

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

Order Instituting Rulemaking to Consider  
Revisions to the Planning Reserve Margin for  
Reliable and Cost-Effective Electric Service.

---

Rulemaking 08-04-012  
(Filed April 10, 2008)

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO TURN'S MOTION FOR ADOPTION OF PROTECTIVE  
ORDER AND APPLICATION OF RULES 10.3 AND 10.4**

Nancy J. Saracino  
General Counsel  
Daniel J. Shonkwiler  
Assistant General Counsel, Corporate  
Stacie L. Ford  
Counsel  
California Independent System Operator  
Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: 916-351-4400  
Facsimile: 916-351-2350  
Attorneys for the  
California Independent System Operator  
Corporation

August 11, 2008

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

Order Instituting Rulemaking to Consider  
Revisions to the Planning Reserve Margin for  
Reliable and Cost-Effective Electric Service.

Rulemaking 08-04-012  
(Filed April 10, 2008)

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO TURN'S MOTION FOR ADOPTION OF PROTECTIVE  
ORDER AND APPLICATION OF RULES 10.3 AND 10.4**

**I. INTRODUCTION**

Pursuant to Rule 11.1 (e) of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits this Response to the Motion for Protective Order and Application of Rules 10.3 and 10.4 filed by The Utility Reform Network (TURN) on July 25, 2008.

CAISO generally supports TURN's Motion for Adoption of a Protective Order and Application of Rules 10.3 and 10.4, and agrees with TURN that the Model Protective Order (MPO) adopted by the Commission in D. 08-04-023 is a reasonable starting point for the resolution of data confidentiality issues. As acknowledged by TURN, however, the CAISO *does* believe that there are issues unique to this proceeding, particularly regarding the applicability of Commission Rules of Practice and Procedure 10.3 (Computer Model Documentation) and 10.4 (Computer Model and Data Base Access). As explained below, the CAISO will need the cooperation of the parties to limit the total number of base and sensitivity cases to seventy-two; or, in the event the parties cannot reach an agreement, an order by the Administrative Law Judge (ALJ) to reach a limit of

seventy-two base and sensitivity cases, pursuant to Rule 1.2, which permits deviation from the Rules of Practice and Procedure for “good cause.”

## **II. RESPONSE**

Rules 10.3<sup>1</sup> and 10.4<sup>2</sup> were designed to implement Public Utilities Code Sections 1821 – 1822 (enacted by AB 475, the “No Black Box” legislation), and intended to ensure access to computer models and data bases used by the Commission, Commission staff, and parties in Commission proceedings, so that said computer models and inputs are available for verification by parties. The CAISO appreciates that Rules 10.3 and 10.4 are necessary to allow for meaningful participation by parties in a proceeding, but thinks it would be remiss if it did not articulate why strict applicability of Rules 10.3 and 10.4 may be unattainable in this proceeding. Particularly, the CAISO is concerned that because it is the only party with an established consulting agreement with GE Energy, the vendor selected to conduct the Planning Reserve Margin Study (PRM Study), strict application of Rules 10.3 and 10.4 may be infeasible.

---

<sup>1</sup> Rule 10.3 Computer Model Documentation:

(a) Any party who sponsors testimony or exhibits which are based in whole, or in part, on a computer model shall provide to any party upon request the following information:

- (1) A description of the source of all input data;
- (2) The complete set of input data (input file) used in the sponsoring party's computer run(s);
- (3) Documentation sufficient for an experienced professional to understand the basic logical processes linking the input data to the output, including but not limited to a manual which includes:
  - (A) A complete list of variables (input record types), input record formats, and a description of how input files are created and data entered as used in the sponsoring party's computer model(s).
  - (B) A complete description of how the model operates and its logic. This description may make use of equations, algorithms, flow charts, or other descriptive techniques.
  - (C) A description of a diagnostics and output report formats as necessary to understand the model's operation.
- (4) A complete set of output files relied on to prepare or support the testimony or exhibits; and
- (5) A description of post-processing requirements of the model output.

The CAISO originally initiated a PRM (Planning Reserve Margin) stakeholder process in late November 2007 to review a preliminary study scope and proposals by potential vendors to perform a PRM study. In March of 2008, the CAISO announced that it had selected GE Energy to perform the PRM Study, and entered into a contract with GE Energy consistent with the preliminary study scope. Subsequently, on April 10,

---

(b) If a sponsoring party modifies its computer model or the data base, and sponsors the modified results in the proceeding, such party shall provide the modified model or data to any requesting party who has previously requested access to the original model or data base.

(c) Parties shall maintain copies of computer models and data bases in unmodified form until 90 days after the date of issuance of the Commission's last order or decision in the proceeding, including order or decision on application for rehearing, to the extent that those computer models and data bases continue to provide the basis, in whole or in part, for their showing.

<sup>2</sup> Rule 10.4 Computer Model and Data Base Access:

(a) Any party seeking access to a computer model or data base shall serve on the sponsoring party a written explanation of why it requests access to the information and how its request relates to its interest or position in the proceeding.

(b) Any sponsoring party shall provide timely and reasonable access to, and explanation of, that computer model or data base to all parties complying with subsection (a).

(c) If a party requests access to a data base, the sponsoring party may, at its election, either

- (1) provide such access on its own computer,
- (2) perform any data sorts requested by the requesting party,
- (3) make the data base available to the requesting party to run on the requesting party's own computer, or
- (4) make the data base available through an external computer service.

(d) If a party requests access to a computer model, the sponsoring party may, at its election, either

- (1) make the requested runs on its own computer,
- (2) make the model available to the requesting party to run on that party's own computer, or
- (3) have the requested model run produced for the requesting party by an external computer service.

(e) The sponsoring party is not required to modify its computer model or data base in order to accommodate a request, or to install its model on the requesting party's computer, or to provide detailed training on how to operate the model beyond provision of written documentation. The sponsoring party is not required to provide a remote terminal or other direct physical link to its computer for use by the requesting party. The sponsoring party may take reasonable precautions to preclude access to other software or data not applicable to the specific model or data base being used.

(f) Within five business days of receipt of a request from a requesting party pursuant to this rule, the sponsoring party shall indicate whether the request is clear and complete and shall provide the requesting party a written estimate of the date of completion of the response.

2008, the California Public Utilities Commission (Commission or CPUC) opened this proceeding “to review, and modify to the extent found to be appropriate, the Planning Reserve Margin (PRM) and the assumptions, methods, and procedures used for its determination.”<sup>3</sup> As a result of the parallel PRM initiatives, the CAISO and the CPUC merged their PRM stakeholder processes, and are working collaboratively on the PRM Study, to determine the underlying study methodology and gather data needed to complete the PRM Study, which will provide the basis for the PRM established by the Commission in this proceeding. Given that the CAISO had already engaged GE Energy to perform the PRM Study as a consultant prior to the initiation of this proceeding, GE Energy continues to be responsible for conducting the study upon which the Commission will rely. Notwithstanding the collaborative arrangement between the CAISO and the Commission, the CAISO remains a party to the proceeding.

As noted, GE Energy continues to be responsible for conducting the study upon which the Commission will rely. Specifically, GE Energy will use seventy-two base and sensitivity cases and rely on its own proprietary Multi-Area Reliability Simulation program (MARS Model) to perform the PRM Study. Unique to this proceeding, however, is the fact that only the CAISO—a party—bears the costs associated with the services provided to the Commission by GE Energy. Moreover, the CAISO does not have a license agreement in place with GE Energy in order to run the MARS Model, and has provided for GE Energy to perform all seventy-two base and sensitivity cases necessary to complete the PRM study.

The agreement as entered into by the CAISO and GE Energy was not intended to facilitate a proceeding subject to Rules 10.3 and 10.4. The CAISO did not intend to bear

---

<sup>3</sup> *Order Instituting Rulemaking* (OIR), issued April 16, 2008 in R. 08-04-012 at 17-18.

the cost of paying GE Energy to run an unlimited number of base and sensitivity cases through the MARS model in order to comply with discovery requests in a proceeding. In order for Rules 10.3 and 10.4 to strictly apply here, the CAISO's contract with GE Energy would have to be expanded, which is not necessarily an expense or commitment the CAISO is ready to make. Furthermore, the CAISO cannot at this time even comply with Rule 10.4 since it does not have proprietary rights to the MARS model, and does not have a license agreement with GE Energy. Thus, the scope of the agreement between the CAISO and GE Energy does not allow for the opportunity for Rules 10.3 and 10.4 to apply, without subjecting the CAISO to additional expense, or even placing the CAISO in a position to breach its agreement with GE Energy by divulging the MARS Model.

The CAISO submits that to the extent parties in this proceeding are willing to collaborate and reach agreement on the *seventy-two* base and sensitivity cases ultimately submitted to GE Energy, the CAISO is agreeable to jointly defining the variances that will populate the MARS Model. Moreover, to the extent parties request documentation of the MARS Model and agree to sign GE Energy's Proprietary Information Agreement, GE Energy has indicated to the CAISO that it is willing to provide the proprietary MARS manual. The MARS manual, consistent with Rule 10.3, provides documentation sufficient for an experienced professional to understand the basic logical processes linking the input data to the output. To the extent the Commission and parties wish to enter into their own agreement with GE Energy in order to obtain a license agreement in order to access the MARS Model, the CAISO does not object, and in fact encourages it as a possible solution in this proceeding.

The CAISO requests the Administrative Law Judge in this proceeding to recognize the unique circumstances faced by the CAISO given its consulting agreement with GE Energy and its collaborative relationship with the CPUC. The CAISO, consistent with Commission Rule of Practice and Procedure 1.2,<sup>4</sup> seeks liberal construction of Rules 10.3 and 10.4, and submits that this proceeding would benefit from reaching practical solutions to allow parties access to the MARS Model, that otherwise may not necessarily conform to a strict application of Rules 10.3 and 10.4.

### **III. CONCLUSION**

For the foregoing reasons, CAISO generally supports TURN's Motion for Adoption of a Protective Order, and looks forward to working with parties to ensure fair access to the MARS Model and the information relied on in this proceeding.

Respectfully submitted,

*/s/ Stacie L. Ford*

-----  
Stacie L. Ford  
Counsel

August 11, 2008

California Independent System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: 916-351-4400  
Facsimile: 916-351-2350

---

<sup>4</sup> Rule 1.2 Construction: "These rules shall be liberally construed to secure just, speedy, and inexpensive determination of the issues presented. In special cases and for good cause shown, the Commission may permit deviations from the rules."

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2008. I served on the parties listed on the service list of the following Docket Number R.08-04-012 by electronic mail, a copy of the foregoing Response of the California Independent System Operator Corporation to TURN's Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4

Executed on August 11, 2008 at Folsom,  
California

*/s/ Anna Pascuzzo*

---

Anna Pascuzzo  
An employee of the California Independent  
System Operator



ANDREW B. BROWN  
ELLISON SCHNEIDER & HARRIS LLP  
2015 H STREET  
SACRAMENTO, CA 95811  
abb@eslawfirm.com

AKBAR JAZAYEIRI  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800, 2241 WALNUT GROVE AVE  
ROSEMEAD, CA 91770  
akbar.jazayeri@sce.com

ANNETTE GILLIAM  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
annette.gilliam@sce.com

BRIAN CRAGG  
GOODIN, MAC BRIDE, SQUERI, DAY &  
LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
bcragg@goodinmacbride.com

BARRY F. MCCARTHY  
MCCARTHY & BERLIN LLP  
100 W. SAN FERNANDO ST., SUITE 501  
SAN JOSE, CA 95113  
bmcc@mccarthyllaw.com

BIANCA BOWMAN  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105  
brbc@pge.com

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST., STE 303  
SAN FRANCISCO, CA 94117  
cem@newsdata.com

CAROLYN KEHREIN  
ENERGY MANAGEMENT SERVICES  
2602 CELEBRATION WAY  
WOODLAND, CA 95776  
cmkehrein@ems-ca.com

DAN SILVERIA  
SURPRISE VALLEY ELECTRIC  
CORPORATION  
PO BOX 691  
ALTURAS, CA 96101  
dansvec@hdo.net

DENNY BROWN  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS-20  
SACRAMENTO, CA 95814  
dbrown@energy.state.ca.us

Andrew Campbell  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5203  
SAN FRANCISCO, CA 94102-3214  
agc@cpuc.ca.gov

FRANK ANNUNZIATO  
AMERICAN UTILITY NETWORK INC.  
10705 DEER CANYON DR.  
ALTA LOMA, CA 91737-2483  
allwazeready@aol.com

ANN L. TROWBRIDGE  
DAY CARTER & MURPHY LLP  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864  
atrowbridge@daycartermurphy.com

RYAN BERNARDO  
BRAUN BLAISING MCLAUGHLIN, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814  
bernardo@braunlegal.com

CHARLES A. BRAUN  
BRAUN, BLAISING, MCLAUGHLIN, P.C.,  
915 L STREET, STE. 1270  
SACRAMENTO, CA 95814  
braun@braunlegal.com

BRIAN THEAKER  
DYNEGY, INC.  
980 NINTH STREET, SUITE 2130  
SACRAMENTO, CA 95814  
brian.theaker@dynegy.com

Charlyn A. Hook  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4107  
SAN FRANCISCO, CA 94102-3214  
chh@cpuc.ca.gov

CORY M. MASON  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B30A  
SAN FRANCISCO, CA 94105-1814  
cmmw@pge.com

DAVID LLOYD  
NRG ENERGY  
1817 ASTON AVENUE, SUITE 104  
CARLSBAD, CA 92008  
david.lloyd@nrgenergy.com

DAVID LE  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
dle@caiso.com

ANTHONY J. IVANCOVICH  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
aivancovich@caiso.com

AMBER MAHONE  
ENERGY & ENVIRONMENTAL ECONOMICS,  
INC.  
101 MONTGOMERY STREET, SUITE 1600  
SAN FRANCISCO, CA 94104  
amber@ethree.com

ALICE GONG  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177  
axl3@pge.com

BRIAN K. CHERRY  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET, 1093  
SAN FRANCISCO, CA 94177  
bkc7@pge.com

BARBARA R. BARKOVICH  
BARKOVICH & YAP, INC.  
PO BOX 11031  
OAKLAND, CA 94611  
brbarkovich@earthlink.net

CASE ADMINISTRATION  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
case.admin@sce.com

CHRISTOPHER A. HILEN  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89511  
chilen@sppc.com

CURTIS L. KEBLER  
GOLDMAN, SACHS & CO.  
2121 AVENUE OF THE STARS, STE 2600  
LOS ANGELES, CA 90067  
curtis.kebler@gs.com

Donald J. Brooks  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
dbr@cpuc.ca.gov

DAVID ORTH  
SAN JOAQUIN VALLEY POWER AUTHORITY  
4886 EAST JENSEN AVENUE  
FRESNO, CA 93725  
dorth@krcd.org

KEVIN DUGGAN  
CALPINE CORPORATION  
3845 HOPYARD ROAD, SUITE 345  
PLEASANTON, CA 94588  
duggank@calpine.com

Elizabeth Dorman  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4300  
SAN FRANCISCO, CA 94102-3214  
edd@cpuc.ca.gov

ERIC LEUZE  
RELIANT ENERGY  
PO BOX 5277  
FAIR OAKS, CA 95828  
eleuze@reliant.com

Farzad Ghazzagh  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4209  
SAN FRANCISCO, CA 94102-3214  
fxg@cpuc.ca.gov

GRANT A. ROSENBLUM  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
grosenblum@caiso.com

INGER GOODMAN  
COMMERCE ENERGY INC  
600 ANTON AVE., SUITE 2000  
COSTA MESA, CA 92626  
igoodman@commerceenergy.com

JOHN W. LESLIE, ESQ.  
LUCE, FORWARD, HAMILTON & SCRIPPS,  
LLP  
11988 EL CAMINO REAL, SUITE 200  
SAN DIEGO, CA 92130  
jleslie@luce.com

JOY A. WARREN  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354  
joyw@mid.org

KAREN LINDH  
LINDH & ASSOCIATES  
7909 WALERGA ROAD, STE 112, PMB 119  
ANTELOPE, CA 95843  
karen@klindh.com

KEITH MCCREA  
SUTHERLAND ASHILL & BRENNAN  
1275 PENNSYLVANIA AVENUE NW  
WASHINGTON, DC 20004-2415  
keith.mccrea@sutherland.com

DONALD SCHOENBECK  
RCS, INC.  
900 WASHINGTON STREET, SUITE 780  
VANCOUVER, WA 98660  
dws@r-c-s-inc.com

EDWARD O'NEILL  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533  
edwardoneill@dwt.com

KAREN TERRANOVA  
ALCANTAR & KAHL  
120 MONTGOMERY ST., STE. 2200  
SAN FRANCISCO, CA 94104  
filings@a-klaw.com

GARY A. JORDAN  
GE ENERGY  
ONE RIVER ROAD  
SCHENECTADY, NY 12345-6001  
gary.jordan@ge.com

GRETCHEN SCHOTT  
RELIANT ENERGY, INC.  
1000 MAIN STREET  
HOUSTON, TX 77002  
gschott@reliant.com

JEANNE B. ARMSTRONG  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
jarmstrong@goodinmacbride.com

JAMES MCCLAIN  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
jmccclain@caiso.com

JOHN A. PACHECO  
SEMPRA ENERGY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101-3017  
jpacheco@sempra.com

Kevin R. Dudley  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
kd1@cpuc.ca.gov

KERRY EDEN  
CITY OF CORONA DEPT. OF WATER &  
POWER  
730 CORPORATION YARD WAY  
CORONA, CA 92880  
kerry.eden@ci.corona.ca.us

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

E. J. WRIGHT  
OCCIDENTAL POWER SERVICES, INC.  
111 WEST OCEAN BOULEVARD  
LONG BEACH, CA 90802  
ej\_wright@oxy.com

FRED MOBASHERI  
ELECTRIC POWER GROUP  
201 S. LAKE AVE., SUITE 400  
PASADENA, CA 91101  
fmobasheri@aol.com

GLENN E. HARINGA  
GE ENERGY  
ONE RIVER ROAD, BUILDING 2 RM. 637  
SCHENECTADY, NY 12345-6001  
glenn.haringa@ge.com

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST., STE 303  
SAN FRANCISCO, CA 94117  
hilary@newsdata.com

JENNIFER CHAMBERLIN  
STRATEGIC ENERGY LTD  
2633 WELLINGTON CT.  
CLYDE, CA 94520  
jchamberlin@strategicenergy.com

JESSICA NELSON  
PLUMAS SIERRA RURAL ELECTRIC COOP.  
(908)  
73233 STATE ROUTE 70  
PORTOLA, CA 96122-7069  
jnelson@psrec.coop

JUDITH SANDERS  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
jsanders@caiso.com

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
kdw@woodruff-expert-services.com

KERRY HATTEVIK  
NRG ENERGY  
829 ARLINGTON BLVD.  
EL CERRITO, CA 94530  
kerry.hattevik@nrgenergy.com

KEVIN BOUDREAUX  
CALPINE POWER AMERICA-CA, LLC  
717 TEXAS AVENUE, SUITE 1000  
HOUSTON, TX 77002  
kevin.boudreaux@calpine.com

DONALD C. LIDDELL P. C.  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103  
liddell@energyattorney.com

MARTIN HOMEC  
LAW OFFICE OF MARTIN HOMEC  
PO BOX 4471  
DAVIS, CA 95617  
martinhomec@gmail.com

MICHEL PETER FLORIO  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVE., SUITE 350  
SAN FRANCISCO, CA 94102  
mflorio@turn.org

MICHAEL MAZUR  
3 PHASES RENEWABLES LLC  
2100 SEPULVEDA BLVD, STE 37  
MANHATTAN BEACH, CA 90266  
mmazur@3phasesrenewables.com

PAUL NELSON  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770  
paul.nelson@sce.com

RONALD MOORE  
SOUTHERN CALIFORNIA WATER COMPANY  
630 EAST FOOTHILL BLVD  
SAN DIMAS, CA 91773-9016  
rkmoore@gswater.com

ROD AOKI  
ALCANTAR & KAHL  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
rsa@a-klaw.com

Simon Baker  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
seb@cpuc.ca.gov

SUSAN M. O'BRIEN  
MCCARTHY & BERLIN, LLP  
100 W. SAN FERNANDO ST., SUITE 501  
SAN JOSE, CA 95113  
sobrien@mccarthylaw.com

KAREN MILLS  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
kmills@cbbf.com

Lana Tran  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 2-D  
SAN FRANCISCO, CA 94102-3214  
lft@cpuc.ca.gov

MARY LYNCH  
CONSTELLATION ENERGY COMMODITIES  
GRP  
2377 GOLD MEDAL WAY, SUITE 100  
GOLD RIVER, CA 95670  
mary.lynych@constellation.com

MICHAEL E. BOYD  
CALIFORNIANS FOR RENEWABLE ENERGY,  
INC.  
5439 SOQUEL DRIVE  
SOQUEL, CA 95073  
michaelboyd@sbcglobal.net

MOHAN NIROULA  
CALIF DEPT OF WATER RESOURCES  
3310 EL CAMINO AVENUE, STE 256  
SACRAMENTO, CA 95821  
mniroula@water.ca.gov

MARK L. PERLIS  
DICKSTEIN SHAPIRO LLP  
1825 EYE STREET, NW  
WASHINGTON, DC 20006  
perlism@dicksteinshapiro.com

ROGER VAN HOY  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354  
rogerv@mid.org

SARA O'NEILL  
CONSTELLATION NEWENERGY, INC.  
ONE MARKET ST., SPEAR TOWER, 36TH  
FLOOR  
SAN FRANCISCO, CA 94105  
sara.oneill@constellation.com

STACIE FORD  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
sford@caiso.com

STEVE RAHON  
SAN DIEGO GAS & ELECTRIC COMPANY  
(902)  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548  
srahon@semprautilities.com

KIM KIENER  
504 CATALINA BLVD  
SAN DIEGO, CA 92106  
kмкиener@cox.net

MARCIE A. MILNER  
CORAL POWER, LLC  
4445 EASTGATE MALL, SUITE 100  
SAN DIEGO, CA 92121  
marcie.milner@shell.com

MARC D. JOSEPH  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO, CA 94080  
mdjoseph@adamsbroadwell.com

MICHAEL JASKE  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-39  
SACRAMENTO, CA 95814  
mjaske@energy.state.ca.us

Mark S. Wetzell  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5009  
SAN FRANCISCO, CA 94102-3214  
msw@cpuc.ca.gov

PHILLIP MULLER  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903  
philm@scdenergy.com

RONALD M. CERNIGLIA  
DIRECT ENERGY SERVICES, LLC  
40 COLUMBINE DRIVE  
GLENMONT, NY 12077-2966  
ron.cerniglia@directenergy.com

C. SUSIE BERLIN  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 510  
SAN JOSE, CA 95113  
sberlin@mccarthylaw.com

Peter Skala  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
ska@cpuc.ca.gov

SEBASTIAN CSAPO  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
sscb@pge.com

STEVEN HUHMAN  
MORGAN STANLEY CAPITAL GROUP INC.  
2000 WESTCHESTER AVENUE  
PURCHASE, NY 10577  
steven.huhman@morganstanley.com

SONGZHE ZHU  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR  
151 BLUE RAVINE RD.  
FOLSOM, CA 95630  
szhu@caiso.com

THOMAS DARTON  
PILOT POWER GROUP, INC.  
8910 UNIVERSITY CENTER LANE, STE 520  
SAN DIEGO, CA 92122  
tdarton@pilotpowergroup.com

RICK C. NOGER  
PRAXAIR PLAINFIELD INC.  
2711 CENTERVILLE ROAD, STE. 400  
WILMINGTON, DE 19808

DAVID J. COYLE  
ANZA ELECTRIC CO-OPERATIVE, INC (909)  
PO BOX 391908  
ANZA, CA 92539-1909

RAYMOND R. LEE  
MOUNTAIN UTILITIES (906)  
PO BOX 205  
KIRKWOOD, CA 95646

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814  
steven@iepa.com

TRENT CARLSON  
RELIANT ENERGY, INC.  
1000 MAIN STREET  
HOUSTON, TX 77002  
tcarlson@reliant.com

TRINA D. MCALISTER  
FOLGER LEVIN & KAHN LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111  
tmcaster@flk.com

DOUGLAS LARSON  
PACIFICORP (901)  
201 SOUTH MAIN  
SALT LAKE CITY, UT 84111

LILI SHARIARI  
AOL UTILITY CORP  
12752 BARRETT LANE  
SANTA ANA, CA 92705

SUE MARA  
RTO ADVISORS, LLC.  
164 SPRINGDALE WAY  
REDWOOD CITY, CA 94062  
sue.mara@rtoadvisors.com

THOMAS CORR  
SEMPRA GLOBAL  
101 ASH STREET, HQ 08 C  
SAN DIEGO, CA 92101-3017  
tcorr@sempraglobal.com

THEODORE ROBERTS  
SEMPRA GLOBAL  
101 ASH STREET, HQ 12B  
SAN DIEGO, CA 92101-3017  
troberts@sempra.com

CINDY MORROW  
VALLEY ELECTRIC ASSOCIATION  
800 E. HWY 372  
PAHRUMP, NV 89048

LIBERTY POWER HOLDINGS LLC  
131-A STONEY CIRCLE, NO. 500  
SANTA ROSA, CA 95401