DOCKET
07-OIIP-1
DATE FEB 28 2008
RECD. FEB 28 2008

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)

BEFORE THE CALIFORNIA ENERGY COMISSION

AB32 Implementation – Greenhouse Gas Emissions	Docket 07-OIIP-01

COMMENTS OF FPL ENERGY PROJECT MANAGEMENT, INC ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY ACTIVITIES

Robert Garvin
FPL Energy, LLC
Vice President of Regulatory Affairs
700 Universe Blvd
Juno Beach, FL 33408
Telephone (561) 694-4058
Robert_Garvin@fpl.com

February 28, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)

BEFORE THE CALIFORNIA ENERGY COMISSION

AB32 Implementation – Greenhouse Gas Emissions	Docket 07-OIIP-01

COMMENTS OF FPL ENERGY PROJECT MANAGEMENT, INC ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY ACTIVITIES

INTRODUCTION

Pursuant to the direction provided in the February 9, 2008 Proposed Decision under Rulemaking 06-04-009, 2008, FPL Energy Project Management, Inc ("FPLE") submits its comments to the California Public Utilities Commission ("Commission")[1] regarding Interim Opinion on Greenhouse Gas Regulatory Strategies ("Proposed Decision" or "PD").

FPLE[2] is a leading clean energy provider with over 13,000 MW of natural gas, wind, solar, hydroelectric and nuclear power plants in operation in 25 states. More than 90 percent of FPL Energy's electricity is generated by clean fuels. In addition, FPL

[1] Since the Ruling also is directed to the California Energy, Commission, these comments will be directed to both agencies by the designation "Commissions" where appropriate If there is a need to have a specific reference, the Comments will refer to CPUC or CEC

[2] FPL Energy, LLC and its affiliates FPL Group, Inc , Florida Power & Light Company, FPL Group Capital, Inc , each have subsidiaries and other affiliates with names that include FPL, FPL Energy, FPLE and similar references For convenience and simplicity, FPL Energy, FPL Group, FPL and FPL Group Capital, as well as terms like Corporation, Company, our, we and its, are sometimes used as abbreviated references to specific subsidiaries, affiliates or groups of subsidiaries or affiliates The precise meaning depends on the context

Energy is the nation's leader in wind energy generation and operates the two largest solar thermal fields in the world. Furthermore, FPLE is an affiliate of a regulated utility, Florida Power & Light Company located in southern Florida. In California, FPL Energy affiliates own and/or operate 700 MWs of wind, 310 MWs of concentrated solar thermal, 500 MW of combined cycle natural gas, and 44 MWs of coal generating capacity. Our company brings a unique perspective to the climate change discussion. We have looked at this issue from both the regulated and unregulated perspective as well as from the view of merchant and contracted assets. We operate in all major regions of the country. Our corporation is committed to advancing climate change policies and has actively participated in the development of Regional Greenhouse Gas Initiative (RGGI) protocols in the Northeast as well as the Western Climate Initiative (WCI) and federal efforts.

FPLE supports the Commission-recommended program that encompasses the benefits of both a cap and trade mechanism and expands the existing mandatory programs across all electric retail providers. We do believe that the cap and trade program should be operated with a 100% auction of all CO_2 allowances. If the Commission chooses to utilize free allocation of allowances to emitters, we suggest allocating only a few allowances for free initially and auctioning the majority of the allowances. The program should then transition quickly to 100% auction based program. In addition, the recommendation for a "deliverer" point of regulation provides an opportunity to link with existing GHG programs such as RGGI and WCI as well as others on the regional, national, and international level. As the program develops, FPLE encourages the Commissions and CARB to make every effort to include every relevant carbon emitting sector into the cap and trade program. FPLE is concerned that the PD recommends not extending California's climate change program to include the natural gas sector at this time. Opportunities to reduce GHG emissions in the natural gas sector should be included in the final program design. Finally, FPLE would like to see the program recognize the contribution of renewable and zero emitting generation to GHG reduction. Since these technologies are a major part of the solution to climate change within the electricity sector, we feel requiring them to surrender allowances would only detract from the goals set forth in AB32.

1. FPLE supports the decision to continue existing regulatory programs in conjunction with the development of a GHG cap and trade system.

FPLE agrees with the PD to recommend a mix of a cap and trade GHG control strategy in conjunction with current regulatory control reduction strategies. Although the current renewable energy portfolio (RPS) and energy efficiency programs (EE) were established for multiple environmental, economic, and social benefits, these programs are a critical component of California's greenhouse gas reduction strategy. FPLE supports the Commission's recommendation to expand these programs. While a cap and trade mechanism for GHG reduction is necessary to provide emissions sources an opportunity to develop their own flexible and least cost reductions strategies, the RPS and EE will supplement the results of a cap and trade program. This will assist California in maximizing greenhouse gas reductions and preventing any backsliding in other air emissions programs. Additionally, FPLE supports the continuation of the emissions performance standard (EPS) established under SB1368. This is a good benchmark for the development of new generation sources as well as a good tool for establishing a "threshold" for emissions intensity

2. The "deliverer" point of regulation is the best choice of those proposed to addresses leakage, expandability, and linking to other programs.

FPLE was encouraged to see the Commission propose a point of regulation similar to the one recommended by the Market Advisory Committee.[3] Out of all the options discussed in the PD, the recommended cap and trade program with the "deliverer" of electricity as the point of regulation most completely addresses the evaluation criteria established by the Commission.[4] The "deliverer" approach accounts for in-state emissions while providing a mechanism for the regulation of emissions

3 Recommendations for Designing a Greenhouse Gas Cap and Trade System for California, Recommendations of the Market Advisory Committee to the California Air Resources Board, "(Market Advisory Committee report) June 30 2007, pp. 27-32
4 Proposed Interim Opinion on Greenhouse Gas Regulatory Strategies California Public Utilities Commission, Rulemaking 06-04-009 February 8, 2008 p 5-6

associated with imported electricity at the California boarder. The PD highlights out-of-state electricity imports as a significant portion of California's GHG emissions.[5] Of the proposed options reviewed by the Commission, regulating GHG emissions through the "deliverer" does the most complete job of addressing the stated evaluation criteria (environmental integrity, links to others programs/expandability, accuracy, flexibility, legal issues).[4]

One of the most important characteristics of the "deliverer" approach is it provides for an easy transition to an expanded program. The "deliverer" point of regulation is similar in structure to other established source-based programs like those used in the Europe (EUETS), the UK, and the northeastern U.S. (RGGI). As other programs are developed such as the Western Climate Initiative, the Midwest Greenhouse Gas Accord and a developing federal program, the source-based approach of the "deliverer" point of regulation provides a framework that is easily expandable to include or be included into those programs.

3. FPLE supports the decision to move forward with a multi-sector program and encourages the inclusion of all net carbon emitting sectors.

The development of a multi-sector cap and trade has always been at the forefront of the AB32 discussion. Based on the comments submitted to the Commission to date, a majority of stakeholders participating in this process support a multi-sector cap and trade program. The larger the cap, the more opportunity and flexibility entities have to find the least cost options for compliance. FPLE has concerns regarding the Commission's recommendation to exclude the natural gas sector from the initial launch of the California GHG program. Such an exclusion reduces the amount of capped emissions that will be made available at the launch of the program. As we have seen in other emissions cap and trade programs like the EPA's NOx and ozone reduction programs, once the program is in place, it will be more difficult to bring the natural gas sector into the cap and trade

5 Proposed Interim Opinion on Greenhouse Gas Regulatory Strategies, California Public Utilities Commission Rulemaking 06-04-009 February 8, 2008, p 4

program at a later date. Of all the reasons stated in the PD for the exclusion of the natural gas sector[6], only two are unique to the natural gas sector: (1) reporting protocols have not been developed and (2) "incremental benefits" may be less. We do not believe this is sufficient justification to exclude this entire sector from the program. The other reasons given in the PD for the exclusion of this sector from the program could also be applied to either the electricity or natural gas sectors.

The options available for the natural gas sector to reduce GHG emissions and to use alternative low carbon sources are definitely limited, but that is also true for California's electricity sector. While the limitations of these sectors are on different scales, they both are real. It is correct that energy efficiency programs are an integral tool for reductions in the natural gas sector; however, the same can be stated for the electricity sector. In addition, the reliance on programmatic reduction measures does allow additional time for natural gas reporting protocol development, however one can also make the point that a delay in program implementation for the electricity sector would allow for California to dovetail their program into a regional or national program. Inclusion into a larger cap and trade program would allow the electric sector a greater opportunity to find more cost effective options for reducing or mitigating GHG emissions. Since a delay is not an option for the electric sector, we do not feel it should be an option for the natural gas sector.

We trust that every effort will be made to include the natural gas sector into the cap and trade program. The same reasons a cap and trade program is beneficial for the electricity sector exist for the natural gas sector. The point of regulation may have to be adjusted upstream, but FPLE believes excluding this sector is a mistake. Since the implementation of the program is scheduled for 2012, we encourage the Commission to include the natural gas sector and all other relevant sectors into the cap and trade program at this early stage in the program development. FPLE understands the Commission has looked at the inclusion of the natural gas sector in great detail and we hope that this recommendation is a delay to inclusion rather than an exemption. We would like to

6 Proposed Interim Opinion on Greenhouse Gas Regulatory Strategies, California Public Utilities Commission. Rulemaking 06-04-009, February 8, 2008, p8.

encourage the Commission and CARB to include as many emitting sectors as feasible into the cap and trade program.

FPLE also encourages the Commissions to grant renewable generating sources a key role in the development of California's cap and trade program. Under the PD, electric generation from renewable power is treated the same as other sources. However, the Commission should consider the net system carbon reduction benefits of renewables and exempt renewables from the requirement to obtain emissions allowances. As currently set forth in the PD, renewables would have to obtain allowances through the cap and trade or other allowance allocation mechanism thereby creating a counter productive cost burden. Such costs could further constrain the development of renewable generating resources in California.

As the details of this program are developed further, renewable energy and zero emitting generation must be encouraged to achieve the AB 32 goals. Failure to recognizing the benefits of such generation through an exemption to the cap and trade program does not recognize capital investment to date in sources to reduce GHG emissions. It further serves as a disincentive for future investment in such resources by imposing an unnecessary cost. Therefore, the potential benefits of these technologies as part of the cap and trade program must be carefully weighed against the potential detriments to encouraging investment in future renewable projects.

Conclusion

The current Proposed Decision is encouraging. A platform has been established on which program development can move forward. The decision to mix existing regulatory programs and the developing cap and trade program is a good choice. Other regulatory programs have benefits other than carbon reductions and should be strengthened through the development of this program not weakened. FPLE supports the

decision to move forward with the "deliverer" as the point of regulation. Other options considered by the Commission have their benefits but we agree this choice best accomplishes the evaluation criteria stated throughout this proceeding. FPLE hopes that every effort has been and will be made to include the natural gas sector into the cap and trade program. We do not wish to compromise the integrity of the program or impose any unwarranted costs to consumers, however we hope the opportunities for reductions in the natural gas sector are included and available for all participants under the cap and that appropriate price signals for all relevant sources of carbon emissions are realized.

Moving forward, FPLE is encouraged that the Commission recognized the need for auctioning a portion of the allowances. We have and will continue to support the auctioning of 100% of the allowances because it promotes the "pay as you pollute" concept. We recognize many stakeholders feel there should be a transition period prior to a complete auctioning of the allowances. We disagree. FPLE agrees there is the potential for economic dislocation in the early years of the carbon reduction program as a result of volatile allowance prices and implementation costs. The final program structure must implement mechanisms that mitigate these adverse impacts without eliminating the stimulus to promote and encourage change. To do that, we support cost containment measures/a safety valve, that would prevent allowance prices that are harmful to the economy but continue to be high enough to change behaviors that result in GHG emissions. Moreover, any auction revenues should be dedicated to carbon reduction technologies, energy efficiency programs, renewable technologies, and solutions to climate change as well as mitigating adverse economic impacts on California's ratepayers. AB32 is clear that the program should maximize reductions while minimizing economic impact.

Finally, FPLE suggests that the Commission and CARB work closely with the electric generation sector to identify appropriate measures for mitigating stranded costs associated with fixed contract power pricing and QF contracts as well as adverse impacts to low income consumers. We are confident these issues will be addressed by the Commission and CARB as the program is developed further.

FPLE would like to recognize the effort of the Commission in putting together this proposed recommendation. We know that the details of this program have been vigorously debated both in the public forums as well as in inter- and intra- agency discussions. FPLE appreciates the opportunity to express our positions on all these program details both at this time and in future discussions.

Respectfully submitted,

Robert Garvin
FPL Energy, LLC
Vice President of Regulatory Affairs
700 Universe Blvd
Juno Beach, FL 33408
Telephone (561) 694-4058
Robert_Garvin@fpl.com

February 28, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document

COMMENTS OF FPL ENERGY PROJECT MANAGEMENT, INC. ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY PROCEEDINGS

On all parties of record in the above captioned proceedings by serving an electronic copy on their email addresses of record, by overnight mail to the Assigned Commissioner Peevey's Advisor Nancy Ryan and Administrative Law Judges, and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding as posted on the California Public Utilities Commission's website for proceeding R.06-04-009.

This Certificate of Service is executed on February 28, 2008 in San Francisco, CA.

/s/ Diane I. Fellman

Diane I. Fellman

cadams@covantaenergy.com	pssed@adelphia.net	epoole@adplaw.com
steven schleimer@barclayscapital com	bwallerstein@aqmd gov	agrimaldi@mckennalong com
steven huhman@morganstanley com	akbar jazayeri@sce.com	bcragg@goodinmacbride.com
rick_noger@praxair com	cathy karlstad@sce.com	jsqueri@gmssr com
keith.mccrea@sablaw.com	Laura.Genao@sce com	jarmstrong@goodinmacbride com
ajkatz@mwe.com	rkmoore@gswater com	kbowen@winston.com
ckrupka@mwe com	dwood8@cox.net	lcottle@winston.com
kyle_boudreaux@fpl.com	atrial@sempra.com	mday@goodinmacbride.com
cswoollums@midamerican.com	apak@sempraglobal.com	sbeatty@cwclaw.com
Cynthia.A Fonner@constellation.com	dhecht@sempratrading com	vprabhakaran@goodinmacbride com
kevin boudreaux@calpine.com	daking@sempra com	jkarp@winston.com
trdill@westernhubs.com	svongdeuane@semprasolutions.com	edwardoneill@dwt.com
ej_wright@oxy.com	troberts@sempra.com	jeffgray@dwt.com
todil@mckennalong.com	liddell@energyattorney.com	cjw5@pge com
steve.koerner@elpaso com	marcie milner@shell.com	ssmyers@att.net
jenine.schenk@apses.com	rwinthrop@pilotpowergroup.com	lars@resource-solutions org
jbw@slwplc.com	tdarton@pilotpowergroup.com	alho@pge.com
kelly.barr@srpnet.com	lschavrien@semprautilities.com	bkc7@pge com
rrtaylor@srpnet.com	GloriaB@anzaelectric.org	aweller@sel.com
smichel@westernresources.org	llund@commerceenergy com	jchamberlin@strategicenergy com
roger.montgomery@swgas.com	thunt@cecmail org	beth@beth411.com
Lorraine.Paskett@ladwp com	jeanne sole@sfgov.org	kerry.hattevik@mirant com
ron.deaton@ladwp.com	john.hughes@sce.com	kowalewskia@calpine.com
snewsom@semprautilities.com	llorenz@semprautilities.com	hoerner@redefiningprogress.org
dhuard@manatt com	marcel@turn org	janill.richards@doj.ca.gov
curtis.kebler@gs.com	nsuetake@turn.org	cchen@ucsusa.org
dehling@klng.com	dil@cpuc ca.gov	gmorris@emf.net
gregory.koiser@constellation.com	fjs@cpuc ca gov	tomb@crossborderenergy.com
npedersen@hanmor com	achang@nrdc org	kjinnovation@earthlink.net
mmazur@3phasesRenewables com	rsa@a-klaw.com	bmcc@mccarthylaw.com
vitaly.lee@aes com	ek@a-klaw com	sberlin@mccarthylaw.com
tiffany.rau@bp.com	kgrenfell@nrdc org	Mike@alpinenaturalgas.com
klatt@energyattorney.com	mpa@a-klaw com	joyw@mid.org
rhelgeson@scppa.org	sls@a-klaw.com	bdicapo@caiso.com
douglass@energyattorney.com	bill.chen@constellation.com	UHelman@caiso.com

jjensen@kirkwood com
mary.lynch@constellation com
lrdevanna-
rf@cleanenergysystems com
abb@eslawfirm.com
mclaughlin@braunlegal.com
glw@eslawfirm.com
jluckhardt@downeybrand com
jdh@eslawfirm.com
vwelch@environmentaldefense.org
www@eslawfirm.com

westgas@aol com
scohn@smud org
atrowbridge@daycartermurphy com
dansvec@hdo.net
notice@psrec.coop
cynthia.schultz@pacificorp com
kyle.l.davis@pacificorp.com
ryan.flynn@pacificorp com
carter@ieta.org
jason.dubchak@niskags.com
bjones@mjbradley com

kcolburn@symbioticstrategies.com
rapcowart@aol com
Kathryn.Wig@nrgenergy com
sasteriadis@apx com
george.hopley@barcap.com
ez@pointcarbon com
burtraw@rff.org

vb@pointcarbon.com
andrew bradford@constellation.com
gbarch@knowledgeinenergy com
ralph.dennis@constellation.com
smindel@knowledgeinenergy.com
brabe@umich.edu
bpotts@foley.com
james.keating@bp.com
jimross@r-c-s-inc.com
ahendrickson@commerceenergy com
cweddington@commerceenergy.com
tcarlson@reliant.com
ghinners@reliant.com
zaiontj@bp.com
julie.martin@bp.com
fiji.george@elpaso.com
echiang@elementmarkets com
fstern@summitblue.com
nenbar@energy-insights.com
nlenssen@energy-insights com
bbaker@summitblue.com
william.tomlinson@elpaso.com
kjsimonsen@ems-ca.com
jholtkamp@hollandhart.com
Sandra.ely@state.nm us
bmcquown@reliant.com
dbrooks@nevp com
anita.hart@swgas.com
randy.sable@swgas.com
bill.schrand@swgas com
jj prucnal@swgas.com
sandra.carolina@swgas.com
ckmitchell1@sbcglobal.net
chilen@sppc.com
emello@sppc.com

dsoyars@sppc.com
tdillard@sppc com
jgreco@terra-genpower com
leilani johnson@ladwp.com
randy.howard@ladwp com
Robert.Rozanski@ladwp com
robert pettinato@ladwp.com
HYao@SempraUtilities com
rprince@semprautilities.com
rkeen@manatt.com
nwhang@manatt.com
pjazayeri@stroock com
derek@climateregistry org
david@nemtzow.com
harveyederpspc.org@hotmail com
sendo@ci pasadena.ca.us
slins@ci glendale.ca.us
THAMILTON5@CHARTER NET
bjeider@ci burbank.ca.us
rmorillo@ci burbank.ca.us
aimee barnes@ecosecurities.com
case.admin@sce.com
Jairam.gopal@sce.com
tim.hemig@nrgenergy com
bjl@bry com
aldyn.hoekstra@paceglobal.com
ygross@sempraglobal com
jlaun@apogee.net
kmkiener@fox.net
scottanders@sandiego.edu
jkloberdanz@semprautilities.com
andrew.mcallister@energycenter.c
jennifer.porter@energycenter.org
sephra.ninow@energycenter.org
dniehaus@semprautilities.com

jleslie@luce.com	cem@newsdata.com	dietrichlaw2@earthlink net
ofoote@hkcf-law.com	arno@recurrentenergy.com	alex.kang@itron com
ekgrubaugh@iid.com	hgolub@nixonpeabody com	Betty Seto@kema com
	jscancarelli@flk.com	JerryL@abag ca gov
mona@landsiteinc.net	jwiedman@goodinmacbride.com	jody_london_consulting@earthlink.net
pepper@cleanpowermarkets com	mmattes@nossaman com	steve@schiller.com
gsmith@adamsbroadwell com	bwetstone@hotmail.com	mrw@mrwassoc.com
mdjoseph@adamsbroadwell.com	jen@cnt.org	rschmidt@bartlewells com
Diane_Fellman@fpl.com	lisa_weinzimer@platts.com	adamb@greenlining.org
hayley@turn org	steven@moss.net	stevek@kromer com
mflorio@turn.org	sellis@fypower.org	clyde murley@comcast.net
Dan.adler@calcef org	ELL5@pge.com	brenda lemay@horizonwind.com
mhyams@sfwater.org	GXL2@pge.com	carla.peterman@gmail.com
tburke@sfwater.org	jxa2@pge com	elvine@lbl gov
norman.furuta@navy mil	JDF1@PGE.COM	rhwiser@lbl.gov
amber@ethree.com	RHHJ@pge.com	C_Marnay@lbl gov
annabelle.malins@fco.gov uk	sscb@pge com	philm@scdenergy.com
dwang@nrdc.org	SEHC@pge.com	rita@ritanortonconsulting.com
filings@a-klaw.com	svs6@pge.com	cpechman@powereconomics.com
nes@a-klaw.com	S1L7@pge.com	emahlon@ecoact.org
obystrom@cera com	vjw3@pge.com	richards@mid.org
sdhilton@stoel.com	karla.dailey@cityofpaloalto.org	rogerv@mid.org
scarter@nrdc.org	farrokh.albuyeh@oati.net	tomk@mid org
abonds@thelen.com	dtibbs@aes4u.com	fwmonier@tid org
brbc@pge com	jhahn@covantaenergy.com	brbarkovich@earthlink.net
cbaskette@enernoc.com	andy.vanhorn@vhcenergy.com	johnrredding@earthlink.net
colin.petheram@att.com	Joe.paul@dynegy.com	clark.bernier@rlw.com
jwmctarnaghan@duanemorris com	info@calseia org	rmccann@umich.edu
kfox@wsgr.com	gblue@enxco com	cmkehrein@ems-ca.com
kkhoja@thelenreid com	sbeserra@sbcglobal net	grosenblum@caiso com
pvallen@thelen.com	monica schwebs@bingham.com	mgillette@enernoc.com
ray.welch@navigantconsulting com	phanschen@mofo com	rsmutny-jones@caiso com
spauker@wsgr.com	wbooth@booth-law.com	saeed.farrokhpay@ferc.gov
jwmctarnaghan@duanemorris com	josephhenri@hotmail.com	e-recipient@caiso.com
rreinhard@mofo.com	pthompson@summitblue.com	david@branchcomb.com

kenneth swain@navigantconsulting.com	karen@klindh.com	jst@cpuc.ca.gov
kdusel@navigantconsulting.com	ehadley@reupower.com	jtp@cpuc.ca.gov
gpickering@navigantconsulting.com	sas@a-klaw.com	jol@cpuc.ca.gov
lpark@navigantconsulting.com	egw@a-klaw.com	jci@cpuc.ca.gov
davidreynolds@ncpa.com	akelly@climatetrust.org	jf2@cpuc.ca.gov
scott.tomashefsky@ncpa.com	alan.comnes@nrgenergy.com	krd@cpuc.ca.gov
ewolfe@resero.com	kyle.silon@ecosecurities.com	lrm@cpuc.ca.gov
Audra.Hartmann@Dynegy.com	californiadockets@pacificorp.com	ltt@cpuc.ca.gov
Bob.lucas@calobby.com	Philip.H.Carver@state.or.us	mjd@cpuc.ca.gov
curt.barry@iwpnews.com	samuel.r.sadler@state.or.us	ner@cpuc.ca.gov
danskopec@gmail.com	lisa.c.schwartz@state.or.us	pw1@cpuc.ca.gov
dseperas@calpine.com	cbreidenich@yahoo.com	psp@cpuc.ca.gov
dave@ppallc.com	dws@r-c-s-inc.com	pzs@cpuc.ca.gov
dkk@eslawfirm.com	jesus.arredondo@nrgenergy.com	rmm@cpuc.ca.gov
wynne@braunlegal.com	charlie.blair@delta-ee.com	ram@cpuc.ca.gov
kgough@calpine.com	Tom.Elgie@powerex.com	smk@cpuc.ca.gov
kellie.smith@sen.ca.gov	clarence.binninger@doj.ca.gov	sgm@cpuc.ca.gov
kdw@woodruff-expert-services.com	david.zonana@doj.ca.gov	svn@cpuc.ca.gov
mwaugh@arb.ca.gov	ayk@cpuc.ca.gov	scr@cpuc.ca.gov
pbarthol@energy.state.ca.us	agc@cpuc.ca.gov	tcx@cpuc.ca.gov
pstoner@lgc.org	aeg@cpuc.ca.gov	ken.alex@doj.ca.gov
rachel@ceert.org	blm@cpuc.ca.gov	ken.alex@doj.ca.gov
bernardo@braunlegal.com	bbc@cpuc.ca.gov	jsanders@caiso.com
steven@lipmanconsulting.com	cf1@cpuc.ca.gov	jgill@caiso.com
steven@iepa.com	cft@cpuc.ca.gov	
wtasat@arb.ca.gov	tam@cpuc.ca.gov	ppettingill@caiso.com
lmh@eslawfirm.com	dsh@cpuc.ca.gov	mscheibl@arb.ca.gov
etiedemann@kmtg.com	edm@cpuc.ca.gov	gcollord@arb.ca.gov
ltenhope@energy.state.ca.us	eks@cpuc.ca.gov	jdoll@arb.ca.gov
bushinskyj@pewclimate.org	cpe@cpuc.ca.gov	pburmich@arb.ca.gov
obartho@smud.org	hym@cpuc.ca.gov	bblevins@energy.state.ca.us
bbeebe@smud.org	jm3@cpuc.ca.gov	dmetz@energy.state.ca.us
bpurewal@water.ca.gov	jnm@cpuc.ca.gov	deborah.slon@doj.ca.gov
dmacmull@water.ca.gov	jbf@cpuc.ca.gov	dks@cpuc.ca.gov
kmills@cfbf.com	jk1@cpuc.ca.gov	kgriffin@energy.state.ca.us

ldecarlo@energy.state.ca.us mpryor@energy.state.ca.us mgarcia@arb.ca.gov pduvair@energy.state.ca.us wsm@cpuc.ca.gov ntronaas@energy.state.ca.us hurlock@water.ca.gov hcronin@water.ca.gov rmiller@energy.state.ca.us		