BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Authorization of a
Non-Bypassable Charge to Support
California’s Wildfire Fund.

Rulemaking 19-07-017

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON
PROPOSED DECISION APPROVING IMPOSITION OF A NON-BYPASSABLE
CHARGE TO SUPPORT CALIFORNIA'S WILDFIRE FUND AND ADOPTING RATE
AGREEMENT BETWEEN THE CALIFORNIA DEPARTMENT OF WATER
RESOURCES AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION

FADIA RAFEEDIE KHOURY
GARY Y. CHEN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-7214
E-mail: Gary.Chen@sce.com

Dated: October 21, 2019
SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON PROPOSED DECISION APPROVING IMPOSITION OF A NON-BYPASSABLE CHARGE TO SUPPORT CALIFORNIA'S WILDFIRE FUND AND ADOPTING RATE AGREEMENT BETWEEN THE CALIFORNIA DEPARTMENT OF WATER RESOURCES AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION

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AGREEMENT BETWEEN THE CALIFORNIA DEPARTMENT OF WATER
RESOURCES AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (Commission)
Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully
submits these reply comments on the Proposed Decision Approving Imposition of a Non-
Bypassable Charge (NBC) to Support California’s Wildfire Fund and Adopting Rate Agreement
Between the California Department of Water Resources and the California Public Utilities
Commission, dated September 23, 2019 (PD).

I.

REPLY COMMENTS

A. The PD Should Not Be Revised to Address Issues Outside the Scope of this

   Proceeding

   Several intervenors assert that the Commission should at this time determine certain
aspects of AB 1054 beyond the non-bypassable charge (NBC). For example, The Utility Reform
Network (TURN) and the California Large Energy Consumers Association (CLECA) both argue
that the Commission should alter the PD to specify that the financing or capital costs associated with shareholder contributions should not be recovered from ratepayers.¹ TURN also asks that the state tax deduction resulting from the shareholder contribution to the Wildfire Fund should result in a revenue requirement reduction.² Such issues are clearly outside the well-established scope of this proceeding. TURN even acknowledges that “the scope does not expressly include shareholder contributions to the Wildfire Fund[].”³ While the fact of the shareholder contributions to the Wildfire Fund was a part of the PD, issues emanating from the shareholder contributions were not among the issues listed in the Assigned Commissioner’s Scoping Memo and Ruling. Raising an issue such as the tax implications of the shareholders’ contribution to the Wildfire Fund at such a late stage of the proceeding does not allow for proper consideration of a complex issue. Even if the Commission were to consider the tax issue at this time, precedent weighs in favor of NOT using any tax deduction resulting from the shareholder contribution to reduce the revenue requirement.⁴

II.

CONCLUSION

SCE appreciates the opportunity to provide reply comments on the PD and for the Commission’s prompt attention to this proceeding. The PD indicates that this Rulemaking will remain open to address the annual revenue requirement and sales forecast for the NBC in 2020. Following prompt issuance of a decision on the limited issues before the Commission in this phase of the proceeding, SCE looks forward to working with the Assigned Commissioner, Assigned ALJ and interested parties to address those issues as well as any appropriate additional

¹ See TURN’s Opening Comments on PD at p. 4 and CLECA’s Opening Comments on PD at p. 3.
² See TURN’s Opening Comments on PD at p. 4.
³ Id. at p. 3.
⁴ See, e.g. Re Income Tax Expense for Ratemaking Purposes, D.84-05-036 at Section III.D (if ratepayers do not have to contribute to elective expenses, shareholders are entitled to the benefit of the lower income tax resulting from the deduction of those expenses). See also Resolution E-4965, Finding of Fact No. 2, p. 9 (tax effects occurring outside of ratemaking should be recognized outside of ratemaking).
AB 1054 implementation issues. However, resolution of whether or not establishment of the NBC is just and reasonable must not be delayed in order to eliminate the uncertainty of potential credit downgrades and to allow the utilities to continue to invest in infrastructure to improve system safety, reliability and resiliency and to expand opportunities for efficient electrification of the transportation and building sectors. SCE urges the Commission to approve a Final Decision at the October 24, 2019 Voting Meeting without modifying the PD to address issues clearly outside the scope of this proceeding.

Respectfully submitted,

FADIA RAFEEDIE KHOURY
GARY Y. CHEN

/s/ Gary Y. Chen
By: Gary Y. Chen
Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-7214
E-mail: Gary.Chen@sce.com

October 21, 2019
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Authorization of a
Non-Bypassable Charge to Support
California’s Wildfire Fund. Rulemaking No. 19-07-017

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)
REPLY COMMENTS ON PROPOSED DECISION APPROVING IMPOSITION OF A
NON-BYPASSABLE CHARGE TO SUPPORT CALIFORNIA’S WILDFIRE FUND AND
ADOPTING RATE AGREEMENT BETWEEN THE CALIFORNIA DEPARTMENT OF
WATER RESOURCES AND THE CALIFORNIA PUBLIC UTILITIES COMMISSION
on all parties identified on the attached service list for R.19-07-017. Service was effected by
transmitting copies via e-mail to all parties who have provided an e-mail address and by placing
copies in sealed envelopes and causing such envelopes to be delivered via United States mail
with first-class postage prepaid to the offices of the Assigned ALJ or other addressee(s).

ALJ Patrick Doherty
California Public Utilities Commission
Administrative Law Judge Division
505 Van Ness Avenue, Room 5044
San Francisco, CA  94102-3214

Executed on October 21, 2019, at Rosemead, California.

/s/ Olivia Gutierrez
Olivia Gutierrez
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
# CALIFORNIA PUBLIC UTILITIES COMMISSION

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## Parties

<table>
<thead>
<tr>
<th>Attorneys</th>
<th>Firms</th>
</tr>
</thead>
<tbody>
<tr>
<td>SHARON YANG</td>
<td>FRED G. YANNEY</td>
</tr>
<tr>
<td>DIRECTOR OF LEGAL SERVICES</td>
<td>YANNEY LAW OFFICE</td>
</tr>
<tr>
<td>LIBERTY UTILITIES (WEST REGION)</td>
<td>17409 MARQUARDT AVE. UNIT C-4</td>
</tr>
<tr>
<td>DOWNEY, CA 90241</td>
<td>CERRITOS, CA 90703</td>
</tr>
<tr>
<td>FOR: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC</td>
<td>FOR: GOLDEN STATE WATER COMPANY</td>
</tr>
<tr>
<td>GARY CHEN</td>
<td>RONALD MOORE</td>
</tr>
<tr>
<td>ATTORNEY</td>
<td>SR ANALYST, REGULATORY AFFAIRS</td>
</tr>
<tr>
<td>SOUTHERN CALIFORNIA EDISON COMPANY</td>
<td>BEAR VALLEY ELECTRIC SERVICE</td>
</tr>
<tr>
<td>2244 WALNUT GROVE AVENUE, PO BOX 800</td>
<td>630 EAST FOOTHILL BOULEVARD</td>
</tr>
<tr>
<td>ROSEMEAD, CA 91770</td>
<td>SAN DIMAS, CA 91773</td>
</tr>
<tr>
<td>FOR: SOUTHERN CALIFORNIA EDISON COMPANY</td>
<td>FOR: BEAR VALLEY ELECTRIC SERVICE, A DIVISION OF GOLDEN STATE WATER COMPANY (BEAR VALLEY)</td>
</tr>
<tr>
<td>MARIA C. SEVERSON, ESQ.</td>
<td>MICHAEL J. AGUIRRE, ESQ.</td>
</tr>
<tr>
<td>ATTORNEY</td>
<td>ATTORNEY</td>
</tr>
<tr>
<td>AGUIRRE &amp; SEVERSON LLP</td>
<td>AGUIRRE &amp; SEVERSON LLP</td>
</tr>
<tr>
<td>501 WEST BROADWAY, STE. 1050</td>
<td>501 W. BROADWAY, STE. 1050</td>
</tr>
<tr>
<td>SAN DIEGO, CA 92101-3591</td>
<td>SAN DIEGO, CA 92101-3591</td>
</tr>
<tr>
<td>FOR: RUTH HENRICKS</td>
<td>FOR: RUTH HENRICKS</td>
</tr>
<tr>
<td>EDWARD LOPEZ</td>
<td>CHRISTOPHER M. LYONS</td>
</tr>
<tr>
<td>EXECUTIVE DIR</td>
<td>SR. COUNSEL</td>
</tr>
<tr>
<td>UTILITY CONSUMERS@ACTION NETWORK</td>
<td>SAN DIEGO GAS &amp; ELECTRIC COMPANY</td>
</tr>
<tr>
<td>3405 KENYON ST. SUITE 401</td>
<td>8326 CENTURY PARK COURT, CP32D</td>
</tr>
</tbody>
</table>
WALNUT CREEK, CA  94597
FOR: WILD TREE FOUNDATION

BERKELEY, CA  94703
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY

JULIA A. LEVIN
EXECUTIVE DIR.
BIOENERGY ASSOCIATION OF CALIFORNIA
PO BOX 6184
ALBANY, CA  94706
FOR: BIOENERGY ASSOCIATION OF CALIFORNIA

WILLIAM B. ABRAMS
COMMUNITY ADVOCATE
1519 BRANCH OWL PLACE
SANTA ROSA, CA  95409
FOR: WILLIAM ABRAMS

JOSH STOOPS
ATTORNEY
BRAUN BLAISING SMITH WYNNE, PC
915 L STREET, SUITE 1480
SACRAMENTO, CA  95814
FOR: CALIFORNIA CHOICE ENERGY AUTHORITY
/ PIONEER COMMUNITY ENERGY / SILICON
VALLEY CLEAN ENERGY AUTHORITY

SCOTT BLAISING
COUNSEL
BRAUN BLAISING SMITH WYNNE P.C.
915 L STREET, SUITE 1480
SACRAMENTO, CA  95814
FOR: REDWOOD COAST ENERGY AUTHORITY / MONTEREY BAY COMMUNITY POWER AUTHORITY / SONOMA CLEAN POWER AUTHORITY / MARIN CLEAN ENERGY

RONDAL LIEBERT
ATTORNEY AT LAW
ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA  95816
FOR: CALIFORNIA MANUFACTURERS OF TECHNOLOGY ASSN.

ANDREW B. BROWN
ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVE, SUITE 400
SACRAMENTO, CA  95816-5931
FOR: INSTITUTIONAL EQUITY INVESTORS

KAREN NORENE MILLS
ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2600 RIVER PLAZA DRIVE
SACRAMENTO, CA  95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

DANIEL MARSH
MGR - RATES & REGULATORY AFFAIRS
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
933 ELOISE AVENUE
SOUTH LAKE TAHOE, CA  96150
FOR: LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

CARLA SCARSELLA
SENIOR ATTORNEY - REGULATORY
PACIFICORP
825 NE MULTNOMAH ST, STE 2000
PORTLAND, OR  97232
FOR: PACIFICORP

POOJA KISHORE
MGR - REGULATORY AFFAIRS
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 2000
PORTLAND, OR  97232
FOR: PACIFIC POWER, A DIVISION OF PACIFICORP (PACIFICORP)

Information Only

ANNA FERO
DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA  00000

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

CHRISTOPHER WARNER
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY

ESTHER NORTHRUP
COX CALIFORNIA TELCOM, LLC
EMAIL ONLY

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10/21/2019
EMAIL ONLY, CA  00000

FRANZ CHENG
CPUC - ENERGY
EMAIL ONLY
EMAIL ONLY, CA  00000

JESSE CASON, JR.
SR ENGINEER, ENERGY RESOURCES SCHEDULING
CA DEPARTMENT OF WATER RESOURCES
EMAIL ONLY
EMAIL ONLY, CA  00000

JOHN PACHECO
EXECUTIVES
CALIFORNIA DEPARTMENT OF WATER RESOURCES
EMAIL ONLY
EMAIL ONLY, CA  00000

KIMBERLY CHANG
PORTFOLIO MGNT
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA  00000

LAURA GENAO
MANAGING DIR, REGULATORY AFFAIRS
SOUTHERN CALIFORNIA EDISON COMPANY
EMAIL ONLY
EMAIL ONLY, CA  00000

MICHAEL CONKLIN
CPUC - ENERGY
EMAIL ONLY
EMAIL ONLY, CA  00000

SAMANTHA PATE
SAN DIEGO GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA  00000

SUSIE BERLIN
ATTORNEY AT LAW
LAW OFFICES OF SUSIE BERLIN
EMAIL ONLY
EMAIL ONLY, CA  00000

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

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA  00000

EDWIN GUYANDI
ANALYST
NEWTYN MANAGEMENT
405 PARK AVENUE, SUITE 1104
NEW YORK, NY  10022

BLAKE ELDER
POLICY RESEARCH ANALYST
EQ RESEARCH LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC  27511

TRACY DAVIS
HORIZON WEST TRANSMISSION, LLC
5920 WEST WILLIAM CANNON DR., BLDG 2
AUSTIN, TX  78749

CC SONG
DIRECTOR OF REGULATORY POLICY
CLEAN POWER ALLIANCE
555 W. 5TH STREET, 35TH FLOOR
LOS ANGELES, CA  90013

CHRIS STEPHENS
PARALEGAL / EXE. ASSIST
CLEAN POWER ALLIANCE OF SO. CALIF.
555 WEST 5TH STREET, 35TH FL.
LOS ANGELES, CA  90013

GINA GOODHILL
POLICY DIRECTOR
CLEAN POWER ALLIANCE
555 WEST 5TH STREET, 35TH FLOOR
LOS ANGELES, CA  90013

JERRY R. BLOOM
ATTORNEY
BAKER & HOSTETLER LLP
11601 WILSHIRE BLVD., STE. 1400

DANIEL W. DOUGLASS
ATTORNEY
DOUGLASS & LIDDELL
4766 PARK GRANADA, SUITE 209

https://ia.cpuc.ca.gov/servicelists/R1907017_87017.htm
LOS ANGELES, CA  90025
FOR: DIRECT ACCESS CUSTOMER COALITION

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

COOPER CAMERON
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA  91770

GARY STERN
MANAGING DIR.
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA  91770

NGUYEN QUAN
REGULATORY AFFAIRS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA  91773

KEITH SWITZER
MANAGER - TARIFFS & SPECIAL PROJECTS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA  91773-9016
FOR: GOLDEN STATE WATER COMPANY

MARIA BYRNES
LEGAL ASSISTANT
AGUIRRE & SEVERSON LLP
501 WEST BROADWAY, STE. 1050
SAN DIEGO, CA  92101

DONALD C. LIDDELL
ATTORNEY
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA  92103

JOHN W. LESLIE, ESQ.
ATTORNEY
DENTONS US LLP
4655 EXECUTIVE DRIVE, STE. 700
SAN DIEGO, CA  92121

CLAY FABER
DIR. CA & FEDERAL REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32F
SAN DIEGO, CA  92123
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

KIRSTIE C. RAAGAS
MGR - REGULATORY
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32F
SAN DIEGO, CA  92123

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA  92123-1530

PAUL MARCONI
DIR
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE / PO BOX 1547
BIG BEAR LAKE, CA  92315
FOR: GOLDEN STATE WATER COMPANY

SUE MARA
CONSULTANT
RTO ADVISORS, L.L.C.
164 SPRINGDALE WAY
REDWOOD CITY, CA  94062

ILANA FARMER MANDELBAUM
DEPUTY COUNTY COUNSEL
SAN MATEO COUNTY COUNSEL'S OFFICE
400 COUNTY CENTER, 6TH FLOOR
REDWOOD CITY, CA  94063

AMY C. YIP-KIKUGAWA
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214
FOR: PUBLIC ADVOCATES OFFICE

ARTHUR FISHER
CALIF PUBLIC UTILITIES COMMISSION
SAFETY BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214

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10/21/2019
SAN FRANCISCO, CA  94105
55 SECOND STREET, SUITE 1700
SAN FRANCISCO, CA  94105

RANDALL J. LITTENEKER, ESQ.
ATTORNEY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B30A / PO BOX 7442
SAN FRANCISCO, CA  94105

KARI CAMERON
LEGAL ADMIN.
BUCHALTER
55 SECOND STREET, STE. 1700
SAN FRANCISCO, CA  94105-3493

LILLIAN RAFII
ATTORNEY
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND STREET, STE. 1700
SAN FRANCISCO, CA  94105-3493

ANDY UMANA
SENIOR PARALEGAL
AT&T SERVICE
430 BUSH STREET, ROOM 321
SAN FRANCISCO, CA  94108

DAVID MILLER
SENIOR LEGAL COUNSEL
AT&T SERVICES, INC.
430 BUSH STREET, 3RD FLOOR
SAN FRANCISCO, CA  94108

WALID ABDUL-RAHIM
AVP - SR. LEGAL COUNSEL
AT&T SERVICES, INC.
430 BUSH STREET, ROOM 308
SAN FRANCISCO, CA  94108

ANNA FERO
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

BRIAN T. CRAGG
ATTORNEY
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY,
505 SANSOME ST., STE 900
SAN FRANCISCO, CA  94111

I ASHE
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, STE. 2800
SAN FRANCISCO, CA  94111

I SULTAN
ASSOCIATE
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE. 800
SAN FRANCISCO, CA  94111

KELCIE ABRAHAM
BCG
2 EMBARCADERO CENTER SUITE 24
SF, CA  94111

MARJORY FINN
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, STE 800
SAN FRANCISCO, CA  94111

PATRICK FERGUSON
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

TARA KAUSHIK
PARTNER
HOLLAND & KNIGHT LLP
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA  94111

VIDHYA PRABHAKARAN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

VIDHYA PRABHAKARAN
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET STE 800
SF, CA  94111

STEVEN F. GREENWALD
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA  94111

ALLIE DETRIO
REIMAGINE POWER
77 SALA TERRACE
<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Company/Association</th>
<th>Address</th>
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<tr>
<td>LENNEAL GARDNER</td>
<td>CASE ADMINISTRATION</td>
<td>PACIFIC GAS AND ELECTRIC COMPANY</td>
<td>trans bay cable LLC, one letterman dr. bldg. c, 5th fl., san francisco, ca, 94129</td>
<td>san francisco, ca, 94112</td>
</tr>
<tr>
<td>BRIAN GRUBBS</td>
<td>ADVISORS</td>
<td>MONTAGUE DEROSE AND ASSOCIATES, LLC</td>
<td>one letterman dr. bldg. c, 5th fl., san francisco, ca, 94129</td>
<td>walnut creek, ca, 94596</td>
</tr>
<tr>
<td>THOMAS DEL MONTE</td>
<td>RACHEL BIRD</td>
<td>BORREGO SOLAR</td>
<td>law office of thomas r. del monte, 1555 botelho drive, no.172, walnut creek, ca, 94596</td>
<td>oakland, ca, 94612</td>
</tr>
<tr>
<td>SHERIDAN PAUKER</td>
<td>TIM LINDL</td>
<td>KEYES &amp; FOX LLP</td>
<td>keyes &amp; fox llp, 436 14th street, suite 1305, oakland, ca, 94612</td>
<td>oakland, ca, 94612</td>
</tr>
<tr>
<td>ADRIAN SLIPSKI</td>
<td>MIKE CALLAHAN</td>
<td>MARIN CLEAN ENERGY</td>
<td>center for accessible technology, 3075 adelaine street, suite 220, berkeley, ca, 94703</td>
<td>san rafael, ca, 94901</td>
</tr>
<tr>
<td>BETH OLHASSO</td>
<td>ELIZABETH BOJORQUEZ</td>
<td>CA CABLE &amp; TELECOMMUNICATIONS ASS'N</td>
<td>agricultural energy consumers ass, 925 l street, suite 800, sacramento, ca, 95814</td>
<td>sacramento, ca, 95814</td>
</tr>
<tr>
<td>JACKIE KINNEY</td>
<td>LAURA FERNANDEZ</td>
<td>BRAUN BLAISING SMITH WYNNE, P.C.</td>
<td>sr vp &amp; general counsel, ca cable &amp; telecommunications ass'n, 1001 k street, 2nd floor, sacramento, ca, 95814</td>
<td>sacramento, ca, 95814</td>
</tr>
<tr>
<td>LAURA FERNANDEZ</td>
<td>ATTORNEY</td>
<td>STATE SENATOR JERRY HILL</td>
<td>attorney, braun blaising smith wynne, p.c., 915 l street, suite 1480, sacramento, ca, 95814</td>
<td>sacramento, ca, 95814</td>
</tr>
</tbody>
</table>
REGULATORY CLERK                          JEROME F. CANDELARIA
BRAUN BLAISING SMITH WYNNE, PC            CALIFORNIA CABLE TV ASSOCIATION
915 L STREET, STE. 1480                   1001 K STREET, 2ND FLOOR
SACRAMENTO, CA  95814                     SACRAMENTO, CA  95814-3832

JEDEDIAH J. GIBSON                        JEFFERY D. HARRIS
ATTORNEY                                  ATTORNEY
ELLISON, SCHNEIDER & HARRIS, L.L.P.       ELLISON SCHNEIDER HARRIS & DONLAN LLP
2600 CAPITOL AVENUE, SUITE 400            2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA  95816                     SACRAMENTO, CA  95816

SAMANTHA G. NEUMYER                       LYNN M. HAUG
ELLISON SCHNEIDER HARRIS & DONLAN LLP     ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVE., STE. 400               2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA  95816                     SACRAMENTO, CA  95816-5905

ANN L. TROWBRIDGE
ATTORNEY
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DR., STE. 205
SACRAMENTO, CA  95864

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