BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA


Rulemaking 15-03-011 (Filed March 26, 2015)

OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED DECISION ON TRACK 1 ISSUES

WILLIAM V. WALSH
AMBER DEAN WYATT

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4347
Facsimile: (626) 302-7740
E-mail: William.V.Walsh@sce.com

Dated: January 4, 2016
OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON PROPOSED DECISION ON TRACK 1 ISSUES


I.
SCE SUPPORTS THE PROPOSED DECISION AND SUGGESTS A PROCEDURAL MODIFICATION FOR ADDRESSING BROAD PCIA POLICY ISSUES

The Proposed Decision strikes an appropriate balance in providing guidance and structure to ensure investor owned-utility (“IOU”) energy storage procurement activities further the goals of Assembly Bill (“AB”) 2514, while providing the flexibility needed for the rapidly evolving energy storage market. In particular, SCE supports the Proposed Decision’s conclusions that:

➢ the IOUs should have flexibility to design solicitation processes consistent with their needs;
customer-connected energy storage projects should be eligible, within limits, to satisfy a portion of the transmission- and distribution-connected domain targets; energy storage procurement data is market sensitive and must be protected under the existing confidentiality rules in Decision (“D.”) 06-06-066; and the current Consistent Evaluation Protocol is an appropriate tool for benchmarking and reporting purposes.

SCE’s sole suggestion to modify the Proposed Decision is related to how it would address Power Charge Indifference Amount (“PCIA”) issues scoped for Track 1. The Proposed Decision defers certain unresolved PCIA issues in Track 1 to the IOUs’ 2014 Energy Storage Request for Offers (“ES RFO”) Applications (the “Applications”). Approval of the 2014 ES RFO contracts, however, may occur independently of these remaining PCIA issues. Because these issues may apply to the ES RFOs of 2016 and later, SCE suggests that the Commission address these issues in Track 2 of this proceeding. Resolving these PCIA policy issues in this single proceeding rather than the separate IOU Applications seeking approval of energy storage contracts is procedurally more expeditious and will ensure consistency.

Certain PCIA issues are in scope for the approval of the 2014 ES RFO contracts. In D.14-10-045, the Commission ordered the IOUs to consult with affected parties and to file a proposed PCIA methodology that could determine the above-market stranded cost of generation-function energy storage with the IOUs’ applications for contract approval. That is, the discussion of the mechanics of how to calculate the PCIA for energy storage is in scope. In addition, whether the PCIA applies to the life of the contracts resulting from the 2014 ES RFO is also within scope of the Applications. However, broader policy issues -- such as when the PCIA cost recovery mechanism should apply and whether it should apply for the life of energy storage contracts procured in future RFOs -- are not currently in scope of the Applications.

1 See Proposed Decision at 45.
2 D.14-12-048, at Ordering Paragraph 1(6).
SCE maintains these broader policy issues can and should be determined independent of the Applications. Addressing these issues in the IOUs’ individual Applications is awkward from an evidentiary perspective, because the same broad policy issues will need to be litigated in at least two separate applications. Further, SCE did not serve testimony with its Application on these broader policy issues, because they were not germane to the approval of contracts resulting from SCE’s 2014 ES RFO. Rather, SCE provided testimony supporting the Joint IOU Protocol on the mechanics of the PCIA (as directed in D.14-10-045) and requested that the PCIA apply for the life of the 2014 ES RFO contracts. It would not be ideal from an evidentiary perspective to retroactively add to the scope of the individual ES RFO Applications, or to litigate the same broader policy issues in multiple proceedings.

SCE maintains that the Commission has sufficient evidence before it to determine that departing load customers should remain responsible for any stranded costs that exist over the life of the energy storage contracts procured on their behalf. However, to the extent the Commission wants to defer deciding this PCIA issue and others to another forum, SCE suggests that the Commission defer these issues to Track 2 of the Energy Storage OIR. That forum is better suited to determine broader policy issues than the IOUs’ individual contract approval applications.

II.

CONCLUSION

SCE supports the Proposed Decision. It strikes an appropriate balance in providing guidance and structure to ensure IOU energy storage procurement activities further the goals of AB 2514, while providing the flexibility needed for the rapidly evolving energy storage market. For the reasons provided herein, to the extent the Commission seeks to defer a decision on the broader PCIA policy issues to another forum, SCE asks that the Commission defer those issues to Track 2 of the Energy Storage OIR rather than the IOUs’ individual ES RFO applications.
Respectfully submitted,

WILLIAM V. WALSH
AMBER WYATT

/s/ William V. Walsh
By: William V. Walsh

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4347
Facsimile: (626) 302-7740
E-mail: William.V.Walsh@sce.com

January 4, 2016
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to consider ) Rulemaking 15-03-011
policy and implementation refinements to the ) (Filed March 26, 2015)
Energy Storage Procurement Framework and )
Design Program (D.13-10-040, D.14-10-045) )
and related Action Plan of the California )
Energy Storage Roadmap. )

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 the OPENING COMMENTS OF SOUTHERN
CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED DECISION ON
TRACK 1 ISSUES on all parties identified on the attached service list(s) R.15-03-011.
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 hand or by overnight courier to the offices of the ALJ(s):

ALJ Julie Halligan
CPUC – Div. of ALJs
505 Van Ness Avenue
San Francisco, CA  94102

☒ Placing copies in properly addressed, sealed envelopes and depositing such copies
in the United States mail with first-class postage prepaid to all parties for those
listed on the attached non-e-mail list.

Executed this 4th day of January, 2016, at Rosemead, California.

/s/ Norman Goss
Norman Goss, Legal Administrative Assistant
SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: R1503011 - CPUC - OIR TO CONSID
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: DECEMBER 21, 2015

Download the Comma-delimited File
About Comma-delimited Files

Back to Service Lists Index

Parties

BRIAN KORPICS                             CC SONG
POLICY MANAGER                            REGULATORY ANALYST
THE CLEAN COALITION                       MARIN CLEAN ENERGY
EMAIL ONLY                                EMAIL ONLY
EMAIL ONLY, CA  00000                     EMAIL ONLY, CA  00000
FOR: CLEAN COALITION
EVELYN LEE
PACIFIC GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: PACIFIC GAS & ELECTRIC COMPANY
RACHEL GOLD
POLICY DIRECTOR
LARGE-SCALE SOLAR ASSOCIATION
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: LARGE-SCALE SOLAR ASSOCIATION
J. DOUGLAS DIVINE
CHIEF EXECUTIVE OFFICER
EAGLE CREST ENERGY COMPANY
3000 OCEAN PARK BVLD., STE. 1020
SANTA MONICA, CA 90405
FOR: EAGLE CREST ENERGY COMPANY

AMBER WYATT
SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE./PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

GREG BASS
DIR
NOBLE AMERICAS ENERGY SOLUTIONS LLC
401 WEST A STREET, SUITE 500
SAN DIEGO, CA 92101-3017
FOR: NOBLE AMERICAS ENERGY SOLUTIONS LLC

FOR: MARIN CLEAN ENERGY
PATRICK FERGUSON
DAVIS WRIGHT TREMAINE, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: CALPINE CORPORATION
TED KO
STEM. INC.
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: STEM, INC.

DANIEL W. DOUGLASS
ATTORNEY
DOUGLASS & LIDDELL
4766 PARK GRANADA, SUITE 209
CALABASAS, CA 91302
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS (AREM), DIRECT ACCESS CUSTOMER COALITION (DACC), WESTERN POWER TRADING FORUM (WPTF)

JOHN W. LESLIE, ESQ
ATTORNEY
DENTONS US LLP
600 WEST BROADWAY, STE. 2600
SAN DIEGO, CA 92101
FOR: SHELL ENERGY NORTH AMERICA (US), L.P.

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE (CESA)
KELLEY RODGERS
ENERGY PROGRAM MANAGER
SAN DIEGO COUNTY WATER AUTHORITY
4677 OVERLAND AVENUE
SAN DIEGO, CA  92123
FOR: SAN DIEGO COUNTY WATER AUTHORITY (SDCWA)

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

JOSHUA BLEDSOE
LATHAM & WATKINS LLP
650 TOWN CENTER DRIVE, 20TH FLOOR
COSTA MESA, CA  92626-1925
FOR: ALEVO ENERGY, INC.

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

PIERRE BULL
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR

PAUL A. SZYMANSKI
SR. COUNSEL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT., CP32D
SAN DIEGO, CA  92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

GUSTAVO E. LUNA
VP - ORIGINATION
TERRA-GEN POWER, LLC
11512 EL CAMINO REAL, SUITE 370
SAN DIEGO, CA  92130
FOR: TERRA-GEN POWER, LLC

CHRISTOPHER J. GRIECO
EXECUTIVE V.P.
GRAVITY POWER, LLC
5735B HOLLISTER AVENUE, STE. B
GOLETA, CA  93117
FOR: GRAVITY POWER, LLC

LISA-MARIE G. CLARK
LEGAL DIVISION
CPUC
505 VAN NESS AVE., RM. 4300
SAN FRANCISCO, CA  94102
FOR: ORA

NORA SHERIFF
ALCANTAR & KAHL, LLP
345 CALIFORNIA ST., STE. 2450
SAN FRANCISCO, CA  94104
FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION (CLECA)

LARISSA KOEHLER
ATTORNEY
ENVIRONMENTAL DEFENSE FUND

https://ia.cpuc.ca.gov/servicelists/R1503011_82973.htm
SAN FRANCISCO, CA  94104-4540
FOR: NATURAL RESOURCES DEFENSE COUNCIL

SHERIDAN J. PAUKER, ESQ.
REGULATORY COUNSEL
WILSON SONSINI GOODRICH & ROSATI
ONE MARKET PLAZA, SPEAR TOWER, STE 3300
SAN FRANCISCO, CA  94105
FOR: ROBERT BOSCH LLC
MICHAEL DAY
GOODIN MACBRIDE SQUEIRI & DAY LLP
505 SANSOME STREET, STE. 900
SAN FRANCISCO, CA  94111
FOR: ABENGOA SOLAR

YANA GARCIA
EARTHJUSTICE
50 CALIFORNIA STREET, SUITE 500
SAN FRANCISCO, CA  94111
FOR: SIERRA CLUB

JASON B. KEYES
ATTORNEY
KEYES FOX & WIEDMAN LLP
436 14TH STREET, STE. 1305
OAKLAND, CA  94612
FOR: SOLARCITY CORPORATION

DAVID KATES
DAVID MARK & COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA, CA  95403
FOR: THE NEVADA HYDRO COMPANY

123 MISSION STREET, 28TH FLOOR
SAN FRANCISCO, CA  94105
FOR: ENVIRONMENTAL DEFENSE FUND (EDF)
MEGAN MATSON
PARTNER
TABLE ROCK CAPITAL
150 CALIFORNIA ST., STE. 600
SAN FRANCISCO, CA  94111
FOR: TABLE ROCK CAPITAL
SEAN P. BEATTY
WEST REGION GEN. COUNSEL
NRG ENERGY, INC.
100 CALIFORNIA STREET, SUITE 650
SAN FRANCISCO, CA  94111
FOR: NRG ENERGY, INC.
MEGAN M. MYERS
ATTORNEY
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA  94121
FOR: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES (CEERT)
GREGORY MORRIS
DIRECTOR
GREEN POWER INSTITUTE
2039 SHATTUCK AVENUE, STE 402
BERKELEY, CA  94704
FOR: THE GREEN POWER INSTITUTE (A PROGRAM OF THE PACIFIC INSTITUTE)
BILL WEAVER
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA  95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
information only

ANDREW CAMPBELL
EXEC. DIR., ENERGY INSTITUTE AT HAAS UNIVERSITY OF CALIFORNIA, BERKELEY EMAIL ONLY
EMAIL ONLY, CA 00000
BRIAN THEAKER
DIRECTOR - REGULATORY AFFAIRS NRG ENERGY, INC. EMAIL ONLY
EMAIL ONLY, CA 00000
DANIELLE OSBORNE MILLS
SENIOR POLICY ADVISOR LARGE-SCALE SOLAR ASSOCIATION EMAIL ONLY
EMAIL ONLY, CA 00000
ELI HARLAND
CALIFORNIA ENERGY COMMISSION ENERGY RESEARCH & DEVELOPMENT DIV. EMAIL ONLY
EMAIL ONLY, CA 00000
JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP EMAIL ONLY

BARBARA BARKOVICH
CONSULTANT BARKOVICH & YAP EMAIL ONLY
EMAIL ONLY, CA 00000
CASE COORDINATION PACIFIC GAS AND ELECTRIC COMPANY EMAIL ONLY
EMAIL ONLY, CA 00000
DIANE FELLMAN
DIR - GOVERNMENTAL & REGULATORY AFFAIRS NRG ENERGY, INC. EMAIL ONLY
EMAIL ONLY, CA 00000
JAMIE L MAULDIN
ADAMS BROADWELL JOSEPH & CARDOZO EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: COALITION OF CALIFORNIA UTILITY EMPLOYEES JEREMY WAEN
REGULATORY ANALYST MARIN CLEAN ENERGY

https://ia.cpuc.ca.gov/servicelists/R1503011_82973.htm
EMAIL ONLY
EMAIL ONLY, CA 00000
TIM OLSEN
ENERGY COALITION
EMAIL ONLY
EMAIL ONLY, CA 00000
WADE A. GREENACRE
CASE MGR.
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000
DAVIS WRIGHT TREMAINE, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
MIKE FERRY
CENTER FOR SUSTAINABLE ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
SANDER K. COHAN
DIRECTOR, INNOVATION
ENEL GREEN POWER NORTH AMERICA, INC.
1 TECH DRIVE, SUITE 220
ANDOVER, MA 01810
JEFF GATES
DIRECTOR OF SALES & FIELD OPERATIONS
ALEVO ENERGY, INC.
2320 CONCORD PARKWAY SOUTH
CONCORD, NC 28027
TONY SIEBERT
ZBB ENERGY CORPORATION
N93 W14475 WHITTAKER WAY
MENOMONEE FALLS, WI 53051
JOE GRECO
SR. V.P.

EMAIL ONLY
EMAIL ONLY, CA 00000
UDI HELMAN
HELMAN ANALYTICS
EMAIL ONLY
EMAIL ONLY, CA 00000
REGULATORY
MARIN CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000
MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000
TAM HUNT
COMMUNITY RENEWABLES SOLUTIONS, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
JIM KOBUS
RESEARCH
MORGAN STANLEY
1585 BROADWAY, 38TH FLOOR
NEW YORK, NY 10036
KATHERINE HOFFMASTER
SR. REGULATORY AFFAIRS ANALYST
NEXTERA ENERGY RESOURCES
700 UNIVERSE BLVD., FEJ/JB
JUNO BEACH, FL 33405
KELLY CRANDALL
KEYES FOX & WIEDMAN LLP
1400 16TH ST., 16 MARKET SQR., STE. 400
DENVER, CO 80202
STEVEN ZURETTI
DIR - REGULATORY AFFAIRS
TERRA-GEN POWER LLC
9590 PROTOTYPE COURT, SUITE 200
RENO, NV  89521-5916

JEFFREY A. SERFASS
MANAGING DIRECTOR
CALIFORNIA HYDROGEN BUSINESS COUNCIL
3438 MERRIMAC ROAD
LOS ANGELES, CA  90049
FOR: CALIFORNIA HYDROGEN BUSINESS COUNCIL
GREGORY S. G. KLATT
ATTORNEY
DOUGLASS & LIDDELL
4766 PARK GRANADA, STE. 209
CALABASAS, CA  91302
SHAWN BAILEY
DIRECTOR - PLANNING & ANALYSIS
SEMPRA US GAS AND POWER
488 8TH STREET
SAN DIEGO, CA  92101
WILLIAM P. FULLER
REGULATORY CASE MANAGER
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA  92123
SUE MARA
CONSULTANT
RTO ADVISORS, LLC
164 SPRINGDALE WAY
REDWOOD CITY, CA  94062
FOR: ALLAINCE FOR RETAIL ENERGY MARKETS (AREM)
CANDICE YU

BROOKFIELD ENERGY MARKETING INC.
6171 RUBY PL
LOS ANGELES, CA  90042
FOR: BROOKFIELD ENERGY MARKETING INC.
MILISSA MARONA
DIR - GOV'T & UTILITY RELATIONS
CODA ENERGY
135 E. MAPLE AVE.
MONROVIA, CA  91016

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., PO BOX 800
ROSEMEAD, CA  91770

MARCIE MILNER
VP - REGULATORY AFFAIRS
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA  92121
ANTHONY HARRISON
MGR. - REGULATORY AFFAIRS
STEM, INC.
100 ROLLINS RD.
MILLBRAE, CA  94030
ERIC BORDEN
ENERGY POLICY ANALYST
THE UTILITY REFORM NETWORK
785 MARKET STREET, STE. 1400
SAN FRANCISCO, CA  94103

BILL KISSINGER
For: Sierra Club

California Energy Markets

Morgan Lewis & Bockius LLP
One Market, Spear Street Tower
San Francisco, CA  94105

Dustin Elliott
Morgan, Lewis & Bockius, LLP
One Market St., Spear Street Tower
San Francisco, CA  94105

Matthew Vespa
Sr. Attorney
Sierra Club
85 Second St., 2nd Fl
San Francisco, CA  94105

Monica Schwebs
Morgan Lewis Bockius, LLP
One Market, Spear Street Tower
San Francisco, CA  94105-1596

Brian T. Cragg
Attorney
Goodin, MacBride, Squeri & Day, LLP
505 Sansome St., Ste. 900
San Francisco, CA  94111

Luisa F. Elkins
Goodin MacBride Squeri & Day, LLP
505 Sansome St., Ste. 900
San Francisco, CA  94111

William Rostov
Staff Attorney
Earthjustice
50 California St., Ste. 500
San Francisco, CA  94111

For: Sierra Club

California Energy Markets

https://ia.cpuc.ca.gov/servicelists/R1503011_82973.htm

1/4/2016
425 DIVISADERO ST., STE 303
SAN FRANCISCO, CA  94117

RANALD J. LITTENEKER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, B30A
SAN FRANCISCO, CA  94120

ANDREW YIP
MGR - BUS. DEVELOPMENT (RBNA/PJ-BGT)
ROBERT BOSCH LLC
4009 MIRANDA AVENUE, STE. 200
PALO ALTO, CA  94304

SHARMILA RAVULA
DIR - BUS. DEVELOP. RBNA/PJ-DC MICROGRID
ROBERT BOSCH LLC
4009 MIRANDA AVENUE, SUITE 200
PALO ALTO, CA  94304

GENEVIEVE DUFU AU-MCCARTHY
SOLARCITY CORPORATION
3055 CLEARVIEW WAY
SAN MATEO, CA  94402

EMMIE STENSTEDT
ELSYS INC.
4966 HUMMINGBIRD ROAD
PLEASANTON, CA  94566

MARK STOUT
V.P.-PROJECT DEVELOPMENT
AMBER KINETICS, INC.
32920 ALVARADO NILES RD., STE. 250
UNION CITY, CA  94587

SARAH J. HARVEY
KEYES FOX & WIEDMAN LLP
436 14TH STREET, SUITE 1305
SAN FRANCISCO, CA 94612

TIM LINDL
COUNSEL
KEYES FOX & WIEDMAN LLP
436 14TH STREET, STE. 1305
OAKLAND, CA 94612
FOR: SONOMA CLEAN POWER AUTHORITY
PHILLIP MULLER
PRESIDENT
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903
C. SUSIE BERLIN
LAW OFFICES OF SUSIE BERLIN
1346 THE ALAMEDA, STE. 7, NO. 141
SAN JOSE, CA 95126
JILL POWERS
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM, CA 95630

LEGAL DEPARTMENT
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630
TOM FLYNN
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM, CA 95630
LORENZO KRISTOV
CALIFORNIA ISO
250 OUTCROPPING WAY

CENTER FOR SUSTAINABLE ENERGY
426 17TH STREET, SUITE 700
OAKLAND, CA 94612
TANDY McMANNES
ABENGOA SOLAR
I KAISER PLAZA, STE. 1675
OAKLAND, CA 94612-3699

DEDRICK ROPER
CHARGEPOINT, INC.
254 EAST HACIENDA AVENUE
CAMPBELL, CA 95008

DEBRA EMERSON
SONOMA CLEAN POWER AUTHORITY
50 SANTA ROSA AVE., 5TH FL.
SANTA ROSA, CA 95404
JORDAN PINJUV
COUNSEL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM, CA 95630
PETER KLAUER
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM, CA 95630
HEATHER SANDERS
CALIFORNIA ISO
250 OUTCROPPING WAY
FOLSOM, CA 95630-8773
DAN GRIFFITHS
ATTORNEY
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.
JUSTIN WYNNE
ATTORNEY
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA  95814

OSTAP LOREDO-CONTRERAS
ENERGY SYSTEM RESEARCH OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-43
SACRAMENTO, CA  95814

STEVEN KELLY
POLICY DIRECTOR
INDEPENDENT ENERGY PRODUCERS ASSCIATION
1215 K STREET, STE. 900
SACRAMENTO, CA  95814

CHRISTA LIM
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA  95816

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA  95816-5905

LYNN M. HAUG
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA  95816-5905

JACK ELLIS
1425 ALPINE WAY / PO BOX 6600

915 L STREET, SUITE 1270
SACRAMENTO, CA  95814
KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1127 - 11TH STREET, SUITE 514
SACRAMENTO, CA  95814

SCOTT BLAISING
COUNSEL
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA  95814
CHASE KAPPEL
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVE., SUITE 400
SACRAMENTO, CA  95816

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS L.L.P.
2600 CAPITOL AVE, SUITE 400
SACRAMENTO, CA  95816-5905
JEFFERY D. HARRIS
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA  95816-5905

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA  95864
FOR: GILL RANCH STORAGE, LLC
SARAH ADAMS
BUSINESS DEVELOPMENT
<table>
<thead>
<tr>
<th>TAHOE CITY, CA</th>
<th>96145-6600</th>
<th>NW NATURAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>220 NW SECOND AVENUE</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PORTLAND, OR 97209</td>
</tr>
<tr>
<td>SHAUN LOGUE</td>
<td></td>
<td>FOR: GILL RANCH STORAGE, LLC</td>
</tr>
<tr>
<td>BROOKFIELD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENERGY MARKETING, INC.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>480 BLVD. DE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LA CITE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GATINEAU, PQ</td>
<td>J8T 8R3</td>
<td></td>
</tr>
<tr>
<td>CANADA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**State Service**

<table>
<thead>
<tr>
<th>HAL KANE</th>
<th>MARC MONBOUQUETTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>SR. ANALYST, RISK ASSESSMENT</td>
<td>CALIFORNIA PUBLIC UTILITIES COMMISSION</td>
</tr>
<tr>
<td>CPUC - SED DIV</td>
<td>ENERGY DIVISION</td>
</tr>
<tr>
<td>EMAIL ONLY</td>
<td>EMAIL ONLY</td>
</tr>
<tr>
<td>EMAIL ONLY, CA</td>
<td>EMAIL ONLY, CA</td>
</tr>
<tr>
<td>00000</td>
<td>00000</td>
</tr>
<tr>
<td>AMY C. BAKER</td>
<td>ARTHUR J. O’DONNELL</td>
</tr>
<tr>
<td>CALIF PUBLIC</td>
<td>CALIF PUBLIC</td>
</tr>
<tr>
<td>UTILITIES COMMISSION</td>
<td>UTILITIES</td>
</tr>
<tr>
<td>EXECUTIVE DIVISION</td>
<td>COMMISSION</td>
</tr>
<tr>
<td>ROOM 5210</td>
<td>RISK ASSESSMENT AND ENFORCEMENT</td>
</tr>
<tr>
<td>505 VAN NESS AVENUE</td>
<td>AREA</td>
</tr>
<tr>
<td>SAN FRANCISCO, CA 94102-3214</td>
<td>505 VAN NESS AVENUE</td>
</tr>
<tr>
<td>CHRISTOPHER</td>
<td>EHREN SEYBERT</td>
</tr>
<tr>
<td>MYERS</td>
<td>CALIF PUBLIC UTILITIES COMMISSION</td>
</tr>
<tr>
<td>ELECTRICITY</td>
<td>EXECUTIVE DIVISION</td>
</tr>
<tr>
<td>PLANNING &amp; POLICY BRANCH</td>
<td>ROOM 5303</td>
</tr>
<tr>
<td>ROOM 4104</td>
<td>505 VAN NESS AVENUE</td>
</tr>
<tr>
<td>505 VAN NESS AVENUE</td>
<td>SAN FRANCISCO, CA 94102-3214</td>
</tr>
<tr>
<td>GABRIEL PETLIN</td>
<td>JULIE HALLIGAN</td>
</tr>
<tr>
<td>CALIF PUBLIC</td>
<td>CALIF PUBLIC UTILITIES COMMISSION</td>
</tr>
<tr>
<td>UTILITIES COMMISSION</td>
<td>DIVISION OF ADMINISTRATIVE LAW JUDGES</td>
</tr>
<tr>
<td>INFRASTRUCTURE PLANNING AND PERMITTING B</td>
<td>ROOM 5041</td>
</tr>
<tr>
<td>AREA 4-A</td>
<td>505 VAN NESS AVENUE</td>
</tr>
<tr>
<td>505 VAN NESS AVENUE</td>
<td>505 VAN NESS AVENUE</td>
</tr>
</tbody>
</table>
List of Non-Email Recipients

MEGAN MATSON PARTNER
TABLE ROCK CAPITAL
Table Rock Capital
150 CALIFORNIA ST., STE. 600
SAN FRANCISCO CA 94111