

Comments of Quality Conservation Services On Administrative Structures for Energy Efficiency

**Prepared by:
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Quality Conservation Services, Inc. (“QCS”), an energy efficiency service provider specializing in residential, low income and small commercial installations, has been providing EE services in California for the past five years. QCS has not been a third party or a “non-Utility” implementer, nor have we submitted any proposal for the Commission’s consideration in either of the 2002-03 or the 2004-05 solicitations. We have acted as subcontractor or contractor for several Utility and non-Utility programs, operating in the service areas of all four major California utilities. Therefore, we feel we have no vested or pre-determined interests in supporting any single type of program. In fact, we hope to continue our activities in the future providing energy efficiency services in California under whatever administrative structure is selected.

However, QCS has been a third party program sponsor/implementer under the “Standard Offer Program” administrative structure in Texas for the past four years (2001-2004) since it was initiated. QCS has been an implementer/sponsor under all three major Standard Offers (Large C&I, Residential/Small Commercial, and HTR). We present the following analysis of the Texas Standard Offer Program as a resource for anyone evaluating that system for potential use in California.

In the interest of full disclosure, we are aware that the California Coalition for Energy Efficiency (CCEE) has recommended this general approach as the administrative model for California. Having the experience with this procedure as well as other types of administrative structure in California and elsewhere, Quality Conservation Services supports the Standard Offer approach to EE administration as providing the best combination of features. Nevertheless, we feel that the following description is an accurate and unbiased summary of the Texas Standard

Offer Program and its implications if adopted for California (\$2.3+ billion in benefits, providing 1.34 million kilowatts and 4.5 billion kwh in annual savings).

Our discussion is divided into the following general categories:

THE 2003 STANDARD OFFER PROGRAM IN TEXAS

The Large Commercial & Industrial SOP

The Residential and Small Commercial SOP

The Hard-to-Reach SOP

The Not-For-Profit SOP

The Load Management SOP

STANDARD OFFER PROGRAMS VERY COST-EFFECTIVE

FUNDING, BENEFITS ALLOCATED AMONG CUSTOMER CLASSES

ADMINISTRATION, OVERHEADS CAPPED AT 10%

LARGE NUMBER OF IMPLEMENTERS ENCOURAGED

MODIFIED MARKET TRANSFORMATION PROGRAMS ALLOWED

OTHER FEATURES AND CONSIDERATIONS

Eliminates Conflicts of Interest, Even With IOU Administration.

Breadth of Technologies.

Lighting Limits

Customer Co-Payments Encouraged

CALIFORNIA RESULTS FROM TEXAS-STYLE STANDARD OFFER PROGRAM

THE 2003 STANDARD OFFER PROGRAM IN TEXAS

In Texas, eight investor own utilities (IOUs) are covered by regulations mandating the standard offer programs to achieve energy efficiency. The Commission approves templates for the various SOPs, but the utility-administrators annually decide which to implement and what the budgets for each should be. The IOUs may also request any special pilots or special considerations. Annually, the IOUs must also report on the prior year program. All of these plans and reports are submitted by each IOU on or before April 1st of each year and are subject to

Commission review and approval. However, the IOUs are precluded from implementing any of the programs they administer, although they can participate in another service area where they are not administrators.

Unless otherwise indicated, all of the data contained in this analysis is taken from the publicly available 2003 reports and plans submitted to the Public Utilities Commission of Texas (PUCT) by each of the Texas IOUs on or before April 1, 2004 in the PUCT's docket No. 29940.

In 2003, there were 31 approved SOPs with an initial budget of about \$48 million. Within each SOP, there are normally numerous contractor/implementers, chosen on a first-come, first-served basis as long as there are funds available. Since no one sponsor could have more than 20%, there are a minimum of 5 and sometimes 30+ implementers. Subject to PUCT approval, budgets can be (and were) shifted during the year. There were five types of SOPs used.

Texas Standard Offer Programs	2003 Budget	Host Utility Administrators
LG COM & IND	\$22,358,694	8
RES/SM COM	14,786,422	8
HTR-RES	9,489,679	10
N-F-P	600,000	3
LD MGT	533,404	2
All SOPs	\$47,768,199	31

The **Large Commercial & Industrial SOP** for non-residential customers with at least 100 kW Peak demand was implemented by all IOUs. Implementer funds are capped at 35% of Texas' ten-year avoided cost savings achieved. This SOP failed to hit its targets, primarily because the largest IOU (Oncor, formerly Texas Utilities) achieved only about half of its savings and participation targets. This may have been an anomaly in that Oncor had come close or exceeded to its C&I goals in the two prior years.

A combination **Residential and Small Commercial SOP** was implemented by all eight IOUs. In prior years, several IOUs had used separate residential and small commercial programs. Implementer funds for each or both are capped at 50% of Texas' ten-year avoided cost savings achieved. This SOP achieved its kwh and kW savings targets.

The **Hard-to-Reach SOP** was implemented by all eight IOUs. The PUCT allows several variations on the HTR, which in some cases allows it to be more closely coordinated with the Residential SOP. Two of the IOUs elected to use two different HTR SOPs to reach this group, hence there are ten HTR SOPs although there are only eight IOUs. Implementer budgets are capped at 90% of avoided costs savings achieved¹. HTR is defined solely as a customer which is shown to have an income below 200% of the Federal Poverty Guidelines.

The **Not-For-Profit SOP** was a pilot effort implemented in 2003 by three small IOUs under a special settlement agreement. The Implementer budgets were not capped by any avoided cost consideration nor were they required to be cost-effective. The targets were specific Not-for-Profit organizations within their service areas and not generally open to third parties. This is not expected to be replicated in future years in Texas, unless the budgets are capped and the program opened to wider participation.

The **Load Management SOP** was implemented by two of the IOUs. Its goals are comparable to the demand response programs in California. Implementer budgets are capped at 15% of avoided cost savings achieved. Only one of the two programs achieved any savings, and even that one had high administrative costs to achieve this.

STANDARD OFFER PROGRAMS VERY COST-EFFECTIVE

The SOP program costs are capped by regulation at a fixed percentage of the ten year-avoided costs, with the maximum percentage varying by type of program. In Texas, the

¹ Technically, 100% is allowed, but a 10% administrative budget for the Administrator is required to fit under the avoided cost cap, so in practice 90% is the maximum.

maximum caps are set at 15% for load management programs, at 35% for large commercial and industrial programs (over 100 KW demand customers), at 50% for small commercial (under 100 kW demand), at 50% for residential customers, and at 90% for Hard-To-Reach (under 200% of poverty guideline).

There are also adders allowed to be used, with the most important being a 20% air pollution adder for selected regions. To date, no administrator (utility) has sought to use any such adders.

The avoided costs are set statewide by the Commission, which also sets an inflator and a present value discount rate, to be used for purpose of setting incentives. The avoided costs and the incentives are set separately for energy (kilowatt hours) and for demand (peak kilowatts)². The Texas avoided costs are much lower than those which have been used in California. To make this comparable, we have recalculated the Texas results using California avoided costs as included in the Commission’s proposal worksheets prepared in 2003 by the Energy Division for 2004-2005 implementation:

Texas Standard Offer Programs	2003 Costs Expended	Avoided Costs (CA)	% of CA Av. Costs	Ben/Cost Ratio
LG COM & IND	\$12,510,731	\$70,712,903	17.7%	5.65
RES/SM COM	16,621,743	44,528,012	37.3%	2.68
HTR-RES	11,822,777	22,863,142	51.7%	1.93
N-F-P³	872,083	144,921	601.8%	0.17
LD MGT⁴	238,363	NA	NA	NA
All SOPs	\$42,065,697	\$138,248,978	30.4%	3.29

² In Texas, only electric IOUs are required to participate. To date, no gas utilities and no municipal utilities have elected to participate in the Texas programs.

³ The Not-For-Profit SOP was a negotiated small pilot effort which did not have a pre-set incentives cap.

⁴ The California Avoided Cost Table used did not separate out demand only avoided costs, but wrapped both energy and demand into a single per kwh value. However, the Load Management SOP saves only demand, for which there is no California Avoided Cost value.

Thus, the Benefit-Cost Ratio for the Texas SOP programs, using California avoided costs, average about 3.29, equal to about 30% of avoided costs.

This is a conservative estimate. The Texas program requires all measures to have an effective useful life (EUL) of no less than 10 years, but does not count any savings beyond ten years. Therefore, the actual savings may have an average life of several years greater. However, the above listed values assume an EUL of only ten years.

FUNDING, BENEFITS ALLOCATED AMONG CUSTOMER CLASSES

The PUCT controls the amount of funding which goes to any type of customer by the funding allocated to each type of SOP. A budget is approved at the start of each year through a “Plan” submitted the prior April identifying the types of SOPs to be used, the funding proposed for each and the projected savings benefits to be realized. During the year, the IOU administrator may shift funds to reflect greater or lesser needs or demand, subject to the approval of the Texas Commission. The following was the initial approved budgets and the amount that was actually expended:

Texas Standard Offer Programs	2003 Budget	% Budget Category	2003 Actual	% Actual by Category	% Budget Expended
LG COM & IND	\$22,358,694	47%	\$12,510,731	30%	56%
RES/SM COM	14,786,422	31%	16,621,743	40%	112%
HTR-RES	9,489,679	20%	11,822,777	28%	125%
N-F-P	600,000	1%	872,083	2%	145%
LD MGT	533,404	1%	238,363	1%	45%
All SOPs	\$47,768,199	100%	\$42,065,697	100%	88%

As can be seen, the Large C&I program started with 47% of the budgets, but wound up using only 56% of this level. During the year, a number of administrators were allowed to shift funds (a total of about \$4.2 million) from the under used Large C&I to meet the greater demand for the HTR programs and the Residential/Small Commercial programs. Overall, about 12% of the total SOP funds were undersubscribed. However, virtually all of these were due to the

somewhat cyclical Large C&I program. The HTR and Residential/Small Commercial programs were well oversubscribed.

Texas Standard Offer Programs	2003 Budget	2003 Expended	2003 Uncommitted	% Uncomm of Total
LG COM & IND	\$22,358,694	\$12,510,731	\$9,847,963	44.0%
RES/SM COM	\$14,786,422	16,621,743	(\$1,835,321)	-12.4%
HTR-RES	\$9,489,679	11,822,777	(\$2,333,098)	-24.6%
N-F-P	\$600,000	872,083	(\$272,083)	-45.3%
LD MGT	\$533,404	238,363	\$295,041	55.3%
All SOPs	\$47,768,199	\$42,065,697	\$5,702,502	11.9%

Because the amount expended is proportionate to the benefits realized, it is straightforward to assure that each major class receives the proper savings benefits. For example, the following is the split by kW savings and by kWh savings, showing an approximate 50%-50% split between Large C&I (including Load Mgt) and smaller Res/SmComm customers (including HTR and N-F-P) programs:

Texas Standard Offer Programs	2003 KW Actual	% MW Achieved	2003 MWH Actual	% KWH Achieved
LG COM & IND	33,292	41%	141,425,806	51%
RES/SM COM	24,247	30%	89,056,023	32%
HTR-RES	10,623	13%	45,726,284	17%
N-F-P	85	0%	289,842	0%
LD MGT	13,129	16%	0	0%
All SOPs	81,375	100%	276,497,955	100%

The avoided cost benefits are also proportionately split. Using California avoided cost values, Large C&I received \$70.7 million in benefits while the smaller customers received \$67.5 million in benefits, a reasonable 51%-49% split in benefits.

Texas Standard Offer Programs	Avoided Costs (CA)	% of Av.Cost Benefits Achieved
LG COM & IND	\$70,712,903	51.1%

RES/SM COM	44,528,012	32.2%
HTR-RES	22,863,142	16.5%
N-F-P	144,921	0.1%
LD MGT	NA	NA
All SOPs	\$138,248,978	100.0%

ADMINISTRATION, OVERHEADS CAPPED AT 10%

One of the primary reasons that the Texas SOP efforts are so cost-effective is the emphasis they have placed on producing savings while minimizing overhead and administrative costs. By regulatory rule, administration may not exceed 10% of the budget. While enforcement for individual programs or for individual utilities are sporadic, most utilities and most programs make a strong effort to stay within these requirements.

In 2003, the thirty-one Standard Offer Programs averaged 9.6% “administrative” costs.

Texas Standard Offer Programs	2003 Actual	2003 Admin	% Admin of Total
LG COM & IND	\$12,510,731	\$1,501,699	12.0%
RES/SM COM	16,621,743	1,223,831	7.4%
HTR-RES	11,822,777	1,147,049	9.7%
N-F-P	872,083	96,353	11.0%
LD MGT	238,363	63,686	26.7%
All SOPs	\$42,065,697	\$4,032,618	9.6%

The SOPs with significantly greater administrative costs were the first year Pilot Load Management SOP, which was being tested in two utilities, one of which had no takers (resulting in 100% administration) and the other which had high start-up costs. The reason for the Large C&I SOP going over the 10% mark was that the program itself was seriously undersubscribed in 2003 and the administrative costs were not reduced sufficiently to reflect this lower activity level.

The SOPs that met the 10% mark were the customer types, which are normally considered to have the highest administrative cost needs: Hard-To-Reach, Residential and Small Commercial.

In Texas, “Administration” includes a wider variety of overhead costs than in California. These include all of the costs that the “Administrator” must bear. In addition to the standard “administrative” costs, these also include all inspections, all EM&V, all costs for determining deemed savings and measure lives, all Implementer solicitation and enrollment, etc. Not included are any costs for marketing and outreach, which is the sole responsibility of the Implementer. Administrators are not allowed to assist in any customer marketing effort.

Also not included is any generic overarching information program, such as California’s “Flex Your Power.” This may well be a shortcoming of the Texas program and we would recommend California continue a statewide information effort in combination with the Standard Offer Programs.

There are no provisions to cover the administrative costs of individual contractors (Implementers). Such costs must be covered by the Implementer/contractors, much as contractors who participate in California rebate programs must cover their own administrative costs. This also has the impact of reducing the costs for the Administrators who do not have to track contractor costs, only their savings results.

LARGE NUMBER OF IMPLEMENTERS ENCOURAGED

In a very successful effort to encourage a large number of implementers, rather than a single winner take all, the Texas Standard Offer Program features three important considerations: (a) qualified proposals are accepted on a first-come, first served basis, (b) a requirement that no single implementer can ever have more than 20% of any Standard Offer Program, and (c) provisions are made to encourage first time and smaller project proposals.

While the IOU-administrators are not required to provide the number or identity of SOP implementers, five have done so, at least in part. For example, CenterPoint Energy (formerly known as Houston Lighting and Power), which has a typically sized program (16.5% of the state total, slightly above average for the eight utilities), currently lists on its website 21 different Sponsor/Implementers in its Residential and Small Commercial SOP and 29 different Sponsor/Implementers in its HTR SOP for 2004⁵.

The following is a breakdown of the five IOU Administrators that did provide listings for 2004 to date. These include two medium sized utilities and three small utilities. All have a very active participation level, even the smallest. These five collectively show nearly 200 different Sponsor/Implementers for a total program. Extrapolating these five to the entire state, we project there could be as many as 300 to 350 Sponsor/Implementers to date.

Texas Standard Offer Programs	CenterPoint Energy	Central Power & L	SWEPCO	West Texas Util	Xcel Energy	Total Listed
Portion of Total	16.6%	16.4%	3.9%	3.8%	2.1%	42.8%
LG COM & IND	Not Listed	8	3	3	9	23
RES/SM COM	21	35	7	22	15	100
HTR-RES	29	15	6	12	12	74
All SOPs	50	58	16	37	36	197

By comparison, for its 2004 program, California secured only about 170 Sponsor/Implementers total statewide in an effort many times larger.

Furthermore, innovation and new participants are strongly encouraged. The applications are greatly simplified and the only requirements are the correct licenses, appropriate insurance, and evidence of financial security. To assure that the money is not held by unsuccessful projects, performance deposits are required (normally 5% of amounts reserved) and the reservations are limited or have serious milestone requirements. Since payments are made only if actual savings are demonstrated, an incompetent organization with an unsuccessful program cannot receive ratepayer funds. Therefore, the project implementer is taking all of the risks, not the ratepayers.

⁵ CenterPoint actually reports 37 HTR SOP program sponsors, but 8 of these are duplicate Sponsors.

Because of this, the Standard offer Program can “afford” to allow a wide variety of sponsors to participate and see if they are successful in delivering energy savings.

MODIFIED MARKET TRANSFORMATION PROGRAMS ALLOWED

The Texas model allows for the use of targeted market transformation (MT) programs, administered, but not implemented, by the IOUs. IOU administrative costs are also capped at 10% and must meet the cost-effectiveness guidelines for that customer class. The primary differences are (a) the Implementer(s) may be chosen by competitive bidding or other procedure rather than first come, first-served, (b) the MT programs are limited to the specifics allowed under the program, rather than being open to all technologies, and (c) while the program overall must be cost-effective, the payouts do not have to be proportion to actual energy savings. The Texas Commission must approve the program for statewide implementation prior to any IOU adapting it.

In 2003, there were two MT programs being implemented: an Energy Star Residential New Construction Program sponsored by four of the eight utilities, and an Energy Star Air Conditioning Program being implemented by three of the eight utilities.

The Energy Star New Construction program was overall cost-effective and successful, far exceeding its participation and peak demand targets, while its kwh savings target was 76% of goal. The Energy Star Air Conditioning program was cost-effective but somewhat less successful, being 6% below goal for its demand reduction and far below (by 60%) in kWh savings and in overall participation (38%). Part of the reason was that many of the A/C contractors preferred the increased flexibility and openness of the standard offer programs.

OTHER FEATURES AND CONSIDERATIONS

Eliminates Conflicts of Interest, Even With IOU Administration. While we believe that the program would be better off without Utility administration due to conflicts of financial and cultural interests, the Standard Offer Program has done much to eliminate such conflicts

while keeping the IOUs as administrators. The IOU-Administrators are responsible for verification of and inspection of installations and of administering contracts and payments. The IOUs are not involved in selecting the programs or the implementers/sponsors, therefore they cannot influence these. Moreover, since the programs receive ratepayer funds only if and to the extent and in proportion to their delivery of demonstrated energy savings, the IOUs or other parties cannot implement below standard savings programs to “use up” the funds and yet minimize the actual energy savings. Even if the IOU-administrator or the IOU-implementer were to deliberately try to minimize savings, the only impact it would have would be to roll the funds into the following year when they would be used to secure the same or more savings. This is not saying that this would be the plan of any administrator. However, by assuring all parties that the IOUs (or any other party) could not bias or seriously undermine the savings efforts even if they were desirous of doing so, the Standard Offer Program would eliminate the potential concerns within the EE community and restore a more cooperative and collegial atmosphere.

Breadth of Technologies. The programs are required to be neutral with respect to technology, with one exception (see Lighting Limits). This allows any type of contractor, consultant, supplier, or other implementer to participate. Rather than concentrating or mandating specific measures or technologies, any cost-effective technology can be used to deliver demonstrable savings on an equivalent basis.

Lighting Limits. No more than 65% of the incentives due for savings in any single project may come from lighting. In the event more than 65% of the savings are from lighting, the payments for lighting are reduced so that no more than 65% of the project’s payments are for lighting. Thus, in the extreme case of only lighting measures, the implementer would receive only 65% of the payments due for the achieved savings.

Customer Co-Payments Encouraged, Not Mandated. Implementers are allowed to keep any customer co-payments made, with no reductions in incentives received. This has the effect of encouraging co-payments where they can be required (e.g., for larger C&I projects, for common area improvements, some residential applications). It also allows consultants or others conducting audits or information only efforts to take credit for the measures subsequently

installed by participants. It also allows sponsors to make installations where such co-payments are less feasible or where the costs of securing them would be greater than the total co-payment amounts.

CALIFORNIA RESULTS FROM TEXAS-STYLE STANDARD OFFER PROGRAM

We believe that there are several improvements that can be made in the Standard Offer Program approach to Administration if it were to be adapted as the California model. For example, we would separate residential from small commercial; we would institute a separate Institutional SOP for government and not for profit facilities; we would probably increase the funding for residential and small commercial HTR; we would reduce the level going for EM&V and Administration; and we would look more closely at how HTR programs are defined. We also believe that the Statewide Marketing and Outreach Program should be continued. In addition, we definitely believe an SOP which includes Gas savings is critical to the overall success of the programs.

However, even before these improvements are considered, we can get a good approximation of the results of adopting the SOP as the primary administrative procedure for California by using the 2004-05 funding cycle.

The total funding for 2004-05, including the \$245 million in procurement funding, was \$822.7 million for EE funding. Subtracting the \$41 million for the various statewide marketing and outreach efforts and for the \$90.7 million from natural gas funding leaves \$691 million in net EE funding. This is slightly more than 16.4 times the size of the 2003 Texas Standard Offer Program.

Applying this ratio to the results of the 2003 program gives us the following estimates for California's electric savings programs:

California's 2004-05 Electric SOP

Total Benefits	\$2,271,430,000
HTR Benefits	\$375,641,000
Res & SmCom Benefits	\$731,595,000
Large C&I Benefits	\$1,161,813,000
Admin & EM&V Costs	\$66,256,000
Total Electric Budget	\$691,000,000
KWH Savings (Annual)	4,542,860,000
KW Savings	1,337,000

Applying the results of the Texas program to California, even without considering the benefits of a much larger programs and economies of scale, and even excluding the gas savings benefits, we are looking at benefits of almost \$2.3 billion dollars, with half going to HTR, Small Commercial and residential customers. We also have peak demand savings of 1.34 million kilowatts and annual savings of 4.5 billion kilowatt hours!

CONCLUSION

While it could use some improvements, the Texas Standard Offer based administrative structure has clearly demonstrated the ability to deliver large amounts of very cost-effective energy savings at a relatively low administrative cost with many very desirable attributes.

Quality Conservation Services joins with the California Coalition for Energy Efficiency recommending its acceptance and implementation for California.

Respectfully submitted,

Allan Rago

Quality Conservation Services, Inc.

April 26, 2004

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **COMMENTS OF QUALITY CONSERVATION SERVICES ON ADMINISTRATIVE STRUCTURES FOR ENERGY EFFICIENCY** by emailing this document in Acrobat 6.0 format to all email addresses on the R.01-08-028 service list. A list of the email addresses is attached to the original of this filing.

Dated: April 26, 2004

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