BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company )
To Revise Its Electric Marginal Costs, Revenue ) Application No. 10-03-014
Allocation, and Rate Design, Including Real ) (Filed March 22, 2010)
Time Pricing to Revise Its Customer Energy )
Statements, and to Seek Recovery of Incremental )
Expenditures. (U 39 M) )

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO
MOTION TO STRIKE PORTIONS OF SCE’S OCTOBER 29, 2010 REBUTTAL
TESTIMONY

BRUCE A. REED

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
Telephone:  (626) 302-4183
Facsimile:  (626) 302-6693
E-mail:bruce.reed@sce.com

Dated:  November 15, 2010
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STATE OF CALIFORNIA

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TESTIMONY

In a November 4, 2010 motion, the Division of Ratepayer Advocates (DRA) and The
Utility Reform Network (TURN) seek to strike portions of the rebuttal testimony Southern
California Edison Company (SCE) served on October 29, 2010. Pursuant to Rule 11.1(e),
assigned Administrative Law Judge Pulsifer asked SCE to respond to the DRA/TURN motion on
November 15, 2010.†

† Apparently, due to the size of the motion, DRA’s electronic service of the motion was unsuccessful. SCE was
unaware that the motion had been filed until it was advised by ALJ Pulsifer on November 12, 2010 that the
motion had been filed. SCE agreed to respond to the motion one business day later, which is November 15,
2010. Tr. 1/205.
I.

THE DRA/TURN MOTION PROVIDES NO BASIS TO STRIKE ANY PORTION OF
SCE’S REBUTTAL TESTIMONY

The DRA/TURN motion argues several self-contradictory points that ultimately provide no basis to strike any part of SCE’s rebuttal testimony. The motion argues that because SCE failed to present “opening” or “direct” testimony on October 6, 2010, and that because the Commission has warned utilities not to use rebuttal testimony instead of direct testimony as a litigation tactic SCE should be foreclosed from presenting rebuttal testimony on October 29, 2010. Alternatively, DRA and TURN argue that SCE’s rebuttal testimony is not rebuttal testimony because it provides “direct evidence” that should have been provided as “opening testimony,” that SCE’s rebuttal is inappropriate because it does not specifically rebut any direct testimony, or that SCE’s rebuttal testimony is “nothing more than friendly support for the application masquerading as rebuttal.” Elsewhere, the motion concedes that SCE’s testimony is in fact rebuttal testimony, but vague as to specifically which party it is rebutting. None of the reasons cited in the motion justify striking SCE’s rebuttal testimony.

A. The Law And Policy Principles Cited By DRA and TURN Have Limited Or No Applicability To SCE’s Participation In This Proceeding

The legal and policy arguments made by DRA and TURN (evidently taken directly from other motions to strike utility testimony) to justify striking portions of SCE’s rebuttal testimony do not apply to SCE. PG&E is the applicant and bears the burden of supporting its proposals through its testimony. PG&E filed its application and served its initial, i.e., “direct” testimony in

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2 Motion, pp. 3-4.
3 Motion, pp. 2-4. Without any basis, the motion suggests that SCE intentionally sought to deny other parties the opportunity to rebut SCE’s testimony. “SCE’s failure to present opening testimony was not accidental but rather represents a calculated tactic to deny parties an opportunity to provide written rebuttal.” Motion, p. 2.
4 Motion, p. 4.
5 Motion, p. 4.
March 2010. In accordance with the adopted schedule for this proceeding, DRA served its “direct testimony” on September 8, 2010. In that testimony, DRA provided its justification for a number of its own proposals, reasons why DRA believed some of PG&E’s proposals should be rejected by the Commission, and an indication of some of PG&E’s proposals that DRA could accept. Subsequently, on October 6, 2010, a large number of intervening parties served testimony in which they may have provided their own proposals, explicitly agreed or disagreed with PG&E’s or DRA’s proposals, or tacitly accepted some of PG&E’s proposals. On October 29, 2010, PG&E served its rebuttal to the testimony of DRA and other parties. SCE and other parties also served rebuttal testimony on the same date.

While SCE is a utility, it is an intervenor and not the utility applicant in this proceeding. SCE has participated on a limited basis in this proceeding because the resolution of some of the residential rate design issues in PG&E’s application will be of great importance to SCE and other regulated electric utilities. In contrast to many other parties, SCE is not making any affirmative proposals and does not have the burden of proof that attaches to a utility applicant, or DRA or intervenors, who are making requests for the Commission to adopt their rate design proposals. Thus, the argument made by DRA and TURN that SCE deliberately withheld or did not include adequate justification for a proposal in direct testimony on October 6, 2010, but instead waited until October 29, 2010 to substantiate its position in rebuttal testimony, is inapplicable to SCE in this proceeding.

The cases and references cited in the DRA/TURN motion illustrate the point. For example, Decision (D.)07-11-037 involved a water utility applicant that requested a revenue increase. The utility provided rebuttal testimony that was excessive in comparison to the initial testimony, leading the Commission to conclude that the initial testimony was inadequate and

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6 Some other parties served testimony on October 29, 2010 that cannot be characterized as rebuttal testimony. For example, the “rebuttal testimony” of Marin Energy Authority merely recites the proposals of TURN, DRA, and CCSF that it also endorses.

7 There is no requirement known to SCE that an intervening party must make a direct showing or else be foreclosed from serving rebuttal testimony that properly responds to the proposals made by other parties in their direct testimony.
provided little time for DRA to review. Although, portions of the rebuttal testimony DRA moved to strike were ultimately admitted into evidence, it was only given the weight deemed appropriate by the presiding officer. D.07-11-037 actually refers to D.04-03-039, where the Commission concluded that “when the utility [the same utility involved in D.07-11-037] has the evidentiary burden, we caution against the use of rebuttal testimony to provide the basic justification.”\footnote{D.07-11-037, footnote 42 at page 111, citing D.04-03-039.} If SCE had been the applicant with the evidentiary burden of proof and made substantive proposals it asked the Commission to adopt for the first time in SCE’s rebuttal testimony, or if SCE had provided evidentiary support for the first time in rebuttal testimony for a proposal it made in its direct testimony – neither of which occurred here – then the decisions cited by DRA and TURN could be applied to SCE.

B. **SCE Served Timely, Appropriate And Specific Rebuttal Testimony To Demonstrate Why Objections Made By DRA, TURN, and other Parties To Certain of PG&E’s Residential Rate Design Proposals Are Unfounded And Why Their Alternate Proposals Should Be Rejected By The Commission**

SCE’s rebuttal testimony explains why, on selected issues, the proposals DRA, TURN, and other parties have made in their direct testimony should not be adopted by the Commission or that their objections to PG&E’s residential rate design proposals are unfounded or without merit based on policy, precedent, or legal bases. The DRA/TURN motion cites D.01-10-059 for the proposition that the purpose of rebuttal is to rebut the positions taken by intervenors and interested parties. SCE agrees and that is exactly what SCE did by serving appropriate, expert rebuttal testimony on October 29, 2010 in accordance with the schedule for this proceeding. The DRA/TURN motion provides no explanation as to how SCE could have responded any earlier to the intervening parties who made alternate proposals or who opposed PG&E’s proposals before
having seen the testimony they served on October 6, 2010. The first and only appropriate place for SCE to rebut that testimony was on October 29, 2010.

While DRA and TURN may disagree with SCE’s rebuttal testimony, this is no disadvantage to them. As stated above, SCE is not the proponent of any proposals in this proceeding and the DRA/TURN motion does not point to any new rate design proposals SCE made in its rebuttal testimony. Likewise, parties have no opportunity to submit surrebuttal testimony in response to PG&E’s rebuttal testimony that was served on the same date. Moreover, while DRA, TURN, and other parties whose testimony was addressed in SCE’s rebuttal testimony have had the opportunity to conduct discovery related to SCE’s rebuttal testimony, none have done so. They continue to have the opportunity to conduct cross-examination on that rebuttal testimony when Mr. Garwacki testifies on November 18, 2010 and to file briefs at a later date to address all of the issues addressed by Mr. Garwacki.

DRA and TURN propose to apply to SCE an erroneous version of the procedural schedule for this proceeding. They assume that all parties (other than PG&E) would “address” DRA’s testimony in their testimony on October 6, 2010, which was the date set for the “direct” testimony of parties other than DRA and PG&E. The motion states that there was an unstated “implication” or requirement that SCE “respond” or “address” DRA’s testimony on October 6, 2010 and that many parties “properly rebutted” DRA’s Opening Testimony in their Opening Testimony” on October 6, 2010. While the motion deliberately mixes “address” “respond” and “rebut” as actions that SCE should have undertaken by October 6, 2010 with respect to DRA’s testimony, the fact is that the adopted schedule established one date, October 29, 2010, as the date for all rebuttal testimony. Contrary to the adopted schedule, DRA and TURN would create an obligation for SCE to “rebut” DRA’s September 8, 2010 testimony on October 6, 2010 and then for SCE to serve a second round of rebuttal testimony to the October 6, 2010 testimony of

2 Motion, p. 6, (emphasis added).
TURN and all other parties on October 29, 2010. The adopted schedule for this proceeding established only one date for rebuttal testimony. SCE complied with that schedule.

II.

THE SPECIFIC PORTIONS OF SCE’S REBUTtal THAT THE DRA/TURN MOTION SEEKS TO STRIKE ARE APPROPRIATE REBUTtal TESTIMONY

SCE finds it difficult to determine which portions of SCE’s rebuttal testimony are at issue, if any at all, based on the DRA/TURN motion. The motion states at page 4 that “In fact, SCE’s rebuttal testimony of nineteen pages … minimally rebuts or refutes the parties’ direct testimony.” Other than the adverb “minimally,” SCE agrees with this statement. The Assigned Administrative Law Judge and the Commission – not DRA or TURN – will determine whether or not it is effective rebuttal testimony. But DRA and TURN concede in this statement that SCE’s testimony is, in fact, rebuttal testimony.

The motion inexplicably asserts that some portions of SCE’s testimony are proper rebuttal testimony and should not be stricken, even though they were served at the same time and are similar or identical in nature to the portions that DRA and TURN contend should be stricken. For example, the motion concedes that Sections III, IV, and V should not be stricken, and that Section II.C either falls into a “grey area” or “may be construed as rebuttal testimony.”\(^1\) DRA even concedes that II.C.1 is proper rebuttal testimony to DRA’s direct testimony, although DRA claims it was somehow disadvantaged because it served its testimony before other parties and could not rebut SCE’s rebuttal testimony.\(^2\)

DRA and TURN argue that portions of Sections I and II of SCE’s rebuttal testimony should be stricken because they are “vague and not specific” in terms of rebutting other parties’

\(^{1}\) Motion, p. 6.

\(^{2}\) “DRA would like the Commission to consider that DRA was disadvantaged because it had to serve its Opening Testimony one month before other parties. Generally, this is done so parties can address DRA’s testimony within their Opening Testimonies.” (emphasis added). SCE notes that parties who are making alternative proposals to those made by PG&E and DRA could certainly indicate in their direct testimony why the Commission should adopt their proposals as opposed to PG&E’s or DRA’s. However, SCE was not in that position because it is not making any specific proposal for the Commission to adopt.
There is no doubt that DRA and TURN and other parties know which portions of their testimony have been rebutted by SCE, as evidenced by DRA and TURN filing the motion itself, or by looking at many of the 38 citations in SCE’s rebuttal testimony.

However, to respond to the specific complaints raised by DRA and TURN, Section I of SCE’s rebuttal testimony summarizes SCE’s testimony contained in Sections II through V, and those sections each indicate which parties’ testimony SCE’s testimony rebuts. The DRA/TURN motion also contends, among other things, that Section I of SCE’s rebuttal testimony supports PG&E’s Conservation Incentive Adjustment (‘CIA’) proposal and “fails to identify any opening testimony that discusses CIA or D.09-08-028.”\(^\text{13}\) The CIA opening testimony references are provided with specificity in Section V of SCE’s rebuttal testimony, which DRA and TURN do not move to strike. Written testimony is not a legal brief that requires multiple citations to each sentence to make such identifications. Moreover, it is incredible that DRA and TURN believe that SCE would be unable to rebut the claims made by the opponents of the CIA by referring to D.09-08-028, where a CIA was adopted for SCE and where the concerns similar to those raised by the opponents of the CIA were already considered by the Commission.

DRA and TURN also seek to strike another portion of Section I that simply summarizes SCE’s rebuttal to DRA, Vote Solar, the Solar Alliance, Greenlining, and CCSF contained in Section II. These parties oppose PG&E’s residential rate design proposals on the basis that the proposals result in unacceptable bill impacts or promote other possible rate design structures. In Sections II.A and II.B, SCE points out that (1) the bill impact assessments relied upon by these parties overemphasize short-term impacts and are mitigated by the CARE program,\(^\text{14}\) (2) the adverse short-term bill impacts of PG&E’s proposals cited by these parties are minimal in comparison to the long-term trend of PG&E’s rates for the period from 2001 through 2009, and (3) neglect to consider the extended period of time when Tier 1 and Tier 2 rates declined in real

\(^{12}\) Motion, p. 4.

\(^{13}\) Motion, p. 5.

\(^{14}\) SCE Rebuttal Testimony, pp. 4 -6.
terms compared to enormous increases in rates for Tiers 3 and above. In Section II.C, SCE rebuts the testimony of parties (DRA, CCSF, Vote Solar, and Solar Alliance) who prefer little or no change to present rate structures that would exacerbate current rate inequities that have developed over the past 10 to 15 years and the alternative proposals of DRA and Solar Alliance that do little to prevent future inequities in the residential rate group or would make them worse. No part of Section II of SCE’s rebuttal testimony should be stricken.

III.

CONCLUSION

For the reasons discussed above, SCE requests that the motion of DRA and TURN to strike portions of SCE’s rebuttal testimony be denied.

Respectfully submitted,

BRUCE A. REED

/s/ Bruce A. Reed

By: Bruce A. Reed

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4183
Facsimile: (626) 302-6693
E-mail: bruce.reed@sce.com

November 15, 2010

15 SCE Rebuttal Testimony, pp. 2-3.
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 RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO MOTION TO STRIKE PORTIONS OF SCE’S OCTOBER 29, 2010 REBUTTAL TESTIMONY on all parties identified on the attached service list(s). 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 15th day of November, 2010, at Rosemead, California.

/s/ Andrea Moreno
Andrea Moreno
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Website</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>KAREN NORENE MILLS</td>
<td>AT&amp;L</td>
<td></td>
<td>ATTORNEY AT LAW</td>
</tr>
<tr>
<td>CALIFORNIA FARM BUREAU FEDERATION</td>
<td>EMAIL ONLY</td>
<td></td>
<td>Email Only, CA 00000</td>
</tr>
<tr>
<td>KEITH R. MCCREA</td>
<td>SUTHERLAND ASBILL &amp; BRENNAN LLP</td>
<td>1275 PENNSYLVANIA AVE, NW</td>
<td>ATTORNEY AT LAW</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WASHINGTON, DC 20004-2415</td>
<td></td>
</tr>
<tr>
<td>DANIEL DOUGLASS</td>
<td>DOUGLASS &amp; LIDDELL</td>
<td>21700 OXNARD STREET, SUITE 1030</td>
<td>ATTORNEY</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WOODLAND HILLS, CA 91367</td>
<td></td>
</tr>
<tr>
<td>KEVIN DOUGLASS</td>
<td></td>
<td>2244 WALNUT GROVE AVENUE</td>
<td>ATORNEY</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ROSEMEAD, CA 91770</td>
<td></td>
</tr>
<tr>
<td>CHARLES F. COLLINS</td>
<td>COUNTY OF KERN</td>
<td>1115 TRUXTUN AVENUE, 4TH FLOOR</td>
<td>EXEC. DIR.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>BAKERSFIELD, CA 93301</td>
<td></td>
</tr>
<tr>
<td>PAUL KERKORIAN</td>
<td>UTILITY COST MANAGEMENT, LLC</td>
<td>6475 N PALM AVE., STE. 105</td>
<td>ATORNEY AT LAW</td>
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<td>FRENSO, CA 93704</td>
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<td></td>
<td></td>
<td>FOR: MOVANT, LAMONT PU DISTRICT/ CITY</td>
<td>ATTORNEY AT LAW</td>
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<tr>
<td>SUE MARA</td>
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<tr>
<td>DAVID J. BYERS, ESQ.</td>
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Information Only

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

KHOJASTEH DAVOODI
DEPARTMENT OF THE NAVY
1322 PATTERSON AVENUE SE
WASHINGTON NAVY YARD, DC 20374-5018

LARRY R. ALLEN
UTILITY RATES AND STUDIES OFFICE
DEPARTMENT OF THE NAVY
1322 PATTERSON AVENUE, SE, STE 1000
WASHINGTON NAVY YARD, DC 20374-5018

JIM ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017

MAURICE BRUBAKER
BRUBAKER & ASSOCIATES, INC.
16690 SWINGLEY RIDGE ROAD, SUITE 140
CHESTERFIELD, MO 63017

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 E. THIRD AVE.
DURANGO, CA 81301

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

DON LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

JERRY O. CROW
KERNTAX
4309 HANH AVE.
BAKERSFIELD, CA 93309

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

THERESA L. MUeller
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

THOMAS J. LONG
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102-5408

ETHAN SPRAGUE
SUNRUN
717 MARKET ST., STE. 600
SAN FRANCISCO, CA 94103

MARYBELLE C. ANG
STAFF ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

ROBERT FINKELSTEIN
THE UTILITY REFORM NETWORK
FOR: THE UTILITY REFORM NETWORK

DEBORAH SHEFLER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

ED LUCHA
CASE COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A, ROOM 991
SAN FRANCISCO, CA 94105

JANET LIU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850

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11/15/2010
<table>
<thead>
<tr>
<th>Name</th>
<th>Company/Group</th>
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<tr>
<td>Kasia Crain</td>
<td>Case Mgr - Operations</td>
<td>Pacific Gas and Electric Company</td>
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<tr>
<td></td>
<td></td>
<td>PO Box 770000, MC B10A</td>
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<td></td>
<td>San Francisco, CA 94105</td>
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<tr>
<td>Lauren Rohde</td>
<td></td>
<td>Pacific Gas and Electric Company</td>
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<td>77 Beale Street, MC B9A</td>
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<td>San Francisco, CA 94105</td>
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<tr>
<td>Gwen Rose</td>
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<td>The Vote Solar Initiative</td>
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<tr>
<td></td>
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<td>300 Brannan Street, Suite 609</td>
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<td>San Francisco, CA 94107</td>
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<tr>
<td>Steven Moss</td>
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<td>673 Kansas Street</td>
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<td>San Francisco, CA 94107</td>
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<td>Salle E. Yoo</td>
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<td>Davis Wright Tremaine LLP</td>
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<td></td>
<td>505 Montgomery Street, Suite 800</td>
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<td>Edward O'Neill</td>
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<td>505 Montgomery Street, Suite 800</td>
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<td></td>
<td>San Francisco, CA 94111-6533</td>
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<tr>
<td>Randall J. Littemeiker</td>
<td></td>
<td>Pacific Gas and Electric Company</td>
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<tr>
<td></td>
<td></td>
<td>77 Beale Street, PO Box 7442, MC B30A</td>
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<td></td>
<td>San Francisco, CA 94120-7442</td>
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<tr>
<td>Joseph F. Wiedman</td>
<td></td>
<td>Keyes &amp; Fox LLP</td>
</tr>
<tr>
<td></td>
<td></td>
<td>436 14th Street, Suite 1305</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Oakland, CA 94612</td>
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<tr>
<td>Enrique Gallardo</td>
<td></td>
<td>The Greenlining Institute</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1918 University Ave., 2nd Floor</td>
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<tr>
<td></td>
<td></td>
<td>Berkeley, CA 94704-1051</td>
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<tr>
<td>Sara Birmingham</td>
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<td>Dir - Western Policy</td>
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<td>Solar Alliance</td>
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<td>11 Lynn Court</td>
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<td>San Rafael, CA 94901</td>
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<td>Wendy L. Illingworth</td>
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<td>Economic Insights</td>
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<tr>
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<td></td>
<td>320 Feather Lane</td>
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<td></td>
<td></td>
<td>Santa Cruz, CA 95060</td>
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<tr>
<td>Richard McCann</td>
<td></td>
<td>Aspen Group for Western Manufactured</td>
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<td></td>
<td>2655 Portage Bay Ave E, Suite 3</td>
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<td>Davis, CA 95616</td>
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<tr>
<td>Andy Katz</td>
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<td>801 K Street, Suite 2700</td>
</tr>
<tr>
<td></td>
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<td>Sacramento, CA 95814</td>
</tr>
<tr>
<td>Scott Blaising</td>
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</tr>
</tbody>
</table>

For: South San Joaquin Irrigation District
State Service

SCOTT MURTISHAW
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CHERIE CHAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER DANFORTH
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID PECK
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

LEE-WHEI TAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

STEVE ROSCOW
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION

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