

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

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M)	Application 08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009, 2010, and 2011	Application 08-05-026 (Filed May 15, 2008)

**SIXTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON THE
RESULTS OF ITS 2009 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM EFFORTS IN
COMPLIANCE WITH ADVICE LETTER 2498-E-A**

LISE JORDAN
DANIEL F. COOLEY
Law Department
Pacific Gas and Electric Company
Post Office Box 7442
San Francisco, CA 94120
Telephone: (415) 973-6646
Fax: (415) 973-0516
E-mail: DFC2@pge.com

Attorneys for:
PACIFIC GAS AND ELECTRIC COMPANY

Dated: May 3, 2010

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RESULTS OF ITS 2009 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM EFFORTS IN
COMPLIANCE WITH ADVICE LETTER 2498-E-A**

Pacific Gas and Electric Company (PG&E) files its Sixth Annual Progress Report on its 2009 Family Electric Rate Assistance (FERA) Program efforts in compliance with the FERA reporting requirements developed jointly by the utilities, DRA, Energy Division, Latino Issues Forum, and TURN as set forth in PG&E's Advice Letter 2498-E-A, which became effective June 17, 2004. This advice letter was a requirement of Decision 04-02-057, mimeo, page 58, and Ordering Paragraph 5.

Respectfully submitted,

LISE JORDAN
DANIEL F. COOLEY

/s/ _____
DANIEL F. COOLEY
Law Department
Pacific Gas and Electric Company
Post Office Box 7442
San Francisco, CA 94120
Telephone: (415) 973-6646
Fax: (415) 973-0516
E-mail: DFC2@pge.com
Attorneys for:
PACIFIC GAS AND ELECTRIC COMPANY

May 3, 2010

**SIXTH ANNUAL PROGRESS REPORT TO THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**FAMILY ELECTRIC RATE ASSISTANCE
(FERA)**

JANUARY 1, 2009 - DECEMBER 31, 2009

May 3, 2010

**PACIFIC GAS AND ELECTRIC COMPANY
FERA PROGRAM
MAIL CODE B5K
PO Box 770000
SAN FRANCISCO, CA 94177**

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FAMILY ELECTRIC RATE ASSISTANCE (FERA)

I. PARTICIPANT INFORMATION

A. Provide the total number of FERA customers by month, for the reporting period.

See Table 1.

Table 1		
2009	FERA Enrolled¹	FERA Receiving Tier 3 Benefit¹
January	16,162	9,996
February	16,622	8,779
March	17,649	9,392
April	18,055	9,093
May	18,378	10,726
June	18,899	10,859
July	19,742	12,588
August	20,926	13,286
September	21,555	13,975
October	22,698	12,821
November	23,286	12,570
December	24,278	15,277

Notes:

¹ Does not include sub-metered tenants.

B. Provide the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter.

See Table 2.

Table 2			
FERA Penetration Rate			
2009 Quarter Ending	FERA-Eligible Households¹	FERA-Participating Households¹	FERA Household Penetration Rate²
March 31	179,512	17,649	10%
June 30	179,512	18,899	11%
September 30	179,512	21,555	12%
December 31	179,512	24,278	14%

Notes:

¹Does not include sub-metered tenants.

²FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

C. Discuss how the estimates of current FERA-eligible households were developed.

For the 2009 program year reporting period, PG&E used the same Joint Utilities' methodology for calculating demographic FERA-eligibility rates that was adopted for California Alternate Rates for Energy (CARE) in 2001 in Decision (D.) 01-03-028. The particulars of the calculations may be found in Attachment A, "Technical Addendum: Joint-Utility Methodology for Calculating CARE Penetration" excerpted from the Joint Utilities' "Reporting Requirements Manual (RRM) Working Group Report for Low Income Assistance Programs" (R.98-07-037) and Attachment B, the Joint Utility CARE eligibility update (filed on October 15, 2008 in compliance with the directives of D.02-07-033, Ordering Paragraph 4(b), as modified by the Assigned Commissioner's Ruling (ACR) of December 27, 2002 and the Scoping Memorandum of June 24, 2004).¹ In summary, PG&E applies county-based commodity-specific demographic eligibility multipliers to the technically eligible meter count within that county. The product of this calculation is then added together to obtain an overall eligibility for each commodity served.

The estimates of FERA-demographically eligible households were calculated for each utility by applying the demographic eligibility rate to technically eligible households by county and utility service area. The methodology is described in

¹ The Joint Utilities are PG&E, Southern California Edison Company, San Diego Gas and Electric Company and Southern California Gas Company. Energy Division and the Division of Ratepayer Advocates also participate in the RRM Working Group.

the Low Income Reporting Requirements Manual. These rates were developed by Athens Research and utilize current year income and household size data. The 2009 penetration rates reported in low income monthly reports used demographic eligibility rates that were submitted to the Commission on October 15, 2008.

PG&E applied the demographically eligible meter count supplied by the Joint Utility demographer to internally derive the technically eligible meter count by county and commodity. To derive the demographic information, the Joint Utilities hired a demographic consultant, Athens Research, which culled information starting with the current census tract data available for PG&E's service area. Additionally, commercially available demographic updates were utilized to update the population information for the current year. The Joint Utility demographer then developed matrices, applying appropriate statistical methods in order to properly represent the information by county and commodity. The raw percentage of estimated eligible population, by county and fuel type, was then provided to PG&E for combining with the technically eligible meter counts. The product of these statistics results in PG&E's estimated eligible population.

D. Provide the current FERA sub-metered tenant counts at year-end.

247 sub-metered tenants were enrolled in FERA at year-end.

E. Discuss any problems encountered during the reporting period administering FERA for sub-metered tenants and/or master-meter customers.

Since FERA was created in June 2004, the main problems encountered by sub-metered tenants and/or master-metered customers include understanding the FERA discount on their bills, understanding the difference between the FERA discount and the CARE discount, and understanding whether or not they can apply for both discounts.

Also, some landlords/managers fail to advise PG&E when a FERA-certified tenant has moved out of the facility. PG&E provides a FERA certification report to landlords/managers on a regular basis, and the landlord/manager is requested to contact PG&E if any information needs to be updated.

II. PROGRAM COSTS

A. Discount Cost

1. State the average monthly FERA discount received, in dollars per FERA customer.^{1,2}

The average monthly FERA discount in 2009, per FERA customer, was \$28.04.

Notes:

¹Does not include sub-metered tenants.

² Enrolled customers are excluded from the monthly average during any months they did not reach Tier 3 usage.

2. State the cumulative annual discount for all FERA customers.¹

The 2009 annual FERA discount was \$3,976,627.

The 2004 through 2009 cumulative annual discount was \$9,891,108.

Notes:

¹Does not include sub-metered tenants.

B. Administrative Cost

1. Show the FERA Program's administrative cost by category.

See Table 3.

Table 3	
FERA Program Administrative Costs by Category and Benefits	
Category	Cost
Outreach	\$157,706
Processing, Certification, and Verification	\$125,739
General Administration	\$50,930
Billing System / Programming	\$11,768
Regulatory Compliance	\$864
Energy Division Staff Funding	\$0
TOTAL PROGRAM COSTS	\$347,007
CUSTOMER BENEFITS	\$3,979,510
TOTAL PROGRAM COSTS & CUSTOMER BENEFITS	\$4,326,517

2. Explain what is included in each administrative cost category.

Outreach: This category includes bill inserts, applications (printing and mailing), postage, sub-metered outreach, information technology (technical support and software licensing), staff labor, event staffing, website design, and other outreach.

Processing, Certification and Verification: This category includes staff labor for application processing and training.

General Administration: This category includes office supplies, program management labor and information technology (technical support and software licensing).

Billing System / Programming: This category includes manual rebilling, programming and billing labor.

Regulatory Compliance: This category includes program applications and advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings, and tariff revisions.

CPUC Energy Division Staff Funding: This category includes funding for the Energy Division staff.

Customer Benefits: This category includes rate discounts.

3. Explain how costs of joint CARE/FERA activities are charged to each program.

For joint CARE/FERA activities, PG&E charged the expenses to appropriate CARE/FERA order numbers depending on the nature of the activities and the number of hours spent on each program.

C. Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.

The year-end December 31, 2009 balance for the FERA balancing account was a debit of \$4,643,804

The year-end December 31, 2008 balance for the FERA balancing account was a debit of \$2,566,392

The year-end December 31, 2007 balance for the FERA balancing account was a debit of \$1,603,094.

The year-end December 31, 2006 balance for the FERA balancing account was a debit of \$1,658,767.

The year-end December 31, 2005 balance for the FERA balancing account was a debit of \$1,340,372¹.

The year-end December 31, 2004 balance for the FERA balancing account was a debit of \$340,948.

Notes:

¹ The figures were adjusted and different from the 2005 Annual Report.

III. OUTREACH

A. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

Consistent with the provisions of D.04-02-057 that, "[A]dditional outreach should be undertaken when it can be done at little cost" (mimeo, p. 56), outreach for FERA is coordinated with PG&E's CARE and Low Income Energy Efficiency ("LIEE," also known as "Energy Partners") outreach efforts.

Since implementing a single application for the CARE and FERA Programs, PG&E has expanded FERA outreach through multiple initiatives at no additional cost to the program. These are described below.

Automated Phone Enrollment

The advent of the automated phone enrollment initiative easily became the cornerstone outreach effort, helping to reach customers quickly and efficiently. Working with SoundBite Communications, PG&E utilized the Automated Voice Messaging (AVM) technology for its enrollment. The automated interactive system allows customers to verify their eligibility and enroll in the CARE or FERA Program via a touchtone phone.

Bill Inserts

A bill insert consisting of a postage-paid bilingual mini application was mailed in the February, June, July, August, September and October billing cycles. It included postage-paid return mailing and was in English and Spanish. The bill insert presented FERA information in a concise way and allowed the customer to fill out a condensed version of the application. This initiative was an efficient outreach tool because of its ability to reach every residential PG&E customer who was not already on FERA.

Direct Mails

The direct mail initiative would not be successful without a postage-paid, self-addressed application. This was mailed to customers' homes, thereby reducing barriers of accessibility to enrollment information. Those direct mail initiatives included:

- Account Closed (AC) – An English/Spanish direct mail piece to customers residing at addresses of recently-closed CARE accounts.
- Balanced Payment Plan (BPP) – An English/Spanish direct mail piece to customers participating in the Balanced Payment Plan Program.

- Customer Care and Billing (CC&B) – PG&E utilized data from its customer information system to generate a list of prospective customers. The list included those customers who were on Medical Baseline or receiving life support and customers who had received a 48-hour notice or had been required to submit a credit deposit.
- Customer No Response (CNR) – An English/Spanish direct mail piece to customers who had previously requested an application but did not mail it in or complete the enrollment process.
- Executive-Sponsored (EXEC) – A letter from a PG&E director highlighting the CARE Program accompanied with a CARE/FERA application using zip code data.
- Pay Plan-New Service (PP-NS) – An English/Spanish direct mail piece in two parts to customers who requested a payment plan or started new service.
- Recertification (RDM) – Every month, a letter and an application to CARE customers who were removed due to failure to recertify during the previous month, asking them to reapply for either the CARE or FERA Program.
- Third Party Notification (TPN) – An English/Spanish direct mail piece in three parts to customers on the Third Party Notification Program which allows a customer to designate a friend or relative to receive duplicate copies of past-due payment notices.
- Zip code (ZIP) – An English/Spanish direct mail piece in two parts to customers in specific zip codes with the highest percentages of CARE-eligible, unenrolled customers.
- Volunteer Income Tax Assistance (VITA)/United Way – PG&E partnered with United Way through the VITA initiative to help customers save money on their monthly energy bill during or in preparation for the tax season. Applications were included in VITA packets.

Integration

FERA coordinated with CARE, Cooling Centers and Energy Partners (PG&E's LIEE Program), in order to generate FERA enrollment. FERA applications were on display and available to participants at Cooling Centers that partnered with PG&E. FERA information and applications were distributed at various CARE and Energy Partners outreach events. Also, CARE Community Outreach Contractors (COCs) assisted in enrolling FERA customers at no additional cost. In addition, CARE customers who notified PG&E of a change in income status which no longer qualified them for CARE were then informed about FERA and provided with an opportunity to apply if qualified. Additionally, customers that applied for CARE, but were income-qualified for FERA, were automatically enrolled in the FERA Program.

Kiosks

Through the Local Office initiative, ADA-compliant self-service kiosks have been installed to create an easy-to-use touch point for customers to apply for FERA. The kiosks help raise awareness and generate new enrollments while providing a convenient way for customers to fill out an application. In addition to the kiosks, local office customer service representatives have been trained to speak about the program benefits with every customer.

These kiosks include an application holder as well as a slot where the customer can deposit the completed application. Each kiosk comes with a lock and key in order to help maintain security and confidentiality and gives customers the opportunity to enroll themselves while waiting in line to pay their bills. The local office staff replenishes the supply of applications in the kiosk and mails completed applications to the FERA Program on a regular basis.

Online

PG&E continued to use its website to promote the FERA Program. Each application was posted in-language and in a format that allowed easy download and printing. Detailed information about the program was provided and links to other assistance programs were made available.

With the online application available on PG&E's website, customers were able to enroll online using one of two options: completion of a simple form which requires no registration or via "My Account", which requires registration. With the online application, customers were able to complete the necessary household and income eligibility information, accept the declaration which states that the information they provided is true, and submit the application electronically. PG&E also utilized an online mailbox – CAREandFERA@pge.com – as an internal and external communication tool for any program-related inquiries.

Senior and Disabled Outreach

FERA continued its outreach to seniors and those with disabilities. With respect to the challenges associated with financial assistance programs, seniors and those with disabilities may be overwhelmed with the steps involved in completing the application. FERA focused attention on this customer population and utilized large-print applications in multiple languages and participated in targeted outreach events for face-to-face interactions.

B. Discuss each of the following:

- 1. How FERA customer data and other relevant program information is shared within the utility, for example, between LIEE and other appropriate low-income programs.**

The FERA discount is recorded directly into the customer information system. This allows Customer Service Representatives (CSRs) to see the FERA status of any customer calling PG&E's contact center for assistance. This provides important information for the CSR to use when discussing other benefits and services that may be of assistance to the income-qualified customer.

FERA features other financial assistance information on its applications. Each 8.5" x 11" application provides a brief description of other assistance programs available as well as contact numbers.

2. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.

With the increasing awareness of energy efficiency, many FERA income-qualified households with electric usage below Tier 3 (131 – 200 percent of baseline) were not interested in applying for the FERA discount since they would not benefit from it. The FERA Program commended customers on their energy conservation efforts but encouraged them to apply for FERA anyway, in preparation for any unforeseen future energy usage increase.

IV. PROCESSING FERA APPLICATIONS

A. Processing Self-Certification and Self-Recertification Applications (individual and sub-metered customers)

1. Provide the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period.

See Table 4.

TABLE 4						
FERA Self-Certification and Self-Recertification Applications ¹						
	Provided ²	Received	Approved	Denied	Pending/Never Completed	Duplicates
Utility	10,895	16,469	16,298	98	73	1,493
Capitation	0	0	0	0	0	0
Other Third-Party	0	0	0	0	0	0
Total	10,895	16,469	16,298	98	73	1,493

Notes:

¹Includes sub-metered tenants.

²Excludes CARE/FERA outreach applications and multiple bill inserts.

B. Processing Random Post-Enrollment Verification Requests

1. Provide the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period.

See Table 5.

TABLE 5						
FERA Random Post-Enrollment Verification Requests ¹						
	Requested	Received	Approved ²	Denied	Pending/Never Completed	Duplicates
Total			634			

Notes:

¹ Random Post-Enrollment Verification was not conducted specifically for FERA in 2009 due to the small number of enrollments and discounts.

² 634 CARE Post-Enrollment Verification requests were approved for FERA in 2009.

V. PROGRAM MANAGEMENT

A. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

Assembly Bill 2576 (Stats. 2006, Ch. 787) required the utilities to utilize a single application for CARE and FERA Programs. PG&E implemented this change on June 1, 2007.

This change allowed FERA to expand its outreach efforts to include additional bill inserts, direct mails and automated telephone enrollment at no additional cost to the program. These increased efforts were innovative approaches to outreach to customers who were in dire need of financial relief and services, especially during a time of increasing home foreclosures, rising cost of living and a record-high 11 percent unemployment rate. As a result, FERA enrollment increased from 9 percent to 14 percent in 2009.

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

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

On May 3, 2010, I served a true copy of:

**SIXTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON THE
RESULTS OF ITS 2009 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM EFFORTS IN
COMPLIANCE WITH ADVICE LETTER 2498-E-A**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for A.08-05-022, et al., and A.08-06-031 with an e-mail address.
- [XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for A.08-05-022, et al., and A.08-06-031 without an e-mail address.

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

Executed on this 3rd day of May 2010, at San Francisco, California.

/s/

TAUVELA U’U

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
CPUC DOCKET NO. A0805022 -024; -025; -026; A0806031

Total number of addressees: 203

CRAIG M. BUCHSBAUM ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
FOR: Pacific Gas and Electric Company
Email: cmb3@pge.com
Status: INFORMATION

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO CA 94177
Email: regrelcpuccases@pge.com
Status: INFORMATION

LINDA FONTES
PACIFIC GAS & ELECTRIC COMPANY
123 MISSION RM 1404 MC H14F
SAN FRANCISCO CA 94105
Email: lcf2@pge.com
Status: INFORMATION

LISE H. JORDAN, ESQ. DIRECTOR AND COUNSEL,
RATES
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94105
Email: lhj2@pge.com
Status: INFORMATION

TINA NGUYEN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION-RM 1456
SAN FRANCISCO CA 94105
Email: ttn7@pge.com
Status: INFORMATION

BRETT SEARLE SR. PROJECT MGMT ANALYST
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, RM 559A, MCB5K
SAN FRANCISCO CA 94105
Email: bjsv@pge.com
Status: INFORMATION

BRANDON TRAN
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET ST, MC N9E
SAN FRANCISCO CA 94105
Email: BVT2@pge.com
Status: INFORMATION

BRIAN K. CHERRY
PACIFIC GAS AND ELECTRIC COMPANY (39)
PO BOX 770000, MAIL CODE: B10C
SAN FRANCISCO CA 94177
Email: bkc7@pge.com
Status: INFORMATION

REGULATORY FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A / PO BOX 7442
SAN FRANCISCO CA 94105
Email: cpuccases@pge.com
Status: INFORMATION

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: SRH1@pge.com
Status: INFORMATION

KRISTEN MONAHAN
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET ST, MC N6G
SAN FRANCISCO CA 94105
Email: KMMV@pge.com
Status: INFORMATION

MARY O'DRAIN
PACIFIC GAS AND ELECTRIC COMPANY
123 MISSION - RM 1410, MC H14G
SAN FRANCISCO CA 94177
Email: mjob@pge.com
Status: INFORMATION

FRANCES L. THOMPSON
PACIFIC GAS AND ELECTRIC COMPANY
3401 CROW CANYON ROAD, 170C
SAN RAMON CA 94583
Email: flt2@pge.com
Status: INFORMATION

MARDI WALTON SR. REGULATORY ANALYST
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: MEWR@pge.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

CPUC DOCKET NO. A0805022 -024; -025; -026; A0806031

Total number of addressees: 203

DANIEL COOLEY ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MAIL CODE B30A
SAN FRANCISCO CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: dfc2@pge.com
Status: PARTY

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, MC B9A
SAN FRANCISCO CA 94105
Email: jwwd@pge.com
Status: PARTY

Zaida Amaya-Pineda
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: zca@cpuc.ca.gov
Status: STATE-SERVICE

Melicia Charles
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5306
SAN FRANCISCO CA 94102-3214
Email: mvc@cpuc.ca.gov
Status: STATE-SERVICE

Josephine Emelo
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
Email: je3@cpuc.ca.gov
Status: STATE-SERVICE

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

Kelly Hymes
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5306
SAN FRANCISCO CA 94102-3214
Email: khy@cpuc.ca.gov
Status: STATE-SERVICE

CHONDA J. NWAMU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, B30A
SAN FRANCISCO CA 94120
Email: cjn3@pge.com
Status: PARTY

Donna L. Wagoner
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRANCH
505 VAN NESS AVE AREA 3-C
SAN FRANCISCO CA 94102-3214
Email: dlw@cpuc.ca.gov
Status: INFORMATION

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

Joe Como
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
505 VAN NESS AVE RM 4101
SAN FRANCISCO CA 94102-3214
Email: joc@cpuc.ca.gov
Status: STATE-SERVICE

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

Risa Hernandez
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: rhh@cpuc.ca.gov
Status: STATE-SERVICE

Varoujan Jinbachian
CALIF PUBLIC UTILITIES COMMISSION
PUBLIC ADVISOR OFFICE
320 WEST 4TH ST STE 500
LOS ANGELES CA 90013
Email: vsj@cpuc.ca.gov
Status: STATE-SERVICE

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
CPUC DOCKET NO. A0805022 -024; -025; -026; A0806031

Total number of addressees: 203

Kimberly Kim
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5021
SAN FRANCISCO CA 94102-3214
Email: kk2@cpuc.ca.gov
Status: STATE-SERVICE

Alik Lee
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: ayo@cpuc.ca.gov
Status: STATE-SERVICE

Kevin S. Nakamura
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRANCH
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: kev@cpuc.ca.gov
Status: STATE-SERVICE

Dan Olson
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: do2@cpuc.ca.gov
Status: STATE-SERVICE

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

Karen Watts-Zagha
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
Email: kwz@cpuc.ca.gov
Status: STATE-SERVICE

MICHAEL KARP
A.W.I.S.H.
PO BOX 812
LOPEZ ISLAND WA 98261
Email: michael@awish.net
Status: INFORMATION

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

Robert Lehman
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: leh@cpuc.ca.gov
Status: STATE-SERVICE

Pamela Nataloni
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5124
SAN FRANCISCO CA 94102-3214
Email: jpn@cpuc.ca.gov
Status: STATE-SERVICE

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

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

SUSAN E. BROWN ATTORNEY
A WORLD INSTITUTE FOR SUSTAINABLE HUMANI
PO BOX 428
MILL VALLEY CA 94942
FOR: A World Institute for Sustainable Humanity
Email: sebesq@comcast.net
Status: PARTY

JAMES HODGES
ACCES
1069 45TH ST
SACRAMENTO CA 95819
FOR: ACCES, The Community Action of San Mateo
County, Inc., TELACU, The Maravilla Foundation
Email: hodgesjl@surewest.net
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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MICHAEL LAMOND
ALPINE NATURAL GAS OPERATING COMPANY
PO BOX 550
15 ST. ANDREWS ROAD, STE 7
VALLEY SPRINGS CA 95252
FOR: Alpine Natural Gas Company
Email: mike@alpinenaturalgas.com
Status: PARTY

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

GLORIA BRITTON
ANZA ELECTRIC CO-OPERATIVE, INC.
EMAIL ONLY
EMAIL ONLY CA 00000-0000
Email: GloriaB@anzaelectric.org
Status: INFORMATION

MARK MCNULTY
4654 MAYAPAN DR
LA MESA CA 91941-7148
FOR: Bear Valley Electric/Golden State water
Email: markmcnulty@sbcglobal.net
Status: INFORMATION

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

ROBERT J. BICKER LEGISLATIVE ANALYST
CALIFORNIA APARTMENT ASSOCIATION
980 NINTH ST, STE 200
SACRAMENTO CA 95814
Email: rbicker@caanet.org
Status: INFORMATION

HILARY CORRIGAN
CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST., STE 303
SAN FRANCISCO CA 94117-2242
Email: cem@newsdata.com
Status: INFORMATION

LYDIA FLORES PRESIDENT
AMERICAN INSULATION INC
8305 MIRALANI DRIVE
SAN DIEGO CA 92126
FOR: American Insulation Inc.
Email: lflores@americaninsul.com
Status: PARTY

DAVE STEPHENSON RATE REGULATION MANAGER -
WESTERN REGIO
AMERICAN WATER WORKS SERVICE CO.
4701 BELOIT DRIVE
SACRAMENTO CA 95838
Email: dstephenson@amwater.com
Status: INFORMATION

ELISABETH ADAMS
ASSERT INC.
155 W. AVE J-5
LANCASTER CA 93534
Email: eadams.assert@verizon.net
Status: INFORMATION

PETER HOFMANN
BO ENTERPRISES
43B EAST MAIN ST
LOS GATOS CA 95030-6907
FOR: Bo Enterprises
Email: phofmn@aol.com
Status: PARTY

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

CALIFORNIA ENERGY MARKTS
425 DIVISADERO ST, STE 303
SAN FRANCISCO CA 94117
Email: cem@newsdata.com
Status: INFORMATION

DEVI EDEN ADVISOR TO COMMISSIONER ROSENFELD
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 35
SACRAMENTO CA 95814-5512
Email: deden@energy.state.ca.us
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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SARAH BESERRA
CALIFORNIA REPORTS.COM
39 CASTLE HILL COURT
VALLEJO CA 94591
FOR: CALIFORNIA REPORTS.COM
Email: sbeserra@sbcglobal.net
Status: INFORMATION

JEANNE M. SOLE
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, RM 234
1 DR. CARLTON B. GOODLET PLACE
SAN FRANCISCO CA 94102-4682
Email: jeanne.sole@sfgov.org
Status: INFORMATION

COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA CA 92626
Status: INFORMATION

JOHN NEWCOMB
696 SOUTH TIPPECANOE AVE
SAN BERNARDINO CA 92415
FOR: Community Action Partnership of San Bernardino
County
Email: jnewc@capsbc.sbcounty.gov
Status: INFORMATION

JANINE L. SCANCARELLI ATTORNEY
CROWELL & MORING LLP
275 BATTERY ST, 23RD FLR
SAN FRANCISCO CA 94111
Email: jscancarelli@crowell.com
Status: INFORMATION

MARIA Y. JUAREZ DEPUTY DIRECTOR
DEPARTMENT OF COMMUNITY ACTION
2038 IOWA AVE, STE B-102
RIVERSIDE CA 92507
Email: mjuarez@capriverside.org
Status: INFORMATION

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER ST, FOURTH FLR
BERKELEY CA 94704-1204
FOR: DISABILITY RIGHTS ADVOCATES
Email: pucservice@dralegal.org
Status: PARTY

ANN KELLY DEPT. OF THE ENVIRONMENT
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE ST
SAN FRANCISCO CA 94102
Email: ann.kelly@sfgov.org
Status: INFORMATION

MARY TUCKER ENVIRONMENTAL SERVICES
DEPARTMENT
CITY OF SAN JOSE
200 E. SANTA CLARA, 10TH FLR
SAN JOSE CA 95113
Email: mary.tucker@sanjoseca.gov
Status: INFORMATION

WILLIAM F. PARKER
COMMUNITY ACTION AGENCY OF SAN MATEO
930 BRITTAN AVE
SAN CARLOS CA 94070
FOR: COMMUNITY ACTION AGENCY OF SAN MATEO
Email: wparker@baprc.com
Status: PARTY

DANA ARMANINO COMMUNITY DEVELOPMENT
AGENCY
COUNTY OF MARIN
3501 CIVIC CENTER DRIVE, RM 308
SAN RAFAEL CA 94903
FOR: County of Marin Community Development Agency
Email: darmanino@co.marin.ca.us
Status: PARTY

JEFFREY GRAY ATTORNEY
DAVIS WRIGHT TREMAINE
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
Email: jeffgray@dwt.com
Status: INFORMATION

JASON WIMBLEY DIVISION CHIEF, ENERGY&ENVIRON
PROGRAMS
DEPT. OF COMMUNITY SERVICES & DEVELOPMEN
2389 GATEWAY OAKS DRIVE
SACRAMENTO CA 95833
Email: jwimbley@csd.ca.gov
Status: INFORMATION

MARY - LEE KIMBER ATTORNEY
DISABILITY RIGHTS ADVOCATES
2001 CENTER ST, 3RD FLR
BERKELEY CA 94704-1204
FOR: DISABILITY RIGHTS ADVOCATES
Email: pucservice@dralegal.org
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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Rashid A. Rashid
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4107
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: rhd@cpuc.ca.gov
Status: PARTY

Harvey Y. Morris
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5036
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: hym@cpuc.ca.gov
Status: STATE-SERVICE

STEVE GROVER
ECONORTHWEST
888 SW FIFTH AVE, STE 1460
PORTLAND OR 97204
Email: grover@portland.econw.com
Status: INFORMATION

ORTENSIA LOPEZ EXECUTIVE DIRECTOR
EL CONCILIO OF SAN MATEO
1419 BURLINGAME AVE., STE N
BURLINGAME CA 94010
Email: or10sia@aol.com
Status: INFORMATION

Sarjit S. Randhawa
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
FOR: Energy
Email: SSR@cpuc.ca.gov
Status: STATE-SERVICE

DOCKET COORDINATOR
5727 KEITH ST.
OAKLAND CA 94618
Email: cpucdockets@keyesandfox.com
Status: INFORMATION

SENATOR RICHARD POLANCO
3701 GLENALBYN DRIVE
LOS ANGELES CA 90065
Email: Senpolanco22@aol.com
Status: INFORMATION

Robert Kinosian
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5202
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: gig@cpuc.ca.gov
Status: STATE-SERVICE

Matthew Tisdale
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4104
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: mwt@cpuc.ca.gov
Status: STATE-SERVICE

STEPHEN GROVER, PH.D.
ECONORTHWEST
888 SW 5TH AVE, STE 1460
PORTLAND OR 97204
Email: grover@portland.econw.com
Status: INFORMATION

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
Email: abb@eslawfirm.com
Status: INFORMATION

JULIE RICHARDSON
ENERGY EFFICIENCY, INC.
PO BOX 1612
UNION CITY CA 94587
FOR: Energy Efficiency, Inc.
Email: julieenergyeff@aol.com
Status: PARTY

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

DAVE SULLIVAN P.E. CONSULTING ENGINEER
614 38TH PLACE
FLORENCE OR 97439-8216
Email: davesullivan_71@msn.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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YOLE WHITING
12532 JACKSON HILL LANE
EL CAJON CA 92021
Email: ywhiting@cox.net
Status: INFORMATION

LADONNA WILLIAMS EXECUTIVE DIRECTOR
PO BOX 5653
VALLEJO CA 94591
Email: zzeria@aol.com
Status: INFORMATION

CAROLYN COX GENERAL MANAGER
5213 ROSEANA COURT
FAIR OAKS CA 95628
Email: carolyncox2@sbcglobal.net
Status: PARTY

BILL JULIAN
43556 ALMOND LANE
DAVIS CA 95618
Email: billjulian@sbcglobal.net
Status: PARTY

RONALD MOORE SR. REGULATORY ANALYST
GOLDEN STATE WATER CO/BEAR VALLEY
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773
FOR: Goldane State Water Company
Email: rkmoore@gswater.com
Status: PARTY

ALLYSON S. TAKETA
FULBRIGHT & JAWORSKI L.L.P.
555 SOUTH FLOWER ST, 41ST FLR
LOS ANGELES CA 90071
FOR: Golden State Water Company
Email: ataketa@fulbright.com
Status: INFORMATION

FRED G. YANNEY
FULBRIGHT & JAWORSKI L.L.P.
555 SOUTH FLOWER ST, 41ST FLR
LOS ANGELES CA 90017-2571
FOR: Golden State Water Company
Email: fyanney@fulbright.com
Status: INFORMATION

KEITH SWITZER VICE PRESIDENT OF REGULATORY
AFFAIRS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD
SAN DIMAS CA 91773
FOR: Golden State Water Company
Email: kswitzer@gswater.com
Status: PARTY

ZACHARY FRANKLIN
GRID ALTERNATIVES
EMAIL ONLY
EMAIL ONLY CA 0
FOR: GRID ALTERNATIVES
Email: zfranklin@gridalternatives.org
Status: INFORMATION

ROBERT E. BURT
INSULATION CONTRACTORS ASSN.
4153 NORTHGATE BLVD., NO.6
SACRAMENTO CA 95834
Status: INFORMATION

ALEX KANG
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND CA 94607
Email: alex.kang@itron.com
Status: INFORMATION

GEOFF INGE
KTM ENERGY CONSULTING SERVICES
777 29TH ST, STE 200
BOULDER CO 80303
Email: gbinge@ktminc.com
Status: INFORMATION

LAILA CORREA
LATINO ISSUES FORUM
160 PINE ST, STE 700
SAN FRANCISCO CA 94111
FOR: Latino Issues Forum
Status: PARTY

FAITH BAUTISTA LIOB MEMBER
LIOB
9630 BLACK MOUNTAIN ROAD, STE G
SAN DIEGO CA 92126
Email: bautistafaith@yahoo.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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JOSE ATILIO HERNANDEZ LIOB MEMBER
LIOB
9237 GERALD ST
NORTHRIDGE CA 91343
Email: Jose.atilio@gmail.com
Status: INFORMATION

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

BOB HONDEVILLE
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: bobho@mid.org
Status: INFORMATION

JOY A. WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: joyw@mid.org
Status: INFORMATION

JOHN DUTCHER
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD CA 94534-7875
Email: ralf1241a@cs.com
Status: PARTY

LARA ETTENSON
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: lettenson@nrdc.org
Status: INFORMATION

JIM MEYERS SOUTHWEST REGIONAL MANAGER
NORTH AMERICAN INSULATION MANUF. ASSOC.
7792 SOUTH HARRISON CIRCLE
CENTENNIAL CO 80122
Email: jmeyers@naima.org
Status: INFORMATION

MICHAEL WILLIAMS LIOB MEMBER
LIOB
3045 N. SUNNYSIDE, STE 101
FRESNO CA 93727
Email: mjjwms@calwes.com
Status: INFORMATION

ALEX SOTOMAYOR
MARAVILLA FOUNDATION
5729 UNION PACIFIC AVE
LOS ANGELES CA 90022
FOR: Maravilla Foundation
Email: alexsot@aol.com
Status: PARTY

THOMAS S KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95352-4060
Email: tomk@mid.org
Status: INFORMATION

WAYNE AMER PRESIDENT
MOUNTAIN UTILITIES (906)
PO BOX 205
KIRKWOOD CA 95646
Email: wamer@kirkwood.com
Status: INFORMATION

DUTCHER JOHN V.P. REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD CA 94534
FOR: Mountain Utilities
Email: Ralf1241a@CS.com
Status: INFORMATION

PAUL KERKORIAN
UTILITY COST MANAGEMENT, LLC
6475 N PALM AVE., STE. 105
FRESNO CA 93704
FOR: Nonprofit Housing Associatio of Northrn California
Email: pk@utilitycostmanagement.com
Status: PARTY

TARYN CIARDELLA SR. LEGAL SECRETARY
NV ENERGY
EMAIL ONLY
EMAIL ONLY NV 0
Email: tciardella@nvenergy.com
Status: INFORMATION

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DON WOOD SR.
PACIFIC ENERGY POLICY CENTER
4539 LEE AVE
LA MESA CA 91941
Email: dwood8@cox.net
Status: PARTY

MARISA DECRISTOFORO
PACIFICORP
825 NE MULTNOMAH ST, STE 800
PORTLAND OR 97232
Email: Marisa.Decristoforo@PacifiCorp.com
Status: INFORMATION

MICHELE RODRIGUEZ
PLANNING SUSTAINABLE COMMUNITIES
220 MCALLISTER AVE
KENTFIELD CA 94904
Email: michele@boggis.com
Status: INFORMATION

DIANA BJORNSKOV SENIOR PROGRAM MANAGER
PORTLAND ENERGY CONSERVATION, INC
1400 SW 5TH AVE, STE 700
PORTLAND OR 97201
Email: Dbjornskov@peci.org
Status: INFORMATION

M. SAMI KHAWAJA, PH.D
QUANTEC, LLC
SUITE 400
720 SW WASHINGTON ST
PORTLAND OR 97205
Email: Sami.Khawaja@cadmusgroup.com
Status: INFORMATION

BENJAMIN CARROLL
RENAISSANCE INC.
2615 W DUDLEY AVE.
FRESNO CA 93728
FOR: Renaissance Inc.
Email: ben@renaissanceinc.net
Status: PARTY

DAVE MUNK PROGRAM MANAGER
RESOURCE ACTION PROGRAM
2724 UPPER CATTLE CREEK ROAD
CARBONDALE CO 81623
Email: dm@getwise.org
Status: INFORMATION

MICHELLE R. MISHOE
PACIFICORP
825 NE MULTNOMAH ST, STE 1800
PORTLAND OR 97232
FOR: PacifiCorp
Email: michelle.mishoe@pacificorp.com
Status: PARTY

MARK TUCKER
PACIFICORP
825 NE MULTNOMAH, STE 2000
PORTLAND OR 97232
Email: californiadockets@pacificorp.com
Status: INFORMATION

JESSICA NELSON ENERGY SERVICES MANAGER
PLUMAS SIERRA RURAL ELECTRIC COOP. (908)
73233 STATE ROUTE 70
PORTOLA CA 96122-7069
Email: jnelson@psrec.coop
Status: INFORMATION

RICK C. NOGER
PRAXAIR, INC.
2430 CAMINO RAMON DRIVE, STE. 300
SAN RAMON CA 94583
Email: rick_noger@praxair.com
Status: INFORMATION

RON GARCIA
RELIABLE ENERGY MANAGEMENT, INC.
6250 PARAMOUNT BLVD.
LONG BEACH CA 90805
Email: ron@reenergy.com
Status: INFORMATION

CRISTAL BEDORTHA
RESIDENTIAL WALL INSULATION
3714 NELSON AVE.
OROVILLE CA 95965
FOR: Residential Wall Insulation
Email: cristalfour@aol.com
Status: PARTY

JAMES DEZELL
RHA, INC.
SUITE 205
1151 HARBOR BAY PKWY
ALAMEDA CA 94502
Email: jldezell@yahoo.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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BARBARA WILLIAMS
RHA, INC.
1151 HARBOR BAY PKWY STE. 205
ALAMEDA CA 94502-6561
Email: barbara@rhainc.com
Status: INFORMATION

PAMELA GORSUCH PROJECT MANAGER
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVE, STE 20
CHICO CA 95926
Email: pamelag@rhainc.com
Status: INFORMATION

JOHN JENSEN REGIONAL MANAGER
RICHARD HEATH AND ASSOCIATES, INC.
7847 CONVOY COURT , STE 102
SAN DIEGO CA 92111
Email: jjensen@rhainc.com
Status: INFORMATION

JAMES O'BANNON
RICHARD HEATH AND ASSOCIATES, INC.
1026 MANGROVE AVE., STE 20
CHICO CA 95926
Email: jim@rhainc.com
Status: INFORMATION

PAMELA L. GORSUCH PROGRAM MANAGER
RHA INC
1026 MANGROVE AVE., STE 20
CHICO CA 95926
FOR: Richard Heath and Associates, Inc.
Email: pamelal@rhainc.com
Status: INFORMATION

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO CA 92123-1530
FOR: San Diego Gas & Electric Company/Southern
California Gas Company
Email: JYamagata@SempraUtilities.com
Status: PARTY

STEVE RAHON
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO CA 92123-1548
Email: LSchavrien@SempraUtilities.com
Status: INFORMATION

JERRY H. MANN ATTORNEY
PERKINS, MANN & EVERETT
2222 W. SHAW AVE., STE 202
FRESNO CA 93711
FOR: Richard Heath & Associates
Email: jmann@pmelaw.com
Status: PARTY

HECTOR HUERTA
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE 103
FRESNO CA 93650
Email: hhuerta@rhainc.com
Status: INFORMATION

KRISTINE LUCERO EXECUTIVE ASSISTANT
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE., STE. 103
FRESNO CA 93650
Email: klucero@rhainc.com
Status: INFORMATION

JOE WILLIAMS CEO
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE, STE 103
FRESNO CA 93650
Email: joe@rhainc.com
Status: INFORMATION

ART BRICE
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVE, STE 103
FRESNO CA 93650
FOR: Richard Heath and Associates, Inc.
Email: abrace@rhainc.com
Status: PARTY

REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO CA 92123-1530
Email: CentralFiles@SempraUtilities.com
Status: INFORMATION

YVETTE VAZQUEZ
SAN DIEGO GAS & ELECTRIC
8335 CENTURY PARK CT.
SAN DIEGO CA 92123-1569
Email: YVazquez@SempraUtilities.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD ST, STE 344
SAN FRANCISCO CA 94107
FOR: San Francisco Community Power
Email: steven@sfpower.org
Status: INFORMATION

JIM MCNAMARA
SAN LUIS OBISPO COUNTY, INC.
1030 SOUTHWOOD DRIVE
SAN LUIS OBISPO CA 93401
Email: jmcnamara@eocslo.org
Status: INFORMATION

GEORGETTA J. BAKER
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
101 ASH ST, HQ 13
SAN DIEGO CA 92101
FOR: SDG&E/SOCALGAS
Email: GBaker@SemptraUtilities.com
Status: PARTY

ARLEEN NOVOTNEY
SOUTHERN CALIFORNIA FORUM
941 PALMS BLVD.
VENICE CA 90291
FOR: Self
Email: socal.forum@yahoo.com
Status: PARTY

LOUISE A. PEREZ
COMMUNITY RESOURCE PROJECT, INC.
250 HARRIS AVE, STE 6
SACRAMENTO CA 95838
FOR: Self
Email: lperez@cresource.org
Status: PARTY

GREGORY REDICAN DEPUTY DIRECTOR
COMMUNITY ACTION AGENCY OF SAN MATEO
930 BRITTAN AVE
SAN CARLOS CA 94070
FOR: Self
Email: gredican@caasm.org
Status: PARTY

SCOTT BERG
SELF HELP HOME IMPROVEMENT PROJECT INC.
3777 MEADOWVIEW DR., 100
REDDING CA 96002
FOR: Self Help Home Improvement Project Inc.
Email: sberg@shhip.org
Status: INFORMATION

KEITH GRIFFITH
SELF HELP HOME IMPROVEMENT PROJECT INC.
3777 MEADOWVIEW DR. 100
REDDING CA 96002
FOR: Self Help Home Improvement Project Inc.
Email: sberg@shhip.org
Status: PARTY

RICHARD ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, STE 1000
LAKE HOPATCONG NJ 07849-1313
Email: sesco@optonline.net
Status: INFORMATION

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO NV 89520-0024
Email: tdillard@sppc.com
Status: INFORMATION

CHRISTOPHER HILEN
SIERRA PACIFIC POWER CO.
PO BOX 10100
RENO NV 89511
Email: chilen@sppc.com
Status: INFORMATION

ELEAN P. MELLO REVENUE REQUIREMENTS AND
FERC
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89511
Email: emello@sppc.com
Status: INFORMATION

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89520
Email: emello@sppc.com
Status: PARTY

JEDEDIAH J. GIBSON ATTORNEY
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Sierra Pacific Power Company
Email: jjg@eslawfirm.com
Status: PARTY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
CPUC DOCKET NO. A0805022 -024; -025; -026; A0806031

Total number of addressees: 203

CHRISTOPHER A. HILEN
NV ENERGY
6100 NEIL ROAD, MS A35
RENO NV 89511
FOR: Sierra Pacific Power Company
Email: chilen@NVEnergy.com
Status: PARTY

MICHAEL R. THORP
SOCALGAS AND SDG&E
555 WEST FIFTH ST, STE 1400
LOS ANGELES CA 90013-1011
Email: MThorp@SempraUtilities.com
Status: PARTY

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD CA 91770
Email: Case.Admin@sce.com
Status: INFORMATION

JOHN FASANA
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVE.
ROSEMEAD CA 91770
Email: john.fasana@sce.com
Status: INFORMATION

JEANNIE HARRELL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: jeannie.harrell@sce.com
Status: INFORMATION

JACK F. PARKHILL
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: parkhijf@sce.com
Status: INFORMATION

RICHARD SHAW PRESIDENT
SOUTHERN CALIFORNIA FORUM
PO BOX 469
FILLMORE CA 93016
Email: r-l-shaw@msn.com
Status: INFORMATION

GREGGORY L. WHEATLAND
ELLISON SCHNEIDER & HARRIS L.L.P.
2600 CAPITOL AVE, STE 400
SACRAMENTO CA 95816-5905
FOR: Sierra Pacific Power Company
Email: glw@eslawfirm.com
Status: PARTY

SARA BIRMINGHAM DIRECTOR, WESTERN POLICY
SOLAR ALLIANCE
646 19TH AVE
SAN FRANCISCO CA 94121
FOR: Solar Alliance
Email: sara@solaralliance.org
Status: INFORMATION

ROBERTO DEL REAL
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: roberto.delreal@sce.com
Status: INFORMATION

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

AKBAR JAZAYEIRI
SOUTHERN CALIFORNIA EDISON COMPANY (338)
2241 WALNUT GROVE AVENUE
PO BOX 800
ROSEMEAD CA 91770
Email: akbar.jazayeri@sce.com
Status: INFORMATION

STEVEN D. PATRICK
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH ST, GT14G1
LOS ANGELES CA 90013-1011
Email: SDPatrick@SempraUtilities.com
Status: INFORMATION

JENNIFER M. TSAO SHIGEKAWA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: Jennifer.Shigekawa@sce.com
Status: INFORMATION

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PETE ZANZOT
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: pete.zanzot@sce.com
Status: INFORMATION

LARRY R. COPE ATTORNEY
SOUTHERN CALIFORNIA EDISON
PO BOX 800, 2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: larry.cope@sce.com
Status: INFORMATION

KIM F. HASSAN
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH ST, HQ-12
SAN DIEGO CA 92101
FOR: Southern California Gas Company & San Diego Gas
Electric Company
Email: KHassan@SemptraUtilities.com
Status: PARTY

VALERIE J. ONTIVEROZ SPECIALIST/ STATE
REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89193-8510
Email: valerie.ontiveroz@swgas.com
Status: PARTY

KEITH LAYTON
SOUTHWEST GAS CORPORATION
PO BOX 98510
LAS VEGAS NV 89193-8510
FOR: Southwest Gas Corporation
Email: keith.layton@swgas.com
Status: PARTY

HOLLY J. LLOYD ANALYST III/STATE REGULATORY
AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
FOR: Southwest Gas Corporation
Email: holly.lloyd@swgas.com
Status: PARTY

DAVID C. CLARK
SYNERGY COMPANIES
28436 SATELLITE ST
HAYWARD CA 94545
FOR: Synergy Companies, Inc.
Email: davidclark@synergycompanies.org
Status: PARTY

MICHAEL MONTOYA SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
Email: montoym1@sce.com
Status: PARTY

MONICA GHATTAS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: monica.ghattas@sce.com
Status: PARTY

BOBBI J. STERRETT SNR. SPECIALIST/STATE
REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
Email: bobbi.sterrett@swgas.com
Status: INFORMATION

JOHN P. HESTER SENIOR VP, REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89193-8510
FOR: Southwest Gas Corp
Email: john.hester@swgas.com
Status: INFORMATION

KEITH A. LAYTON SENIOR COUNSEL
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
FOR: Southwest Gas Corporation
Email: keith.layton@swgas.com
Status: PARTY

TIMOTHY J. LAWLER CEO/PRESIDENT
SUNDOWNER INSULATION, INC.
1495 RAILROAD AVE
CLOVIS CA 93612
FOR: Sundowner Insulation, Inc.
Email: sundnr2@sbcglobal.net
Status: PARTY

STEVEN R. SHALLENBERGER
SYNERGY COMPANIES
28436 SATELLITE ST
HAYWARD CA 94545
Email: shallenbgr@aol.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
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RICHARD VILLASENOR
TELACU
12252 MC CANN DRIVE
SANTA FE SPRINGS CA 90670
Email: richvilla4@hotmail.com
Status: PARTY

STEPHANIE CHEN
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE, 2ND FLR
BERKELEY CA 94704
FOR: THE GREENLINING INSTITUTE
Email: stephaniec@greenlining.org
Status: INFORMATION

SAMUEL S. KANG
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE, 2ND FLR.
BERKELEY CA 94704
FOR: THE GREENLINING INSTITUTE
Email: samuelk@greenlining.org
Status: PARTY

BRUCE PATTON
RANCHO VALLEY BUILDERS, INC.
647 AERO WAY
ESCONDIDO CA 92029
FOR: The San Diego Community Energy Advisory
Committee (SDCEAC)
Email: bpatton_rancho@sbcglobal.net
Status: PARTY

KAREN NOTSUND ASSISTANT DIRECTOR
UC ENERGY INSTITUTE
2547 CHANNING WAY 5180
BERKELEY CA 94720-5180
Email: knotsund@berkeley.edu
Status: INFORMATION

RAYMOND J. CZAHAR CHIEF FINANCIAL OFFICER
WEST COAST GAS COMPANY
9203 BEATTY DRIVE
SACRAMENTO CA 95826
FOR: West Coast Gas Company
Email: westgas@aol.com
Status: PARTY

DOUGLAS MOIR
WESTERN APPLIANCE
1976 W. SAN CARLOS ST
SAN JOSE CA 95128
Email: dwmoir@westernappliance.com
Status: INFORMATION

ALLAN RAGO
QUALITY CONSERVATION SERVICES, INC.
4701 ARROW HIGHWAY, STE E
MONTCLAIR CA 91763
FOR: The Energy Efficiency Council; Quality Conservation
Services, Inc.
Email: arago@qcscsca.com
Status: PARTY

ROBERT GNAIZDA POLICY DIRECTOR/GENERAL
COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE, SECOND FLR
BERKELEY CA 94704
FOR: THE GREENLINING INSTITUTE
Email: robertg@greenlining.org
Status: PARTY

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
FOR: The Local Government Sustainable Energy Coalition
Email: jody_london_consulting@earthlink.net
Status: INFORMATION

HAYLEY GOODSON ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME ST, STE 900
SAN FRANCISCO CA 94104
FOR: TURN
Email: hayley@turn.org
Status: PARTY

MARK SHIRIN
VENTURA TV APPLIANCE CENTER
3619 E VENTURA BLVD
FRESNO CA 93702-5009
Email: vtvgeneral@aol.com
Status: INFORMATION

RAYMOND J. CZAHAR, C.P.A.
WEST COAST GAS COMPANY
9203 BEATTY DRIVE
SACRAMENTO CA 95826
Email: westgas@aol.com
Status: PARTY

BILL BELANSKY
WESTERN INSULATION
680 COLUMBIA AVE
RIVERSIDE CA 92507-2144
Email: bill.belansky@mascocs.com
Status: INFORMATION

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STEPHANIE BORBA
WESTERN INSULATION, L.P.
2400 ROCKEFELLER DRIVE
CERES CA 95307
Email: stephanie.borba@masco.com
Status: INFORMATION

STEVE HEIM
WESTERN INSULATION, L.P.
2400 ROCKEFELLER DRIVE
CERES CA 95307
FOR: Western Insulation, L.P.
Email: steve.heim@masco.com
Status: PARTY

SHEILA DEY EXECUTIVE DIRECTOR
WESTERN MANUFACTURED HOUSING COMMUNITIES
455 CAPITAL MALL STE 800
SACRAMENTO CA 95814
Email: sheila@wma.org
Status: INFORMATION

IRENE K. MOOSEN ATTORNEY
WESTERN MANUFACTURED HOUSING COMM. SVCS.
53 SANTA YNEZ AVE
SAN FRANCISCO CA 94112
Email: irene@igc.org
Status: PARTY

WALLIS WINEGARD
WINEGARD ENERGY, INC.
5354 IRWINDALE AVE., BUILDING B
IRWINDALE CA 91706
FOR: Winegard Energy, Inc.
Email: wallis@winegardenergy.com
Status: INFORMATION

LUIS A. CHAVEZ
WINEGARD ENERGY, INC.
5354 IRWINDALE AVE., BUILDING B
IRWINDALE CA 91706
FOR: Winegard Energy, Inc.
Email: luis@winegardenergy.com
Status: PARTY

WALLIS J. WINEGARD
WINEGARD ENERGY, INC
5354 IRWINDALE AVE, BLDG B.
IRWINDALE CA 91706
Email: wallis@winegardenergy.com
Status: INFORMATION

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abb@eslawfirm.com; abrice@rhainc.com; akbar.jazayeri@sce.com; alex.kang@itron.com; alexsot@aol.com; ann.kelly@sfgov.org; arago@qcsca.com; ataketa@fulbright.com; atr@cpuc.ca.gov; ayo@cpuc.ca.gov; barbara@rhainc.com; bautistafaith@yahoo.com; ben@renaissanceinc.net; bernardo@braunlegal.com; bill.belansky@masco.com; billjulian@sbcglobal.net; bjsv@pge.com; bkc7@pge.com; bobbi.sterrett@swgas.com; bobho@mid.org; bpatton_rancho@sbcglobal.net; bruce.foster@sce.com; BVT2@pge.com; californiadockets@pacificorp.com; carolyncox2@sbcglobal.net; Case.Admin@sce.com; cem@newsdata.com; cem@newsdata.com; CentralFiles@SempraUtilities.com; chilen@NVEnergy.com; chilen@sppc.com; cjn3@pge.com; cmb3@pge.com; cpuccases@pge.com; cpucdockets@keyesandfox.com; cristalfour@aol.com; darmanino@co.marin.ca.us; davesullivan_71@msn.com; davidclark@synergycompanies.org; Dbjornskov@peci.org; deden@energy.state.ca.us; demorse@omsoft.com; demorse@omsoft.com; dfc2@pge.com; dlw@cpuc.ca.gov; dm@getwise.org; do2@cpuc.ca.gov; dstephenson@amwater.com; dwmoir@westernappliance.com; dwood8@cox.net; eadams.assert@verizon.net; emello@sppc.com; emello@sppc.com; flt2@pge.com; fyanney@fulbright.com; GBaker@SempraUtilities.com; gbinge@ktminc.com; gig@cpuc.ca.gov; GloriaB@anzaelectric.org; glw@eslawfirm.com; gredican@caasm.org; grover@portland.econw.com; grover@portland.econw.com; hayley@turn.org; hcf@cpuc.ca.gov; hhuerta@rhainc.com; hodgesjl@surewest.net; holly.lloyd@swgas.com; hym@cpuc.ca.gov; irene@igc.org; je3@cpuc.ca.gov; jeanne.sole@sfgov.org; jeannie.harrell@sce.com; jeffgray@dw.com; Jennifer.Shigekawa@sce.com; jim@rhainc.com; jjensen@rhainc.com; jjg@eslawfirm.com; jldezell@yahoo.com; jmann@pmelaw.com; jmcnamara@eocslo.org; jmeyers@naima.org; jnelson@psrec.coop; jnewc@capsbc.sbcounty.gov; joc@cpuc.ca.gov; jody_london_consulting@earthlink.net; joe@rhainc.com; john.fasana@sce.com; john.hester@swgas.com; Jose.atilio@gmail.com; joyw@mid.org; jpn@cpuc.ca.gov; jscancarelli@crowell.com; julieenergyeff@aol.com; jwimbley@csd.ca.gov; jwwd@pge.com; JYamagata@SempraUtilities.com; keith.layton@swgas.com; keith.layton@swgas.com; kev@cpuc.ca.gov; KHassan@SempraUtilities.com; khy@cpuc.ca.gov; kk2@cpuc.ca.gov; klucero@rhainc.com; KMMV@pge.com; knotsund@berkeley.edu; kswitzer@gswater.com; kwz@cpuc.ca.gov; larry.cope@sce.com; lcf2@pge.com; leh@cpuc.ca.gov; lettenson@nrdc.org; lflores@americanInsul.com; lhj2@pge.com; lperez@cresource.org; LSchavrien@SempraUtilities.com; luis@winegardeenergy.com; Marisa.Decristoforo@PacifiCorp.com; markmcnulty@sbcglobal.net; mary.tucker@sanjoseca.gov; mcl@cpuc.ca.gov; MEWR@pge.com; michael@awish.net; michele@boggis.com; michelle.mishoe@pacificorp.com; mike@alpinenaturalgas.com; mjob@pge.com; mjuarez@capriverside.org; mjwms@calwes.com; mla@cpuc.ca.gov; monica.ghattas@sce.com; montoym1@sce.com; MThorp@SempraUtilities.com; mvc@cpuc.ca.gov; mwt@cpuc.ca.gov; or10sia@aol.com; pamela@rhainc.com; pamela@rhainc.com; parkhijf@sce.com; pete.zanzot@sce.com; phofmn@aol.com; pk@utilitycostmanagement.com; pssed@adelphia.net; pucservice@dralegal.org; pucservice@dralegal.org; ralf1241a@cs.com; Ralf1241a@CS.com; rbicker@c

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aanet.org;regrelcpuccases@pge.com;rhd@cpuc.ca.gov;rh@cpuc.ca.gov;richvill
a4@hotmail.com;rick_noger@praxair.com;rkmoore@gswater.com;r-l-
shaw@msn.com;rmccann@umich.edu;robertg@greenlining.org;roberto.delreal@
sce.com;ron@reenergy.com;Sami.Khawaja@cadmusgroup.com;samuelk@gree
nlining.org;sara@solaralliance.org;sberg@shhip.org;sberg@shhip.org;sbeserra
@sbcglobal.net;sbs@cpuc.ca.gov;SDPatrick@SempraUtilities.com;sebesq@co
mcast.net;Senpolanco22@aol.com;sesco@optonline.net;shallenbgr@aol.com;sh
eila@wma.org;socal.forum@yahoo.com;SRH1@pge.com;ssr@cpuc.ca.gov;step
hanie.borba@masco.com;stephaniec@greenlining.org;steve.heim@masco.com;
steven@sfpower.org;sundnr2@sbcglobal.net;tcidella@nenergy.com;tdill
ard@sppc.com;tmr@cpuc.ca.gov;tnf@cpuc.ca.gov;tomk@mid.org;ttn7@pge.co
m;valerie.ontiveroz@swgas.com;vsj@cpuc.ca.gov;vtvgeneral@aol.com;wallis@
winegardenergy.com;wallis@winegardenergy.com;wamer@kirkwood.com;westg
as@aol.com;westgas@aol.com;wparker@baprc.com;YVazquez@SempraUtilitie
s.com;ywhiting@cox.net;zca@cpuc.ca.gov;zfranklin@gridalternatives.org;zzeria
@aol.com;