINGTON DC 20004-2415
FOR: CA Manufacturers & Technology Assn.
Email: keith.mccrea@sablav.com
Status: APPEARANCE

RICHARD MCCANN PH.D
M.CUBED
2655 PORTAGE BAY, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

BARRY F. MCCARTHY ATTORNEY
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, STE 501
SAN JOSE CA 95113
Email: bmcc@mccarthylaw.com
Status: INFORMATION

JAMES MCCLUSKEY
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST
SACRAMENTO CA 95814-5512
FOR: CALIFORNIA ENERGY COMMISSION
Email: jmclusk@energy.state.ca.us
Status: STATE-SERVICE

KEITH R. MCCREA ATTORNEY
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., NW
WASHINGTON DC 20004-2415
FOR: California Manufacturers & Technology Association
Email: keith.mccrea@sablav.com
Status: APPEARANCE

KARLY MCCRORY
SOLAR DEVELOPMENT
2424 PROFESSIONAL DRIVE
ROSEVILLE CA 95677
Email: karly@solardevelop.com
Status: INFORMATION

LIZBETH MCDANNEL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD CA 91770
Email: lizabeth.mcdannel@sce.com
Status: INFORMATION

KAREN MCDONALD
POWEREX CORPORATION
1400,
666 BURRAND ST
VANCOUVER BC V6C 2X8 CANADA
FOR: Powerex Corporation
Email: karen.mcdonald@powerex.com
Status: APPEARANCE

DOUGLAS MCFARLAN VP, PUBLIC AFFAIRS
MIDWEST GENERATION EME
440 SOUTH LASALLE ST., STE 3500
CHICAGO IL 60605
Email: dmcfarlan@mwgen.com
Status: INFORMATION

JAN MCFARLAND
AMERICANS FOR SOLAR POWER
1100 11TH ST, STE 323
SACRAMENTO CA 95814
FOR: Americans for Solar Power
Email: janmcfar@sonic.net
Status: APPEARANCE

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JEANNE MCKINNEY
THELEN REID BROWN RAYSMAN & STEINER
101 SECOND ST, STE 1800
SAN FRANCISCO CA 94105
Status: APPEARANCE

BRUCE MCLAUGHLIN ATTORNEY
BRAUN & BLAISING P.C.
915 L ST, STE 1420
SACRAMENTO CA 95814
FOR: BRAUN & BLAISING P.C.
Email: mclaughlin@braunlegal.com
Status: INFORMATION

JAMES MCMAHON SENIOR ENGAGEMENT MANAGER
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
FOR: California Department of Water Resources
Email: JMcMahon@navigantconsulting.com
Status: STATE-SERVICE

RACHEL MCMAHON
CEERT
1100 11TH ST, STE 311
SACRAMENTO CA 95814
Email: rachel@ceert.org
Status: INFORMATION

JACK MCNAMARA ATTORNEY
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS CA 91376-1380
Email: jackmack@suesec.com
Status: INFORMATION

MICHAEL MEACHAM ENVIRONMENTAL RESOURCE
MANAGER
CITY OF CHULA VISTA
276 FOURTH AVE
CHULA VISTA CA 91910
Status: APPEARANCE

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL RD.
RENO NV 89511
Email: emello@sppc.com
Status: INFORMATION

CHARLES MIDDLEKAUFF ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: crmd@pge.com
Status: APPEARANCE

ROSS MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH ST
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: rmiller@energy.state.ca.us
Status: STATE-SERVICE

KAREN MILLS
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: kmills@cxbf.com
Status: INFORMATION

KAREN NORENE MILLS ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: kmills@cxbf.com
Status: APPEARANCE

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, STE 100
SAN DIEGO CA 92121
FOR: CORAL POWER
Email: mmilner@coral-energy.com
Status: INFORMATION

FRED MOBASHERI
ELECTRIC POWER GROUP
201 S. LAKE AVE., STE 400
PASADENA CA 91101
Email: fmobasher@aol.com
Status: STATE-SERVICE

MICHAEL D. MONTOYA ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: mike.montoya@sce.com
Status: APPEARANCE

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ANN MOORE
CITY OF CHULA VISTA
276 FOURTH AVE
CHULA VISTA CA 91910
FOR: The City of Chula Vista
Email: amoore@ci.chula-vista.ca.us
Status: APPEARANCE

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD
SAN DIMAS CA 91773
Email: rkmoore@gswater.com
Status: INFORMATION

GREGG MORRIS DIRECTOR
GREEN POWER INSTITUTE
2039 SHATTUCK AVE, STE 402
BERKELEY CA 94704
FOR: Green Power Institute
Email: gmorris@emf.net
Status: APPEARANCE

GREGORY MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., STE 402
BERKELEY CA 94704
FOR: Green Power Institute
Email: gmorris@emf.net
Status: APPEARANCE

STEPHEN A. S. MORRISON ATTORNEY
CITY & COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE STE 234
SAN FRANCISCO CA 94102
FOR: City & County of San Francisco
Email: stephen.morrison@sfgov.org
Status: APPEARANCE

STEPHEN A.S. MORRISON ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM 234
SAN FRANCISCO CA 94102
FOR: City of San Francisco
Email: stephen.morrison@sfgov.org
Status: APPEARANCE

DAVID MORSE
1411 W. COVELL BLVD., STE 106-292
DAVIS CA 95616-5934
Email: demorse@omsoft.com
Status: INFORMATION

Jay Morse
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: jxm@cpuc.ca.gov
Status: STATE-SERVICE

THERESA L. MUELLER ATTORNEY
SAN FRANCISCO CITY ATTORNEY
CITY HALL, RM 234
SAN FRANCISCO CA 94102-4682
FOR: City and County of San Francisco
Email: theresa.mueller@sfgov.org
Status: APPEARANCE

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL CA 94903
Email: philm@scdenergy.com
Status: INFORMATION

STEVE MUNSON
VULCAN POWER COMPANY
345 SW CYBER DRIVE, STE 103
BEND OR 97702
Email: smunson@vulcanpower.com
Status: APPEARANCE

SUSAN MUNVES ENERGY AND GREEN BLDG. PROG.
ADMIN.
CITY OF SANTA MONICA
1212 5TH ST, FIRST FLR
SANTA MONICA CA 90401
Email: susan.munves@smgov.net
Status: APPEARANCE

CLYDE MURLEY
1031 ORDWAY ST
ALBANY CA 94706
FOR: Union of Concerned Scientists
Email: clyde.murley@comcast.net
Status: APPEARANCE

ERIN M. MURPHY
MCDERMOTT WILL & EMERY LLP
600 THIRTEENTH ST, NW
WASHINGTON DC 20005
FOR: Morgan Stanley Capital Group Inc.
Email: emmurphy@mwe.com
Status: APPEARANCE

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MEGAN MACNEIL MYERS ATTORNEY
LAW OFFICES OF MEGAN MACNEIL MYERS
PO BOX 638
LAKEPORT CA 95453
FOR: Americans for Solar Power
Email: meganmmyers@yahoo.com
Status: APPEARANCE

SARA STECK MYERS
LAW OFFICES OF SARA STECK MYERS
122 28TH AVE.
SAN FRANCISCO CA 94121
FOR: Center for Energy Efficiency and Renewable
Technologies
Email: ssmyers@worldnet.att.net
Status: APPEARANCE

ROBYN NARAMORE
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: robyn.naramore@sce.com
Status: INFORMATION

SEAN M. NEAL
DUNCAN, WEINBER, GENZER & PEMBROKE, P.C.
915 L ST, SUITE 1410
SACRAMENTO CA 95814
FOR: Lassen Municipal Utility District
Email: smn@dwgp.com
Status: INFORMATION

CRYSTAL NEEDHAM SENIOR DIRECTOR, COUNSEL
EDISON MISSION ENERGY
18101 VON KARMAN AVE, STE 1700
IRVINE CA 92612-1046
Email: cneedham@edisonmission.com
Status: APPEARANCE

JESSICA NELSON
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA CA 96122-7064
Email: notice@psrec.coop
Status: APPEARANCE

ROBERT NICHOLS
NEW WEST ENERGY
MAILING STATION ISB 665
BOX 61868
PHOENIX AZ 85082-1868
Email: rsnichol@srpnet.com
Status: APPEARANCE

ROBERT S. NICHOLS
NEW WEST ENERGY
MAILING STATION ISB 665
PO BOX 61868
PHOENIX AZ 85082-1868
Email: rsnichol@srpnet.com
Status: INFORMATION

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO CA 92123-1530
Email: dnehaus@semprautilities.com
Status: INFORMATION

SEPHRA A. NINOW POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE, STE 100
SAN DIEGO CA 92123
Email: sephra.ninow@energycenter.org
Status: INFORMATION

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2678 BISHOP DRIVE
SAN RAMON CA 94583
Email: rick_noger@praxair.com
Status: INFORMATION

KEVIN O'BEIRNE
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO CA 92123
Email: ko'beirne@semprautilities.com
Status: INFORMATION

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4107
SAN FRANCISCO CA 94102-3214
Email: nao@cpuc.ca.gov
Status: STATE-SERVICE

CHRISTOPHER O'BRIEN SHARP SOLAR
VP STRATEGY AND GOVERNMENT RELATIONS
3808 ALTON PLACE NW
WASHINGTON DC 20016
FOR: SHARP SOLAR SYSTEMS DIVISION
Email: obrienc@sharpsec.com
Status: INFORMATION

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Total number of addressees: 586

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE ST, STE 200
DENVER CO 80202
Email: todil@mckennalong.com
Status: INFORMATION

STANDISH O'GRADY
FRIENDS OF KIRKWOOD ASSOCIATION
31 PARKER AVE
SAN FRANCISCO CA 94118
Email: sho@ogrady.us
Status: INFORMATION

Jerry Oh
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
505 VAN NESS AVE RM 3200
SAN FRANCISCO CA 94102-3214
Email: joh@cpuc.ca.gov
Status: STATE-SERVICE

CHRISTOPHER C. O'HARA ASSISTANT GENERAL
COUNSEL-REGULATORY
NRG ENERGY
211 CARNEGIE CENTER DRIVE
PRINCETON NJ 8540
Email: chris.ohara@nrgenergy.com
Status: APPEARANCE

DAVID OLIVARES ELECTRIC RESOURCE
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO CA 95352
FOR: Electric Resource Planning and Development
Modesto Irrigation District
Email: davido@mid.org
Status: INFORMATION

DAVID OLSEN
IMPERIAL VALLEY STUDY GROUP
3804 PACIFIC COAST HIGHWAY
VENTURA CA 93001
FOR: Imperial Valley Study Group
Email: olsen@avenuecable.com
Status: INFORMATION

ERIC OLSON
NAVIGANT CONSULTING INC.
3100 ZINFANDEL DR., STE 600
RANCHO CORDOVA CA 95670-6078
Email: eolson@navigantconsulting.com
Status: INFORMATION

SARA O'NEILL VP - REGULATORY AND GOVERNMENT
AFFAIRS
CONSTELLATION NEW ENERGY, INC.
SPEAR TOWER, 36TH FLOOR
ONE MARKET ST
SAN FRANCISCO CA 94105
FOR: Constellation New Energy, Inc.
Email: sara.oneill@constellation.com
Status: APPEARANCE

DAVID ORTH
KINGS RIVER CONSERVATION DISTRICT
4886 EAST JENSEN AVE
FRESNO CA 93725
FOR: Kings River Conservation District
Email: dorth@krcd.org
Status: APPEARANCE

FREDERICK M. ORTLIEB OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVE, STE 1100
SAN DIEGO CA 92101
FOR: CITY OF SAN DIEGO
Email: fortlieb@sandiego.gov
Status: APPEARANCE

FRITZ ORTLIEB ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVE, STE 1200
SAN DIEGO CA 92101
FOR: City of San Diego
Email: fortlieb@sandiego.gov
Status: APPEARANCE

CARL K. OSHIRO ATTORNEY
CSBRT/CSBA
100 PINE ST, STE 3110
SAN FRANCISCO CA 94111
Email: ckomail@pacbell.net
Status: APPEARANCE

ROBERT OTT
RELIANT ENERGY
PO BOX 148
HOUSTON TX 77001-0148
Email: rott@reliant.com
Status: INFORMATION

JOHN PACHECO ATTORNEY
SAN DIEGO GAS & ELECTRIC
101 ASH ST
SAN DIEGO CA 92101
FOR: San Diego Gas & Electric
Email: jpacheco@sempra.com
Status: APPEARANCE

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RAJ N. PANKHANIA
HERCULES MUNICIPAL UTILITY
111 CIVIC DRIVE
HERCULES CA 94547
Email: raj.pankhania@ci.hercules.ca.us
Status: INFORMATION

JOHN PAPPAS UTILITY ELECTRIC PORTFOLIO
MANAGEMENT
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, N12E
SAN FRANCISCO CA 94105
Email: jsp5@pge.com
Status: INFORMATION

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
FOR: NAVIGANT CONSULTING, INC.
Email: lpark@navigantconsulting.com
Status: INFORMATION

JON W. PARNELL MANAGER - CROSS VALLEY CANAL
KERN COUNTY WATER AGENCY
3200 RIO MIRANDA DRIVE
BAKERSFIELD CA 93308
Email: jparnell@kcwa.com
Status: INFORMATION

BERJ K. PARSEGHIAN ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: berj.parseghian@sce.com
Status: APPEARANCE

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
Email: judypau@dwt.com
Status: INFORMATION

JOSEPH M. PAUL SENIOR CORPORATE COUNSEL
DYNEGY, INC.
2420 CAMINO RAMON, STE 215
SAN RAMON CA 94583
FOR: Dynegy
Email: Joe.paul@dynegy.com
Status: APPEARANCE

Karen P. Paull
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4300
SAN FRANCISCO CA 94102-3214
Email: kpp@cpuc.ca.gov
Status: INFORMATION

CARL PECHMAN
POWER ECONOMICS
901 CENTER ST
SANTA CRUZ CA 95060
Email: cpechman@powereconomics.com
Status: INFORMATION

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 S FLOWER ST., STE 1500
LOS ANGELES CA 90071-2916
FOR: Southern California Generation Coalition
Email: npedersen@hanmor.com
Status: APPEARANCE

ROGER PELOTE
WILLIAMS POWER COMPANY
12736 CALIFA ST
VALLEY VILLAGE CA 91607
Email: roger.pelote@williams.com
Status: INFORMATION

CARLOS F. PENA
SEMPRA ENERGY LAW DEPARTMENT
101 ASH ST
SAN DIEGO CA 92101
Email: cfpena@sempra.com
Status: INFORMATION

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS CA 94024
FOR: CLEAN POWER MARKETS, INC.
Email: pepper@cleanpowermarkets.com
Status: APPEARANCE

CARLA PETERMAN
UCEI
2547 CHANNING WAY
BERKELEY CA 94720
Email: carla.peterman@gmail.com
Status: INFORMATION

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Total number of addressees: 586

GABE PETLIN
3 PHASES ENERGY SERVICES
PRESIDIO OF SAN FRANCISCO
6 FUNSTON AVE
SAN FRANCISCO CA 94129
Email: gpetlin@3phases.com
Status: APPEARANCE

JACK PIGOTT
GEN 3 SOLAR, INC.
31302 HUNTSWOOD AVE
HAYWARD CA 94544
Email: jpigott@gen3solar.com
Status: INFORMATION

WILL PLAXICO
HELIOS ENERGY, LLC
31897 DEL OBISPO ST. STE 220
SAN JUAN CAPISTRANO CA 92675
Email: xplaxico@heliosenergy.us
Status: APPEARANCE

RYAN PLETKA RENEWABLE ENERGY PROJECT
MANAGER
BLACK & VEATCH
11401 LAMAR
OVERLAND PARK KS 66211
FOR: BLACK & VEATCH
Email: pletkarj@bv.com
Status: INFORMATION

EDWARD G. POOLE ATTORNEY
ANDERSON & POOLE
601 CALIFORNIA ST, STE 1300
SAN FRANCISCO CA 94108-2818
Email: epoole@adplaw.com
Status: INFORMATION

TED POPE DIRECTOR
COHEN VENTURES, INC./ENERGY SOLUTIONS
1738 EXCELSIOR AVE
OAKLAND CA 94602
Email: ted@energy-solution.com
Status: INFORMATION

JENNIFER PORTER POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE, STE 100
SAN DIEGO CA 92123
Email: jennifer.porter@energycenter.org
Status: INFORMATION

KEVIN PORTER
EXETER ASSOCIATES, INC.
SUITE 310
5565 STERRETT PLACE
COLUMBIA MD 21044
FOR: EXETER ASSOCIATES, INC.
Email: porter@exeterassociates.com
Status: INFORMATION

VIDHYA PRABHAKARAN
GOODIN,MACBRIDE,SQUERI,DAY,LAMPREY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Reliant Energy, Inc.
Email: vprabhakaran@goodinmacbride.com
Status: APPEARANCE

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, STE 1600
SAN FRANCISCO CA 94104
FOR: ENERGY AND ENVIRONMENTAL ECONOMICS
Email: snuller@ethree.com
Status: INFORMATION

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
555 WEST 5TH ST, GT14D6
LOS ANGELES CA 90013
FOR: San Diego Gas & Electric/SoCal Gas
Email: rprince@semprautilities.com
Status: APPEARANCE

NICOLAS PROCOS
ALAMEDA POWER & TELECOM
2000 GRAND ST
ALAMEDA CA 94501-0263
FOR: Utility Analyst
Email: procos@alamedapt.com
Status: INFORMATION

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO CA 95814
Email: mpryor@energy.state.ca.us
Status: STATE-SERVICE

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH ST, STE 213A
BERKELEY CA 94710
FOR: California Wind Energy Association
Email: nrader@igc.org
Status: APPEARANCE

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Total number of addressees: 586

Junaid Rahman
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jnr@cpuc.ca.gov
Status: STATE-SERVICE

STEVE RAHON DIRECTOR, TARIFF & REGULATORY
ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO CA 92123-1548
Email: lschavrien@semprautilities.com
Status: INFORMATION

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 45
SACRAMENTO CA 95814
FOR: CALIFORNIA ENERGY COMMISSION
Email: hraitt@energy.state.ca.us
Status: STATE-SERVICE

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
Email: cpucrulings@navigantconsulting.com
Status: INFORMATION

RICHARD W. RAUSHENBUSH ATTORNEY
LATHAM & WATKINS LLP
505 MONTGOMERY ST, STE 2000
SAN FRANCISCO CA 94111
Email: richard.raushenbush@lw.com
Status: INFORMATION

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
FOR: Silicon Valley Manufacturers Group
Email: johnredding@earthlink.net
Status: APPEARANCE

PHILLIP REESE INC.
C/O REESE-CHAMBERS SYSTEMS CONSULTANTS,
PO BOX 8
3379 SOMIS ROAD
SOMIS CA 93066
FOR: The California Biomass Energy Alliance
Email: phil@reesechambers.com
Status: APPEARANCE

MADDIE REICHER
EVOLUTION MARKETS
425 MARKET ST, SUTE 2209
SAN FRANCISCO CA 94105
Email: mreicher@evomarkets.com
Status: INFORMATION

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ CA 95062
FOR: Aglet Consumer Alliance
Email: janreid@coastecon.com
Status: APPEARANCE

EDWARD C. REMEDIOS
33 TOLEDO WAY
SAN FRANCISCO CA 94123-2108
Email: ecrem@ix.netcom.com
Status: INFORMATION

RHONE RESCH
SOLAR ENERGY INDUSTRIES ASSOCIATION
805 FIFTEENTH ST, NW, STE 510
WASHINGTON DC 20005
Email: rresch@seia.org
Status: APPEARANCE

MIKE RINGER
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-20
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: mringer@energy.state.ca.us
Status: STATE-SERVICE

THEODORE ROBERTS ATTORNEY
SEMPRA GLOBAL
101 ASH ST, HQ 13D
SAN DIEGO CA 92101-3017
FOR: Sempra Global/Sempra Energy Solutions
Email: troberts@sempra.com
Status: APPEARANCE

THEODORE E. ROBERTS ATTORNEY
SEMPRA ENERGY
101 ASH ST, HQ 13D
SAN DIEGO CA 92101-3017
FOR: Sempra Energy Solutions
Email: troberts@sempra.com
Status: APPEARANCE

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HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE CA 93501
FOR: OAK CREEK ENERGY SYSTEMS, INC.
Email: hal@rwitz.net
Status: INFORMATION

LAURA ROOKE SR. PROJECT MANAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND OR 97204
Email: laura.rooke@pgn.com
Status: INFORMATION

GRANT A. ROSENBLUM STAFF COUNSEL
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CALIFORNIA ISO
Email: grosenblum@caiso.com
Status: INFORMATION

TIM ROSENFELD
HMW INTERNATIONAL, INC.
131 CAMINO ALTO, STE D2
MILL VALLEY CA 94941
Email: tdr-hmw@sbcglobal.net
Status: INFORMATION

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, STE 320
CHESTERFIELD MO 63017
Email: jimross@r-c-s-inc.com
Status: INFORMATION

JP ROSS DEPUTY DIRECTOR
THE VOTE SOLAR INITIATIVE
300 BRANNAN ST, STE 609
SAN FRANCISCO CA 94107
FOR: THE VOTE SOLAR INITIATIVE
Email: jpross@votesolar.org
Status: APPEARANCE

JOSEPH ROSSIGNOLI
NATIONAL GRID
25 RESEARCH DRIVE
WESTBOROUGH MA 01582-0001
Email: joseph.rossignoli@us.ngrid.com
Status: INFORMATION

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST MS 75
SACRAMENTO CA 95817
FOR: SACRAMENTO MUNICIPAL UTILITY DISTRICT
Email: rroth@smud.org
Status: INFORMATION

Nancy Ryan
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5217
SAN FRANCISCO CA 94102-3214
Email: ner@cpuc.ca.gov
Status: STATE-SERVICE

KATHERINE RYZHAYA
PACIFIC GAS & ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
FOR: PACIFIC GAS & ELECTRIC COMPANY
Email: karp@pge.com
Status: INFORMATION

ERIK SALTMARSH ATTORNEY
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
770 L ST, STE 1250
SACRAMENTO CA 95814
FOR: California Electricity Oversight Board
Email: ens@eob.ca.gov
Status: APPEARANCE

Lisa-Marie Salvacion
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4107
SAN FRANCISCO CA 94102-3214
Email: lms@cpuc.ca.gov
Status: STATE-SERVICE

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: California ISO
Email: jsanders@caiso.com
Status: INFORMATION

DAVID A. SANDINO
CALIFORNIA DEPARTMENT OF WATER RESOURCES
1416 9TH ST RM 1118
SACRAMENTO CA 95814
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES
Email: dsandino@water.ca.gov
Status: APPEARANCE

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SOUMYA SASTRY
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: sv56@pge.com
Status: INFORMATION

DAVID SAUL COO
SOLEL, INC.
701 NORTH GREEN VALLEY PKY, STE 200
HENDERSON NV 89074
FOR: SOLEL, INC.
Email: david.saul@solel.com
Status: APPEARANCE

JANINE L. SCANCARELLI ATTORNEY
FOLGER, LEVIN & KAHN, LLP
275 BATTERY ST, 23RD FLR
SAN FRANCISCO CA 94111
Email: jscancarelli@flk.com
Status: INFORMATION

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN ST, STE 750
PHOENIX AZ 85004
Email: jenine.schenk@apses.com
Status: INFORMATION

STEVEN S. SCHLEIMER DIRECTOR, COMPLIANCE &
REGULATORY AFFAIRS
BARCLAYS BANK, PLC
200 PARK AVE, FIFTH FLR
NEW YORK NY 10166
Email: steven.schleimer@barclayscapital.com
Status: INFORMATION

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVE
BERKELEY CA 94703-2714
Email: rschmidt@bartlewells.com
Status: INFORMATION

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON ST, STE 780
VANCOUVER WA 98660
FOR: CAC
Email: dws@r-c-s-inc.com
Status: INFORMATION

Brian D. Schumacher
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: bds@cpuc.ca.gov
Status: STATE-SERVICE

Andrew Schwartz
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5215
SAN FRANCISCO CA 94102-3214
Email: as2@cpuc.ca.gov
Status: STATE-SERVICE

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE ST, STE 200
DENVER CO 80202
Email: pseby@mckennalong.com
Status: APPEARANCE

MICHAEL SHAMES ATTORNEY
UCAN
3100 FIFTH AVE., STE. B
SAN DIEGO CA 92111
FOR: UCAN
Email: mshames@ucan.org
Status: APPEARANCE

Karen M. Shea
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: kms@cpuc.ca.gov
Status: STATE-SERVICE

LINDA Y. SHERIF ATTORNEY
CALPINE CORPORATION
3875 HOPYARD ROAD, STE 345
PLEASANTON CA 94588
FOR: CALPINE CORP.
Email: sherifl@calpine.com
Status: APPEARANCE

NORA SHERIFF ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Energy Producers & Users Coalition
Email: nes@a-klaw.com
Status: APPEARANCE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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Total number of addressees: 586

JEFFREY SHIELDS
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
PO BOX 747
RIPON CA 95366
Email: jshields@ssjid.com
Status: APPEARANCE

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVE
RIDGEWOOD NJ 7450
FOR: RIDGEWOOD POWER MANAGEMENT, LLC
Email: bshort@ridgewoodpower.com
Status: INFORMATION

Anne E. Simon
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5024
SAN FRANCISCO CA 94102-3214
Email: aes@cpuc.ca.gov
Status: STATE-SERVICE

Sean A. Simon
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: svn@cpuc.ca.gov
Status: STATE-SERVICE

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO CO 81301
Email: kjsimonsen@ems-ca.com
Status: INFORMATION

Peter Skala
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: ska@cpuc.ca.gov
Status: STATE-SERVICE

AIMEE M. SMITH ATTORNEY
SEMPRA ENERGY
101 ASH ST HQ13
SAN DIEGO CA 92101
FOR: SEMPRA ENERGY
Email: amsmith@sempra.com
Status: APPEARANCE

Donald R. Smith
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
FOR: Division of Ratepayer Advocates
Email: dsh@cpuc.ca.gov
Status: STATE-SERVICE

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE 1000
SOUTH SAN FRANCISCO CA 94080
Email: gsmith@adamsbroadwell.com
Status: INFORMATION

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH ST, NW, STE 800
WASHINGTON DC 20005
Email: csmoots@perkinscoie.com
Status: APPEARANCE

ROBIN SMUTNY-JONES
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: rsmutny-jones@caiso.com
Status: INFORMATION

JOHN SNIFFEN VICE PRESIDENT
ELEMENT MARKETS
1 SUGARCREEK BLVD., 201
SUGARLAND TX 77478
Email: jsniffen@elementmarkets.com
Status: INFORMATION

JEANNE M. SOLE DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO CA 94102
FOR: The City and County of San Francisco
Email: jeanne.sole@sfgov.org
Status: APPEARANCE

JAMES D. SQUERI ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: California Retailers Association
Email: jsqueri@goodinmacbride.com
Status: APPEARANCE

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Total number of addressees: 586

JAMES D. SQUERI ATTORNEY
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Powerex Corp.
Email: jsqueri@gmssr.com
Status: APPEARANCE

SEEMA SRINIVASAN ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
Email: sls@a-klaw.com
Status: INFORMATION

CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., STE 900
COSTA MESA CA 92626
FOR: BAKER & HOSTETLER LLP
Email: csteen@bakerlaw.com
Status: INFORMATION

Merideth Sterkel
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
FOR: Energy Division
Email: mts@cpuc.ca.gov
Status: STATE-SERVICE

ISSER STEVE VICE PRESIDENT/GENERAL COUNSEL
GOOD COMPANY ASSOCIATES
816 CONGRESS AVE, STE 1400
AUSTIN TX 78701
Email: sisser@goodcompanyassociates.com
Status: INFORMATION

MONIQUE STEVENSON
SEA BREEZE PACIFIC REGIONAL TRANSMISSION
LOBBY BOX 91
333 SEYMOUR ST., STE 1400
VANCOUVER BC V5B 5A6 CANADA
Email: MoniqueStevenson@SeaBreezePower.com
Status: INFORMATION

F. Jackson Stoddard
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5125
SAN FRANCISCO CA 94102-3214
Email: fjs@cpuc.ca.gov
Status: STATE-SERVICE

PATRICK STONER PROGRAM DIRECTOR
LOCAL GOVERNMENT COMMISSION
1303 J ST, STE 250
SACRAMENTO CA 95814
Email: pstoner@lgc.org
Status: INFORMATION

Robert L. Strauss
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
FOR: Energy Division
Email: rls@cpuc.ca.gov
Status: STATE-SERVICE

VENKAT SURAVARAPU ASSOCIATES DIRECTOR
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
1150 CONNECTICUT AVE NW, STE. 201
WASHINGTON DC 20036
FOR: CAMBRIDGE ENERGY RESEARCH ASSOCIATES
Email: vsuravarapu@cera.com
Status: INFORMATION

KENNY SWAIN
POWER ECONOMICS
901 CENTER ST
SANTA CRUZ CA 95060
Email: kswain@powereconomics.com
Status: INFORMATION

KEITH SWITZER
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773-9016
Email: kswitzer@gswater.com
Status: INFORMATION

PAUL A. SZYMANSKI ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST
SAN DIEGO CA 92101
Email: pszymanski@sempra.com
Status: INFORMATION

George S. Tagnipes
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jst@cpuc.ca.gov
Status: STATE-SERVICE

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Total number of addressees: 586

BOB TANG ASSISTANT DIRECTOR
CITY OF AZUSA
729 NORTH AZUSA AVE
AZUSA CA 91702-9500
Email: btang@ci.azusa.ca.us
Status: INFORMATION

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Cogeneration Association of California
Email: filings@a-klaw.com
Status: INFORMATION

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE
SACRAMENTO CA 95821
Email: lterry@water.ca.gov
Status: INFORMATION

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, STE 210
WALNUT CREEK CA 94597
Email: pthompson@summitblue.com
Status: INFORMATION

WILLIAM TOBIN
SEMPRA GLOBAL
101 ASH ST, HQ08C
SAN DIEGO CA 92101
Email: wtobin@sempraglobal.com
Status: INFORMATION

SCOTT TOMASHEFSKY
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE CA 95678-6420
Email: scott.tomashefsky@ncpa.com
Status: INFORMATION

WAYNE TOMLINSON
EL PASO CORPORATION
2 NORTH NEVADA AVE
COLORADO SPRINGS CO 80903
Email: william.tomlinson@elpaso.com
Status: INFORMATION

NELLIE TONG
KEMA, INC.
492 NINTH ST, STE 220
OAKLAND CA 94607
Email: nellie.tong@us.kema.com
Status: INFORMATION

ANGELA TORR
PACIFIC GAS & ELECTRIC COMPANY
MC N13E
245 MARKET ST
SAN FRANCISCO CA 94105
Email: ACT6@pge.com
Status: INFORMATION

DAVID TOWNLEY
18 BASSWOOD AVE
OAK PARK CA 91377
Email: David.Townley@townleytech.com
Status: INFORMATION

SUSAN G. TRAUTMANN
SIERRA PACIFIC POWER COMPANY
6226 WEST SAHARA AVE
LAS VEGAS NV 89151
FOR: Sierra Pacific Power Company/Nevada Power Company
Email: ericj@eslawfirm.com
Status: INFORMATION

ALLEN K. TRIAL COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST, HQ-12D
SAN DIEGO CA 92101
Email: atrial@sempra.com
Status: INFORMATION

NANCY TRONAAS
CALIFORNIA ENERGY COMMISSION
1516 9TH ST. MS-20
SACRAMENTO CA 95814-5512
Email: ntronaas@energy.state.ca.us
Status: STATE-SERVICE

ANN L. TROWBRIDGE
DAY CARTER MURPHY LLC
3620 AMERICAN RIVER DRIVE, STE 205
SACRAMENTO CA 95864
FOR: Merced Irrigation District/Sacramento Municipal Utility District/California Clean DG Coalition
Email: atrowbridge@daycartermurphy.com
Status: APPEARANCE

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Laura J. Tudisco
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5032
SAN FRANCISCO CA 94102-3214
Email: ljt@cpuc.ca.gov
Status: STATE-SERVICE

JANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF CALIFORNIA
64 LOS ALTOS SQUARE
LOS ALTOS CA 94022
FOR: LEAGUE OF WOMEN VOTERS OF CALIFORNIA
Email: jturnbu@ix.netcom.com
Status: INFORMATION

Robert Turner
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: rmt@cpuc.ca.gov
Status: STATE-SERVICE

ANDREW ULMER STAFF COUNSEL
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE, STE 120
SACRAMENTO CA 95821
FOR: California Department of Water Resources
Email: aulmer@water.ca.gov
Status: STATE-SERVICE

LISA URICK ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST
SAN DIEGO CA 92101
FOR: San Diego Gas & Electric
Email: lurick@sempra.com
Status: APPEARANCE

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA CA 94563
Email: andy.vanhorn@vhcenergy.com
Status: INFORMATION

BETH VAUGHAN
CALIFORNIA COGENERATION COUNCIL
4391 N. MARSH ELDER COURT
CONCORD CA 94521
Email: beth@beth411.com
Status: INFORMATION

DAVID VIDAVER
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-20
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: dvidaver@energy.state.ca.us
Status: STATE-SERVICE

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90-4000
BERKELEY CA 94720
Email: elvine@lbl.gov
Status: INFORMATION

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH ST, HQ09
SAN DIEGO CA 92101-3017
Email: svongdeuane@semprasolutions.com
Status: APPEARANCE

WILLIAM V. WALSH ATTORNEY
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
FOR: Southern California Edison
Email: william.v.walsh@sce.com
Status: APPEARANCE

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO CA 94304-2016
Email: rwalther@pacbell.net
Status: INFORMATION

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
FOR: NATURAL RESOURCES DEFENSE COUNCIL
Email: dwang@nrdc.org
Status: INFORMATION

JOY A. WARREN ATTORNEY
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: joyw@mid.org
Status: INFORMATION

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JAMES WEIL DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 37
COOL CA 95614
Email: jweil@aglet.org
Status: APPEARANCE

Steven A. Weissman
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5107
SAN FRANCISCO CA 94102-3214
Email: saw@cpuc.ca.gov
Status: STATE-SERVICE

JON WELNER
PAUL HASTINGS JANOFSKY & WALKER LLP
55 SECOND ST, 24TH FLR
SAN FRANCISCO CA 94105-3441
Email: jonwelner@paulhastings.com
Status: INFORMATION

WILLIAM W. WESTERFIELD III ATTORNEY
ELLISON, SCHNEIDER & HARRIS LLP
2015 H ST
SACRAMENTO CA 95814
FOR: Sierra Pacific Power Company
Email: www@eslawfirm.com
Status: APPEARANCE

WILLIAM W. WESTERFIELD III ATTORNEY
ELLISON, SCHNEIDER & HARRIS L.L.P.
2015 H ST
SACRAMENTO CA 95814
FOR: Sierra Pacific Power Company per e-mail 9-26-06
Email: www@eslawfirm.com
Status: APPEARANCE

GREGGORY L. WHEATLAND ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
FOR: Hercules Municipal Utility
Email: glw@eslawfirm.com
Status: APPEARANCE

DEANA M. WHITE ATTORNEY
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: deana.white@sce.com
Status: INFORMATION

LISA WEINZIMER CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVE, NO. 2
SAN FRANCISCO CA 94118
Email: lisa_weinzimer@platts.com
Status: INFORMATION

ANDREA WELLER
STRATEGIC ENERGY, LTD
7220 AVENIDA ENCINAS, STE 120
CARLSBAD CA 92209
Email: aweller@sel.com
Status: INFORMATION

MICHAEL WERNER
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE, LL90
SACRAMENTO CA 95821
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES
Email: hcronin@water.ca.gov
Status: APPEARANCE

WILLIAM W. WESTERFIELD, 111 ATTORNEY
ELLISON, SCHNEIDER & HARRIS L.L.P.
2015 H ST
SACRAMENTO CA 95814
Email: www@eslawfirm.com
Status: INFORMATION

Jane Whang
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5029
SAN FRANCISCO CA 94102-3214
Email: jjw@cpuc.ca.gov
Status: STATE-SERVICE

GREGGORY L. WHEATLAND
ELLISON, SCHNEIDER & HARRIS, L.L.P.
2015 H ST
SACRAMENTO CA 95814
FOR: the City of Corona
Email: glw@eslawfirm.com
Status: APPEARANCE

KEITH WHITE
931 CONTRA COSTA DRIVE
EL CERRITO CA 94530
Email: keithwhite@earthlink.net
Status: INFORMATION

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Keith D White

CALIF PUBLIC UTILITIES COMMISSION

RATEMAKING BRANCH

505 VAN NESS AVE AREA 4-A

SAN FRANCISCO CA 94102-3214

Email: kwh@cpuc.ca.gov

Status: STATE-SERVICE

RICHARD F. WIEBE

LAW OFFICE OF RICHARD R. WIEBE

425 CALIFORNIA ST, STE 2025

SAN FRANCISCO CA 92104

FOR: Center of Biological Diversity

Email: wiebe@pacbell.net

Status: APPEARANCE

JOSEPH F. WIEDMAN ATTORNEY

GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP

505 SANSOME ST, STE 900

SAN FRANCISCO CA 94111

FOR: PacifiCorp

Email: jwiedman@goodinmacbride.com

Status: INFORMATION

KATHRYN WIG PARALEGAL

NRG ENERGY, INC.

211 CARNEGIE CENTER

PRINCETON NY 8540

Email: Kathryn.Wig@nrgenergy.com

Status: APPEARANCE

VALERIE WINN PROJECT MANAGER

PACIFIC GAS & ELECTRIC

77 BEALE ST, B9A

SAN FRANCISCO CA 94105

Email: vjw3@pge.com

Status: INFORMATION

VALERIE J. WINN

PACIFIC GAS AND ELECTRIC COMPANY

PO BOX 770000, B9A

SAN FRANCISCO CA 94177-0001

Email: vjw3@pge.com

Status: INFORMATION

RYAN WISER

BERKELEY LAB

MS-90-4000

ONE CYCLOTRON ROAD

BERKELEY CA 94720

FOR: BERKELEY LAB

Email: rhwiser@lbl.gov

Status: INFORMATION

Laura Wisland

CALIF PUBLIC UTILITIES COMMISSION

ENERGY RESOURCES BRANCH

505 VAN NESS AVE AREA

SAN FRANCISCO CA 94102-3214

Email: ln1@cpuc.ca.gov

Status: STATE-SERVICE

OSA L. WOLFF ATTORNEY

SHUTE, MIHALY & WEINBERGER, LLC

396 HAYES ST

SAN FRANCISCO CA 94102

Email: wolff@smwlaw.com

Status: INFORMATION

LANA WONG

CALIFORNIA ENERGY COMMISSION

1516 NINTH ST., MS-20

SACRAMENTO CA 95814

Email: lwong@energy.state.ca.us

Status: STATE-SERVICE

VIKKI WOOD

SACRAMENTO MUNICIPAL UTILITY DISTRICT

6301 S ST, MS A204

SACRAMENTO CA 95817-1899

Email: vwood@smud.org

Status: INFORMATION

JAMES B. WOODRUFF

SOUTHERN CALIFORNIA EDISON COMPANY

2244 WALNUT GROVE AVE, STE 342, GO1

ROSEMEAD CA 91770

Email: woodrujb@sce.com

Status: INFORMATION

KEVIN WOODRUFF

WOODRUFF EXPERT SERVICES, INC.

1100 K ST, STE 204

SACRAMENTO CA 95814

FOR: WOODRUFF EXPERT SERVICES

Email: kdw@woodruff-expert-services.com

Status: INFORMATION

JIM WOODWARD

CALIFORNIA ENERGY COMMISSION

1516 NINTH ST, MS 20

SACRAMENTO CA 95814-5504

Email: jwoodwar@energy.state.ca.us

Status: STATE-SERVICE

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Total number of addressees:

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND ST
DAVENPORT IA 52801
Email: cswollums@midamerican.com
Status: INFORMATION

CYNTHIA WOOTEN
LUMENX CONSULTING, INC.
1126 DELAWARE ST
BERKELEY CA 94702
Email: cwooten@lumenxconsulting.com
Status: INFORMATION

LINDA WRAZEN
SEMPRA GLOBAL ENTERPRISES
101 ASH ST, HQ 08C
SAN DIEGO CA 92101
Email: lwrazen@sempraglobal.com
Status: INFORMATION

E.J. WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, STE 110
HOUSTON TX 77046
Email: ej_wright@oxy.com
Status: INFORMATION

ELIZABETH WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, STE 110
HOUSTON TX 77046
Email: ej_wright@oxy.com
Status: APPEARANCE

ANDY WUELLNER
MOUNTAIN UTILITIES
PO BOX 1
KIRKWOOD CA 95646
Status: APPEARANCE

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B13L
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: jay2@pge.com
Status: INFORMATION

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES CA 90013
Email: hyao@semprautilities.com
Status: INFORMATION

SALLE E. YOO ATTORNEY
DAVIS WRIGHT TREMAINE
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: South San Joaquin Irrigation District
Email: salleyoo@dwt.com
Status: APPEARANCE

MICHAEL A. YUFFEE
MCDERMOTT WILL & EMERY LLP
600 THIRTEENTH ST, NW
WASHINGTON DC 20005-3096
Email: myuffee@mwe.com
Status: INFORMATION

GEORGE ZAHARIUDAKIS
PACIFIC GAS AND ELECTRIC COMPANY
MAILD CODE B9A
77 BEALE ST, RM. 904
SAN FRANCISCO CA 94105
Email: gxz5@pge.com
Status: INFORMATION

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-45
SACRAMENTO CA 95814
Email: kzocchet@energy.state.ca.us
Status: STATE-SERVICE