

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

Joint Application of Pacific Gas and Electric Company (U 39E), Southern California Edison Company (U 338-E), San Diego Gas & Electric Company (U 902E), and Southern California Gas Company (U 904G) Submitting the California Energy Efficiency Strategic Plan

Rulemaking 08-07-011
Filed June 2, 2008

**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) INITIAL COMMENTS IN
RESPONSE TO THE ORDER INSTITUTING RULEMAKING IN R.08-07-011**

JENNIFER TSAO SHIGEKAWA
LARRY R. COPE

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
E-mail: larry.cope@sce.com

Dated: **July 17, 2008**

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I.

INTRODUCTION

Southern California Edison Company (SCE) hereby submits these comments in response to the issues raised in Section five (“Schedule, Initial Comments”) of the Order Instituting Rulemaking¹ (OIR) for Rulemaking 08-07-011, issued July 14, 2008, which is consolidated with Application (A.) 08-06-004, the Joint Utility Application proposing a California Energy Efficiency Strategic Plan. SCE has no objections to the issues presented in the OIR and continues to support the California Public Utilities Commission (Commission)-sponsored strategic planning process in general.

As noted in the OIR, the Commission has opened this rulemaking to continue the development of a Commission-sponsored California Strategic Plan for Energy Efficiency (CPUC Strategic Plan) through the year 2020 and beyond. Earlier in this process, on June 2, 2008, SCE, with Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SCG) jointly filed A.08-06-004, proposing a California

¹ “Order Instituting Rulemaking to Develop the Commission’s Energy Efficiency Strategic Plan”, R.08-07-011, July 14, 2008.

Energy Efficiency Strategic Plan (CEESP).² The CEESP, the filing of which had been ordered by D.07-10-032,³ included the aforementioned IOUs' proposed statewide goals, outcomes, and strategies. We believe that these proposed measures, which grew out of a time-constrained but widely attended and high energy collaborative process, are necessary and appropriate for California's energy and energy efficiency future and faithfully respond to the Commission's directions regarding energy efficiency in general, and energy efficiency strategic planning in particular.

The following comments respond to the issues raised in Section five of the OIR.

II.

DISCUSSION

A. Issue 1: "Identification of the party and interest of the party in this proceeding"

SCE has a profound interest in this proceeding for a variety of reasons including: SCE's responsibility to provide electric power to its customers; SCE's central role to provide energy efficiency to its customers; SCE's statewide, national, and international role in energy efficiency programs, measures and policies; and SCE's expertise and experience with energy efficiency, including our co-authorship of the CEESP.

B. Issue 2: "Any objections to or recommendations regarding this order's determinations as to categorization of the proceeding as quasi-legislative, the need for hearing, issues to be considered, or scheduling."

SCE has the following reactions and recommendations:

1. SCE supports the categorization of this proceeding as quasi-legislative.
2. SCE does not object to hearings, but does not see the need for them at this point in the process. We note that over 500 individuals have participated in dozens of

² "California Energy Efficiency Strategic Plan", June 2, 2008 (at www.californiaenergyefficiency.com), filed by PG&E, SDG&E, SCE and SCG as CPUC Application 08-06-004.

³ CPUC Decision 07-10-032, October 18, 2007.

workshops and/or submitted comments on the draft and final versions of the CEESP and that this record is available to the Commission and other parties (at the www.californiaenergyefficiency.com web site). As discussed in paragraph four below, SCE believes it would be very valuable to finalize the strategic plan in advance of final Commission decisions regarding the IOUs' 2009-11 energy efficiency program portfolios.

3. With respect to the issues to be considered, SCE is supportive of maintaining the broad range of issues that have been discussed, considered, and acted upon throughout the strategic planning process. As noted in D.07-10-032, the CEESP, the OIR and elsewhere, to be successful in this regard it is necessary to consider a wide range of issues; a broad host of government actors, market participants, and others; and the entire continuum of market transformation, from research and technology development at one end to codes and standards at the other end. We note only two constraints regarding the issues to be considered. One, we do not believe that it is necessary or appropriate to re-visit at this point past Commission energy efficiency decisions. Two, as described in paragraph four below, important scheduling constraints will significantly limit the ability to fully analyze all issues in this strategic planning cycle.
4. With respect to scheduling, SCE recommends that the Commission adopt an aggressive timetable that will produce a final strategic plan in advance of final Commission decisions regarding the IOUs' 2009-11 energy efficiency program portfolios. SCE commends the Commission for establishing in the OIR the goal of a September 2008 final decision and encourages the Commission to make scheduling, process, and related decisions that will maintain the current momentum and meet that very valuable deadline.

III.

CONCLUSION

SCE appreciates the opportunity to provide these initial comments to the issues raised in Section five of the OIR. SCE enthusiastically support, the Commission-sponsored energy efficiency strategic planning process and looks forward to working with the Commission, parties, and other stakeholders in this next phase of the process.

Respectfully submitted,

JENNIFER TSAO SHIGEKAWA
LARRY R. COPE

/s/ Larry R. Cope

By: Larry R. Cope

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
E-mail:larry.cope@sce.com

July 17, 2008

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 **INITIAL COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE ORDER INSTITUTING RULEMAKING IN R.08-07-011** on all parties identified on the R.08-07-011 service list. Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 17th day of July, 2008, at Rosemead, California.

/s/ Jennifer Alderete

Jennifer Alderete

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

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



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Parties

RICHARD ESTEVES
 SESCO, INC.
 77 YACHT CLUB DRIVE
 LAKE HOPATCONG, NJ 07849
 FOR: SESCO

MIKE MOORE
 NEWPORT VENTURES
 22 JAY STREET
 SCHENECTADY, NY 12305
 FOR: NEWPORT VENTURES

KEITH R. MCCREA
 ATTORNEY AT LAW
 SUTHERLAND ASBILL & BRENNAN LLP
 1275 PENNSYLVANIA AVE, NW
 WASHINGTON, DC 20004
 FOR: CALIFORNIA MANUFACTURERS &
 TECHNOLOGY ASSOCIATION

MERRILEE HARRIGAN
 VICE PRESIDENT OF EDUCATION
 ALLIANCE TO SAVE ENERGY
 1850 M STREET NW, SUITE 600
 WASHINGTON, DC 20036
 FOR: ALLIANCE TO SAVE ENERGY

JAMES ROSS
 RCS, INC.
 500 CHESTERFIELD CENTER, SUITE 320
 CHESTERFIELD, MO 63017
 FOR: RCS

GREG TROPSA
 PRESIDENT
 ICE ENERGY, INC.
 9351 EASTMAN PARK DRIVE, UNIT B
 WINDSOR, CO 80550
 FOR: ICE ENERGY INC.

KEITH LAYTON
 SOUTHWEST GAS CORPORATION
 PO BOX 98510
 LAS VEGAS, NV 89193-8510
 FOR: SOUTHWEST GAS CORPORATION

VALERIE J. ONTIVEROZ
 SPECIALIST/ STATE REGULATORY AFFAIRS
 SOUTHWEST GAS CORPORATION
 5241 SPRING MOUNTAIN ROAD
 LAS VEGAS, NV 89193-8510

CYNTHIA K. MITCHELL
 530 COLGATE COURT
 RENO, NV 89503
 FOR: TURN

MICHAEL R. THORP
 ATTORNEY
 SOCIALGAS AND SDG&E
 555 WEST FIFTH STREET, STE 1400

LOS ANGELES, CA 90013-1011

STEVEN D. PATRICK
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1011
FOR: SAN DIEGO GAS & ELECTRIC COMPANY
AND SOUTHERN CALIFORNIA GAS COMPANY

ALEX SOTOMAYOR
MARAVILLE FOUNDATION
5729 UNION PACIFIC AVENUE
LOS ANGELES, CA 90022

DIANA MAHMUD
ATTORNEY AT LAW
THE METROPOLITAN WATER DISTRICT OF SOUTH
PO BOX 54153
LOS ANGELES, CA 90054-0153
FOR: THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA

ARLEEN NOVOTNEY
SOUTHERN CALIFORNIA FORUM
941 PALMS BLVD.
VENICE, CA 90291
FOR: SELF

MICHELE SWANSON
SOUTH BAY CITIES COUNCIL OF GOVERNMENTS
3868 CARSON STREET, SUITE 110
TORRANCE, CA 90503
FOR: SOUTH BAY ENERGY SAVINGS CENTER

RICHARD VILLASENOR
TELACU
12252 MC CANN DRIVE
SANTA FE SPRINGS, CA 90670

PAUL WUEBBEN
SOUTH COAST AIR QUALITY MANAGEMENT DIST
21865 COPLEY DRIVE
DIAMOND BAR, CA 91765-4178
FOR: SOUTH COAST AIR QUALITY MANAGEMENT
DISTRICT

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
PO BOX 800 2244 WALNUT GROVE AVENUE
ROSEMead, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

MICHAEL MONTOYA
SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMead, CA 91770

STACIE SCHAFFER
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 390
ROSEMead, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KEITH SWITZER
BEAR VALLEY ELECTRIC SERVICE
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
FOR: BEAR VALLEY ELECTRIC SERVICE

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773

DON WOOD SR.
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941

BRUCE PATTON
RANCHO VALLEY BUILDERS, INC.
647 AERO WAY
ESCONDIDO, CA 92029
FOR: THE SAN DIEGO COMMUNITY ENERGY
ADVISORY COMMITTEE (SDCEAC)

CARLOS F. PENA
SEMPRA ENERGY
101 ASH STREET, HQ12
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC/SOCAL GAS

GEORGETTA J. BAKER
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
101 ASH STREET, HQ 13
SAN DIEGO, CA 92101
FOR: SDG&E/SOCALGAS

KIM F. HASSAN
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101
FOR: SOUTHERN CALIFORNIA GAS COMPANY &
SAN DIEGO GAS ELECTRIC COMPANY

DONALD C. LIDDELL
ATTORNEY AT LAW
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
FOR: CALIFORNIA NATURAL GAS VEHICLE
COALITION/ ICE ENERGY INC.

ANDREW MCALLISTER
 DIRECTOR OF PROGRAMS
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVE., SUITE 100
 SAN DIEGO, CA 92123
 FOR: CALIFORNIA CENTER FOR SUSTAINABLE
 ENERGY

IRENE M. STILLINGS
 EXECUTIVE DIRECTOR
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVE., STE 100
 SAN DIEGO, CA 92123
 FOR: CALIFORNIA CENTER FOR SUSTAINABLE
 ENERGY

JENNIFER PORTER
 POLICY ANALYST
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVENUE, SUITE 100
 SAN DIEGO, CA 92123
 FOR: CALIFORNIA CENTER FOR SUSTAINABLE
 ENERGY

JOY C. YAMAGATA
 REGULATORY MANAGER
 SAN DIEGO GAS & ELECTRIC COMPANY
 8330 CENTURY PARK COURT, CP 32 D
 SAN DIEGO, CA 92123
 FOR: SAN DIEGO GAS & ELECTRIC
 COMPANY/SOUTHERN CALIFORNIA GAS COMPANY

SEPHRA A. NINOW
 POLICY ANALYST
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVENUE, SUITE 100
 SAN DIEGO, CA 92123

MALCOLM LEWIS
 PRESIDENT
 CTG ENERGETICS, INC.
 16 TECHNOLOGY DRIVE, SUITE 109
 IRVINE, CA 92618
 FOR: CTG ENERGETICS, INC.

MWIRIGI IMUNGI
 THE ENERGY COALITION
 15615 ALTON PARKWAY, SUITE 245
 IRVINE, CA 92618
 FOR: THE ENERGY COALITION

JUDI G. SCHWEITZER
 SCHWEITZER AND ASSOCIATES, INC.
 25422 TRABUCO ROAD, STE.105-P
 LAKE FOREST, CA 92630
 FOR: JUDY G. SCHWEITZER

TAMLYN M. HUNT
 ENERGY PROGRAM DIRECTOR
 COMMUNITY ENVIRONMENTAL COUNCIL
 26 W. ANAPAMU ST., 2ND FLOOR
 SANTA BARBARA, CA 93101
 FOR: COMMUNITY ENVIRONMENTAL COUNCIL

ROBERT C. WILKINSON
 DIRECTOR, WATER POLICY PROGRAM
 4426 BREN BUILDING
 SANTA BARBARA, CA 93106

PETER CANESSA
 CALIFORNIA STATE UNIVERSITY, FRESNO
 1211 CHAPARRAL CIRCLE
 SAN LUIS OBISPO, CA 93401
 FOR: CALIFORNIA STATE UNIVERSITY, FRESNO

TIMOTHY J. LAWLER
 SUNDOWNER INSULATION CO., INC.
 1495 ROAD AVENUE
 CLOVIS, CA 93612
 FOR: SUNDOWNER INSULATION CO.

ART BRICE
 RICHARD HEATH AND ASSOCIATES, INC.
 590 W. LOCUST AVENUE, SUITE 103
 FRESNO, CA 93650
 FOR: RICHARD HEATH AND ASSOCIATES, INC.

PAUL KERKORIAN
 UTILITY COST MANAGEMENT, LLC
 6475 N PALM AVE., STE. 105
 FRESNO, CA 93704
 FOR: NONPROFIT HOUSING ASSOCIATIO OF
 NORTHRN CALIFORNIA

JERRY H. HANN
 PERKINS, MANN & EVERETT, A.P.C.
 2222 W. SHAW AVENUE, SUITE 202
 FRESNO, CA 93711
 FOR: RICHARD HEATH & ASSOCIATES, INC.

JERRY H. MANN
 ATTORNEY AT LAW
 PERKINS, MANN & EVERETT
 2222 W. SHAW AVE., SUITE 202
 FRESNO, CA 93711
 FOR: RICHARD HEATH & ASSOCIATES

JEFFREY HELLER
 FAIA - PRESIDENT
 HELLER MANUS ARCHITECTS
 221 MAIN STREET, SUITE 940
 SAN FRANCISCO, CA 94044
 FOR: HELLER MANUS ARCHITECTS

REMI TAN
 AP - ARCHITECT
 HELLER MANUS ARCHITECTS
 221 MAIN STREET, SUITE 940
 SAN FRANCISCO, CA 94044
 FOR: HELLER MANUS ARCHITECTS

GREGORY REDICAN
 DEPUTY DIRECTOR

WILLIAM F. PARKER
 COMMUNITY ACTION AGENCY OF SAN MATEO

COMMUNITY ACTION AGENCY OF SAN MATEO
930 BRITTAN AVENUE
SAN CARLOS, CA 94070

930 BRITTAN AVENUE
SAN CARLOS, CA 94070
FOR: SELF

DENNIS J. HERRERA
CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102
FOR: CITY AND COUNTY OF SAN FRANCISCO

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
FOR: THE UTILITY REFORM NETWORK

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: CITY AND COUNTY OF SAN FRANCISCO

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
FOR: TURN

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

RASHID A. RASHID
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEPHEN A. S. MORRISON
CITY & COUNTY OF SAN FRANCISCO
CITY HALL, RM 234
1 DR CARLTON B. GOODLET PLACE
SAN FRANCISCO, CA 94102-4682
FOR: CITY & COUNTY OF SAN FRANCISCO

AUDREY CHANG
STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
FOR: NATURAL RESOURCES DEFENSE COUNCIL
(NRDC)

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

CHONDA J. NWAMU
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, PO BOX 7442 B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

DANIEL COOLEY
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

LUKE TOUGAS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

SHIRLEY A. WOO
LAW DEPARTMENT
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94106
FOR: PACIFIC GAS AND ELECTRIC COMPANY

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

JAMES SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREYLLP
505 SANSOME STREET, STE 900
SAN FRANCISCO, CA 94111
FOR: CBIAA/CAA

EDWARD W. O'NEILL
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

IRENE K. MOOSEN
ATTORNEY AT LAW
WESTERN MANUFACTURED HOUSING COMM. SVCS.

PETER OUBORG
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, B30A

53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112

SAN FRANCISCO, CA 94120-7442

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES (CEERT)

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875
FOR: MOUNTAIN UTILITIES

JOHN KOTOWSKI
CHIEF EXECUTIVE OFFICER
GLOBAL ENERGY PARTNERS, LLC
3569 MT. DIABLO BLVD., STE 200
LAFAYETTE, CA 94549
FOR: GLOBAL ENERGY PARTNERS, LLC

GERALD LAHR
ASSOCIATION OF BAY AREA GOVERNMENTS
101 8TH STREET
OAKLAND, CA 94607
FOR: ABAG

ROBERT L. KNIGHT
CALIFORNIA BUILDING PERFORM. CONT. ASSN.
1000 BROADWAY, SUITE 410
OAKLAND, CA 94607
FOR: BEVILACQUA-KNIGHT INC/ CALIFORNIA
BUILDING PERFORMANCE CONTRACTOR'S ASSN.

JODY LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609
FOR: COUNTY OF LOS ANGELES, INTERNAL
SERVICES DEPARTMENT/THE LOCAL
GOVERNMENT SUSTAINABLE ENERGYCOALITION

J. ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN STREET
OAKLAND, CA 94612
FOR: REDEFINING PROGRESS

SCOTT WENTWORTH
CITY OF OAKLAND
7101 EDGEWATER DRIVE, NO. 2
OAKLAND, CA 94621
FOR: CITY OF OAKLAND

EILEEN PARKER
QUEST
2001 ADDISON STREET, STE. 300
BERKELEY, CA 94704
FOR: QUANTUM ENERGY SERVICES &
TECHNOLOGIES, INC.

THALIA N.C. GONZALEZ
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLR.
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

MARY - LEE KIMBER
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, 3RD FLOOR
BERKELEY, CA 94704-1204
FOR: DISABILITY RIGHTS ADVOCATES

MELISSA W. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204
FOR: DISABILITY RIGHTS ADVOCATES

JOHN PROCTOR
PROCTOR ENGINEERING GROUP
418 MISSION AVE
SAN RAFAEL, CA 94901
FOR: PROCTOR ENGINEERING GROUP, LTD.

PETER M. SCHWARTZ
ATTORNEY AT LAW
PETER SCHWARTZ & ASSOCIATES, LLC
381 CHAPMAN DRIVE
CORTE MADERA, CA 94925
FOR: PETER M. SCHWARTZ

TIM ROSENFELD
MARIN ENERGY MANAGEMENT TEAM
131 CAMINO ALTO, SUITE D
MILL VALLEY, CA 94941
FOR: MARIN ENERGY MANAGEMENT TEAM

SUSAN E. BROWN
A WORLD INSTITUTE FOR SUSTAINABLE HUMANI
PO BOX 428
MILL VALLEY, CA 94942
FOR: A WORLD INSTITUTE FOR SUSTAINABLE
HUMANITY

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX, CA 94978
FOR: WOMEN'S ENERGY MATTERS (WEM)

HANK RYAN
SMALL BUSINESS CALIFORNIA
750 47TH AVE., 56
CAPITOLA, CA 95010
FOR: SMALL BUSINESS CALIFORNIA

FRANK TENG
 ENVIRONMENT AND ENERGY ASSOCIATE
 SILICON VALLEY LEADERSHIP GROUP
 224 AIRPORT PARKWAY, SUITE 620
 SAN JOSE, CA 95110
 FOR: SILICON VALLEY LEADERSHIP GROUP.

MICHAEL LAMOND
 ALPINE NATURAL GAS OPERATING COMPANY
 PO BOX 550
 15 ST. ANDREWS ROAD, SUITE 7
 VALLEY SPRINGS, CA 95252

BILL MARCUS
 JBS ENERGY
 311 D STREET, STE. A
 WEST SACRAMENTO, CA 95605
 FOR: THE UTILITY REFORM NETWORK

JAMES WEIL
 DIRECTOR
 AGLET CONSUMER ALLIANCE
 PO BOX 37
 COOL, CA 95614
 FOR: AGLET CONSUMER ALLIANCE

ERIC LEE
 SR. ENGINEER
 DAVIS ENERGY GROUP
 123 C STREET
 DAVIS, CA 95616
 FOR: DAVIS ENERGY GROUP

BILL JULIAN
 43556 ALMOND LANE
 DAVIS, CA 95618

MICHAEL E. BACHAND
 PRESIDENT
 CALCERTS,, INC.
 31 NATOMA STREET, SUITE 120
 FOLSOM, CA 95630
 FOR: CALCERTS, INC.

THOMAS S. CROOKS
 DIRECTOR
 MCR PERFORMANCE SOLUTIONS
 3161 CAMERON PARK DR STE 215
 CAMERON PARK, CA 95682-7979
 FOR: MCR PERFORMANCE SOLUTIONS

GREGGORY L. WHEATLAND
 ELLISON SCHNEIDER & HARRIS L.L.P.
 2015 H STREET
 SACRAMENTO, CA 95811-3109
 FOR: SIERRA PACIFIC POWER COMPANY

CHRIS BROWN
 EXECUTIVE DIRECTOR
 CALIFORNIA URBAN WATER CONSERVATION
 455 CAPITOL MALL, SUITE 703
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA URBAN WATER CONSERVATION

MICHAEL BOCCADORO
 THE DOLPHIN GROUP
 925 L STREET, SUITE 800
 SACRAMENTO, CA 95814
 FOR: INLAND EMPIRE UTILITIES, CHINO
 BASIN COALITION, SANTA ANA WATERSHED
 PROJECT AUTHORITY

LYNN HAUG
 ELLISON, SCHNEIDER & HARRIS, LLP
 2015 H STREET
 SACRAMENTO, CA 95814-3109
 FOR: DEPARTMENT OF GENERAL
 SERVICES/ENERGY POLICY ADVISORY
 COMMITTEE

KRISTA CLARK
 ASSOCIATION OF CALIFORNIA WATER AGENCIES
 910 K STREET, SUITE 100
 SACRAMENTO, CA 95814-3577
 FOR: ASSOCIATION OF CALIFORNIA WATER
 AGENCIES

LOURDES JIMENEZ-PRICE
 OFFICE OF THE GENERAL COUNSEL
 SACRAMENTO MUNICIPAL UTILITY DISTRICT
 6201 S STREET, MS B406
 SACRAMENTO, CA 95817-1899
 FOR: SMUD

JAMES HODGES
 ACCES
 1069 45TH STREET
 SACRAMENTO, CA 95819
 FOR: ACCES

RAYMOND J. CZAHR, C.P.A.
 CHIEF FINANCIAL OFFICER
 WEST COAST GAS COMPANY
 9203 BEATTY DRIVE
 SACRAMENTO, CA 95826

CHRIS SCRUTON
 8690 CALVINE RD.
 SACRAMENTO, CA 95828
 FOR: CHRIS SCRUTON

KAREN NORENE MILLS
 ATTORNEY AT LAW
 CALIFORNIA FARM BUREAU FEDERATION
 2300 RIVER PLAZA DRIVE
 SACRAMENTO, CA 95833
 FOR: CALIFORNIA FARM BUREAU FEDERATION

ROB NEENAN
 CALIFORNIA LEAGUE OF FOOD PROCESSORS
 1755 CREEKSIDE OAKS DRIVE, SUITE 250

ROBERT E. BURT
 INSULATION CONTRACTORS ASSN.
 4153 NORTHGATE BLVD., NO.6

SACRAMENTO, CA 95833
FOR: CALIFORNIA LEAGUE OF FOOD
PROCESSORS

SACRAMENTO, CA 95834
FOR: INSULATION CONTRACTORS ASSN.

LOUISE A. PEREZ
COMMUNITY RESOURCE PROJECT, INC.
250 HARRIS AVENUE, SUITE 6
SACRAMENTO, CA 95838
FOR: SELF

JIM PARKS
SACRAMENTO MUNICIPAL UTILITY DIST.
6301 S STREET, A204
SACRAMENTO, CA 95852-1830

CRISTAL BEDORTHA
RESIDENTIAL WALL INSULATION
3714 NELSON AVE.
OROVILLE, CA 95965
FOR: RESIDENTIAL WALL INSULATION

JON W. SLANGERUP
CLEAREEDGE POWER CORPORATION
7205 EVERGREEN PARKWAY
HILLSBORO, OR 97124
FOR: CLEAREEDGE POWER CORPORATION

DON MEEK
ATTORNEY AT LAW
10949 SW 4TH AVENUE
PORTLAND, OR 97219
FOR: WOMEN'S ENERGY MATTERS

MICHELLE MISHOE
PACIFICORP
825 NE MULTNOMAH STREET
PORTLAND, OR 97232
FOR: PACIFICORP

RYAN FLYNN
PACIFICORP
825 NE MULTNOMAH STREET, 18TH FLOOR
PORTLAND, OR 97232

THOMAS ECKHART
CAL - UCONS, INC.
10612 NE 46TH STREET
KIRKLAND, WA 98033
FOR: CAL-UCONS, INC.

CATHY HIGGINS
PROGRAM DIRECTOR
NEW BUILDINGS INSTITUTE
PO BOX 2349
WHITE SALMON, WA 98672
FOR: NEW BUILDINGS INSTITUTE

Information Only

NIKHIL GANDHI
STRATEGIC ENERGY TECHNOLOGIES, INC.
17 WILLIS HOLDEN DRIVE
ACTON, MA 01720

DONALD GILLIGAN
PRESIDENT
NATIONAL ASSOCIATION OF ENERGY SERVICE
610 MOUNTAIN STREET
SHARON, MA 02067

AMELIA GULKIS
ENSAVE, INC.
65 MILLER STREET, SUITE 105
RICHMOND, VT 05477

RICHARD ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG, NJ 07849-1313

CLARK PIERCE
LANDIS+GYR
REGULATORY AFFAIRS
246 WINDING WAY
STRAFORD, NJ 08084

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

ED OSANN
EXECUTIVE DIRECTOR
CALIF. URBAN WATER CONSERVATION COUNCIL
1001 CONNECTICUT AVE., NW, SUITE 801
WASHINGTON, DC 20036

JENNIFER THORNE AMANN
AMER. CNCL FOR AN ENERGY EFFICIENT ECON.
1001 CONNECTICUT AVENUE, NW NO. 801
WASHINGTON, DC 20036
FOR: AMER. CNCL FOR AN ENERGY EFFICIENT
ECON.

STEVEN NADEL

JAMES R. STAPLES

AMERICAN-COUNCIL FOR ENERGY-EFFICIENT
1001 CONNECTICUT AVE. NW, SUITE 801
WASHINGTON, DC 20036

STAPLES MARKETING COMMUNICATIONS
N28W23050 ROUNDY DRIVE
PEWAUKEE, WI 53072
FOR: STAPLES MARKETING COMMUNICATIONS

MARIANNE KING
STAPLES MARKETING COMMUNICATIONS
N28W23050 ROUNDY DRIVE
PEWAUKEE, WI 53072
FOR: STAPLES MARKETING COMMUNICATIONS

NICK HALL
TECMARKET WORKS
165 WEST NETHERWOOD ROAD, 2/F, SUITE A
OREGON, WI 53575

GREY STAPLES
THE MENDOTA GROUP, LLC
1830 FARO LANE
SAINT PAUL, MN 55118

ANNETTE BEITEL
200 17TH STREET
WILMETTE, IL 60091

ROSEMARY MCMAHILL
DIRECTOR - REGULATORY AFFAIRS
CURRENT GROUP LLC
2500 STECK AVE. NO. 35
AUSTIN, TX 78757

JIM MEYERS
SOUTHWEST REGIONAL MANAGER
NORTH AMERICAN INSULATION MANUF. ASSOC.
7792 SOUTH HARRISON CIRCLE
CENTENNIAL, CO 80122

PETER C. JACOBS
BUILDING METRICS INC.
2540 FRONTIER AVE. SUITE 100
BOULDER, CO 80301

MELISSA MCGUIRE
SUMMIT BLUE CONSULTING LLC
1722 14TH STREET, SUITE 230
BOULDER, CO 80302

DON STONEBERGER
APS ENERGY SERVICES
SUITE 750
400 E. VAN BUREN STREET
PHOENIX, AZ 85004

BOBBI J. STERRETT
SNR. SPECIALIST/STATE REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO, NV 89520-0024

DAVID R. PETTIJOHN
MANAGER, WATER RESOURCES DEVELOPMENT
LOS ANGELES DEPT. OF WATER & POWER
111 NORTH HOPE STREET, ROMM 1460
LOS ANGELES, CA 90012

TIMOTHYA. BLAIR
THE METROPOLITAN WATER DISTRICT
700 N. ALAMEDA STREET
LOS ANGELES, CA 90012

WILLIAM P. MCDONNELL
THE METROPOLITAN WATER DISTRICT
700 N. ALAMEDA STREET
LOS ANGELES, CA 90012

KAREN W. WONG
ENERGY PROGRAMS ADVISOR
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH STREET, GT28A4
LOS ANGELES, CA 90013

NORA HERNANDEZ
COUNTY OF LOS ANGELES-INTERNAL SERVICES
1100 N. EASTERN AVENUE
LOS ANGELES, CA 90063

SENATOR RICHARD POLANCO
3701 GLENALBYN DRIVE
LOS ANGELES, CA 90065

GREGORY J. KOSIER
PORTFOLIO MANAGER
CONSTELLATION NEWENRGY, INC.
350 SOUTH GRND AVENUE, 38TH FLOOR
LOS ANGELES, CA 90071

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

DAVID NEMTZOW
NEMTZOW & ASSOCIATES

SUSAN MUNVES
ENERGY AND GREEN BLDG. PROG. ADMIN.

1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401

CITY OF SANTA MONICA
1212 5TH STREET, FIRST FLOOR
SANTA MONICA, CA 90401

RON GARCIA
RELIABLE ENERGY MANAGEMENT, INC.
6250 PARAMOUNT BLVD.
LONG BEACH, CA 90805

LUIS CHAVEZ
1859 BUSINESS CENTER DRIVE
DUARTE, CA 91010

MONTE WINEGAR
PROJECT DIRECTOR
WINEGARD ENERGY
1818 FLOWER AVENUE
DUARTE, CA 91010

BRAD BERGMAN
DIRECTOR
INTERGY CORPORATION
133 W. LEMON AVE.
MONROVIA, CA 91016

BILL KELLY
CORRESPONDENT
CALIFORNIA ENERGY CIRCUIT
PO BOX 1022
SOUTH PASADENA, CA 91031

JOSE ATILIO HERNANDEZ
LIOB MEMBER
LIOB
9237 GERALD STREET
NORTHRIDGE, CA 91343

CHIARA D'AMORE
ICF INTERNATIONAL
14724 VENTURA BLVD.
SHERMAN OAKS, CA 91403

DIANA PAPE
ICF INTERNATIONAL
14724 VENTURA BLVD.
SHERMAN OAKS, CA 91403

STEVEN CULBERTSON
ICF INTERNATIONAL
14724 VENTURA BLVD., SUITE 1001
SHERMAN OAKS, CA 91403

TOM HAMILTON
SR. MANAGER, ICF INTERNATIONAL
14724 VENTURA BLVD., STE. 1001
SHERMAN OAKS, CA 91403

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737

ALLAN RAGO
QUALITY CONSERVATION SERVICES, INC.
SUITE E
4701 ARROW HIGHWAY
MONTCLAIR, CA 91763

AKBAR JAZAYEIRI
SOUTHERN CALIFORNIA EDISON COMPANY
2241 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT, ROOM 370
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DON ARAMBULA
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JACK F. PARKHILL
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JEANNIE HARRELL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JENNIFER SHIGEKAWA
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JOHN FASANA
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GOVE AVE.
ROSEMEAD, CA 91770

JOHN FASANA
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JOHN NALL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVE

LAURA I. GENAO
SOUTHERN CALIFORNIA EDISON
PO BOX 800, 2244 WALNUT GROVE AVENUE

ROSEMEAD, CA 91770

PETE ZANZOT
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

TORY S. WEBER
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

MARK MCNULTY
5150 RANDLETT DRIVE
LA MESA, CA 91941
FOR: BEAR VALLEY ELECTRIC/GOLDEN STATE
WATER

YOLE WHITING
12532 JACKSON HILL LANE
EL CAJON, CA 92021

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO, CA 92106

ASHLEY WATKINS
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE. SUITE 100
SAN DIEGO, CA 92123
FOR: CALIFORNIA CENTER FOR SUSTAINABLE
ENERGY

ROBERT GILLESKIE
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE, SUITE 100
SAN DIEGO, CA 92123

STEVE RAHON
DIRECTOR, TARIFF & REGULATORY ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548

LYDIA FLORES
PRESIDENT
AMERICAN INSULATION INC
8305 MIRALANI DRIVE
SAN DIEGO, CA 92126

TOM HAMILTON
ENERGY PROGRAM MANAGER
QUALITY BUILT
15330 AVENUE OF SCIENCE
SAN DIEGO, CA 92128

JENNIFER HOLMES
ITRON INC.
11236 EL CAMINO REAL

ROSEMEAD, CA 91770

ROBERTO DEL REAL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941

RICHARD T. SPERBERG
ONSITE ENERGY CORPORATION
2701 LOKER AVENUE WEST, SUITE 107
CARLSBAD, CA 92010

GREG BASS
DIRECTOR, RETAIL COMMODITY OPERATIONS
SEMPRA ENERGY SOLUTIONS
400 WEST A STREET, STE 500
SAN DIEGO, CA 92101-3017

JOHN JENSEN
REGIONAL MANAGER
RICHARD HEATH AND ASSOCIATES, INC.
7847 CONVOY COURT , SUITE 102
SAN DIEGO, CA 92111

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123

CENTRAL FILES
REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530

FAITH BAUTISTA
LIOB MEMBER
LIOB
9630 BLACK MOUNTAIN ROAD, SUITE G
SAN DIEGO, CA 92126

BILL BELANSKY
WESTERN INSULATION
16465 VIA ESPRILLO
SAN DIEGO, CA 92127

BOB RAMIREZ
ITRON, INC. (CONSULTING & ANALYSIS DIV.)
11236 EL CAMINO REAL
SAN DIEGO, CA 92130

RACHEL HARCHARIK
ITRON, INC.
11236 EL CAMINO REAL

SAN DIEGO, CA 92130

DAVID GORDON
EFM SOLUTIONS
10310 CAMINITO AGADIR
SAN DIEGO, CA 92131

FRED PATZKE
13576 CALIFORNIA STREET
YUCAIPA, CA 92399-5449

MARIA Y. JUAREZ
DEPUTY DIRECTOR
DEPARTMENT OF COUMMINTY ACTION
2038 IOWA AVENUE, SUITE B-102
RIVERSIDE, CA 92507

CRYSTAL NEEDHAM
SENIOR DIRECTOR, COUNSEL
EDISON MISSION ENERGY
18101 VON KARMAN AVE., STE 1700
IRVINE, CA 92612-1046

ROB GUNNIN
VICE PRESIDENT SUPPLY
COMMERCE ENERGY, INC.
600 ANTON BLVD., SUITE 2000
COSTA MESA, CA 92626

SHARYN BARATA
OPINION DYNAMICS CORPORATION
28202 CABOT ROAD, SUITE 300
LAGUNA NIGUEL, CA 92677

MARIANN LONG
ASSISTANT GENERAL MANAGER
UTILITIES JOINT SERVICES
201 S. ANAHEIM BLVD., NO. 101
ANAHEIM, CA 92805

JEFF HIRSCH
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO, CA 93012-9243

JIM MCNAMARA
SAN LUIS OBISPO COUNTY, INC.
1030 SOUTHWOOD DRIVE
SAN LUIS OBISPO, CA 93401

ART BRICE
VICE PRESIDENT
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE. 103
FRESNO, CA 93650

JOE WILLIAMS
CEO
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, STE 103

SAN DIEGO, CA 92130

KURT J. KAMMERER
K. J. KAMMERER & ASSOCIATES
PO BOX 60738
SAN DIEGO, CA 92166-8738

JOHN NEWCOMB
696 SOUTH TIPPECANOE AVENUE
SAN BERNARDINO, CA 92415
FOR: COMMUNITY ACTION PARTNERSHIP OF
SAN BERNARDINO COUNTY

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

TED FLANIGAN
PRESIDENT
ECOMOTION - THE POWER OF THE INCREMENT
1537 BARRANCA PARKWAY, SUITE F-104
IRVINE, CA 92618

SHAWN THOMPSON
CITY OF IRVINE
1 CIVIC CENTER PLAZA
IRVINE, CA 92646

DALE A. GUSTAVSON
GENERAL MANAGER
BETTER BUILDINGS INTERACTIVE, LLC.
31 E MACARTHUR CRES APT B314
SANTA ANA, CA 92707-5936

CHERYL COLLART
VENTURA COUNTY REGIONAL ENERGY ALLIANCE
1000 SOUTH HILL ROAD, STE. 230
VENTURA, CA 93003

RICHARD SHAW
PRESIDENT
SOUTHERN CALIFORNIA FORUM
PO BOX 469
FILLMORE, CA 93016

ELISABETH ADAMS
ASSERT INC.
155 W. AVENUE J-5
LANCASTER, CA 93534

HECTOR HUERTA
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., SUITE 103
FRESNO, CA 93650

KRISTINE LUCERO
EXECUTIVE ASSISTANT
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE. 103

FRESNO, CA 93650

MARK SHIRIN
VENTURA TV APPLIANCE CENTER
3619 E VENTURA BLVD
FRESNO, CA 93702-5009

BEN CARROLL
2615 W DUDLEY AVE.
FRESNO, CA 93728

ORTENSIA LOPEZ
EXECUTIVE DIRECTOR
EL CONCILIO OF SAN MATEO
1419 BURLINGAME AVE., SUITE N
BURLINGAME, CA 94010

LAUREN CASENTINI
RESOURCE SOLUTIONS GROUP, INC.
711 MAIN STREET
HALF MOON BAY, CA 94019

ANN KELLY
DEPT. OF THE ENVIRONMENT
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO, CA 94102

BRUCE FOSTER
SENIOR VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NORMAN J. FURUTA
ATTORNEY AT LAW
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO, CA 94103-1399

ERIC CUTTER
ENERGY AND ENVIRONMENTAL ECONOMICS, INC.
101 MONTGOMERY STREET, SUITE 1600
SAN FRANCISCO, CA 94104

KRISTEN GRENFELL
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET 20TH FLOOR
SAN FRANCISCO, CA 94104

ANDREW MEIMAN
NEWCOMB ANDERSON MCCORMICK
201 MISSION STREET, SUITE 2010
SAN FRANCISCO, CA 94105

FRESNO, CA 93650

MICHAEL WILLIAMS
LIOB MEMBER
LIOB
3045 N. SUNNYSIDE, SUITE 101
FRESNO, CA 93727

JOSEPH AMADER
7620 CARMEL VALLEY RD.
CARMEL, CA 93923

ALISON TEN CATE
RESOURCE SOLUTIONS GROUP
711 MAIN STREET
HALF MOON BAY, CA 94019

JOHN CELONA
505 VISTA AVENUE
SAN CARLOS, CA 94070

ATHENA BESA
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, STE 2060
SAN FRANCISCO, CA 94102

PEDRO VILLEGAS
SAN DIEGO GAS & ELECTRIC/ SO. CAL. GAS
601 VAN NESS AVE 2060
SAN FRANCISCO, CA 94102

MATT GOLDEN
SUSTAINABLE SPACES, INC.
1167 MISSION STREET
SAN FRANCISCO, CA 94103

BEN CARVER
MAP SUMMER FELLOW
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST., 20TH FLOOR
SAN FRANCISCO, CA 94104

GREG CHANG
BLOOMBERG NEWS
345 CALIFORNIA ST., STE 3500
SAN FRANCISCO, CA 94104

LARA ETTENSON
SUSTAINABLE ENERGY FELLOW
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

ANDY GOETT
PA CONSULTING GROUP
425 MARKET STREET, 22ND FLOOR
SAN FRANCISCO, CA 94105

ANN L. MCCORMICK, P.E.
PRINCIPAL
NEWCOMB ANDERSON MCCORMICK
201 MISSION STREET, SUITE 2010
SAN FRANCISCO, CA 94105

BRETT SEARLE
PROJECT MANAGEMENT ANALYST
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION-ROOM 1464, MCH14F
SAN FRANCISCO, CA 94105

CARMEN BASKETTE
ENERNOC, INC.
594 HOWARD STREET, SUITE 400
SAN FRANCISCO, CA 94105

CRAIG M. BUCHSBAUM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

EILEEN COTRONEO
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

JENNIFER BARNES
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE N7K
245 MARKET STREET
SAN FRANCISCO, CA 94105

JENNY GLUZGOLD
PACIFIC GAS & ELECTRIC CO.
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

JOHN M. NEWCOMB
NEWCOMB ANDERSON MCCORMICK
201 MISSION STREET, SUITE 2010
SAN FRANCISCO, CA 94105

LINDA FONTES
PACIFIC GAS & ELECTRIC COMPANY
123 MISSION ROOM 1404 MC H14F
SAN FRANCISCO, CA 94105

LISE H. JORDAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105

MATT SULLIVAN
NEWCOMB ANDERSON MCCORMICK
201 MISSION ST., SUITE 2010
SAN FRANCISCO, CA 94105

ROBERT B. MCLENNAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SANDY LAWRIE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

SHILPA RAMALYA
77 BEALE STREET, MAIL CODE N6G
SAN FRANCISCO, CA 94105

STELLA ZAHARIUDAKIS
REGULATORY CASE COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MCB9A
SAN FRANCISCO, CA 94105

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

TERRY M. FRY
NEXANT, INC.
101 SECOND STREET, 10TH FLOOR
SAN FRANCISCO, CA 94105

TINA NGUYEN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION-ROOM 1456
SAN FRANCISCO, CA 94105

WHITNEY RICHARDSON
PACIFIC GAS & ELECTRIC
77 BEALE STREET, MCB9A
SAN FRANCISCO, CA 94105

ROBERT KASMAN
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET, ROOM 656B
SAN FRANCISCO, CA 94105-1702

ROBERT J. REINHARD
MORRISON AND FOERSTER
425 MARKET STREET
SAN FRANCISCO, CA 94105-2482

EDWARD G. POOLE
ATTORNEY AT LAW
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818
FOR: CALIFORNIA INDEPENDENT PETROLEUM
ASSOCIATION

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110

JANINE L. SCANCARELLI
ATTORNEY AT LAW
FOLGER, LEVIN & KAHN, LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

SARAH BUCHWALTER
ICF INTERNATIONAL
394 PACIFIC AVE., 2ND FLOOR
SAN FRANCISCO, CA 94111

ANNE ARQUIT NIEDERBERGER
POLICY SOLUTIONS
4156A 24TH STREET
SAN FRANCISCO, CA 94114

JIM FLANAGAN
JAMES FLANAGAN ASSOCIATES
124 LOWER TERRACE
SAN FRANCISCO, CA 94114

LISA WEINZIMER
ASSOCIATE EDITOR
PLATTS MCGRAW-HILL
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123

WALTER MCGUIRE
EFFICIENCY PARTNERSHIP
2962 FILLMORE STREET
SAN FRANCISCO, CA 94123

BRIAN K. CHERRY
VP, REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B10C
SAN FRANCISCO, CA 94177

JILL MARVER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, N7K
SAN FRANCISCO, CA 94177

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

MARY O'DRAIN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION - ROOM 1410, MC H14G
SAN FRANCISCO, CA 94177

ROLAND RISSER
DIRECTOR, CUSTOMER ENERGY EFFICIENCY
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000, MAIL CODE N6G
SAN FRANCISCO, CA 94177

WILLIAM C. MILLER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177

HELEN ARRICK
BUSINESS ENERGY COALITION
MC B8R, PGE
PO BOX 770000
SAN FRANCISCO, CA 94177-0001

RAFAEL FRIEDMANN
SUPERVISOR CUSTOMER ENERGY EFFICIENCY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177-0001

ELLEN PETRILL
DIRECTOR, PUBLIC/PRIVATE PARTNERSHIPS
ELECTRIC POWER RESEARCH INSTITUTE
3420 HILLVIEW AVENUE
PALO ALTO, CA 94304

ANDREW W. WOOD
ENERGY EFFICIENCY ENGINEER
HONEYWELL UTILITY SOLUTIONS
353 A VINTAGE PARK DRIVE
FOSTER CITY, CA 94404

MARY SUTTER
EQUIPOISE CONSULTING INC.
2415 ROOSEVELT DRIVE
ALAMEDA, CA 94501-6238

JAMES DEZELL
RHA, INC.
SUITE 205
1151 HARBOR BAY PKWY
ALAMEDA, CA 94502

KEVIN CUDD
SENIOR PROGRAM MANAGER
PG&E
1320 EL CAPITAN DRIVE, SUITE 330
DANVILLE, CA 94526

TERRY L. MURRAY
MURRAY & CRATTY
8627 THORS BAY ROAD
EL CERRITO, CA 94530

DUTCHER JOHN
V.P. REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534
FOR: MOUNTAIN UTILITIES

DAVID C. CLARK
SYNERGY COMPANIES
28436 SATELLITE STREET
HAYWARD, CA 94545

STEVEN R. SHALLENBERGER
SYNERGY COMPANIES
28436 SATELLITE STREET
HAYWARD, CA 94545

GERRY HAMILTON
SENIOR ASSOCIATE
GLOBAL ENERGY PARTNERS, LLC
3569 MT. DIABLO BLVD., SUITE 200
LAYFAYETTE, CA 94549

MISTI BRUCERI
1521 I STREET
NAPA, CA 94559

ASHISH GOEL
FOUNDER AND COO
INTERGY CORPORATION
11875 DUBLIN BOULEVARD, SUITE A201
DUBLIN, CA 94568

GRANT COOKE
VICE PRESIDENT
INTERGY CORPORATION
11875 DUBLIN BOULEVARD, SUITE A201
DUBLIN, CA 94568

JAY BHALLA
PRINCIPAL
INTERGY CORPORATION
11875 DUBLIN BLVD., SUITE A201
DUBLIN, CA 94568

RICHARD FOX
DIRECTOR
INTERGY CORPORATION
11875 DUBLIN BOULEVARD, SUITE A201
DUBLIN, CA 94568

PATRICIA R. THOMPSON
SUMMIT BLUE CONSULTING
2752 DOS RIOS DR.
SAN RAMON, CA 94583

LADONNA WILLIAMS
EXECUTIVE DIRECTOR
PO BOX 5653
VALLEJO, CA 94591

SARAH BESERRA
CALIFORNIA REPORTS.COM
39 CASTLE HILL COURT
VALLEJO, CA 94591

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94596
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

MICHAEL CHENG
2723 HARLAND COURT
WALNUT CREEK, CA 94598

ALEX KANG
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND, CA 94607

ANN PETERSON
ITRON, INC.
1111 BROADWAY, SUITE 1800
OAKLAND, CA 94607

FRED COITO
KEMA INC
492 NINTH ST., SUITE 220
OAKLAND, CA 94607

JENNIFER FAGAN
PRINCIPAL ENERGY CONSULTANT
ITRON, INC
1111 BROADWAY, SUITE 1800
OAKLAND, CA 94607

JO TIFFANY
ALLIANCE TO SAVE ENERGY
717 WASHINGTON STREET, STE. 210
OAKLAND, CA 94607

JOHN CAVALLI
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND, CA 94607

KATHLEEN GAFFNEY
KEMA
492 NINTH ST., SUITE 220
OAKLAND, CA 94607

KARL BROWN
1333 BROADWAY, STE. 240
OAKLAND, CA 94612

ZACHARY FRANKLIN
GRID ALTERNATIVES
1610 HARRISON STREET, SUITE C
OAKLAND, CA 94612

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

BRUCE MAST
BUILD IT GREEN
1434 UNIVERSITY AVENUE
BERKELEY, CA 94702

PETER MILLER
CONSULTANT
1834 DELAWARE STREET
BERKELEY, CA 94703

BOBAK ROSHAN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

JESSE W. RASKIN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
FOR: THE GREENLINING INSTITUTE

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

STEPHANIE CHEN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704

STEVE KROMER
3110 COLLEGE AVENUE, APT 12
BERKELEY, CA 94705
FOR: STEVEN KROMER

CRAIG TYLER
TYLER & ASSOCIATES
2760 SHASTA ROAD
BERKELEY, CA 94708

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90R4000
BERKELEY, CA 94720

MARCIA W. BECK
LAWRENCE BERKELEY NATIONAL LABORATORY
MS 90-90R3027D
1 CYCLOTRON ROAD
BERKELEY, CA 94720

KAREN NOTSUND
ASSISTANT DIRECTOR
UC ENERGY INSTITUTE
2547 CHANNING WAY 5180
BERKELEY, CA 94720-5180

DANA ARMANINO
CDA
COUNTY OF MARIN
3501 CIVIC CENTER DRIVE, ROOM 308
SAN RAFAEL, CA 94903

JAY LUBOFF
JAY LUBOFF CONSULTING SERVICES
7 ANNIE LANE
MILL VALLEY, CA 94941

RITA NORTON
RITA NORTON AND ASSOCIATES, LLC
18700 BLYTHSWOOD DRIVE,
LOS GATOS, CA 95030

PETER HOFMANN
BO ENTERPRISES
43B EAST MAIN ST
LOS GATOS, CA 95030-6907

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

GENE THOMAS
ECOLOGY ACTION
211 RIVER STREET
SANTA CRUZ, CA 95060

MAHLON ALDRIDGE
 VICE PRESIDENT, ENERGY & CLIMATE GROUP
 ECOLOGY ACTION, INC.
 211 RIVER STREET
 SANTA CRUZ, CA 95060
 FOR: ECOLOGY ACTION, INC.

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

BARRY HOOPER
 CITY OF SAN JOSE
 10TH FLOOR
 200 EAST SANTA CLARA ST.
 SAN JOSE, CA 95113-1905

MARY TUCKER
 CITY OF SAN JOSE, ENVIRONMENTAL SRVC DEP
 200 EAST SANTA CLARA ST., 10TH FLR.
 SAN JOSE, CA 95113-1905

DOUGLAS MOIR
 WESTERN APPLIANCE
 1976 W. SAN CARLOS STREET
 SAN JOSE, CA 95128

FRANCES L. THOMPSON
 PACIFIC GAS AND ELECTRIC COMPANY
 123 MISSION STREET, RM. 1408 MC H14G
 SAN FRANCISCO, CA 95177

NANCY KIRSHNER-RODRIGUEZ
 CONSULTING DEPARTMENT MANAGER
 CONSOL
 7407 TAM O SHANTER DRIVE
 STOCKTON, CA 95210-3370

ROBERT W. HAMMON
 PRINCIPAL
 CONSOL
 7407 TAM OSHANTER DRIVE
 STOCKTON, CA 95210-3370

ELISE KLEIBER
 2400 ROCKEFELLER DR.
 CERES, CA 95307

BOB HONDEVILLE
 MODESTO IRRIGATION DISTRICT
 1231 11TH STREET
 MODESTO, CA 95354

JOY A. WARREN
 REGULATORY ADMINISTRATOR
 MODESTO IRRIGATION DISTRICT
 1231 11TH STREET
 MODESTO, CA 95354

THOMAS S. KIMBALL
 MODESTO IRRIGATION DISTRICT
 1231 11TH STREET
 MODESTO, CA 95354

WILLIE M. GATERS
 MANAGER, ENERGY AND SUSTAINABILTY DIV.
 GENERAL SERVICES DEPT.
 COUNTY OF SONOMA
 2300 COUNTY CENTER DRIVE, A200
 SANTA ROSA, CA 95403
 FOR: COUNTY OF SONOMA

BARBARA R. BARKOVICH
 BARKOVICH & YAP
 44810 ROSEWOOD TERRACE
 MENDOCINO, CA 95460

THOMAS P. CONLON
 PRESIDENT
 GEOPRAXIS
 PO BOX 5
 SONOMA, CA 95476-0005

BENJAMIN FINKELOR
 PROGRAM MANAGER
 UC DAVIS ENEGY EFFICIENCY CENTER
 1 SHIELDS AVENUE
 DAVIS, CA 95616

RICHARD MCCANN
 M.CUBED
 2655 PORTAGE BAY ROAD, SUITE 3
 DAVIS, CA 95616

MARSHALL B. HUNT
 PROGRAMS DIRECTOR, UC DAVIS
 WESTERN COOLING EFFICIENCY CENTER
 1554 DREW AVENUE
 DAVIS, CA 95616-4632
 FOR: WESTERN COOLING EFFICIENCY CENTER

DAVID MORSE
 CALIFORNIA AMERICAN WATER CO.
 1411 W. COVELL BLVD., STE. 106-292
 DAVIS, CA 95616-5934

CAROLYN COX
 GENERAL MANAGER
 5213 ROSEANA COURT
 FAIR OAKS, CA 95628

DOUGLAS E. MAHONE
 HESCHONG MAHONE GROUP
 11626 FAIR OAKS BLVD., 302
 FAIR OAKS, CA 95628

WAYNE AMER
 PRESIDENT
 MOUNTAIN UTILITIES
 PO BOX 205

KIRKWOOD, CA 95646

KENNY SWAIN
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

THOMAS L. TRIMBERGER
CHIEF BUILDING OFFICIAL
CITY OF RANCHO CORDOVA
2729 PROSPECT PARK DRIVE
RANCHO CORDOVA, CA 95670

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

DAVID REYNOLDS
MEMBER SERVICES MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE, CA 95678-6420

SCOTT TOMASHEFSKY
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE, CA 95678-6420

ERIK S. EMBLEM
3 E INTERNATIONAL INCORPORATED
1809 S STREET, SUITE 101-207
SACRAMENTO, CA 95811

JEDEDIAH GIBSON
ATTORNEY
ELLISON SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95811
FOR: SIERRA PACIFIC POWER COMPANY

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95811
FOR: SIERRA PACIFIC POWER COMPANY

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

CLAUDIA ORLANDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST. MS 25
SACRAMENTO, CA 95814

DAN GEIS
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO, CA 95814
FOR: INLAND EMPRIES UTILITIES AGENCY

ELAINE HEBERT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-42
SACRAMENTO, CA 95814

JASON WIMBLEY
DIVISION CHIEF, ENERGY&ENVIRON PROGRAMS
DEPT. OF COMMUNITY SERVICES & DEVELOPMEN
700 NORTH 10TH STREET, ROOM 258
SACRAMENTO, CA 95814

JENNIFER CASTLEBERRY
RUNYON SALTZMAN & EINHORN
ONE CAPITOL MALL, SUITE 400
SACRAMENTO, CA 95814

JILL RUGANI
RUNYON SALTZMAN & EINHORN, INC.
ONE CAPITOL MALL, SUITE 400
SACRAMENTO, CA 95814

JUSTIN C. WYNNE
ATTORNEY AT LAW
BRAUN BLAISING MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814

KAE LEWIS
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 22
SACRAMENTO, CA 95814

KATIE SHULTE JOUNG
CALIFORNIA URBAN WATER CONSERVATION
455 CAPITOL MALL, SUITE 703
SACRAMENTO, CA 95814

MOLLY HARCOS
RUNYON, SALTZMAN & EINHORN, INC.
1 CAPITOL MALL, SUITE 400
SACRAMENTO, CA 95814

RICHARD SAPUDAR
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET

ROBERT J. BICKER
LEGISLATIVE ANALYST
CALIFORNIA APARTMENT ASSOCIATION

SACRAMENTO, CA 95814

980 NINTH STREET, SUITE 200
SACRAMENTO, CA 95814

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

SHEILA DEY
WESTERN MANUFACTURED HOUSING COMMUNITIES
455 CAPITOL MALL STE 800
SACRAMENTO, CA 95814

G. PATRICK STONER
LOCAL GOVERNMENT COMMISSION
1303 J STREET, SUITE 250
SACRAMENTO, CA 95816

WILLIAM W. WESTERFIELD III
SR. ATTORNEY
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET
SACRAMENTO, CA 95817
FOR: SACRAMENTO MUNICIPAL UTILITY
DISTRICT

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899

STEVEN LEHTONEN
PLUMBING, HEATING, COOLING CONTRACTORS
4153 NORTHGATE BLVD., NO. 6
SACRAMENTO, CA 95834-1218

DAVE STEPHENSON
RATE REGULATION MANAGER - WESTERN REGIO
AMERICAN WATER WORKS SERVICE CO.
4701 BELOIT DRIVE
SACRAMENTO, CA 95838

JAMES O'BANNON
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVE., STE 20
CHICO, CA 95926

PAMELA GORSUCH
PROJECT MANAGER
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVENUE, SUITE 20
CHICO, CA 95926

SCOTT BERG
SELF HELP HOME IMPROVEMENT PROJECT INC.
3777 MEADOWVIEW DR., 100
REDDING, CA 96002

JESSICA NELSON
ENERGY SERVICES MANAGER
PLUMAS SIERRA RURAL ELECTRIC COOP. (908)
73233 STATE ROUTE 70
PORTOLA, CA 96122-7069

ROBERT MOWRIS, P.E.
ROBERT MOWRIS & ASSOCIATES
PO BOX 2141
OLYMPIC VALLEY, CA 96145

DR. HUGH (GIL) PEACH
H GIL PEACH & ASSOCIATES LLC
16232 NW OAKHILLS DRIVE
BEAVERTON, OR 97006

PAUL NOTTI
HONEYWELL UTILITY SOLUTIONS
6336 SE MILWAUKIE AVE. 11
PORTLAND, OR 97202

BRIAN HEDMAN
VICE PRESIDENT
QUANTEC, LLC
720 SW WASHINGTON STREET, STE 400
PORTLAND, OR 97205

M. SAMI KHAWAJA, PH.D
QUANTEC, LLC
SUITE 400
720 SW WASHINGTON STREET
PORTLAND, OR 97205

JANE S. PETERS, PH.D.
RESEARCH INTO ACTION, INC.
PO BOX 12312
PORTLAND, OR 97212

SAM SIRKIN
6908 SW 37TH AVENUE
PORTLAND, OR 97219

CATHIE ALLEN
CA STATE MGR.
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 2000
PORTLAND, OR 97232

MARISA DECRISTOFORO
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 800
PORTLAND, OR 97232

DAVE SULLIVAN P.E.
CONSULTING ENGINEER
614 38TH PLACE

MICHAEL BAKER
VICE PRESIDENT
SBW CONSULTING, INC.

FLORENCE, OR 97439-8216

2820 NORTHUP WAY, SUITE 230
BELLEVUE, WA 98004

JENNIFER HOLMES
ENERGY MARKET INNOVATIONS INC.
83 COLUMBIA STREET, SUITE 303
SEATTLE, WA 98104

JIM BAZEMORE
ENERGY MARKET INNOVATIONS INC
83 COLUMBIA STREET, SUITE 303
SEATTLE, WA 98104-1417

MICHAEL KARP
A.W.I.S.H.
PO BOX 812
LOPEZ ISLAND, WA 98261

JOHN M. CLARKSON
HEAT PROJECT UK
ENACT ENERGY
FREEPOST NATW1078
TOLVADDON, UK TR14 0HX
UNITED KINGDOM

State Service

PETER LAI
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AVA N. TRAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AYAT E. OSMAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CATHLEEN A. FOGEL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERYL COX
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

CHRISTINE S. TAM
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

CHRISTOPHER R VILLARREAL
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAN OLSON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID M. GAMSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EDWARD HOWARD
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FRED L. CURRY
CALIF PUBLIC UTILITIES COMMISSION
WATER AND SEWER ADVISORY BRANCH
ROOM 3106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES COMMISSION

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION

LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMIE FORDYCE
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
AREA 5-B
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEAN A. LAMMING
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEANNE CLINTON
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 4002
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GEORGE S. TAGNIPES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHANNA M. SEVIER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOYCE STEINGASS
CALIF PUBLIC UTILITIES COMMISSION
WATER BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JUDITH IKLE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
ROOM 4012
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN WATTS-ZAGHA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

KATHERINE HARDY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY HYMES
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5306
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LISA PAULO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARIANA C. CAMPBELL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW TISDALE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MELICIA CHARLES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL WHEELER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MIKHAIL HARAMATI
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAMELA WELLNER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA

AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT KINOSIAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5202
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

ROBERT LEHMAN
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARAH R. THOMAS
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5105
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARVJIT S. RANDHAWA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SAZEDUR RAHMAN
CALIF PUBLIC UTILITIES COMMISSION
POLICY & DECISION ANALYSIS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS M. RENAGHAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS ROBERTS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIM G. DREW
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ZENAIDA G. TAPAWAN-CONWAY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE W. PREMO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

BELEN VALENCIA
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 22
SACRAMENTO, CA 95814

CYNTHIA ROGERS
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

DENNIS L. BECK JR.
SENIOR STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 14
SACRAMENTO, CA 95814

DON SCHULTZ
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814
FOR: DRA

E.V. (AL) GARCIA
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET. MS 42
SACRAMENTO, CA 95814
FOR: CALIFORNIA ENERGY COMMISSION

GARY KLEIN
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814

NANCY JENKINS, P.E.
MANAGER
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-43
SACRAMENTO, CA 95814

SYLVIA BENDER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS22
SACRAMENTO, CA 95814

ZAIDA AMAYA-PINEDA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

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