

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

Application of Southern California Edison  
Company (U338E) for Approval of Its Charge  
Ready and Market Education Programs

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Application 14-10-014

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS  
ON PROPOSED DECISION OF ALJ GOLDBERG GRANTING SCE'S  
PETITION FOR MODIFICATION**

ANNA VALDBERG  
ANDREA L. TOZER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-1910  
E-mail: Andrea.Tozer@sce.com

Dated: **December 3, 2018**

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ON PROPOSED DECISION OF ALJ GOLDBERG GRANTING SCE’S  
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## **SUBJECT INDEX OF RECOMMENDED CHANGES**

Pursuant to Rule 14.3(b) of the California Public Utilities Commission's ("CPUC" or "Commission") Rules of Practice and Procedure, Southern California Edison Company ("SCE") provides the following Subject Index of Recommended Changes in support of its Comments on the Proposed Decision Granting Petition for Modification.

- SCE recommends that the final decision clarify that SCE will record the revenue requirements associated with the \$22 million bridge funding in a sub-account to track it separately from the original Pilot revenue requirements recorded in the Charge Ready Program Balancing Account ("CRPBA").

## I.

### INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Southern California Edison Company (“SCE”) hereby submits the following comments on Administrative Law Judge (“ALJ”) Goldberg’s proposed decision (“PD”) granting SCE’s petition for modification (“PFM”).

SCE supports ALJ Goldberg’s well-reasoned PD, which approves SCE’s PFM and authorizes an additional \$22 million in bridge funding for SCE’s Charge Ready Phase 1 and Market Education Programs (“Pilot”). This bridge funding will mitigate the detrimental consequences of a funding gap between the Charge Ready Pilot and Charge Ready 2 (*i.e.*, the period between the point at which Pilot funds are fully committed and the point at which the Commission issues a decision in the Charge Ready 2 proceeding). Bridge funding will also facilitate a smooth transition that maintains market momentum for charging station customers, contractors, and vendors.

SCE recommends that the PD be adopted with one minor clarification. To distinguish accounting between the original \$22 million Pilot cap in the Charge Ready Program Balancing Account (“CRPBA”) and the additional \$22 million bridge funding that would be approved by the Commission upon adoption of this PD, SCE requests that the final decision direct SCE to record the revenue requirements associated with the Charge Ready Pilot bridge funding in a separate sub-account of the CRPBA.

## II.

### DISCUSSION

A. **The PD provides certainty to the charging infrastructure market and facilitates a smooth transition to a Charge Ready 2 program.**

1. **The PD provides necessary assurances to the charging infrastructure market.**

SCE recommends that the PD be adopted because it will provide the needed assurances to demonstrate to customers, contractors, and vendors that the charging infrastructure

market is continuing to grow, and that SCE will help to maintain the momentum that began under the Charge Ready Pilot.

As discussed in SCE's PFM, a gap in funding between the Charge Ready Pilot and Charge Ready 2 would create uncertainty for customers and contractors, as well as implementation challenges for SCE and its participating vendors. With the approval of the \$22 million in requested bridge funding, SCE anticipates that it will be able to install a minimum of 1,000 additional charging ports during the period between approval of the PFM and the Commission's decision on SCE's Charge Ready 2 application. Continuing to invest in charging infrastructure signals to the market that expanding charging infrastructure throughout our service territory continues to be a priority to SCE and the Commission and it further demonstrates our shared commitment to reaching California's long-term environmental and transportation electrification goals.

**2. The PD allows for a smooth transition from the Charge Ready Pilot to Charge Ready 2.**

In addition to providing greater certainty to customers, Charge Ready bridge funding will allow SCE to facilitate a smoother, more seamless transition from the Charge Ready Pilot to the Charge Ready 2 program. This will improve efficiency and consistency among SCE staff that are working to implement these programs.

**B. SCE recommends that the final decision clarify that SCE will record the revenue requirements associated with the bridge funding in a separate sub-account of the Charge Ready Program Balancing Account.**

SCE appreciates the PD's approval of SCE's recommended changes to D.16-01-023, and agrees with the PD's Ordering Paragraphs (OP) 2 and 4, which direct SCE to file a Tier 1 advice letter to update the Charge Ready Program Balancing Account within 30 days of the decision to reflect approval to recover the revenue requirements associated with up to \$44

million (2014\$) of capital and operations and maintenance expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs.<sup>1</sup>

To clearly identify the additional bridge funding for tracking compliance with the PD's proposed additional requirements,<sup>2</sup> SCE will record the revenue requirements associated with the \$22 million (2014\$) bridge funding in a sub-account to track it separately from the original Pilot revenue requirements recorded in the CRPBA. SCE requests that the final decision clarify that the bridge funding revenue requirements be separately tracked in a sub-account.

### III.

#### CONCLUSION

SCE appreciates the opportunity to provide these comments and encourages the Commission to adopt the PD, with the clarifications described above and shown in Appendix A.

Respectfully submitted,

ANNA VALDBERG  
ANDREA L. TOZER

*/s/ Andrea L. Tozer*

---

By: Andrea L. Tozer

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-6693  
E-mail: Andrea.Tozer@sce.com

DATE: December 3, 2018

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<sup>1</sup> PD, OP 2 and 4, pp. 20-21.

<sup>2</sup> See PD, OP 5-6, p. 21, establishing a minimum of 1,000 charge ports with a target of 20% in multi-unit dwellings under the \$22 million bridge funding.

**Appendix A**

**SCE's Proposed Modifications to the Proposed Decision**



## SCE's Proposed Modifications to the Proposed Decision

Proposed text deletions are in bold and strikethrough (~~abcd~~)

Proposed text additions are in bold and underlined (**abcd**)

Reference	Proposed Modification
<u>Ordering Paragraph 2</u>	<p>Ordering Paragraph 1 of Decision 16-01-023 is modified to read as follows: The Southern California Edison Company is authorized to recover the revenue requirements associated with up to \$44 million (2014\$) of capital and operations and maintenance expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs, <b><u>with a separate sub-account to track the revenue requirements associated with up to \$22 million (2014\$) in bridge funding separately from the original Pilot revenue requirements.</u></b></p>
<u>Ordering Paragraph 4</u>	<p>Southern California Edison Company shall file a Tier 1 advice letter to update its Charge Ready Program Balancing Account within 30 days of the date of issuance of this decision to reflect approval to recover the revenue requirements associated with up to \$44 million (2014\$) of capital and operations and maintenance expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs, <b><u>with a separate sub-account to track the revenue requirements associated with up to \$22 million (2014\$) in bridge funding separately from the original Pilot revenue requirements.</u></b></p>

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A.14-10-014

**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 **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON PROPOSED DECISION OF ALJ GOLDBERG GRANTING SCE'S PETITION FOR MODIFICATION** on all parties identified on the attached service list(s) for **A.14-10-014**. 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.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by US Mail to the offices of the Commissioners(s) or other addresses(s).

**ALJ Sasha Goldberg  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102**

Executed this day **December 3, 2018**, at Rosemead, California.

/s/ Sandra Sedano  
**Sandra Sedano**  
**Legal Administrative Assistant**

SOUTHERN CALIFORNIA EDISON COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



California  
Public Utilities  
Commission



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### Parties

---

C. C. SONG  
 SR. POLICY ANALYST  
 MARIN CLEAN ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: MARIN CLEAN ENERGY

CHRISTOPHER WARNER  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: PACIFIC GAS AND ELECTRIC COMPANY

JAMES HALL  
 MGR.- ADVANCED VEHICLE AND INFRA. POLICY  
 GENERAL MOTORS LLC  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: GENERAL MOTORS LLC

JAY FRIEDLAND  
 ZERO MOTORCYCLES  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: PLUG IN AMERICA

JOHN BOESEL  
 CALSTART  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: CALSTART

JOSEPH HALSO  
 LEGAL FELLOW  
 SIERRA CLUB  
 50 F STREET, NW, 8TH FLR.  
 WASHINGTON, DC 20001  
 FOR: SIERRA CLUB

THOMAS ASHLEY  
 SR. DIR - GOVN'T AFFAIRS & PUBLIC POLICY  
 GREENLOTS  
 925 N. LA BREA AVE., 6TH FL  
 LOS ANGELES, CA 90038  
 FOR: GREENLOTS

KEVIN LEE  
 ATTORNEY  
 NRG ENERGY, INC.  
 11390 W. OLYMPIC BLVD., STE. 250  
 LOS ANGELES, CA 90064  
 FOR: NRG ENERGY, INC.

FORREST NORTH  
 CHIEF OPERATING OFFICER  
 RECARGO, INC.  
 1015 ABBOT KINNEY BLVD.  
 VENICE, CA 90291  
 FOR: RECARGO, INC.

JESSALYN ISHIGO  
 ENVIRONMENTAL BUSINESS DEVELOPMENT OFF.  
 AMERICAN HONDA MOTOR CO., INC.  
 1919 TORRANCE BLVD.  
 TORRANCE, CA 90501  
 FOR: AMERICAN HONDA MOTOR CO., INC.

MAX BAUMHEFNER  
 ATTORNEY  
 NATURAL RESOURCES DEFENSE COUNCIL  
 111 SUTTER ST., 21ST FLOOR  
 SAN FRANCISCO, CA 91404  
 FOR: THE CHARGE AHEAD CALIFORNIA  
 CAMPAIGN (MEMBERS: NRDC, COMMUNITIES  
 FOR A BETTER ENVIRONMENT , ENVIRONMENT  
 CALIFORNIA RESEARCH & POLICY CENTER,  
 COALITION FO CLEAN AIR, AND THE  
 GREENLINING INSTITUTE)

ANDREA L. TOZER  
 ATTORNEY  
 SOUTHERN CALIFORNIA EDISON COMPANY  
 2244 WALNUT GROVE AVE. / PO BOX 800  
 ROSEMEAD, CA 91770  
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JOHN W. LESLIE, ESQ  
 ATTORNEY  
 DENTONS US LLP  
 EMAIL ONLY  
 EMAIL ONLY, CA 92121  
 FOR: SHELL ENERGY NORTH AMERICA (US),  
 L.P.

E. GREGORY BARNES  
 ATTORNEY  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK COURT, BLDG 3. CP32D  
 SAN DIEGO, CA 92123  
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

SACHU CONSTANTINE  
 DIR. OF POLICY  
 CENTER FOR SUSTAINABLE ENERGY  
 9325 SKY PARK COURT, SUITE 100  
 SAN DIEGO, CA 92123  
 FOR: CENTER FOR SUSTAINABLE ENERGY

MICHAEL CHIACOS  
 ENERGY PROGRAM DIR.  
 COMMUNITY ENVIRONMENTAL COUNCIL  
 26 W. ANAPAMU ST., 2ND FLR.  
 SANTA BARBARA, CA 93101  
 FOR: COMMUNITY ENVIRONMENTAL COUNCIL

DAVID SCHLOSBERG  
 ELECTRIC MOTOR WERKS, INC.  
 846 BRANSTEN RD  
 SAN CARLOS, CA 94070  
 FOR: ELECTRIC MOTOR WERKS, INC.

MARC D JOSEPH  
 ADAMS BROADWELL JOSEPH & CARDOZO, PC  
 601 GATEWAY BLVD., STE. 1000  
 SOUTH SAN FRANCISCO, CA 94080  
 FOR: COALITION OF CALIFORNIA UTILITY  
 EMPLOYESS (CCUE)

IRYNA KWASNY  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 4107  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214  
 FOR: ORA

ELISE TORRES  
 STAFF ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103  
 FOR: THE UTILITY REFORM NETWORK (TURN)

LARISSA KOEHLER  
 SENIOR ATTORNEY  
 ENVIRONMENTAL DEFENSE FUND  
 123 MISSION STREET, 28TH FLOOR  
 SAN FRANCISCO, CA 94105  
 FOR: ENVIRONMENTAL DEFENSE FUND

FRANCESCA WAHL  
 SR. POLICY ASSOCIATE, BUS. DEVELOPMENT  
 TESLA, INC.  
 444 DE HARO STREET, STE. 101  
 SAN FRANCISCO, CA 94107  
 FOR: TESLA, INC.

CHRIS S. KING  
 CHIEF POLICY OFFICER  
 EMETER, A SIEMENS BUSINESS  
 4000 E. THIRD AVE., 4TH FLOOR  
 FOSTER CITY, CA 94404  
 FOR: EMETER (A SIEMENS BUSINESS)

JIMMY O'DEA, PH.D  
 VEHICLES ANALYST  
 UNION OF CONCERNED SCIENTISTS  
 500 12TH STREET, STE. 340  
 OAKLAND, CA 94607  
 FOR: UNION OF CONCERNED SCIENTISTS

JIM BAAK  
 PROGRAM DIR - GRID INTEGRATION  
 VOTE SOLAR  
 360 22ND FLOOR, SUITE 730  
 OAKLAND, CA 94612  
 FOR: VOTE SOLAR

JOEL ESPINO  
 LEGAL COUNSEL  
 THE GREENLINING INSTITUTE  
 360 14TH STREET, 2ND FL.  
 OAKLAND, CA 94612  
 FOR: THE GREENLINING INSTITUTE

ALEX MORRIS  
 SR. DIR., POLICY & REGULATORY AFFAIRS  
 CALIFORNIA ENERGY STORAGE ALLIANCE  
 2150 ALLSTON WAY, SUITE 210  
 BERKELEY, CA 94704  
 FOR: CALIFORNIA ENERGY STORAGE ALLIANCE  
 (CESA)

GREGORY MORRIS  
 DIRECTOR  
 GREEN POWER INSTITUTE  
 2039 SHATTUCK AVE., SUITE 402  
 BERKELEY, CA 94704  
 FOR: GREEN POWER INSTITUTE

COLLEEN C. QUINN  
 VP - GOV'T. RELATIONS AND PUBLIC POLICY  
 CHARGEPOINT, INC.  
 254 EAST HACIENDA AVENUE  
 CAMPBELL, CA 95008  
 FOR: CHARGEPOINT

LAURA FERNANDEZ  
 ATTORNEY  
 BRAUN BLAISING SMITH WYNNE, P.C.  
 915 L STREET, STE 1480  
 SACRAMENTO, CA 95814  
 FOR: CITY OF LANCASTER

STEVEN P. DOUGLAS  
 SR. DIR - ENVIRONMENTAL AFFAIRS  
 ALLIANCE OF AUTOMOBILE MANUFACTURERS  
 1415 L STREET, STE. 1190  
 SACRAMENTO, CA 95814  
 FOR: ALLIANCE OF AUTOMOBILE  
 MANUFACTURERS

## Information Only

---

ABEGAIL TINKER  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

ANGIE BOAKES  
 ELECTRIC MOBILITY GENERAL MGR.  
 SHELL INT'L. PETROLEUM CO., LIMITED  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

ANNE SMART  
 CHARGEPOINT, INC.  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

BONNIE DATTA  
 SR. DIR - AMERICAS & ASIA PACIFIC  
 SIEMENS  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

CASE COORDINATION

CATHERINE BUCKLEY

PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

DAVE PACKARD  
 CHARGEPOINT, INC.  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

DESPINA NIEHAUS  
 CALIFORNIA REGULATORY AFFAIRS  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

JORDAN RAMER  
 EV CONNECT, INC.  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: EV CONNECT, INC.

KAREN SHEA  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

LAUREN DUKE  
 DEUTSCHE BANK SECURITIES INC.  
 EMAIL ONLY  
 EMAIL ONLY, NY 00000

MINCI HAN  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

PAUL D. HERNANDEZ  
 ENERGY & TRANSPORTATION POLICY MANAGER  
 CENTER FOR SUSTAINABLE ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

SEPHRA A. NINOW, J.D.  
 REGULATORY AFFAIRS MGR.  
 CENTER FOR SUSTAINABLE ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

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

CROWELL & MORING  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

TAM HUNT  
 COMMUNITY RENEWABLES SOLUTIONS, LLC  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000-0000

MICHAEL DANDURAND  
 LNZ CAPTIAL, LP  
 411 LAFAYETTE STREET  
 NEW YORK, NY 10003

CONSTANTINE LEDNEV  
 ASSOCIATE-US UTILITIES & POWER RESEARCH  
 DEUTSCHE BANK SECURITIES INC.  
 60 WALL STREET  
 NEW YORK CITY, NY 10005

ARMAN TABATABAI  
 RESEARCH  
 MORGAN STANLEY  
 1585 BROADWAY, 38TH FL.  
 NEW YORK, NY 10036

JERIMIAH BOOREAM  
 POWER, UTILITIES, & ALT ENERGY RESEARCH  
 BANK OF AMERICA MERRILL LYNCH  
 ONE BRYANT PARK  
 NEW YORK, NY 10036

JIM KOBUS  
 RESEARCH  
 MORGAN STANLEY  
 1585 BROADWAY, 38TH FLOOR  
 NEW YORK, NY 10036

JOSEPHINE MOORE  
 POWER AND UTILITIES RESEARCH  
 BANK OF AMERICA MERRILL LYNCH  
 ONE BRYANT PARK  
 NEW YORK, NY 10036

JULIEN DUMOULIN-SMITH  
 HEAD OF US PWR, UTILITIES & ALT ENERGY  
 BANK OF AMERICA MERRILL LYNCH  
 ONE BRYANT PARK  
 NEW YORK, NY 10036

NICHOLAS CAMPANELLA  
POWER AND UTILITIES RESEARCH  
BANK OF AMERICA MERRILL LYNCH  
ONE BRYANT PARK  
NEW YORK, NY 10036

STEVE STUBITZ, CFA  
GLOBAL EQUITIES  
CITADEL  
131 SOUTH DEARBORN STREET  
CHICAGO, IL 60603

ALEXANDER KEROS  
ADVANCED VEHICLE & INFRASTRUCTURE POLICY  
GENERAL MOTORS, LLC  
3050 LOMITA BLVD.  
TORRANCE, CA 90505

ALEC BROOKS  
AEROVIRONMENT, INC.  
181 W. HUNTINGTON DRIVE, SUITE 202  
MONROVIA, CA 91016  
FOR: AEROVIRONMENT, INC.

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

MARISSA BLUNSCHI  
SOUTHERN CALIFORNIA EDISON COMPANY  
8631 RUSH ST.  
ROSEMEAD, CA 91770

DONALD C. LIDDELL  
ATTORNEY  
DOUGLASS & LIDDELL  
2928 SECOND AVE.  
SAN DIEGO, CA 92103  
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE  
(CESA)

HANNON RASOOL  
ADMIN. - CALIF. REGULATORY AFFAIRS  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT. CP32D  
SAN DIEGO, CA 92123

JENNIFER WRIGHT  
REGULATORY CASE MGR.  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32F  
SAN DIEGO, CA 92123

PARINA P. PARIKH  
REGULATORY CASE MGR.  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP 32F  
SAN DIEGO, CA 92123

CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK CT, CP31-E  
SAN DIEGO, CA 92123-1530

MARC MONBOUQUETTE  
SR.MGR - REG & GOV'T AFFAIRS  
EMOTORWERKS  
846 BRANSTEN ROAD  
SAN CARLOS, CA 94070

FIDEL LEON DIAZ  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY SAFETY & INFRASTRUCTURE BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ERIC BORDEN  
ENERGY POLICY ANALYST  
THE UTILITY REFORM NETWORK  
785 MARKET STREET, STE. 1400  
SAN FRANCISCO, CA 94103

MARCEL HAWIGER  
STAFF ATTORNEY  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103

SHIRLEY WOO  
PACIFIC GAS & ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

NICOLE JOHNSON  
REGULATORY ATTORNEY

LISA QI, ESQ.  
ATTORNEY

CONSUMER FEDERATION OF CALIFORNIA  
150 POST ST., STE. 442  
SAN FRANCISCO, CA 94108

CROWELL & MORING, LLP  
3 EMBARCADERO CENTER, STE. 2600  
SAN FRANCISCO, CA 94111

CALIFORNIA ENERGY MARKETS  
425 DIVISADERO ST. STE 303  
SAN FRANCISCO, CA 94117-2242

RYAN SCHUCHARD  
POLICY DIR.  
CALSTART  
501 CANAL BLVD., NO. G  
RICHMOND, CA 94804

MCE REGULATORY  
MARIN CLEAN ENERGY  
1125 TAMALPAIS AVENUE  
SAN RAFAEL, CA 94901

SHALINI SWAROOP  
REGULATORY & LEGISLATIVE COUNSEL  
MARIN CLEAN ENERGY  
1125 TAMALPAIS AVENUE  
SAN RAFAEL, CA 94901

PHILLIP MULLER  
PRESIDENT  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

DAVID PETERSON  
CHARGEPOINT, INC.  
254 EAST HACIENDA AVENUE  
CAMPBELL, CA 95008

NEWONDA NICHOLS  
PROGRAM MGR., UTILITY SOLUTIONS  
CHARGEPOINT, INC.  
254 EAST HACIENDA AVE.  
CAMPBELL, CA 95008

RENEE SAMSON  
DIR - UTILITY SOLUTIONS  
CHARGEPOINT, INC.  
245 HACIENDA AVENUE  
CAMPBELL, CA 95008

CAMILLE STOUGH, ESQ.  
BRAUN BLAISING MCLAUGHLIN & SMITH PC  
915 L STREET, STE. 1480  
SACRAMENTO, CA 95814

JIM HAWLEY  
PRINCIPAL  
DEWEY SQUARE GROUP, LLC  
1020 16TH STREET, SUITE 20  
SACRAMENTO, CA 95814

JIM HAWLEY  
ELECTRIC VEHICLE CHARGING ASSN.  
455 CAPITOL MALL, STE. 600  
SACRAMENTO, CA 95814  
FOR: ELECTRIC VEHICLE CHARGING  
ASSOCIATION

JOHN SHEARS  
CEERT  
1100 11TH STREET, SUITE 311  
SACRAMENTO, CA 95814

SCOTT BLAISING  
COUNSEL  
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.  
915 L STREET, SUITE 1480  
SACRAMENTO, CA 95814

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5931

## State Service

---

CHLOE LUKINS  
ORA DIV.  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY

JOSE ALIAGA-CARO  
UTILITIES ENGINEER  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY



EMAIL ONLY, CA 00000

SANDY GOLDBERG  
 SR. COUNSEL  
 GOVERNOR'S OFF. OF PLANING & RESEARCH  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

ANA M. GONZALEZ  
 CALIF PUBLIC UTILITIES COMMISSION  
 DIVISION OF ADMINISTRATIVE LAW JUDGES  
 ROOM 2106  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

AUDREY NEUMAN  
 CALIF PUBLIC UTILITIES COMMISSION  
 PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
 ROOM 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

JOSEPH A. ABHULIMEN  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY SAFETY & INFRASTRUCTURE BRANCH  
 ROOM 4209  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

MELICIA CHARLES  
 CALIF PUBLIC UTILITIES COMMISSION  
 PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

SASHA GOLDBERG  
 CALIF PUBLIC UTILITIES COMMISSION  
 DIVISION OF ADMINISTRATIVE LAW JUDGES  
 ROOM 5021  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

TOVAH TRIMMING  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 4107  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

EMAIL ONLY, CA 00000

ALAN BACH  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY SAFETY & INFRASTRUCTURE BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214  
 FOR: ORA

ANAND DURVASULA  
 CALIF PUBLIC UTILITIES COMMISSION  
 COMMISSIONER RANDOLPH  
 ROOM 5130  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

JENNIFER KALAFUT  
 CALIF PUBLIC UTILITIES COMMISSION  
 COMMISSIONER PETERMAN  
 ROOM 5303  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

LIAM WEAVER  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY SAFETY & INFRASTRUCTURE BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

SARA M. KAMINS  
 CALIF PUBLIC UTILITIES COMMISSION  
 PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

THOMAS GARIFFO  
 CALIF PUBLIC UTILITIES COMMISSION  
 ELECTRICITY PLANNING & POLICY BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

NOEL CRISOSTOMO  
 AIR POLUTION SPECIALIST  
 CALIFORNIA ENERGY COMMISSION  
 1516 9TH STREET  
 SACRAMENTO, CA 95814

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