

**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	Rulemaking 01-08-028 Filed August 23, 2001
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**WOMEN'S ENERGY MATTERS'
APPLICATION FOR REHEARING OF COMMUNITY CHOICE
ENERGY EFFICIENCY DECISION 03-07-034
AND MOTION TO STAY**

“With no incentive to increase profits by increasing energy sales, Community Choice Aggregators have a natural incentive to achieve the kind of energy savings that California has had to bribe utilities to achieve in the past.” – *Paul Fenn of Local Power, creator of Community Choice legislation in California, Ohio, New Jersey, and Massachusetts*

I. INTRODUCTION

Pursuant to Public Utilities Code §§ 1731, 1732 and Article 21 of the Rules of the California Public Utilities Commission (CPUC) and Rules 85, 86 and 86.1 of the Commission's Rules of Practice and Procedure, Women's Energy Matters hereby applies for rehearing of Decision 03-07-034 (“Decision”), which was mailed July 14, 2003. Our Application is timely filed, 30 days after the Decision was mailed.

We incorporate herein by reference the Application for Rehearing filed today, August 13, 2003, by Dan Meek of RESCUE.

In 2002 the California Legislature passed a law, AB117, that allows for significant restructuring and repair of California's failed electricity markets. Under this reform, communities have been granted the new right to purchase electrical services on behalf of their members. Such communities include cities, counties, joint power authorities, as well as groups of businesses or individuals. Similar “Community Choice” bills have been put

into effect in three other states (Ohio, Massachusetts and New Jersey), and when implemented have resulted in stable and balanced power markets.

California's Community Choice bill also offers significant, and unique, new opportunities to advance major environmental and energy conservation policy goals, since the electrical services for which communities may contract extend beyond merely purchasing quantities of power supply. **AB117 changes the former Public Utilities Code to allow communities to administer funds that are allocated for energy conservation.**

Assembly Bill 117 ("AB117") states that:

No later than July 15, 2003, the commission shall establish policies and procedures by which **any party**, including, but not limited to, **a local entity that establishes a community choice aggregation program**, may apply to become administrators for cost-effective energy efficiency and conservation programs established pursuant to Section 381. **In determining whether to approve an application to become administrators, the commission shall consider** the value of program continuity and planning certainty and the value of allowing competitive opportunities for potentially new administrators. **The commission shall weigh** the benefits of the party's proposed program to ensure that the program meets the following objectives:

ÊÊ (1) Is consistent with the goals of the existing programs established pursuant to Section 381.

ÊÊ (2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.

ÊÊ (3) Accommodates the need for broader statewide or regional programs.Ê
Pub. Util. Code Sec. 318.1(a).

This is one of the most important reforms contained in the bill, and one that has been threatened by the recent CPUC Decision 03-07-034.ÊWe are particularly disturbed with the Decision's concluding claim that the Commission is *already* complying with AB117:

In summary, the Commission is already implementing that portion of AB117 that requires a process for parties to apply for energy efficiency programs funding authorized in Section 381. It selects programs using criteria that are consistent with AB117 and expressed in Section 381.1(a). To the extent the Commission changes its energy efficiency programs and policies, it will consider the requirements of AB117. (*Decision, p.9*).

Since the CPUC is "already implementing" basic third party solicitation procedures and an Energy Efficiency Policy Manual that predate the passage of AB117, this implies that

there was no need for the legislature twice to pass, and the governor to sign, this bill which amends section 381.1(a) of the Public Utilities Code. We will show the CPUC statement above is the result of a series of errors concerning Section 381.1 and AB117 in general.

First of all, the fact that the Commission set aside 80% or more of the Public Goods Charge Energy Efficiency funds for utilities in Program Years (PY) 2002 and 2003, and proposes to do the same in PY 2004-5, makes Decision 03-07-034 inconsistent with AB 117, which requires the CPUC to **“weigh” the application of “any party”** that fulfills the essential criteria specified in the bill to administer the funds.

WEM does not dispute everything about Decision 03-07-034. It is indeed a great idea to give efficiency center stage in California’s energy policy. However, the devil is in the details, and the Decision is woefully inadequate to the changed statutory landscape and the needs of ratepayers for maximum energy efficiency, in a time of extraordinarily high electricity bills and a looming natural gas crisis.

Community Choice is firmly law in California with over sixty cities now preparing to implement it, according to Paul Fenn of Local Power, who is the original author of the legislation. Yet the CPUC is leaving all these cities hanging while they await new rules that the Commission failed to produce by the statutory deadline of July 15, 2003. The CPUC should move expeditiously to rehear this Decision, correct these errors, and produce a set of rules that will be fair to CCAs and other third parties, and result in vastly increasing energy savings in California.

II. REQUEST FOR ORAL ARGUMENT

Oral argument will materially assist the Commission in resolving this application for rehearing. As demonstrated below, the Decision directly contradicts the requirements of AB 117 (2002) for the allocation of Public Goods Charge (PGC) funds for energy efficiency programs, thereby presenting legal issues of exceptional controversy and public importance. These funds amount to approximately \$275 million per year.

III. URGENCY OF APPLICATION

The Commission's July 10 Decision 03-07-034 blithely ignores both the processes and the timeline required by AB117, and is replacing it with a schedule and policies that override the new law. The Commission is racing into a decision August 21 on the upcoming solicitation, which may compound rather than fix the problem and rush us into a September 23 solicitation that threatens illegally to lock up 80% or more of the \$500 million Energy Efficiency (EE) program funds under continued administration by investor owned utilities (IOUs).

The Commission ignored AB117's July 15, 2003 deadline to create a process for community choice aggregators and other non-utility parties to apply for EE funds. This must be corrected immediately, because it is delaying Community Choice Aggregation implementation efforts throughout the state.

There is no justification for rushing the solicitation for the 2004-5 period. The CPUC missed the statutory July 15, 2003 deadline, but it is still legally mandated to create a solicitation opportunity for Community Choice Aggregators, which does not yet exist.

The Decision contains serious errors, which if not rectified, will violate state law, prohibiting both Community Choice Aggregators and other non-utility EE program providers from applying to become administrators pursuant to Section 381.1(a) in its scheduled September 22 solicitation for the 2004-5 cycle.

IV. A NEW TIMEFRAME FOR THE SOLICITATION WILL NOW BE REQUIRED

The CPUC must implement EE under AB 117 without further delay, before allowing the solicitation to go forward. WEM has no desire to unnecessarily delay this fall's solicitation and interfere with the continuity of EE programs; we believe the CPUC and

other parties in this proceeding are similarly dedicated to a smooth transition to new program administration this year, beginning with a prompt, fair solicitation. WEM urges the CPUC to rehear this decision and move with all appropriate haste to create policies and procedures for CCAs that reflects the requirements of AB117, at a minimum incorporating the changes we request at the end of this document. This is all that stands in the way of a solicitation.

In brief, WEM demands that the CPUC immediately end set asides for utilities, allow any party to apply to administer cost effective programs, weigh all proposals fairly, and create at least a skeleton process to accommodate the unique characteristics of CCAS. That process must include developing procedures whereby a CCA could apply for all EE funds collected in its territory which it would then bid out (with CPUC oversight) to other parties.

WEM has commented before in this proceeding that the September 23rd deadline gives too little time for CCAs and other parties to prepare applications. In addition, the Commission must take into account that AB117 establishes certain planning and implementation processes, including opportunities for public input, that will inevitably take some time. The Commission ignored these factors, demonstrating further disregard for the requirements of the new law. Nevertheless, we believe it is possible for the Commission to make the changes necessary in order to conform with the statute and still hold a solicitation before the end of 2003.

V. CPUC MUST ACCOMODATE THE UNIQUE STATUS OF COMMUNITY CHOICE AGGREGATORS

The decision errs when it states:

While the statute requires the Commission to develop procedures for all interested parties, it does not distinguish types of parties. (*Decision 03-07-034, page 10*)

On the contrary, Community Choice Aggregators are specifically mentioned by Section 381.1(a) as potential applicants for EE funds; utilities and electrical corporations are not

mentioned. The statute as a whole describes the processes by which a CCA will operate, but the Decision chose to ignore the special characteristics of CCAs, thereby failing to design policies and procedures to accommodate these unique entities.

Decision 03-07-034 errs by failing to draw any distinction between Community Choice Aggregators, which are customers, and other parties, which are suppliers, in evaluating their eligibility to administer EE funds. This violates, at a minimum, the provision of AB117 regarding Energy Efficiency and Conservation funds that states:

The commission shall weigh the benefits of the party's proposed program to ensure that the program meets the following objectives:...

ÊÊ(2) Advances the public interest in maximizing cost-effective electricity savings and related benefits.

Decision 03-07-034's consideration of Section 381.1 in isolation from the Chapter of state law in which it was written, has resulted in a misunderstanding of Community Choice Aggregation in general. CCAs and suppliers are assigned different roles under Community Choice, to avoid structural confusion, conflict of interest, and incentives to waste energy efficiency funds. In the Community Choice model, it is critical that electricity and EE *suppliers* not be equated with community *buyers*. They cannot be "placed on an equal footing" and expected to fill the role that properly belongs to the other party, as this Decision tries to do. It is absurd for *suppliers to compete with customers* that have formed aggregations for administering funds that are being used to purchase services. Specific language in AB117, such as that quoted above, was included to avoid these problems.

Moreover, it is absurd for CCAs to be denied the opportunity to apply for all EE funds in their territories, just as it would be absurd for them to be forced to buy some or all of their electricity from utilities — when the whole point of aggregation is for groups of customers to put together an *alternative plan to fulfill their energy needs, an integrated plan that is under the control of customers, not utilities or other suppliers, and then go out and solicit suppliers who will bid to fulfill that plan.*

Section 381.1 was put into the Community Choice law because, as in Massachusetts, under a Community Choice law it is *logical* that PGC funds be made available to communities that are responsible for the planning and procurement of their energy resources, and which are themselves administering a competitive bidding process among suppliers.

Yet, decision 03-07-034 refuses to accommodate the special characteristics of CCAs.

Nevertheless, we are not prepared to treat CCAs any different from other parties at this time. To treat them differently at this time would presume a policy direction that we are not prepared to address in the narrow context of this inquiry. (*Decision 03-07-034, page 10*)

The misreading of Community Choice continues with the perception that CCA's are stifling competition when in fact they are facilitating competition among suppliers. As a result, Decision 03-07-034 irrationally threatens to force customers to *compete against suppliers*, whereas it is an essential feature of AB117 to allow the aggregation of customers to facilitate competition among suppliers.

VI. COMMUNITY CHOICE AGGREGATORS ARE DESIGNED FOR INTEGRATED RESOURCE PLANNING

The failure to establish a role for Community Choice Aggregators that is distinctive from suppliers represents a failure to comprehend a major opportunity for Integrated Resource Planning. Whereas in the past Integrated Resource Planning provisions in the California Public Resources Code §25300, §25303, and §25305 implied that utilities, as procurement planners, should also administer energy efficiency and conservation programs, under the Community Choice law there is now a *better* option. With local governments making energy resource decisions pursuant to Chapter 838, and making them without the huge conflict-of-interest posed by utilities, it follows that Integrated Resource Planning would best be managed by CCA's. With no incentive to increase profits by increasing energy sales, Community Choice Aggregators have a *natural*

incentive to achieve the kind of energy savings that California has had to bribe utilities to achieve in the past.

Simply put: CCAs as buyers have an incentive to save on purchases, while suppliers have a vested interest in selling more electricity. Thus suppliers are not the best choice for who should be in the business of preventing consumption of their product.

Community Choice Aggregation is a unique *demand-side* local energy resource management system. Unlike a utility or other supply-side business, Community Choice Aggregators have a vested interest in reducing consumption, eliminating waste, slowing down electric meters, and mitigating throughputs. In this capacity, it is incumbent on the Commission not to deny Community Choice Aggregators the opportunity to manage all PGC funds paid by their communities on their monthly electric bills. Any other policy would clearly violate the intent of $\text{€}25300$, $\text{€}25303$, and $\text{€}25305$ of the California Public Resources Code and erect barriers to Integrated Resource Planning under Chapter 838. And it would fail to advance “the public interest in maximizing cost-effective electricity savings and related benefits”, as required by AB117.

Community Choice aggregators offer numerous advantages for PGC funds administration:

Community Choice Aggregators are the customers who paid the PGC money. Community Choice Aggregators represent the customers who have paid these funds, and thus have a special right to administer these funds.

Community Choice Aggregators are publicly accountable. Community Choice Aggregators are locally elected, as accountable to the public as any entities can be, and are subject to Sunshine Ordinances and Open Meeting Laws.

Community Choice Aggregators work for the public benefit. Community Choice Aggregators benefit the public. Other market participants are providing a for-profit service primarily to benefit their investors.

Community Choice Aggregators are demand-side entities. Community Choice Aggregator administration of PGC funds provides a demand-side orientation that is impossible with supplier-based administrators such as utilities. By replacing the

conflict-of-interest inherent in utility administration of energy efficiency and conservation programs, Community Choice Aggregators are ideal agents for cost-effective energy efficiency and conservation programs.

VII. THE DECISION ERRS BY GIVING SPECIAL TREATMENT TO UTILITIES.

Decision 03-07-034 errs by giving special treatment to utilities. A clear statement **against** special treatment for CCAs is made:

“Until and unless we do (reconsider CCA procedures), we will apply the same procedures and criteria for review that we apply now to all Third Party applicants for energy efficiency funding, including EM&V requirements.” (DD, p.10)

No such statement is made relative to utility programs.

What is worse, Decision 03-07-034 could be interpreted to *preserve special privileges* for utility programs over CCAs. Considering that Third Party applicants have had subordinate status in relation to utilities in the energy efficiency program solicitations offered in 2001 and 2002. The decision to place CCAs under the same procedures and criteria as Third Parties in effect gives preferential treatment to utilities. This is an outrageous policy, considering the sordid history of utility administration of EE programs, and is also a clear violation of AB117.

This is not only an unwise but also an illegal policy. To meet the requirements of Section 381, the Commission may not prohibit CCAs or third parties from an opportunity to administer any and all of the EE funds. No interpretation of Section 381 could logically allow for a continuation of utility set-asides after July 15, 2003.

The intent of the legislature was to give **any party** an opportunity to apply for EE funds. Legislators were well aware when they voted on AB117 that the CPUC’S current practice was allowing third parties to apply for 20% of the funds, and keeping the rest in the hands of the utilities. There was no need for a law, if they intended to continue that process. They didn’t say that any party should have an opportunity to apply for **part** of the funds.

We recommend the above passage be changed as follows:

“We will apply the same procedures and criteria for review of all utility programs that we apply now to all Third Party applicants for energy efficiency funding, including EM&V requirements.”

VIII. ONCE EE POLICIES ARE ESTABLISHED, MULTI-YEAR PROGRAMS ARE PREFERABLE

Decision 03-07-034 presumes Two-Year Programs to be the norm. Several commentators have suggested that funding of programs should be set for multiple years for better planning (DD, pp.11, 12). In fact, the average duration of a CCA contract in other states is six (6) years. Given that CCA solicitations require suppliers to bid energy efficiency programs as components of their service and to include the cost of such programs in their rates, WEM requests that program funding for CCAs be set for six (6) years. Again, this assumption of Decision 03-07-034 reflects the mistake in taking Section 381.1 in isolation from the law in which it was merely a part.

In the near term, however, WEM recognizes that any CCA solicitation that takes place this fall will be of an experimental nature, and it would be reasonable for it to have a shorter timeframe. In addition, WEM recognizes that the majority of cities and counties that are becoming CCAS may not be ready to participate in this EE solicitation process until 2004, partly because the CPUC missed the deadline and has not yet produced policies and procedures to accommodate CCAs in this fall's solicitation, and partly because it gave too short a period between the August 21 decision on the rules for the solicitation and the Sept. 23 proposal deadline, and partly because the CPUC is dragging its feet on opening up a proceeding to address the other issues involved in Community Choice. These failures to comply with the will of the people are part of a pattern of obstruction and illegal behavior and will only contribute to the widespread revulsion for the current leadership of our State.

IX. “ADMINISTRATION” VERSUS “IMPLEMENTATION”

Decision 03-07-034 (p.7) presumes to reinterpret the plain language of the legislature in Section 381.1, specifically the word “administration” as a qualitatively different word, “implementation.” This unauthorized reinterpretation has the effect of limiting the meaning of Section 381.1 to favor utility administration, and is not only inappropriate and discriminatory, but illegal. Section 381.1. says nothing about establishing procedures for “program implementation,” but concerns only “program administration.” While the legislature repeatedly calls for non-utility administration of these funds, Decision 03-07-034 limits this to “implementing” EE programs. These are elementally different and must not be conflated: Not only could “implementer” CCAs be made to remain subservient to local utilities under Decision 03-07-034’s illegal reinterpretation, but the reinterpretation reflects the basic misunderstanding of Community Choice Aggregators, under which a *third party implements* a CCA program under *local public administration*. It is a simple, elegant structure to facilitate competitive solicitations for blocks of publicly organized consumers. Clearly, if CCA’s are required to compete against their local utility to administer their own funds and wins, they should not be required to remain as “implementers” under administration of those same utilities. Decision 03-07-034 should be changed fundamentally to reflect these basic facts.

X. THE COMMISSION SHOULD NOT LIMIT PGC FUNDING FOR GAS ENERGY EFFICIENCY

Decision 03-07-034 limits the availability of Electric and Gas Funds to electric customers. Given that previous Commission orders have repeatedly sought to coordinate delivery of electric and gas energy efficiency services, and considering that the EE Manual, which treats electric and gas programs equally, is repeatedly cited in Decision 03-07-034 as sufficient to meet the requirements of AB117, there are no grounds for suddenly limiting the administration of funds by CCAs to electric customers.

XI. THE COMMISSION SHOULD REDEFINE “PROPORTIONAL SHARE”

The definition of “proportional share” is flawed. Decision 03-07-034’s use of per capita and population and “customers” as the way to indicate the proportionate share will discriminate against communities with large amounts of commercial and industrial customers and with large numbers of master metered living units: meaning rich suburbs would be favored over poor urban communities. Clearly this is unacceptable. Decision 03-07-034 should indicate that the proportionate share is the fraction of all PGC funds collected from a community, regardless of customer class.

XII. CONCLUSION

For the reasons discussed in this Application for Rehearing of DECISION 03-07-034, the commission must grant rehearing. Decision 03-07-034 makes mistakes that now pervade the CPUC’s policies (with the exception of ALJ Malcolm’s August 1, 2003 Alternate Decision). The CPUC seriously errs by ignoring the clear language of Section 381.1(a) and pretending that its past policy, which has a record of 80%-92% set asides for utility programs, already complied with AB117. It does not.

We urge the Commission to cancel the now illegal utility set-asides, and move immediately to accommodate the characteristics of CCAs, which are customers, not suppliers; are subject to CPUC jurisdiction; are public, non-profit, government-related entities; and whose sole purpose is to facilitate competitive solicitations among third parties for the benefit of ratepayers, not stockholders. CCAs are customers, not suppliers; giving “preference” to CCAs simply means allowing customers to administer their own funds. AB117 gives standing to CCAs, by mentioning them uniquely among EE applicants.

The Commission faces a dramatic opportunity to evolve from Integrated Resource Planning (IRP) controlled by utilities which have a massive conflict of interest, to a new form of IRP that has no such conflict

Moreover, we urge the Commission to abandon the misguided course of considering Section 381 in isolation from the law in which it is inextricably embedded. If the Commission misunderstands the basic structure of CCA, its policies on CCA administration will bring further crises and require rehearing of other decisions. We will have no choice but to sue the CPUC for justice if these matters are not resolved.

XIII. MOTION TO STAY

WOMEN'S ENERGY MATTERS REQUESTS that the Commission take no further action, including but not limited to making no further decisions in this proceeding which adversely impact Community Choice Aggregators, and holding no energy efficiency solicitation, and no more than six month "extensions" of existing programs until the Commission rehears this Decision and provides the remedies set forth below. The reason we would allow six months' extensions is to prevent any hiatus of energy efficiency programs while these questions are being considered.

1. Any party must be allowed to bid for 100% of the funds;
2. The CPUC must establish procedures that recognize CCAs as unique entities in relation to EE programs, who will be administrators but NOT implementers, and who will themselves conduct a solicitation, with oversight by the CPUC, for third party implementers;
3. CCAs must be recognized as having the right to apply for 100% of the funds collected within their jurisdictions;
4. Gas as well as electric PGC funds must be available for bidding;
5. The Commission must not substitute "implementation" for "administration";
6. The definition of "proportional share" must be corrected; it should be based on the amounts of PGC funds collected from all utility customers in that community or CCA territory; this "proportional", or fair share of EE funds must be allocated for programs in that community or CCA territory, except in extraordinary circumstances which are thoroughly explored in hearings by the CPUC.

Preparations to integrate Community Choice Aggregation solicitations into the CPUC's overall solicitation for energy efficiency public goods charge funds should be undertaken immediately, in order to avoid further undue delay of Energy Efficiency programs.

WEM would consider allowing the 2003 solicitation to go forward sooner, provided that the Commission renounce any set asides in the solicitation for utilities or any other party, correct the definitions of implementation/administration and proportional share, and make a genuine commitment and show progress in preparing policies and procedures to accommodate the special characteristics of Community Choice Aggregators in the 2004 solicitation.

Dated: August 13, 2003

Respectfully Submitted,

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CERTIFICATION OF SERVICE
R.0108028

I, Barbara George, certify that on this day August 13, 2003, I caused copies of the attached **WOMEN'S ENERGY MATTERS' APPLICATION FOR REHEARING OF COMMUNITY CHOICE ENERGY EFFICIENCY DECISION 03-07-034 AND MOTION TO STAY** to be served on all parties by emailing a copy to all parties identified on the electronic service list provided by the California Public Utilities Commission for this proceeding, and also by hand-delivering an original and six paper copies to the CPUC Docket office, with a copy to Administrative Law Judge Kim Malcolm and Presiding Commissioner Susan Kennedy.

Dated: August 13, 2003 at Sacramento, California.

DECLARANT

(Electronic service List attached to original only)

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