

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of San Diego
Gas & Electric Company (U 902-E) for a
Certificate of Public Convenience and Necessity
for the Sunrise Powerlink Transmission Project

Application No. 06-08-010
(Filed December 14, 2005)

**MOTION BY UTILITY CONSUMERS' ACTION NETWORK
TO ENJOIN SDG&E FROM ENTERING INTO A PERMANENT CROSS-TRIP
ARRANGEMENT WITH CFE**

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of San Diego Gas & Electric Company (U 902-E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project

Application 06-08-010
(Filed August 4, 2006)

**MOTION BY UTILITY CONSUMERS' ACTION NETWORK
TO ENJOIN SDG&E FROM ENTERING INTO A PERMANENT CROSS-TRIP
ARRANGEMENT WITH CFE**

Pursuant to the Commission's Rules of Practice and Procedure Rule 11.3, Utility Consumers' Action Network ("UCAN") requests the Commission enjoin SDG&E from a permanent cross trip arrangement with CFE. UCAN learned recently that CFE has requested that the "cross-trip" of the IV-La Rosita line after an IV-Miguel outage be changed to a cross-trip of the Tijuana-Miguel (after 2007, Tijuana-Otay Mesa) line instead during summer months on a permanent basis. As explained below, if this were to happen, CAISO ratepayers would lose the opportunity for significant savings.

In the preparation of its case over the past 16 months, UCAN has been investigating an option that involves SDG&E contracting with generators in Mexico for emergency supplies. UCAN has been developing a Mexico Light proposal that involves generation which is already sold to the U.S., is not being depended upon by CFE for capacity, and is known to be available as an incremental resource during outages of the IV-Miguel line.

On May 25, 2007, one week before the deadline for intervenor testimony, SDG&E informed UCAN, in a response to UCAN DR24-1, that CFE has requested that the "cross-trip" of the IV-La Rosita line after an IV-Miguel outage be changed to a cross-trip of the Tijuana-Miguel (after 2007, Tijuana-Otay Mesa) line instead during summer months. Indeed, SDG&E revealed that this change was already made, on a temporary basis, in the summer of 2006. This was a total surprise to UCAN. But, more importantly, SDG&E stated the possibility that this arrangement was to be made a permanent, contractual arrangement between SDG&E and CFE. UCAN maintains such an arrangement would constitute a serious lost opportunity for the state's ratepayers, whether Sunrise is approved or not.

As explained in Mr. Marcus' testimony distributed in this case on June 1st and in the attached Affidavit of David Marcus (See Attachment "A"), SDG&E itself estimates that Mexico Light would reduce reliability costs by \$33.3 million per year, consisting of \$19.3 million per year in benefits from deferring the need to build new CTs to meet LCR obligations, plus \$14.0 million per year in reduced LCR costs for existing generation. This benefit is offset by \$9.2 million in energy dispatch benefits that would have been provided by the now-deferred CTs. The net benefit of Mexico Light would be \$24.1 million per year, in levelized dollars over the 2010-2049 period. For purposes of context, this savings is 1/7 of SDG&E's claimed net benefits of Sunrise, but without any of the \$1.3 billion capital cost of Sunrise, or any of its environmental impacts.

UCAN brings this motion because it believes that if SDG&E were to enter into a permanent cross-trip contract with CFE, it would deny SDG&E ratepayers the opportunity to save money starting in 2008 and perhaps unduly limit the Commission's investigation into options to Sunrise. As explained by Mr. Marcus in the attached affidavit, even if Sunrise were to be built, the savings to state consumers could be millions of dollars in 2008-2010.

UCAN believes that this motion is necessary because of the SDG&E's conflict of interest in this matter. UCAN submits that SDG&E will be resistant to keeping UCAN's Mexico Light option available because it would have a detrimental impact upon the urgency of SDG&E's need for its proposed Sunrise Transmission project to be operational by 2010. The demonstrated zeal of SDG&E and the CAISO to get Sunrise approved would very well lead them to approve the CFE offer even though it is not in the interests of the state's ratepayers. Without Commission intervention, it is unlikely that SDG&E take this step to save the state's ratepayers significant amounts of money.

For these reasons, UCAN requests that the Commission issue an ruling Commission enjoin SDG&E from a permanent cross trip arrangement with CFE where the "cross-trip" of the IV-La Rosita line after an IV-Miguel outage be changed to a cross-trip of the Tijuana-Miguel (after 2007, Tijuana-Otay Mesa). UCAN submits that it is important that the Commission issue this ruling promptly, in this proceeding, rather than wait for the completion of this proceeding.

Dated: June 5, 2007

Respectfully submitted,

_____/s/_____
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PROOF OF SERVICE

I, Laura Impastato declare: I am employed in the City and County of San Diego, California. I am over the age of 18 years and am not a party to this action. No service list has been established in this proceeding. On June 5, 2007 I served the Motion to Enjoin SDG&E upon the parties by sending a true and correct copy thereof, addressed as shown on the parties listed on the following page via e-mail. Pursuant to Rule 44.3, I have sent a copy of this protest via e-mail to each person the application lists used by Applicants as being authorized to receive service.

_____/s/_____
Laura Impastato

ATTACHMENT "A"

AFFIDAVIT OF DAVID MARCUS

1. I, David Marcus, hereby declare that I am an expert on transmission matters. I make this declaration to the best of my personal knowledge, information and belief of the facts stated herein. I am personally aware of the facts herein and if called upon as a witness, I would and could testify competently to the information contained herein.
2. In the preparation of its case over the past 16 months, UCAN has been investigating an option that involves SDG&E contracting with generators in Mexico for emergency supplies. UCAN calls this proposal Mexico Light. We have brought it to the attention of both SDG&E and the CAISO during this proceeding.
3. Currently, SDG&E assumes it will obtain no capacity from Mexico during an outage of Miguel-IV, although the physical transfer capability over the Tijuana-Otay Mesa line is up to 800 Mw. Whether CFE (the Mexican state-owned utility which owns most Baja California generation) or others would be willing to enter into firm capacity sales to SDG&E, and at what price, is a question whose answer depends on many factors. The beauty of the Mexico Light proposal is that it involves generation which is already sold to the U.S., is not being depended upon by CFE for capacity, and is known to be available as an incremental resource during outages of the IV-Miguel line.
4. On May 25, 2007, one week before the deadline for intervenor testimony, SDG&E informed UCAN, in a response to UCAN DR24-1, that CFE has requested that the "cross-trip" of the IV-La Rosita line after an IV-Miguel outage be changed to a cross-trip of the Tijuana-Miguel (after 2007, Tijuana-Otay Mesa) line instead during summer months.¹ Indeed, SDG&E revealed that this change was already made, on a temporary basis, in the summer of 2006.² This was a total surprise to UCAN, for as recently as May 25, 2007, the ISO was sending UCAN e-mail about the frequency standard violations in Mexico that it claims would result from a cross-trip of IV-La Rosita during peak loads.³
5. Because SDG&E annual peak load occurs during summer months, a change in the IV-Miguel RAS to trip Tijuana-Otay Mesa would, as SDG&E points out, make the Mexico Light option impossible.⁴ More generally, it would make any use of any generation resource in Mexico for reliability purposes impossible.
6. SDG&E quantified what 165 Mw would be worth in a world without the Sunrise project. SDG&E estimates that Mexico Light would reduce reliability costs by \$33.3 million per year, consisting of \$19.3 million per year in benefits from deferring the need to build new CTs to meet LCR obligations, plus \$14.0 million per year in reduced LCR costs for existing generation. After offsetting \$9.2 million in energy dispatch benefits that would have been provided by the now-deferred CTs, the net benefit of Mexico Light would be

¹ SDG&E, attachment to response to UCAN DR24-1.

² Loc. Cit. We note that this is the first time that UCAN had been so informed and, furthermore, that initially SDG&E had objected to this inquiry.

³ ISO, 5/25/07 e-mail from Robert Sparks to David Marcus with attachment regarding post-transient impacts in Mexico from an IV-Miguel outage at peak load followed by a cross-trip of the IV-La Rosita line.

⁴ SDG&E, attachment to response to UCAN DR24-1.

\$24.1 million per year, in levelized dollars over the 2010-2049 period.⁵ That is 1/7 of SDG&E's corresponding estimate of the net benefits of Sunrise⁶, but without any of the \$1.3 billion capital cost of Sunrise, or any of its environmental impacts.

7. The proposed RAS change is contingent on SDG&E and the ISO agreeing to it.⁷ Arguably, the prospect of saving \$24.1 million per year from Mexico Light should lead them not to agree. Yet, such are the perverse incentives in this case, that SDG&E and the ISO might agree to the permanent arrangement notwithstanding the lost savings. As a result, SDG&E would be passing up a very cost-effective measure in its zeal to eliminate any barriers to approval of Sunrise.
8. The Mexico Light alternative would consist of closing the switch which normally prevents power from flowing from the Intergen units in Mexicali which are part of the CAISO-controlled grid to the adjacent Intergen units which are part of the Mexican grid. From the Mexican Intergen units, power from the CAISO Intergen units would then flow over the existing gen-tie line to the Mexican grid at La Rosita. From there it would flow over the same path used until a few minutes earlier by loop flow from IV to San Diego via Tijuana.
9. Mexico Light is a simple but elegant proposal that neither SDG&E (or DRA) or apparently the ISO has fully examined. Under an existing Remedial Action Scheme ("RAS"), an outage of Miguel-IV triggers the disconnection of generation at two powerplants that are physically located in Mexico but electrically connected to the IV substation and considered to be within the CAISO control area. It also can (and at peak load periods likely would) trigger the disconnection of the single 230 kV transmission line connecting the IV substation to the Mexican grid. This disconnection, commonly referred to as the "cross-trip" of the IV-La Rosita line following a trip (outage) of the IV-Miguel line, has the effect of preventing flow from IV to the SDG&E system via Mexico. SDG&E analyses in this proceeding show that the loop flow from IV to Mexico, and then back to SDG&E from Tijuana, can amount to several hundred Mw at times of peak SDG&E loads and high imports into the San Diego system.⁸ The Mexico Light plan takes advantage of the fact that an IV-Miguel outage cross-trips the CAISO generators in Mexico as well as eliminating several hundred east-to-west Mw of flow across the northern Baja grid to San Diego. It proposes that, if and when a Miguel-IV outage occurs during peak load hours with a cross-trip of the IV-La Rosita line, measures be taken to allow some of the curtailed Mexican generation to resume flowing to San Diego over a new route, through northern Baja California rather than through IV substation.⁹
10. The Mexico Light alternative would only be needed during a peak-hour outage of IV-Miguel, because SDG&E expects to have internal generation of at least 2284 Mw in 2010-2020, even assuming retirement of the entire South Bay plant and an outage of the

⁵ SDG&E, 5/07, Table H-35 Errata. This table assumes, appropriately, that AMI reduces SDG&E's reliability needs. To assume otherwise would contradict SDG&E's testimony in the AMI proceeding, as well as the Commission's findings in approving SDG&E's AMI application. In any case, SDG&E has not quantified the benefits of Mexico Light except in the case where AMI is also present.

⁶ SDG&E, 5/07, Table H-33 Errata, showing SDG&E's estimate of \$168.7 million per year of SUNRISE benefits in the presence of AMI. $168.7/24.1 = 7.00$

⁷ SDG&E, attachment to response to UCAN DR24-1.

⁸ SDG&E, responses to UCAN DR7-12a (loop flow over 300 Mw)

⁹ If an IV-Miguel outage occurs without a cross-trip then there will automatically be several hundred Mw of loop flow from IV to San Diego via Baja, and no action will be needed. Moreover, since loop flow is not compensated under WECC rules, the delivery of those several hundred Mw to SDG&E will have no transmission cost. See SDG&E's response to UCAN DR9-4a.

entire 561 Mw Otay Mesa plant.¹⁰ Adding the existing 2500 Mw import capability after an IV-Miguel outage,¹¹ SDG&E can meet its reliability needs for any load level up to $2284 + 2500 = 4784$ Mw. 4784 Mw is within 300 Mw of the expected SDG&E peak hour load in 2010-2016 (with AMI) even under 1-in-10-year weather conditions¹², and is greater than the expected SDG&E peak hour load in 2010-2017 under normal conditions.¹³

11. Even if Sunrise is built, Mexico Light saves money because it competes with in-basin LCR resources which are still needed even with Sunrise. According to SDG&E, hundreds of Mw of non-SDG&E owned SDG&E-area resources will be needed to meet local capacity requirements (local resource adequacy, or local RA) needs even if Sunrise is built.¹⁴ Mexico Light provides the exact same kind of benefit that Sunrise provides with regard to local capacity requirements: it reduces them by providing an import pathway. In the case of Sunrise, the local RA reduction is 1000 Mw, at a capital cost of \$1.265 billion (per SDG&E). In the case of Mexico Light, the reduction is 165 Mw, at a capital cost of zero.¹⁵ Because Sunrise does not reduce local RA requirements from merchant plants to zero, there is still room for Mexico Light to provide additional benefits even if Sunrise is approved.
12. Moreover, in the period between today and if Sunrise is built (assuming SDG&E is successful by 2010), the savings during the period of 2008-2010 could be millions of dollars if SDG&E is correct that increased competition among RMR suppliers lowers the unit price of RMR capacity.
13. However, if Sunrise is not built by 2010, the benefits of Mexico Light are even larger. Rather than simply reducing the number of Mw of existing SDG&E-area generators which need to be paid to meet LCR needs, Mexico Light would substitute for 165 Mw of new capacity that would otherwise have to be built and paid for to meet LCR needs. This can be seen by comparing SDG&E cases 211 and 240, which show that adding Mexico Light to the no-Sunrise base case eliminates the need for 2-4 combustion turbines (the number

¹⁰ SDG&E, 1/26/07, Table H-1, "Effective Summer Capacity (Committed)" line minus "Largest Single Resource Contingency (G-1)" line.

¹¹ SDG&E, 1/26/07, Table H-1, "San Diego Area N-1 Import Capability" line.

¹² SDG&E, 1/26/07, Table H-11 "90/10 After CSI and Demand Response" line. Table H-11 incorporates the demand-reducing effect of AMI, and is appropriate to use since the Commission has approved SDG&E's AMI proposal. Table H-11 shows maximum 1-in-10 year loads in 2010-2016 of 5075 Mw. .

¹³ SDG&E, attachment to response to UCAN DR9-7e, line 8, showing 1-in-2 peak loads after CSI of 4973 Mw. Subtracting 29 Mw for demand response programs (SDG&E, Table H-11) and 242 Mw for AMI (92 percent of the amount in SDG&E's Table H-11) leaves a 1-in-2 annual peak of 4702 Mw in 2017. 4702 Mw is less than the 4784 Mw load-serving capability of the SDG&E system with currently committed resources and the current Path 44 import limit, after an outage of IV-Miguel and Otay Mesa powerplant. Thus, the 4784 Mw load-serving capability of the 2010-2020 SDG&E system without SUNRISE, Mexico Light, or any other uncommitted generation or transmission addition, is more than enough to meet normal loads in every hour of the year in 2010-2017.

¹⁴ SDG&E, 1/26/07, Table H-12, showing 2284 Mw of SDG&E resources after a G-1 outage of Otay Mesa and surplus capacity peaking at 914 Mw in 2010, which implies that $2284 - 914 = 1370$ Mw of local RA resources will still be needed. Subtracting 541 Mw for Palomar and 47 Mw for Miramar CT leaves $1370 - 541 - 47 = 783$ Mw of non-SDG&E-owned San Diego area LCR resources required in 2010, and more in the years thereafter. Alternatively, the ISO's modeling shows 680 Mw of market-priced San Diego area local RA resources required in 2010. (ISO, workpapers for 4/20/07 Second Errata to 1/26/07 testimony).

¹⁵ SDG&E argues that Mexico Light may require some operating costs, such as wheeling payments to the Mexican utility for the use of its grid, and for the right to interconnect normally CAISO-connected generators to its grid. They are correct. But such costs are likely to be de minimus, since they will only occur in the very few hours per year when an IV-Miguel outage occurs, SDG&E has 560 Mw of generation out of service, and SDG&E loads are near or above 4784 Mw. In any case, there will be similar operating costs for access rights and transmission costs for any generators using the SUNRISE line to displace intra-SDG&E local RA needs.

varies by year) in the years 2010-2020, as well as eliminating the need for 72 Mw of otherwise-required local RA capacity in 2010-2011. More importantly, SDG&E's case 241 shows that there is no need to add any not-yet-committed resources in any year before 2014 if Mexico Light is available. And even in 2014, only 15 Mw of new resources are needed. Thus, Mexico Light all by itself defers the reliability need for Sunrise (or any other not-yet-committed alternative to Sunrise) from 2010 to 2014.¹⁶

14. According to SDG&E, hundreds of Mw of non-SDG&E owned SDG&E-area resources will be needed to meet local capacity requirements (local resource adequacy, or local RA) needs even if Sunrise is built.¹⁷ Mexico Light provides the exact same kind of benefit that Sunrise provides with regard to local capacity requirements: it reduces them by providing an import pathway. In the case of Sunrise, the local RA reduction is 1000 Mw, at a capital cost of \$1.265 billion (per SDG&E). In the case of Mexico Light, the reduction is 165 Mw, at a capital cost of zero.¹⁸ Because Sunrise does not reduce local RA requirements from merchant plants to zero, there is still room for Mexico Light to provide additional benefits even if Sunrise is approved.
15. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 5th day of June, 2007 at San Diego, California.

/s/
DAVID MARCUS
Declarant

¹⁶ SDG&E, 1/26/07, Tables H-11 (Case 240, Reference Case with AMI) and H-13 (Case 211, Mexico Lite (sic) with AMI Combo). UCAN believes, based on CPUC D.07-04-043, that SDG&E has overstated the reliability benefits of AMI somewhat. With UCAN's adjusted values (see the section of this testimony dealing with AMI), the combination of Mexico Light and AMI would leave SDG&E needing 32 Mw of new resources in 2014 rather than the 15 Mw shown by Table H-13. There would still be no need for any other resources besides AMI and Mexico Light in the years 2010-2013, inclusive.

¹⁷ SDG&E, 1/26/07, Table H-12, showing 2284 Mw of SDG&E resources after a G-1 outage of Otay Mesa and surplus capacity peaking at 914 Mw in 2010, which implies that $2284 - 914 = 1370$ Mw of local RA resources will still be needed. Subtracting 541 Mw for Palomar and 47 Mw for Miramar CT leaves $1370 - 541 - 47 = 783$ Mw of non-SDG&E-owned San Diego area LCR resources required in 2010, and more in the years thereafter. Alternatively, the ISO's modeling shows 680 Mw of market-priced San Diego area local RA resources required in 2010. (ISO, workpapers for 4/20/07 Second Errata to 1/26/07 testimony).

¹⁸ SDG&E argues that Mexico Light may require some operating costs, such as wheeling payments to the Mexican utility for the use of its grid, and for the right to interconnect normally CAISO-connected generators to its grid. They are correct. But such costs are likely to be de minimus, since they will only occur in the very few hours per year when an IV-Miguel outage occurs, SDG&E has 560 Mw of generation out of service, and SDG&E loads are near or above 4784 Mw. In any case, there will be similar operating costs for access rights and transmission costs for any generators using the SUNRISE line to displace intra-SDG&E local RA needs.

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