SOUTHERN CALIFORNIA
EDISON
An EDISON INTERNATIONAL Company

Amber Dean
Attorney
Amber.Dean@SCE.com

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California Energy Commission
Docket Office
Attn: Docket Nos. 04-DIST-GEN-1 and 04-IEP-01
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

Re: Distributed Generation and Distributed Energy Resources CPUC Docket No. R04-03-017/ CEC Docket No. 04-DIST-GEN-1 and 04-IEP-01

Dear Docket Clerk:

SCE would like to submit the enclosed comments on the California Energy Commission Integrated Policy Report Committee's April 28, 2005 Workshop on California's Market Potential for Combined Heat and Power and Distributed Generation.

Please do not hesitate to contact me at (626) 302-6961 if you have any questions.

Sincerely,

Amber Dean

AD:ad:Letter1.doc

Enclosure(s)

P.O. Box 800 2244 Walnut Grove Ave. Rosemead, California 91770 (626) 302-6961 Fax (626) 302-7740

BEFORE THE CALIFORNIA ENERGY COMMISSION

Exploring Issues Associated with Implementation and Distribution Planning of Distributed Generation	)	**CEC Docket No. 04-DIST-GEN-1 and 03-IEP-01**
Order Instituting Rulemaking Regarding Policies, Procedures, and Incentives for Distributed Generation and Distributed Energy Resources	)	**CPUC Docket R.04-03-017**

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON THE CALIFORNIA ENERGY COMMISSION INTEGRATED POLICY REPORT COMMITTEE'S APRIL 28, 2005 WORKSHOP

MICHAEL D. MONTOYA
AMBER E. DEAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6057
Facsimile: (626) 302-2050
E-mail: Mike.Montoya@SCE.com

Dated: May 6, 2005

Comments of Southern California Edison for the California Energy Commission Integrated Energy Policy Report Committee's April 28, 2005 Workshop on California's Market Potential for Combined Heat and Power and Distributed Generation

I. Introduction

SCE commends the Integrated Energy Policy Report Committee for its leadership in sponsoring this workshop on market potential for additional combined heat and power (CHP) applications in California. The "Assessment of California CHP Market and Policy Options for Increased Penetration" (Assessment Report), a report prepared under the California Energy Commission's (CEC) PIER Program, formed the basis of a number of the presentations on the main theme of the workshop and provided a potent catalyst for discussion. A preliminary review of this voluminous document indicates that many of its findings are in general agreement with SCE's experience in working with customers to facilitate installation of CHP projects on its electric system. The Assessment Report does, however, contain certain policy recommendations which are premature or improvident. Although SCE has not had an opportunity to fully review and analyze the models used to evaluate the policy options discussed in the Assessment Report, SCE provides these general comments to guide the CEC's overall approach in recommending policies concerning CHP.

Additionally, SCE will provide brief comments on an issue raised in an unexpected departure from the main course of the workshop, wherein two organizations that represent developers of large industrial CHP projects made presentations to draw the Committee's attention to the needs of projects already constructed and in operation. In particular, their comments focused on Qualifying Facility (QF) projects that signed power purchase contracts with California's investor owned utilities during the 1980s.[1] In consideration of the significant amount of workshop time devoted to this topic, SCE will offer some comments to balance the record.

II. Concerns with the CHP Market Assessment

Although the Market Assessment appears to be thorough, by design it fails to incorporate the perspectives of stakeholders other than Distributed Generation (DG) interests, such as non-participants, utilities, regulators, and ratepayer interest groups. Further, although the CEC does an excellent job in advertising the workshops related to DG issues, DG interests typically represent a disproportionate number of the workshops participants, resulting in a tendency of the workshops and associated reports to emphasize the benefits of DG without focusing on the costs. Any structured program or incentive to increase CHP installations – such as "net metering" for large CHP installations – will come with a cost to nonparticipating ratepayers. Given the already high costs of energy, ratepaying

[1] *See* CAC/EPUC (oral presentation in CHP users' round table discussion); California Cogeneration Council Comments.

customers deserve meaningful assurances that DG programs are designed to maximize ratepayer benefit. To that end, the CEC must evaluate policy and program design recommendations with the maximum amount of information available, with an overall objective of ensuring that ratepayer burden results in ratepayer value.

There are a number of open proceedings at the Public Utilities Commission, including the DG OIR, Avoided Cost OIR, Resource Adequacy, and RPS OIR, which will provide the CEC with information necessary to make informed policy decisions about the different DG technologies and applications. Further, recent changes to existing programs and tariffs may influence policy decisions, but the impact of these changes has not yet been evaluated. For instance, as of 2005, projects up to 5 MW may participate in the Self Generation Incentive Program (SGIP), [2] and the "percent of project cost cap" has been eliminated. Further, new standby rates went into effect on April 14, 2005. The impact of these new rates on DG installations has not yet been determined.

The Assessment Report may be a useful tool for policymakers to determine the future direction for DG once these various proceedings are complete and recent changes have been evaluated. However, it is premature to make any of the recommended policy changes until (i) the cost-benefit models and evaluation tools are developed; (ii) actual values for avoided costs are determined; (iii) rules regarding participation of DG in RAR and RPS programs are determined; and (iv) data collection needs are evaluated. In fact, the models and results used in the Assessment Report are premature because the cost-benefit methodology and input values presently being considered by the CPUC have not been completed. One workshop participant implied that the CEC should disregard this analysis and urged that it "stop talking" and issue a decision. While certain operators of large cogeneration facilities may want the State to leap before it looks, SCE cannot condone such an approach, particularly when its ratepayers will be footing the bill.

Indeed, the analysis discussed above is much needed to ensure that ratepayers are getting the purported benefits for which they are paying. For example, current analysis of cogeneration projects subsidized by the SGIP shows that 70-90% of the natural gas-fired projects fail the minimum performance requirements for participation in the Program.[3] Moreover, there is currently no mechanism in place to ensure that cogeneration systems will continue to operate as gas prices increase. Disregarding such information and failing to establish data collection and measurement procedures will merely facilitate inequitable risk and cost shifting to nonparticipating ratepayers. Any policy options ultimately recommended by the CEC should not shift costs to nonparticipating customers without cognizable overriding benefits.

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[2] The SGIP is currently funded through the end of 2007, not 2014 as mentioned in the Market Assessment.

[3] *See* Itron Fourth-Year Impact Report, p. 1-4. "Metered data collected to date suggest that nine of the 31 monitored Level 3/3-N projects achieved the 218.5(b) overall system efficiency target of 42.5%." The Third-Year Impact Report contains even poorer results, showing that approximately 90% of the cogeneration projects evaluated did not meet the required efficiency levels. Itron Third-Year Impact Report pp.9-25 through 9-26.

III. Comments on the Large QF Users' Presentations

Broadly summarized, the large users appearing at the workshop urged the Commission to support, among other things, a CPUC mandate for utilities to sign long term contracts with new and existing cogeneration qualifying facilities (QFs); a preferential set-aside of utility capacity to be met by cogeneration QFs; and a portfolio standard for CHP similar to that enacted by the Legislature for renewable resources. They also cite the necessity of dealing with the CAISO as a barrier. In its written comments, the California Cogeneration Council asserts that "[t]he CAISO has not devoted significant attention to streamlining its regulations or procedures to accommodate large numbers of small, distributed generators."[4]

These comments should be disregarded as outside the scope of this proceeding. Moreover, all of the concerns and issued raised at the workshop are being fully and adequately addressed in proceedings before the Public Utilities Commission, the state agency charged with implementing the PURPA, which governs the contractual relations between utilities and qualifying facilities, such as the non-utility generators represented at the workshop. Specifically, the CPUC is currently examining the State's long-term policy with respect to expiring and new QF contracts in R.04-04-025. Testimony concerning these issues, and related pricing matters, will be submitted in July and hearings are scheduled to begin in August. SCE recognizes the potential value of extending the operation of existing QFs beyond the terms of their existing contracts, provided that replacement agreements fully comply with PURPA and otherwise meet the State's resource adequacy and other policy objectives on a least cost/best fit basis. The notions of cogeneration set asides, mandatory purchase obligations, and portfolio standards have all been advanced by cogeneration interests in predecessor dockets and will likely be advanced in upcoming evidentiary hearings. Moreover, to the extent that the recommendations in the Assessment Report are based on perceptions of some CHP users that existing CAISO rules and procedures are preventing development of new projects, the first priority should be to engage affected parties in a collaborative effort to address issues with the CAISO. Blindly shifting obligations and costs associated with the CAISO's current rules and practices to utilities (and their other customers) is not a solution.

IV. Conclusion

SCE appreciates the opportunity to comment on the Assessment Report and presentations made at the April 28, 2005 workshop. SCE looks forward to the resolution of these issues through an established evidentiary record and well thought policy formation.

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[4] In enumerating the projects that CAC/EPUC represented at the workshop, its spokesman cited typical project sizes ranging from 225 MW to more than 400 MW.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE CALIFORNIA ENERGY COMMISSION INTEGRATED POLICY REPORT COMMITTEE'S APRIL 28, 2005 WORKSHOP** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this 6th day of May, 2005, at Rosemead, California.

Vicki Carr-Donerson

Vicki Carr-Donerson
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

ABBAS M. ABED
TRANSMISSION PLANNING SECTION, CP52A
SAN DIEGO GAS & ELECTRIC
8315 CENTURY PARK COURT,CP21D
SAN DIEGO, CA 92123
04-DIST-GEN-01-DGOII

Dan Adler
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROOM 370
ROSEMEAD, CA 91770
04-DIST-GEN-01-DGOII

SCOTT J. ANDERS
DIRECTOR OF POLICY AND PLANNING
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY - SUITE 110
SAN DIEGO, CA 92123
04-DIST-GEN-01-DGOII

Philippe Auclair
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

DEVRA BACHRACH
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
04-DIST-GEN-01-DGOII

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
04-DIST-GEN-01-DGOII

Valerie Beck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

BRIAN BIERING
RESOURCES AGENCY
1416 NINTH STREET, SUITE 1311
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

Werner M. Blumer
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING, P.C.
8980 MOONEY ROAD
ELK GROVE, CA 95624
04-DIST-GEN-01-DGOII

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

LISA BROWY
CASE ADMINISTRATOR
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123-4150
04-DIST-GEN-01-DGOII

SEAN CASEY
SAN FRANCISCO PUBLIC UTILITIES COMMISSIO
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
04-DIST-GEN-01-DGOII

CENTRAL FILES
CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1548
04-DIST-GEN-01-DGOII

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION STREET
PASADENA, CA 91103
04-DIST-GEN-01-DGOII

ALEXANDER G. CHEN
THERMAL MANAGEMENT GROUP
UNITED TECHNOLOGIES RESEARCH CENTER
411 SILVER LANE, MS129-16
E. HARTFORD, CT 6108
04-DIST-GEN-01-DGOII

JILL K. CLIBURN
45 CRAZY RABBIT DRIVE
SANTA FE, NM 87508
04-DIST-GEN-01-DGOII

ROCCO COLICCHIA
HARRIS & ASSOCIATES
120 MASON CIRCLE
CONCORD, CA 94520
04-DIST-GEN-01-DGOII

JOE COMO
CITY AND COUNTY OF SAN FRANCISCO
ONE DR. CARLTON B. GOODLETT PLACE
Dennis Herrera and City & County of San Francisco
SAN FRANCISCO, CA 94102
04-DIST-GEN-01-DGOII

STEVE COONEN
CONNECT ENERGY
14790 MOSSWOOD LANE
GRASS VALLEY, CA 95945
04-DIST-GEN-01-DGOII

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
04-DIST-GEN-01-DGOII

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
04-DIST-GEN-01-DGOII

REGINA M. DEANGELIS
ATTORNEY AT LAW
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

BERNADETTE DEL CHIARO
ENVIRONMENT CALIFORNIA
ENVIRONMENT CALIFORNIA
1107 9TH STREET, SUITE 601
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

WILLIAM F. DIETRICH
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, 613
WALNUT CREEK, CA 94598-3535
04-DIST-GEN-01-DGOII

CHRISTOPHER T. ELLISON
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

ROB ERLICHMAN
SUNLIGHT ELECTRIC, LLC
57 ASHBURY STREET, 6
SAN FRANCISCO, CA 94117
04-DIST-GEN-01-DGOII

CLAY E. FABER
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013
04-DIST-GEN-01-DGOII

DIANE I. FELLMAN
ATTORNEY AT LAW
LAW OFFICES OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
04-DIST-GEN-01-DGOII

VICTORIA P. FLEMING
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
04-DIST-GEN-01-DGOII

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123
04-DIST-GEN-01-DGOII

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
04-DIST-GEN-01-DGOII

SYLVIA D. GARDNER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B8R
SAN FRANCISCO, CA 94177
04-DIST-GEN-01-DGOII

BRENDA GETTIG
REGIONAL ECONOMIC RESEARCH, INC.
11236 EL CAMINO REAL
SAN DIEGO, CA 92130-2650
04-DIST-GEN-01-DGOII

STEVEN A. GREENBERG
DISTRIBUTED ENERGY STRATEGIES
4100 ORCHARD CANYON LANE
VACAVILLE, CA 95688
04-DIST-GEN-01-DGOII

Maxine Harrison
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
04-DIST-GEN-01-DGOII

Mohammad Hassanpour
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

MICHAEL HALL
BORREGO SOLAR SYSTEMS
727 ALLSTON WAY, SUITE B
BERKELEY, CA 94710
04-DIST-GEN-01-DGOII

GLENN HAMER
DIRECTOR, GOVERNMENT AFFAIRS
FIRST SOLAR ELECTRIC COMPANY
4050 E. COTTON CENTER BLVD., STE. 68
PHOENIX, AZ 85040-8864
04-DIST-GEN-01-DGOII

ARNO HARRIS
EI SOLUTIONS
20 GALLI DR., SUITE 8
NOVATO, CA 94949
04-DIST-GEN-01-DGOII

CHRIS HARRIS
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
04-DIST-GEN-01-DGOII

CHRIS HARRIS
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
04-DIST-GEN-01-DGOII

LYNN M. HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814-3109
04-DIST-GEN-01-DGOII

Martin Homec
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4205
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

DARCIE L HOUCK
MONTEAU & PEEBLES LLP
1001 SECOND STREET
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

DAVID HOWARTH
MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612
04-DIST-GEN-01-DGOII

HEATHER HUNT
W.H. ROBERT & H.F. HUNT, LLC
242 WHIPPOORWILL LANE
STRATFORD, CT 6614
04-DIST-GEN-01-DGOII

MICHAEL HYAMS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4/F
SAN FRANCISCO, CA 94103
04-DIST-GEN-01-DGOII

RONALD K. ISHII
AESC, INC.
1945 CAMINO VIDA ROBLE, SUITE A
CARLSBAD, CA 92008
04-DIST-GEN-01-DGOII

ROB JOHANNSEN
DIRECTOR OF MARKETING
FIRST SOLAR ELECTRIC COMPANY, LLC
4050 E. COTTON CENTER BLVD., STE. 68
PHOENIX, AZ 85040-8864
04-DIST-GEN-01-DGOII

MARK JOHNSON
GOLDEN SIERRA POWER
2872 B MOSQUITO ROAD
PLACERVILLE, CA 95667
04-DIST-GEN-01-DGOII

MARTIN KAY
PROGRAM SUPERVISOR
SOUTH COAST AIR QUALITY
MANAGEMENT DISTR
21865 COPLEY DR.
DIAMOND BAR, CA 91765-3252
04-DIST-GEN-01-DGOII

GREG KENNEDY
OCCIDENTAL POWER SOLAR AND
COGENERATION
3629 TARAVAL ST.
SAN FRANCISCO, CA 94116
04-DIST-GEN-01-DGOII

PAUL C. LACOURCIERE
ATTORNEY AT LAW
THELEN REID & PRIEST LLP
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105
04-DIST-GEN-01-DGOII

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
04-DIST-GEN-01-DGOII

TODD LIEBERG
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-45
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

RONALD LIEBERT
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
04-DIST-GEN-01-DGOII

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
CMTA
ANTELOPE, CA 95843
04-DIST-GEN-01-DGOII

RANDY LITTENEKER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
04-DIST-GEN-01-DGOII

CARL C. LOWER
THE POLARIS GROUP
717 LAW STREET
SAN DIEGO, CA 92109-4236
04-DIST-GEN-01-DGOII

CARL C. LOWER
THE POLARIS GROUP
717 LAW STREET
SAN DIEGO, CA 92109-2436
04-DIST-GEN-01-DGOII

Kim Malcolm
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5005
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

RACHEL MACDONALD
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 43
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
04-DIST-GEN-01-DGOII

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
California Manufacturers & Technology Association
WASHINGTON, DC 20004-2415
04-DIST-GEN-01-DGOII

KARLY MCCRORY
CONTRACTS ADMINISTRATOR
RWE SCHOTT SOLAR INC.
4051 ALVIS COURT, SUITE 1
ROCKLIN, CA 95677
04-DIST-GEN-01-DGOII

JAN E. MCFARLAND
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSO.
1100 ELEVENTH STREET, SUITE 322
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

JAN MCFARLAND
CAL SEIA
1100, 11TH STREET, STE. 322
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

BRUCE MCLAUGHLIN
BRAUN & BLAISING P.C.
915 L STREET, SUITE 1460
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

DAVID MCMANUS
SENIOR PROGRAMS MANAGER
3 PHASES ENERGY SERVICES
6 FUNSTON AVENUE, SUITE A
SAN FRANCISCO, CA 94129
04-DIST-GEN-01-DGOII

MICHAEL D. MONTOYA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
04-DIST-GEN-01-DGOII

JERRY MOORE
CONNECT ENERGY
3625 CINCINNATI AVENUE
ROCKLIN, CA 95765
04-DIST-GEN-01-DGOII

FREDERICK MORSE
MORSE ASSOCIATES, INC.
1808 CORCORAN ST., NW
WASHINGTON, DC 20009
04-DIST-GEN-01-DGOII

CLYDE MURLEY
CONSULTING ON ENERGY AND ENVIRONMENT
600 SAN CARLOS AVENUE
ALBANY, CA 94706
04-DIST-GEN-01-DGOII

MICHAEL J. MURRAY
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B10A
SAN FRANCISCO, CA 94177
04-DIST-GEN-01-DGOII

MEGAN MACNEIL MYERS
LAW OFFICES OF SARA STECK MYERS
122 28TH AVE
SAN FRANCISCO, CA 94121
04-DIST-GEN-01-DGOII

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
04-DIST-GEN-01-DGOII

CHRISTOPHER O'BRIEN
SHARP SOLAR
VP STRATEGY AND GOVERNMENT RELATIONS
3808 ALTON PLACE NW
WASHINGTON, DC 20016
04-DIST-GEN-01-DGOII

FREDERICK M. ORTLIEB
ATTORNEY AT LAW
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101
04-DIST-GEN-01-DGOII

Lisa Paulo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

ROBERT PANORA
TECOGEN, INC.
45 FIRST AVENUE
WALTHAM, MA 2451
04-DIST-GEN-01-DGOII

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
04-DIST-GEN-01-DGOII

PETER T. PARRISH
CALIFORNIA SOLAR ENGINEERING, INC.
820 CYNTHIA AVE.
LOS ANGELES, CA 90065
04-DIST-GEN-01-DGOII

STEVEN D. PATRICK
ATTORNEY AT LAW
SEMPRA ENERGY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013
04-DIST-GEN-01-DGOII

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
444 SOUTH FLOWER STREET, SUITE 1500
LOS ANGELES, CA 90071-2916
04-DIST-GEN-01-DGOII

ANN PETERSON
TECHNOLOGY SYSTEMS DIVISION
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

EDWARD RANDOPLH
ASSEMBLY UTILITIES AND COMMERCE COMMITTE
STATE CAPITOL
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

MARK RAWSON
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 43
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
04-DIST-GEN-01-DGOII

CHARLES REDELL
PO BOX 900928
SEATTLE, WA 98109-9228
04-DIST-GEN-01-DGOII

Steven C Ross
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

KEITH ROBERTS
CITY ENERGY MANAGER
CITY OF SACRAMENTO
927 10TH STREET, 300, GENERAL SERVICES
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
04-DIST-GEN-01-DGOII

JP ROSS
THE VOTE SOLAR INITIATIVE
182 SECOND STREET, SUITE 400
SAN FRANCISCO, CA 94105
04-DIST-GEN-01-DGOII

Funda Emine Saygin
CALIF PUBLIC UTILITIES COMMISSION
1350 FRONT ST., STATE BLDG. ROOM 4006
SAN DIEGO, CA 92101
04-DIST-GEN-01-DGOII

J.A. SAVAGE
CALIFORNIA ENERGY CIRCUIT
3006 SHEFFIELD AVE.
OAKLAND, CA 94602
04-DIST-GEN-01-DGOII

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

LORI SMITH SCHELL PH.D.
EMPOWERED ENERGY
N. ELK RUN
DURANGO, CO 81303
04-DIST-GEN-01-DGOII

NORA E. SHERIFF
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
04-DIST-GEN-01-DGOII

MARK SHIRILAU
ALOHA SYSTEMS, INC.
14801 COMET STREET
IRVINE, CA 92604-2464
04-DIST-GEN-01-DGOII

SUSAN SKILLMAN
TEAM LEAD
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B10A
SAN FRANCISCO, CA 94177
04-DIST-GEN-01-DGOII

Donald R Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

EILEEN M. SMITH, M.ARCH.
FOUNDER & CEO
SOLAR DEVELOPMENT COOPERATIVE
3535 EAST COAST HIGHWAY
CORONA DEL MAR, CA 92625
04-DIST-GEN-01-DGOII

KARI SMITH
POWERLIGHT CORPORATION
2954 SAN PABLO AVENUE
BERKELEY, CA 94706
04-DIST-GEN-01-DGOII

JENNIFER TACHERA
CALIFORNIA ENERGY COMMISSION
1516 - 9TH STREET
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
04-DIST-GEN-01-DGOII

DAN THOMPSON
SUN POWER & GEOTHERMAL ENERGY CO. INC.
863 E. FRANCISCO BLVD.
SAN RAFAEL, CA 94901
04-DIST-GEN-01-DGOII

SCOTT TOMASHEFSKY
CALIFORNIA ENERGY COMMISSION
1516 - 9TH STREET
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DOWNEY, BRAND, SEYMOUR & ROHWER, LLP
555 CAPITOL MALL, STE. 1050
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

DANIEL TUNNICLIFF
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE
ROSEMEAD, CA 91770
04-DIST-GEN-01-DGOII

JANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF CA
64 LOS ALTOS SQUARE
LOS ALTOS, CA 94022
04-DIST-GEN-01-DGOII

TIM TUTT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

EBEN TWOMBLY
KW ENGINEERING
360 - 17TH STREET, SUITE 100
OAKLAND, CA 94612
04-DIST-GEN-01-DGOII

Bradford Wetstone
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
04-DIST-GEN-01-DGOII

LISA WEINZIMER
CALIFORNIA ENERGY CIRCUIT
695 9TH AVE. NO.2
SAN FRANCISCO, CA 94118
04-DIST-GEN-01-DGOII

ROBERT B. WEISENMILLER
MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612
04-DIST-GEN-01-DGOII

WILLIAM W. WESTERFIELD III
STOEL RIVES LLP
770 L STREET, SUITE 800
SACRAMENTO, CA 95814
04-DIST-GEN-01-DGOII

JOSEPH F. WIEDMAN
GOODIN, MACBRIDE, SQUERI, RITCHIE&DA,LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
04-DIST-GEN-01-DGOII

JOSEPH F. WIEDMAN
GOODIN, MACBRIDE, SQUERI, RITCHIE&DA,LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
04-DIST-GEN-01-DGOII

RYAN WISER
BERKELEY LAB
ONE CYCLOTRON ROAD
BERKELEY, CA 94720
04-DIST-GEN-01-DGOII

VIKKI WOOD
PRINCIPAL DEMAND-SIDE SPECIALIST
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A103
SACRAMENTO, CA 95618-1899
04-DIST-GEN-01-DGOII

CATHERINE E. YAP
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND, CA 94611
04-DIST-GEN-01-DGOII

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
04-DIST-GEN-01-DGOII

CENTRAL FILES
SOUTHERN CALIFORNIA GAS COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1530-1011
04-DIST-GEN-01-DGOII

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, RM. 370
ROSEMEAD, CA 91770
04-DIST-GEN-01-DGOII

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431
04-DIST-GEN-01-DGOII