

April 26, 2004

DOCKET OFFICE  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

Re: Order Instituting Rulemaking to Examine the Commission's Future Energy  
Efficiency Policies, Administration and Programs – R.01-08-028

Dear Docket Clerk:

Enclosed for filing are the original and five (5) copies of "Opening Comments of SESCO, Inc. on Proposals for Energy Efficiency Administrative Structure" in the above-captioned matter.

Very truly yours,

Richard M. Esteves

RME/adj

cc: Administrative Law Judge Kim Malcolm  
Administrative Law Judge Meg Gottstein  
Commissioner Susan P. Kennedy  
All Parties of Record in R.01-08-028 (via electronic mail)

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the  
Commission's Future Energy Efficiency  
Policies, Administration and Programs.

R.01-08-028  
(Issued August 23, 2001)

**OPENING COMMENTS OF SESCO, INC. ON PROPOSALS  
FOR ENERGY EFFICIENCY ADMINISTRATIVE  
STRUCTURE**

RICHARD M. ESTEVES

SESCO, INC.

77 Yacht Club Drive  
Lake Hopatcong, NJ 07849  
Telephone: (973) 663 - 5125  
E-mail: [sesco@optonline.net](mailto:sesco@optonline.net)

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**I. INTRODUCTION AND SUMMARY**

On April 8, 2004, five groups submitted separate recommendations for an administrative structure: (1) the Joint Sponsors (a grouping five organizations coordinated by TURN and ORA), (2) the Joint Parties (a grouping of eleven organizations coordinated by NRDC), (3) Cal-Ucons, Inc. ("UCONS"), (4) the California Coalition For Energy Efficiency, or "Coalition" (a grouping of 20 organizations coordinated by Women's Energy Matters), and (5) a unnamed grouping of eleven organizations coordinated by SCE. For ease of reference and since eight are utilities or utility-related organizations, this grouping is referred to hereinafter as "The Utilities." SESCO, Inc. is a member and supporter of the California Coalition.

The most important division among these proposals related to utility administration and control over EE programs. Three of the groups would give day-to-day control back to the utilities, similar to the procedures used prior to the issuance of Commissions EE Policy Manual of 2001. This grouping, which we refer to collectively as the "Yesterday Group," consists of the Joint Parties, Cal-Ucons and The Utilities. The other two groups, the Joint Sponsors and the Coalition, recommend allowing utilities to compete on an equal basis to be Implementers, but would not give utilities automatic preference for selection nor would they necessarily be the program administrators.

The Yesterday Group propose any number of checks and balances and incentives and

oversights to try to counteract the actual and perceived conflicts of interest posed by utility administration, the Joint Sponsors and the Coalition eliminate the need for any such cumbersome activities by removing the utilities from administration or, in the alternative, by removing the utilities from critical decision-making.

While SESCO supports the intent of the Joint Sponsors, we do have some concerns and suggestions which may be worth considering.

## **AVOID THE UTILITY CONFLICT OF INTEREST**

While the Yesterday Group, especially The Utilities seek to minimize the potential impacts of a conflict of interest when the utilities get to chose between their own resources and those of potential competitors, it is something about which the Commission has clearly and repeatedly spoken.

As recently as this past Janaury26, 2004 Procurement Docket Decision (D. 04-01-050), the Commission has clearly warned about the impact of such conflicts of a utility choosing between their own resources and those of third parties. While the topic was limited to generation, the impact is at least as strong for energy efficiency:

The presumption that utilities may favor their own capacity at the expense of third-party generators is well founded, with effects in both procurement of power from existing resources and in the procurement of new capacity. In their procurement from existing resources, utilities are monitored for their patterns of dispatch to assure that the operations are undertaken in a least-cost manner (i.e., Standard of Conduct No. 4). The presumption is that without that standard, utilities would favor their own resources at the expense of lower cost available alternatives. The historical relationship of the utilities with QF producers similarly leads to concern that given the choice utilities would rather rely on their own resources than on those that come from the market. (D.04-01-050, p 61)

Based on our discussion above, the utilities should rely on the formal RFP process to secure future long-term generating capacity resources. The RFP process, if properly designed, calls forth from the marketplace a wide set of choices for development. (D.04-01-050, p 63)

The presumption that utilities may favor their own capacity at the expense

of third-party generators is well founded.

Careful design and monitoring of a competitive solicitation process and use of a least-cost dispatch standard are important means for addressing the potential for bias.

The utilities should rely on the formal RFP process to secure future long-term generating capacity resources.

Utilities may always propose utility-owned and/or utility-built generation at any time if they feel that it can be competitive, but should be required to justify the reasonableness of such proposals, as well as proposals for cost containment.

We should allow the utilities the authority and opportunity to bid in solicitations conducted by generators offering capacity and/or energy. (D.04-01-050, p.186)

Exhibits from last year's hearings show that there were only a limited number of disallowance decisions from 1980-1996, and that the majority of these decisions and dollar adjustments involved affiliate transactions.

The most direct and effective means to avoid any potential conflict of interest is to simply prohibit affiliate transactions. ... The holding companies and affiliates of each utility should plan for future generation investment to be made outside of the utility's service territory and sold to other load serving entities. (D.04-01-050, p. 187)

This concern about a conflict of interest with the selection of generation alternatives is much stronger when the issue is selecting from among EE alternatives. With EE utilities are faced not only with the conflict of selecting between their own programs and those of a competing third party, but they have the additional conflict that a truly effective EE program is counter to the financial and cultural interests of the utility. This issue has long been recognized. the Commission, before it saw the option of third party programs tried a number of efforts and programs. These included very large shareholder incentives, penalties, lost revenue recoveries, stricter oversight, Commission control of EM&V, etc.

However, the Commission, beginning in 1997 (D.97-02-014) started to reject such devices as cumbersome and undesirable. Then in 1999, the Commission determined (D.99-03-056) that despite the difficulties involved in moving administration from the Utilities, that this would be the best long term alternative:

Beyond 2001, however, we are opposed to continuing with utility administration of energy efficiency programs and will actively pursue creating an

organizational alternative for the administration of these programs. (D.99-03-056, p1)

CEC also recommends that continuing utility administration beyond 1999 should only be considered as a short-term strategy. For the longer-term, CEC recommends that the Commission explore the pros and cons of two options: the development of a nonprofit board and the transfer of energy efficiency programs to an existing organization. (D.99-03-056, p 8)

However, none of the comments have lessened our fundamental concerns over a continued role of utilities in the administration of energy efficiency programs over the longer term. In particular, we still believe that utilities as program administrators are not motivated to create the independent energy efficiency industry that we envision for the future. (D.99-03-056, p 11)

The absence of competition for administrative services requires that the Commission continue to evaluate the appropriateness of performance incentives for interim utility administrators and, if continued to be found appropriate, the incentive level and performance basis. Our experience has been that such an evaluation requires an enormous commitment of time and resources. (D.99-03-056, p13)

Continuing with utility administration of energy efficiency programs over the long-term, however, raises significant concerns over (1) the motivation of utilities in a restructured industry and (2) the continued need for substantial regulatory oversight of utility administrators. These concerns have not been assuaged by time and experience with interim utility administrators. However, these concerns do not appear as evident nor as pronounced with regard to low-income assistance programs. (D.99-03-056, p30)

In the meantime, to reduce the potential conflicts between the utilities' role in the newly competitive energy services industry and their continued role as interim program administrators, we direct utilities to transfer program implementation activities away from themselves and towards other market participants. In particular, implementation activities for energy efficiency and low-income energy efficiency should be outsourced and competitively bid to the broadest possible extent and appropriate for maximizing the achievement of the Commission's objectives. (D.99-03-056, p30)

After 2001, the Commission initiated its ground-breaking EE Policy Manual which removed the automatic presumption of utility preferences. By making the selection process open and placing it into the hands of the CPUC itself, the Commission removed many of the conflicts of interest inherent in utility administration and in having the same party responsible for both

implementation and administration.

Unfortunately, what we believe was an excessive and unwarranted concern over possible program disruptions has not allowed the full implementation of the EE Policy Manual procedures. However, the 2004-05 procedures came much closer to the intended levels, particularly on the local program levels.

The next step is to remove the conflict of utilities between selecting and overseeing third party programs that compete with their own programs and the conflict in administering programs that result in lowered financial benefits to the utility. The acceptance of either the Joint Sponsors proposal or the Coalition Proposal would eliminate this conflict.

We note that the groups that support a return to utility administration and control fully recognize the conflicts of interest and have devised all sorts of band-aids in the hope of overcoming this problem. For example, the Joint Parties recommends having an “Independent Observer, having shareholder incentives and penalties, having a “non-financially interested parties” committee, etc. If there is no conflict, why then go through these convolutions?

There is a conflict. There is a massive conflict. We can and should eliminate it.

## **SUGGESTIONS FOR THE JOINT SPONSORS PROPOSAL**

The Joint Sponsors proposal has much to recommend it, beginning with the use of non-utility administrators and the use of open, transparent selection process for implementers. I also believe that its public input procedures are superior to those suggested by the Coalition and should be adopted.

SESCO also believes that the development of a not-for-profit single purpose entity as a the Primary Administrator, if this is feasible, should be strongly considered. It is also particularly important that the Administrator, whoever it might be is not allowed to also undertake Implementation. It is natural that anyone should think their programs are superior.

After all, they would not deliberately design a program that did not optimize the possibilities. By removing the Administrator from program implementation and design, this understandable but deleterious bias is avoided.

The primary concern we have is the Joint Sponsors plan to continue the top-down determination of which programs should be pursued, although they do replace utility top-down with less conflicted top-down decision makers. One of the great strengths of the two third party solicitations has been the large number of innovative and perhaps unexpected program designs. These often sought and met unusual niche areas with significant untapped potential or with innovative approaches. This could easily be lost if the option given to implementers is to bid only for those programs which the PA (with the EEAC, etc.) may have thought were needed.

We definitely prefer the “open” approach taken by the Commission in its non-utility bidding process. It set out the standards to be used to select programs and evaluated all proposals that arrived, regardless of pre-conceived needs.

An even better procedure is to allow any program to be proposed and accepted that provides demonstrated energy savings at or below a pre-set price. This is the procedure used in the Coalition’s Standard Offer approach to energy efficiency. It could be adopted within the Joint Sponsors’ proposal to great advantage. If this is not the procedure used, then the Project Sponsors should consider adopting the EE Policy Manual’s approach (with improved selection transparency and direction as to the evaluation metrics).

The other major concern we have has to do with the excessive use of an CALMAC as an administrative structure to run the various EM&V efforts. CALMAC is an advisory board, not an administrative arm. We encourage the radical restructuring of CALMAC, but it should continue as an advisory board.

The EM&V should be the responsibility of the PA or the Commission/CEC. The PA is already committed to securing EM&V expertise. There is no reason why the PA’s internal EM&V expertise cannot extend to overseeing the project specific EM&V and the overarching

EM&V studies. Unless CALMAC members are also removed from being Implementers, then there would be a serious conflict of interest in having them act as EM&V administrators.

The Energy Division has internalized some EM&V expertise and has an ongoing consultant to assist it. This could either be continued or replicated in the PA.

Finally, the inclusion of any single interest group on CALMAC should be greatly reduced. Specifically, there is no need to have four (or more) utility representatives to represent the interests of the utilities. Having one on a rotating basis should be sufficient, or perhaps two so as to include one IOU and one municipal utility would be sufficient.

## **OTHER RECOMENDATIONS**

The Joint parties have recommended an “Efficiency Leadership Council” (ELC) to coordinate statewide energy efficiency initiatives. As a start, this would include the Commission, the CEC and municipal utilities. This is an excellent idea and should be pursued, with one modification. Outsiders cannot speak for these respective organizations. So, rather than have a group of outside “experts” representing each of these, the ELC should include actual representatives fro each of those organizations. Coordinating “policy level issues” is not the purview of outside personnel, no matter how “expert.” Thus, while the ELC may call on outside resources from time to time, its ongoing make-up should be from the leadership and senior staff of the respective organizations.

## **EVALUATING THE CURRENT ADMINISTRATIVE PROCEDURE**

ALJ Gottstein requested an evaluation of the current system as a useful vehicle in meeting the Commission’s goals. By this we assume the reference is to the procedures called for in the EE Policy Manual.

It is SESCO’s belief that the procedures in the Policy Manual are the most complete and best conceived procedures that we have seen implemented in any state. Were we assured that the

problems to date in using those procedures were part of a learning curve that has now completed its arc, there would be little or no need for its replacement. Even with those problems it is far superior to that proposed by The Utilities or by the Joint Parties.

Arbitrary and artificial “quotas” for utilities (or non-utilities) or preferences for any type of implementers are contrary to the EE Policy Manual and to an efficient market. Yet these were used, officially in the first two years and by implication in the third.

The selection process was far from transparent and based far too heavily on the judgments of a very limited number of evaluators. We have no objection to judgment being used. However, it should be applied before the programs are submitted, not after the evaluators have seen and otherwise rated the programs. For example it is judgment to indicate what scoring should be applied to cost-effectiveness and how the points should be awarded. This can and should be determined prior to the submittal of the proposals.

The use of a “standard contract” is a reasonable procedure. However, then the IOU administrators are allowed to add attachments which take precedence over language in the Commission approved language of the standard contract.

The use of standardized EULs, NTG factors, and deemed savings values are critical to the comparison of competing programs and are called for in the EE Policy Manual. However, in practice, the evaluation staff did not check or correct for these items. Many of the accepted programs had exaggerated (relative to those required by the EE Policy Manual) savings claims to the detriment of the more accurate proposals.

Can these types of problems be corrected. Certainly. Will they? Given the way these issues have been ignored to date, we would rather go with a new program which eliminates arbitrariness than chance an improvement in the implementation of the current Policy Manual. This is perhaps regrettable since the current Policy Manual, as written, is an outstanding effort and it rated a better opportunity to be the success it so deserved to be.

Respectfully submitted,

Richard M. Esteves  
For: SESCO, INC.  
415 West Foothill Blvd.  
Claremont, CA 91711  
E-mail: [sesco@optonline.net](mailto:sesco@optonline.net)  
April 26, 2004

## **CERTIFICATE OF SERVICE**

I certify that I have by electronic mail, to the parties for which an electronic mail address has been provided, this day served a true copy of the following document dated April 26, 2004 to all parties of record in this proceeding or their attorneys of record:

Reply of SESCO, Inc. to Motion of Pacific Gas and Electric Company  
for Order Shortening Time to Respond

I also certify that I caused copies of the attached comments to be served to the ALJ, to the Assigned Commissioner and other required filings for the Commission for this proceeding.

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Richard M. Esteves  
April 26, 2004

## R.01-08-028 EMAIL SERVICE LIST

aahmed02@earthlink.net  
ab50@aol.com  
abrice@rhainc.com  
adiff@aol.com  
admin@gesusa.org  
agarcia@energy.state.ca.us  
agoel@insyncinfo.com  
AGREENFIELD@GLOBALGREEN.ORG  
ajo@cpuc.ca.gov  
alan@rer.com  
alo@cpuc.ca.gov  
ann.kelly@sfgov.org  
arago@qcsca.com  
asowell@sca.ca.gov  
atencate@drintl.com  
atrowbridge@downeybrand.com  
basu@earthlink.net  
bburt@macnexus.org  
bfooster@gepllc.com  
bgroch@greentechenergy.com  
BillM@soldata.com  
bknox@cityofdavis.org  
blaising@braunlegal.com  
bmast@frontierassoc.com  
bmatulich@egia.com  
bob.belhumeur@corporatesystems.com  
bob@sierracc.com  
brenda@rer.com  
brianh@quantecllc.com  
bridget.branigan@swgas.com  
BSD2@pge.com  
bwildman@sbwconsulting.com  
cal.broomhead@sfgov.org  
carellano\_sweinc@sbcglobal.net  
Case.Admin@sce.com  
cbommarito@sbcglobal.net  
ceaston@sempra.com  
Cem@newsdata.com  
charles.bredwell@cpa.state.tx.us  
charles.m.stephens@state.or.us  
chris@emeter.com  
chrischouteau@earthlink.net  
ckmitchell@powernet.net  
cm2@cpuc.ca.gov  
cmkehrein@ems-ca.com  
cornstark1@aol.com  
cpacounsel@dgs.ca.gov  
cpe@cpuc.ca.gov  
cpuccases@pge.com  
cpucservice@senergy.org  
craigtyler@attbi.com  
ctd@cpuc.ca.gov  
ctoca@utility-savings.com  
cwootencohen@earthlink.net  
cxc@cpuc.ca.gov  
d.d.gilligan@worldnet.att.net  
dale.foster@ttemi.com  
dale@betterbuildings.com  
dan@meek.net  
darrell@iwfa.com  
dbachrach@nrdc.org  
dcasentini@drintl.com  
derek.williams@mountainmonitoring.com  
dfrey@archenergy.com  
dgordon@sandiego.gov  
dhungerf@energy.state.ca.us  
dick@adm-energy.com  
irina@ideasarecheap.com  
ist@senergy.org  
janet.combs@sce.com  
Jaybhalla@aol.com  
jcameron@arcainc.com  
jcastleberry@rs-e.com  
jcavalli@qcworld.com  
jcervantes@sandiego.gov  
jcl@cpuc.ca.gov  
jcvantes@sandiego.gov  
jdquinley@aol.com  
jdrivera@drintl.com  
jen@cnt.org  
jennifer.holmes@itron.com  
jerry1@abag.ca.gov  
jes@cpuc.ca.gov  
[jesherman@earthlink.net](mailto:jesherman@earthlink.net)  
jet2@cox.net  
jf2@cpuc.ca.gov  
jg1@cpuc.ca.gov  
jhamrin@resource-solutions.org  
jim@prudens.com  
jimflanagan@iname.com  
jimross@r-c-s-inc.com  
jjensen@rhainc.com  
jlarlin@kema-xenergy.com  
jlaun@apogee.net  
jlb@anyszerda.org  
jlcrafft@earthlink.net  
JLENZMEIER@CBIA.ORG  
jlondon@gralegal.com  
jlong@ci.oceanside.ca.us  
jna@speakeasy.org  
jnickel@fishnick.com  
jodyk@ncat.org  
joe.como@sfgov.org  
joe@rhainc.com  
joel@apogee.net  
john\_mclain@pgn.com  
johnp@energycoalition.org  
john@blueowltechnologies.com  
jon@vpideas.com  
jonathan.teague@dgs.ca.gov  
joseph.ballantine@uinet.com  
joseph.leung@gsa.co.santa-clara.ca.us  
jparker@icfconsulting.com  
jparks@smud.org  
jpeck@semprautilities.com  
jsugar@energy.state.ca.us  
jsummerford@drintl.com  
jsynasio@us-power.com  
jtachera@energy.state.ca.us  
julie\_a\_white@email.whirlpool.com  
jwhargrove@sppc.com  
jwwd@pge.com  
jyamagata@semprautilities.com  
karen@klindh.com  
kathryn@ceert.org  
kchurchill@accenv.com  
kcorfee@xenergy.com  
keely.martin@lao.ca.gov  
keith.fuller@itron.com  
kenh@mid.org  
kenm@powerlogic-usa.com  
kim@cpuc.ca.gov  
kjk@energysp.com  
kmcree@sablau.com  
nieves.lopez@puc.state.tx.us  
njenkins@energy.state.ca.us  
nphall@tecmrkt.com  
nyg@cpuc.ca.gov  
olson@ghpc.org  
operations@ossonline.com  
pattym224@aol.com  
paulfenn@local.org  
paulfenn@local.org  
pcanessa@charter.net  
pedro@headquartersadv.com  
pfeffer@scag.ca.gov  
pgh@cpuc.ca.gov  
phil.hastings@state.me.us  
philsson1@comcast.net  
pjpowerlaw@aol.com  
pmiller@nrdc.org  
ppiette@qcworld.com  
ppl@cpuc.ca.gov  
pstoner@lgc.org  
qcworldmail@yahoo.com  
rachel@ceert.org  
randy.sable@swags.com  
rayce@proctoreng.com  
rbarnes@kema-xenergy.com  
rbordner@emi1.com  
rdt222@cox.net  
reflectorsmike@earthlink.net  
renee\_fernandez@emcorgroup.com  
reports@aees.org  
rg1@cpuc.ca.gov  
RHS@AESCI-INC.COM  
rita@ritanortonconsulting.com  
[rkeyes@attbi.com](mailto:rkeyes@attbi.com)  
rknecht@puc.state.nv.us  
rknight@bki.com  
rlw@rlw.com  
rmccann@umich.edu  
rmowris@earthlink.net  
Robsharp1@aol.com  
rochmanm@spurr.org  
rschmidt@bartlewells.com  
rsperberg@onsitenergy.com  
rsridge@attbi.com  
ru4@cpuc.ca.gov  
rutledgev@publicfm.com  
rwwilson@lbl.gov  
sam@energy-solution.com  
san@senergy.org  
SCarter@nrdc.org  
scasey@sfwater.org  
sesco@optonline.net  
shallenbgr@aol.com  
sharong@moval.org  
shastie@navigantconsulting.com  
sherri@vpideas.com  
shiv@quixnet.net  
sjun@energyinnovation.net  
skumatz@serainc.com  
spillermb@gru.com  
sprice7@mindspring.com  
springer@davisenergy.com  
sruark@co.marlin.ca.us  
ssherwood@xenergy.com  
ssirkin@ecosconsulting.com  
ssr@cpuc.ca.gov  
sstrom@mncee.org

difellman@fellmanlaw.com  
dinalane@gte.net  
dks@cpuc.ca.gov  
dlw@cpuc.ca.gov  
dm@getwise.org  
dmahone@h-m-g.com  
dmb@cpuc.ca.gov  
dnorris@sppc.com  
docket-control@gralegal.com  
dohrmann@adm-energy.com  
don.arambula@sce.com  
donlink@jps.net  
drebello@qcworld.com  
dreyolds@aspensys.com  
drobison@teleport.com  
dsh@cpuc.ca.gov  
dws@r-c-s-inc.com  
dwylie@aswengineering.com  
ecl8@pge.com  
Edward.Vine@ucop.edu  
ek@a-klaw.com  
elmoa@cityofemecula.org  
elsharif@ghpc.org  
emahlon@ecoact.org  
emainland@earthlink.net  
emilio.varanini@dgs.ca.gov  
Energx@att.net  
energy@directapps.com  
energyanalysis@earthlink.net  
eparker@qcworld.com  
ercaldwell@maacproject.org  
estrategy@mindspring.com  
etlowe@aol.com  
ewk@cpuc.ca.gov  
fdeleon@energy.state.ca.us  
fisherconsultants@msn.com  
fkeneipp@pacbell.net  
fountain@dnai.com  
fspasaro@semprautilities.com  
gbaker@sempra.com  
ginaj@alohasys.com  
glynnis@starband.net  
gpeterson@mncee.org  
gthomas@ecoact.org  
gtraynor@tmarshall.com  
gvigneron@scsa.ca.gov  
hankryan2003@yahoo.com  
harringk@cityofemecula.org  
hayley@turn.org  
hmoore@marincounty.net  
ibran@gepllc.com  
Info188@seiinc.org  
inquire@concentric.net  
ipena@ecosconsulting.com

kmcelroy@xenergy.com  
kmckenna@ambag.org  
kmills@cfbf.com  
koeller@earthlink.net  
kristine@rhainc.com  
kswitzer@scwater.com  
kuhler@egia.com  
lcasentini@drintl.com  
leoralawton@fscgroup.com  
lifcentral@lif.org  
llutz@atbi.com  
lmacdonald@icfconsulting.com  
lmh@eslawfirm.com  
lnardoni@icfconsulting.com  
louis.blumberg@fire.ca.gov  
lrm@cpuc.ca.gov  
lrushforth@drintl.com  
ltgwiz@msn.com  
MADUNHAM17@aol.com  
marcel@turn.org  
marie@greenaction.org  
mark@alohasys.com  
martha.davis@appl.qe.com  
martha.lake@atbi.com  
mary.tucker@ci.sj.ca.us  
maryann@cuwcc.org  
matthew@sfbg.com  
Mcart108@earthlink.net  
megan@winegardenergy.com  
mer@cpuc.ca.gov  
mgoodson@ci.davis.ca.us  
mgorman@agclawfirm.com  
mharrigan@ase.org  
michael@headquartersadv.com  
michaelgibbs@icfconsulting.com  
midstateinst@aol.com  
mike@comfortwise.com  
milne@ucla.edu  
mjberm@davisenergy.com  
mmccormick@gralegal.com  
mmesseng@energy.state.ca.us  
moerbeznik@atbi.com  
moore@ecosconsulting.com  
mpa@a-klaw.com  
mrw@mrwassoc.com  
mrw@mrwassoc.com  
mshames@ucan.org  
msheehan@microplanetltd.com  
msutter@alamedanet.net  
mtirpak@icfconsulting.com  
mwbeck@lbl.gov  
mzr@cpuc.ca.gov  
ndesnoo@ci.berkeley.ca.us  
neilmiller@earthlink.net

staples@staples-ad.com  
stephenhall@telus.net  
stevef@ensave.com  
sthigpen@drintl.com  
stone@h-m-g.com  
susan-munves@santa-monica.org  
sustainablefairfax@earthlink.net  
swentworth@oaklandnet.com  
talereza@adm-energy.com  
tam@cpuc.ca.gov  
tara.dunn@dgs.ca.gov  
taryn\_smith@dca.ca.gov  
tconlon@geopraxis.com  
tdavis5128@aol.com  
teckman@nwppc.org  
ted@energy-solution.com  
tenos@rhainc.com  
tflanigan@energycoalition.org  
thamilton@cheers.org  
thughes@californiavingenergy.com  
thunt@hatchparent.com  
timrosenfeld@earthlink.net  
tmfry@nexant.com  
TMichel@egia.com  
tom@ucons.com  
ttt@cpuc.ca.gov  
twombly@kw-engineering.com  
vfleming@navigantconsulting.com  
Vicki.Swank@gsa.co.santa-clara.ca.us  
vjensen@icfconsulting.com  
vrabl@aspensys.com  
wallis@winegardenergy.com  
wem@igc.org  
westdakota@aol.com  
wickend@together.net  
william.dalton@xcelenergy.com  
willieg@ci.chula-vista.ca.us  
wmcguire@mcguireco.com  
wmcguire@mcguireco.com  
wsey01@attglobal.net  
XxL1@pge.com  
zap@cpuc.ca.gov  
ztc@cpuc.ca.gov