

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

09-17-10
08:00 AM

Order Instituting Rulemaking To
Revise and Clarify Commission
Regulations Relating to the Safety of
Electric Utility and Communications
Infrastructure Provider Facilities.

Rulemaking No. 08-11-005
(Issued November 13, 2008)

**MUSSEY GRADE ROAD ALLIANCE REPLY BRIEF FOR ORDER
INSTITUTING RULEMAKING R.08-11-005 PHASE 2**

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Facsimile: (760) 788- 5479
Email: dj0conklin@earthlink.net

September 17, 2010

MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF FOR ORDER INSTITUTING RULEMAKING R.08-11-005 PHASE 2

I.	Introduction.....	2
II.	Overarching Principles and Issues.....	2
III.	Jurisdiction Issues.....	3
IV.	Electric Transmission Issues.....	4
V.	Proposed Rules.....	4
A.	Consensus Rules.....	4
B.	MAP Rules.....	4
1.	MAP No. 4 – General Order 95, Rule 18C [Mussey Grade; App. B. – V.A.].....	4
2.	MAP No. 7 – General Order 95, Rule 35 (paragraph 4) [Joint Elec. Utils.; App. B – VIII.A.].....	8
3.	MAP No. 7 – General Order 95, Rule 35 (3 rd exception) [Joint Elec. Utils.; App. B – VIII.B.].....	11
4.	MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only) [Joint Elec. Utils.; App. B – IX.A.].....	11
5.	MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only) [Mussey Grade & Farm Bureau; App. B – IX.C.].....	14
6.	MAP No. 13 – General Order 165, Section V [Mussey Grade & CPSD; App. B – XIV.A.].....	16
7.	MAP No. 13 – General Order 165, Ordering Paragraph [PG&E; App. B – XIV.B.].....	16
8.	MAP No. 14 – Fire Maps [Mussey Grade & CPSD; App. B – XV.A.].....	17
9.	MAP No. 14 – Fire Maps [CIP Coalition; App. B – XV.B.].....	22
10.	MAP No. 14 – Fire Maps [CIP Coalition; App. B – XV.C.].....	23
VI.	Ancillary Issues.....	23
VII.	Conclusion.....	23
	Table of Authorities.....	24

I. INTRODUCTION

Pursuant to Rule 13 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission) and the schedule established by Administrative Law Judge Kenney,¹ the Mussey Grade Road Alliance (MGRA or Alliance) files this reply brief on issues raised in Phase 2 of the Order Instituting Rulemaking R.08-11-005.

The Alliance and other parties filed comprehensive opening briefs in this proceeding and, for the most part, the content of these briefs matched the corresponding commentary submitted in the workshop report. The Alliance has consequently found that most of the comments it would have regarding the briefs of other parties were already put forward in its own opening brief. Consequently, this reply brief will deal only with new issues raised in briefs that had not been brought up in the workshop comments or which the Alliance did not fully address in its opening brief. The Alliance urges the Commission to consider this reply brief in tandem with its opening brief as it tries to weigh the arguments of the Alliance with those of other parties.

For the convenience of the Commission, the Alliance has maintained exactly the same format as in its opening brief. Our recommendations may be found in our opening brief.

II. OVERARCHING PRINCIPLES AND ISSUES

The Consumer Protection and Safety Division (CPSD) raised an overarching issue that the Alliance finds to be of relevance to this proceeding, and which the Commission should keep in mind when evaluating the content of briefs by all parties. Entitled “The Utilities and CIPs Should Not Be Allowed To ‘Vote’ on How They Wish To Be Regulated,” this section of the (CPSD) opening brief refers to the fact that there are cases in the comments where “...the utilities or CIPs point to the number of votes that a particular PRC received to support their arguments as to why it should be adopted by the Commission.”²

¹ R.08-11-005; ADMINISTRATIVE LAW JUDGE’S RULING GRANTING THE MOTION TO EXTEND THE SCHEDULE FOR PHASE 2; May 7, 2010; p. 4.

² R.08-11-005; OPENING BRIEF OF THE CONSUMER PROTECTION AND SAFETY DIVISION; September 3, 2010; p. 5. (CPSD Brief)

The Alliance notes that this tendency has been repeated in the briefs, sometimes to an egregious degree – and here we refer specifically to the brief by Southern California Edison (SCE). For a number of the MAP PRCs, SCE states that a proposed rule change (PRC) had “very little support” or received “very little opposition”, which in fact completely misrepresents the workshop discussions.

For instance, regarding the discussion of Rule 35, Exception 3 Proposal By The Joint Electric Utilities (which had to do with the proposal by utilities to cut off power to all properties owned by customers who refuse access to utilities for purposes of vegetation management), SCE states that this PRC “received very little opposition”.³ In fact, discussion of this item was long and involved, and raised many concerns among advocacy groups. By “little opposition” here and concerning other PRCs we assume that SCE is referring to the disparity in numbers between utility representatives than non-utility representatives (or perhaps SCE means that this PRC was opposed by “little people” rather than “big corporations”).

A rough tally of the voting roster reveals that there were 27 companies or utilities and their contractors participating in the workshop, as opposed to eight advocacy groups.⁴ Hence, it is obvious that the sheer volume of votes will favor pro-industry measures at the cost of pro-ratepayer measures. We therefore agree with CPSD that “the significance of the number of parties voting for or against an item should not count as much as who the entities are that voted for or against a proposed regulation, as well as the consistency of the parties’ position with the Commission’s purpose in issuing the OIR ‘to adopt additional requirements and clarifications, which may be necessary in order to further reduce the risk of hazards, including fires.’”⁵

III. JURISDICTION ISSUES

The Alliance has no comment at this time.

³ R.08-11-005; OPENING BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PHASE 2 WORKSHOP REPORT TO BE PROVIDED; September 3, 2010; p. 26. (SCE Opening Brief)

⁴ The voting sheet is available on numerous pages of the Workshop report, Appendix B, for instance on p. B-102. We have classified CAISO, CPSD, DRA, Facilities Management, LA County, MGRA, CFBF, and IBEW as advocacy groups. We apologize in advance to any group incorrectly left off of (or placed onto) this list.

⁵ CPSD Opening Brief; p. 5.

IV. ELECTRIC TRANSMISSION ISSUES

The Alliance has no comment at this time.

V. PROPOSED RULES

A. Consensus Rules

The Alliance has no comments on the consensus rules at this time.

B. MAP Rules

1. MAP No. 4 – General Order 95, Rule 18C [Mussey Grade; App. B. – V.A.]

The Alliance sponsored this PRC and we discuss our position and those of other parties in our opening brief.⁶

a) LA County

Los Angeles County, which is responsible for the safety of ten million people, supports this rule. Its brief states that “Contingency planning for major utilities should not be a consideration, it should be a given. While significant actions, like turning off the power, should only be considered under the most extreme conditions, the utilities need to have this procedure fully operational and available when faced with extreme circumstances.”⁷

b) CPSD

CPSD explains their neutral vote on this item in the following way: “Although CPSD agrees with the intent of this proposal, contingency planning is something utilities should already be applying in their daily operations. Therefore CPSD voted neutral on this item.”⁸

⁶ R.08-11-005; MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF FOR ORDER INSTITUTING RULEMAKING R.08-11-005 PHASE 2; September 3, 2010; p.8. (Alliance Opening Brief)

⁷ R.08-11-005; LOS ANGELES COUNTY'S OPENING BRIEF ON WORKSHOP REPORT FOR PHASE II; September 3, 2010; p. 3.

⁸ CPSD Opening Brief; p. 13.

While the Alliance concurs that utilities *should* have contingency plans for extreme conditions in place, we have seen no evidence (with the possible exception of SDG&E) that this is so. This is understandable from the standpoint that extreme events (exceeding the system design limitations) are expected to be rare, and it is unlikely that such conditions will arise under the tenure of any particular utility officer. For most disastrous conditions – floods, earthquakes, and (non-power line) fires, utilities have in place recovery plans – this is “standard” contingency planning. What concerns the Alliance, however, is that extreme fire-weather conditions could cause a utility’s infrastructure to become the *source* of the disaster, with multiple near-simultaneous ignitions as observed in October 2007 in California, and in 1977, 1983, and 2009 in Australia. We therefore maintain that utilities should have contingency plans in place that would prevent an extreme weather event from necessarily resulting in a conflagration.

We are asking the Commission to adopt the premise that such events are “foreseeable”, rather than “acts of God”, and to require that utilities show that they have measures in place that will protect the public from their infrastructure under foreseeable conditions.

c) SCE

Southern California Edison claims that “The proposed rule is also severely flawed because it assumes the utilities (or anyone else) can predict wildfires in areas containing facilities that conform to G.O. 95. Thus, the proposed rule is impossible to operationalize.”⁹

This has been a common misconception regarding this PRC. The Alliance PRC does not require that utilities be able to predict wildfires nor does it, as other parties have claimed, require that utilities be capable of preventing 100% of wildland fires. What it *does* require is that electrical utilities be capable of recognizing when conditions may be likely to exceed GO 95 design requirements, and having engineering and / or operational measures in place that would prevent the widespread damage that would be *likely* if conditions significantly in excess of utility design specifications were to occur.

⁹ R.08-11-005; OPENING BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PHASE 2 WORKSHOP REPORT TO BE PROVIDED; September 3, 2010; p. 18. (SCE Opening Brief)

SCE also urges “Mussey Grade to support the full funding of each utility’s vegetation management program (in conformance with the Phase 1 decision) and infrastructure replacement program.”¹⁰ While this is a constructive suggestion, neither of these measures would ameliorate the failure case that the Alliance proposed this PRC to address.

d) SDG&E

SDG&E is concerned that “The contingency planning proposal submitted by Mussey Grade Road Alliance (Mussey Grade) would duplicate work already being done in SDG&E’s ongoing collaborative process. There is no need for the Commission to order SDG&E to come up with a contingency plan to deal with wind and fire danger -- SDG&E and interested stakeholders are hard at work addressing these issues already.”¹¹

First off, as SDG&E knows, the Alliance is part of that collaborative process and has been for almost a year. That process led SDG&E to declare unilaterally that it will shut off electricity at the tolerance level of its equipment, which it interprets as 56 miles per hour gust winds under GO 95. There was no discussion of this approach (other than a general reminder by SDG&E that the Commission requires it to operate its system safely) before SDG&E announced it – and told all of the so-called stakeholders at the time that the company has no shut off plan other than this unilateral decision. Moreover, SDG&E is missing the point of this PRC – the work it and stakeholders are doing to deal with wind and fire danger will form the *basis* of the contingency plan. We stated in our opening brief that this work would likely make them compliant with the proposed rule.¹²

e) Multi-Jurisdictional Utilities

PacifiCorp and Sierra Pacific raise a legitimate concern with this proposed rule change as they perceive it would affect their territories: “As described above, high winds in both PacifiCorp’s and Sierra’s service territories typically occur during the winter and correspond with snow and rain.

¹⁰ Id.; p. 19.

¹¹ R.08-11-005; PHASE 2 OPENING BRIEF OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E); September 3, 2010; p. 9. (SDG&E Opening Brief).

¹² Alliance Opening Brief; p. 15.

As the windiest periods occur in the wet season, fire risks are much lower and contingency plans like those contemplated in this proposal are unlikely to reduce fire risks.”¹³

We address this concern in our opening brief, which explains that contingency plans should cover foreseeable conditions.¹⁴ We have not examined meteorological data for PacifiCorp or Sierra’s service territories, nor consulted with meteorologists regarding this issue, so we hesitate to say that they should be exempted from this rule. However if electrical utilities are able to demonstrate that there is no reasonable scenario that would lead to wind levels exceeding GO 95 design standards during fire weather conditions, that would, in our opinion, meet the intent of this rule. Likewise, we would not object to certain geographical areas being included in or excluded from this rule, provided that this geographical basis is determined on a scientific basis. A state-wide utility hazard map (discussed in MAP 14) might form an appropriate basis for such classification.

f) Summary

All in all, the Alliance believes that this PRC is a practical step that the electrical utilities would want to undertake in order to lessen the chances that ignitions by their equipment develop into catastrophic fire events. One would think that, following the 2007 Firestorm in Southern California, at least SDG&E and SCE would support such a rule because it would benefit them to do so. However, their arguments against this PRC make it obvious that they often forget the purpose of this rulemaking. Instead, they prefer to argue against measures that would prevent loss of life and property than to either suggest or support new approaches to safety that would decrease the chance of wildland fires being started by them. Contingency planning is necessary to prevent disasters before they start and that is why the Alliance became involved in this process and proposed this PRC.

¹³ R.08-11-005; JOINT OPENING BRIEF OF THE MULTI-JURISDICTIONAL ELECTRIC UTILITIES; September 3, 2010; p. 9. (MJEU Opening Brief)

¹⁴ Alliance Opening Brief; pp. 14-15.

2. MAP No. 7 – General Order 95, Rule 35 (paragraph 4) [Joint Elec. Utils.; App. B – VIII.A.]

The Alliance opening brief argued against adoption of this PRC.¹⁵

a) TURN

We note that while TURN supported this PRC, it did so contingent upon a number of additional notification requirements, which include a change to Electric Rule 11 (Discontinuance of Service) that would explicitly state that utilities have discretion to cut off power when they cannot gain entry to do required vegetation management,¹⁶ a thirty day notice period prior to shut-off,¹⁷ and notification of all occupants in the event of shut-off of a multi-unit structure.¹⁸

The Alliance agrees with TURN that “[t]here are certain instances, however, where a customer’s reluctance to allow a utility onto their property may be entirely reasonable.”¹⁹ However, we do not think that simply expanding notification requirements would be sufficient to address these issues, and electrical utilities will likely argue that introducing this delay could potentially leave a hazardous situation unaddressed. The Alliance, on the other hand, argued that facilitating law enforcement support would reduce the potential for abuse while still allowing the utilities ready access to address hazardous situations.²⁰

However, if the Commission determines that this PRC should be adopted, the Alliance believes that the additional measures proposed by TURN will have an overall effect of reducing impacts on the public, especially those who are “innocent bystanders” who would have their power shut off but who have no control over access to the utility facilities.

¹⁵ Alliance Opening Brief; p. 17.

¹⁶ R.08-11-005; OPENING BRIEF OF THE UTILITY REFORM NETWORK IN PHASE TWO OF RULEMAKING 08-11-005; p. 4. (TURN Opening Brief)

¹⁷ Id.; p. 5.

¹⁸ Id.

¹⁹ Id. p. 3.

²⁰ Alliance Opening Brief; p. 20.

b) PacifiCorp

The description Sierra PacifiCorp of how it manages its own problem customers is illustrative of the point that the Alliance wishes to raise about the relationship between electrical utilities and law enforcement:

“Only after numerous informal attempts to resolve a situation with a customer will PacifiCorp involve legal processes such as contacting local law enforcement or seeking an injunction. There would be extremely limited instances in which PacifiCorp would seek to shut-off service.”²¹ Sierra Pacific makes a very similar statement.

This description begs the question of why some electrical utilities are completely unable to get adequate support from either law enforcement or the courts. We note that what they are effectively asking for is an authority that transcends the law and is answerable to no one. As we noted in our opening brief, we believe that this is approaching the problem backwards. If law enforcement officials and the courts are leaving real hazard situations in place, the Commission needs to ask how this could possibly be the case and what can be done to address it.

Finally, we also note that if the circumstances under which this draconian power would be enacted are “extremely limited”, then we would expect they make up a very small fraction of refusals. This is a tremendous amount of power being brought to bear to address what is admittedly a very limited problem. We do not consider it appropriate.

c) SCE

The Alliance *does* consider SCE’s stated approach to customer refusals and shut-off to be appropriate and reasonable. Specifically:

“As a matter of policy, SCE does not intend to turn off service at a location different from the location causing the unsafe condition, but may choose to terminate service at the location of the

²¹ R.08-11-005; JOINT OPENING BRIEF OF THE MULTI-JURISDICTIONAL ELECTRIC UTILITIES; September 3, 2010; p. 18. (MJEU Opening Brief)

obstructed access if the threat of harm from the condition appears imminent and all other options for correcting the condition have been exhausted.”²²

In fact, SCE does not fully support the ability of utilities to turn off power at locations other than those that are directly responsible for the hazard:

“SCE supports the right to terminate service at the location where access is restricted, and is neutral on authority to terminate service at other locations where the property owner receives service.”²³

However, according to PG&E, the authority to shut off power to protect public safety already exists under its current tariff rules:

“PG&E already has the right to deny or terminate service immediately and without notice to any customer who threatens to create a hazardous condition (PG&E Tariff rule 11(H)(1)(b)) or with reasonable notice if ‘any of the required clearances between the existing Service Facilities and any object becomes impaired under any applicable laws, ordinances, rules, or regulations’. (PG&E Tariff rule 16(F)(3)(b).)”²⁴

It is therefore not clear to the Alliance why SCE is supporting this PRC when the authority it would grant greatly exceeds that of SCE’s current termination policy.

d) PG&E

Despite the fact that it has authority to terminate service to eliminate hazardous conditions under its Tariff rule 11(H)(1)(b), PG&E also claims that it needs more authority in order to turn off multiple locations. It maintains, though that this would be a very rare occurrence because the utility is already has strong disincentives to turn off power:

²² R.08-11-005; OPENING BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PHASE 2 WORKSHOP REPORT TO BE PROVIDED; September 3, 2010; p. 25. (SCE Opening Brief)

²³ Id.

²⁴ R.08-11-005; OPENING BRIEF OF PACIFIC GAS AND ELECTRIC COMPANY (U39E) ON PHASE 2 JOINT PARTIES’ WORKSHOP REPORT FOR WORKSHOPS HELD JANUARY – JUNE 2010; September 3, 2010; p. 10. (PG&E Opening Brief)

“An electric power company is in the business of making money from providing service, and no company makes any money when it is forced to terminate power to a customer -- especially at multiple locations. Such action stops the meter(s) from running and guarantees an even unhappier customer. It simply runs counter to basic business incentives. Termination of power at one location to enforce vegetation management clearances is not something that a utility wants to do – although it may be forced to do so in extreme situations. Termination of power at multiple locations is the last thing that a utility wants to do.”²⁵

We do not believe that the logic of this statement is complete. Yes, utilities are businesses that make money by selling electricity to customers. However, there are customers that all businesses would prefer not to do business with – those who cost the company more than the company stands to make in profit from them. This is one basis for Commission regulation of shut-off practices. We would assume that stubborn refusal customers, who require numerous visits by utility staff, and possibly action on the part of utility attorneys, would fall into this category. Hence, this PRC would lighten the load for electrical utilities in such cases but would also potentially be subject to abuse because there is no significant business incentive to prevent inappropriate use of this proposed shut-off mechanism. Simply put, it is like shooting at a fly with a canon. It is better to let those utilities in favor of the PRC handle those few problem customers on an individual basis than to subject all customers to a shut off standard that could only be challenged after the fact.

3. MAP No. 7 – General Order 95, Rule 35 (3rd exception) [Joint Elec. Utils.; App. B – VIII.B.]

a)

The Alliance opposed this PRC in its opening brief.²⁶

4. MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only) [Joint Elec. Utils.; App. B – IX.A.]

The Alliance argued against adoption of this PRC in its Opening Brief.²⁷

²⁵ Id.; p. 11.

²⁶ Alliance Opening Brief; p. 21.

²⁷ Alliance Opening Brief; p. 24.

a) LADWP

The electric utility support for extending the minimum trim distance from 6.5 feet to 10 feet is not universal. The Alliance was pleased to see that LADWP does not think that an increased trim distance is necessary because: “*overcutting can impact the health of the trees and may be counterproductive to existing utilities programs that combat GHG gases. For example, LADWP has undertaken numerous programs to reduce CO2 emissions, including distributing more than 100,000 trees through the “Trees for a Green LA”*

Reduced trim cycles can maintain the proper balance of fire safety, while obtaining the proper clearances from conductors, preserving the health of the trees and enduring the environmental benefits.”²⁸

The Alliance noted in its own opening brief that the question of trim cycle timing is critical to the question of trim distances, and that one of the primary motivations for this PRC is to reduce electrical utility vegetation costs by reducing the trim cycle frequency²⁹ to the potential detriment of the trees involved.

b) SDG&E

One claim that SDG&E makes to support this proposal for increased trim distances is that “it is sometimes necessary to take legal action, and in such instances the utility may only be allowed to trim to the minimum guidelines listed in Appendix E.”³⁰ We assume that this is a hypothetical concern, as SDG&E has cited no cases as example. Besides, the language of the current guidelines clearly state that the specified trim distances are *minimum* trim distances. A court might deliberately misread the rule, but adopting a more stringent rule based upon this unlikely possibility would be inappropriate.

SDG&E goes on to question the credibility of the Alliance:

²⁸ R.08-11-005; OPENING BRIEF OF THE LOS ANGELES DEPARTMENT OF WATER AND POWER ON THE PHASE 2 JOINT PARTIES’ WORKSHOP REPORT; p. 9. (LADWP Opening Brief)

²⁹ Alliance Opening Brief; p. 28.

³⁰ SDG&E Opening Brief; p. 21.

“On one hand, Mussey Grade professes to be very concerned about the possibility of wildfires in Southern California, and professes to be the concerned voice of San Diego County’s extensive back country. On the other hand, however, Mussey Grade wants to limit the amount of tree trimming done around high-voltage conductors in high-risk fire zones to levels that SDG&E, SCE, and PG&E do not believe are adequate. This dichotomy should give the Commission pause as it considers all of the fire safety claims and arguments made by Mussey Grade.”³¹

We assume that SDG&E also questions the safety commitment of LADWP and Los Angeles County, who also oppose this expanded trim distance. However, this observation by SDG&E suggests that it might be advantageous to reiterate the purpose and goals of the Mussey Grade Road Alliance.

It is our goal to protect the environs and quality of life of residents of the Mussey Grade Road area including specifically such matters as the preservation of trees as well as fire safety. By extension as intervenors before the CPUC, the Alliance also protects the environs and quality of life of other rural California residents living in similar environments. One key aspect of this protection in California, and a key concern and area of study of the Alliance, is fire safety. However, if avoidance of wildland fires were our sole or primary motivation, none of us would live here – it is dangerously fire-prone. Rural Californians accept a higher level of risk to life and property in order to benefit from the outstanding environmental quality that rural California offers. Achieving the proper balance between safety on the one hand and environmental health and aesthetics on the other is a constant struggle, for the back-country residents themselves and for the government agencies that serve them. The Commission has recognized the importance of this balancing act itself in D.97-01-044: “we must be certain that our efforts to insure safe and reliable service cause as little disruption to the natural environment and the aesthetics of affected property as possible, to the extent that we offer guidance about trimming beyond specified minimum clearances.”

In fact, SDG&E’s own data from the Mussey Grade area fully supports our assertion that SDG&E has been perfectly able to conduct trimming that is in excess of the minimum trim distances specified in Appendix E under the current guidelines: “86 percent of the trees trimmed by SDG&E in the vicinity of Mussey Grade Road (286 trees out of 330) were trimmed to 10-11.9 feet post-trim clearances. The remaining 44 trees were trimmed to additional clearances, but these were

³¹ Id.; p. 22.

not routine clearance trims that would be covered by the Appendix E recommended guidelines.”³² This has all been conducted under the *current* guidelines, without need of the expanded trim distances specified in this PRC.

We do not have knowledge of customer refusals or legal action taken by residents of the Mussey Grade area as SDG&E extended its trim distances over the last couple of years, though some residents have expressed dismay and concern due to the greater impact to the Mussey Grade oak canopy. Leaving aside the question of whether the current SDG&E trimming practices are appropriate, the Alliance is most concerned with the following question: If minimum trim distances are expanded from six to ten feet as proposed by this PRC, would SDG&E (or other utilities) take this as a message to expand their standard trimming distances to an even greater distance still? To 15 feet? To 20 ? To 25?³³ By increasing the *minimum* distance, we believe that electrical utilities will be encouraged to exercise greater *discretionary* trim distances – and they may do so not for safety reasons but rather to reduce costs by increasing the time between trim cycles.

We therefore request that the Commission reject this PRC as unnecessary and potentially counterproductive.

5. MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only) [Mussey Grade & Farm Bureau; App. B – IX.C.]

The Alliance and the Farm Bureau co-sponsored this proposed rule change.³⁴

a) LA County

Los Angeles County supports the Alliances and Farm Bureau’s proposed rule language: “This proposed rule change, by expanding on the current rule, provides clear reasoning for both the public and the employees of the utility as to why clearance distance may need to be greater than the minimum clearance distances recommended at the time of pruning.”³⁵

³² SDG&E Opening Brief; p. 23.

³³ A 25 foot minimum trim was suggested by SDG&E in Phase 1 of these proceedings.

³⁴ Alliance Opening Brief; p. 25.

³⁵ LA County Opening Brief; p. 5.

b) PG&E

PG&E is concerned that the proposed language would lead to difficulties with customers: “The phrase “tree health” (which has nothing to do with the overarching safety and reliability purposes of GO 95) especially could cause extended disagreements with property owners who might argue that the health of their tree will be damaged by any pruning at all.”³⁶ However, this is a hypothetical concern that ignores the word “or” – *any* of the proposed criteria would be considered as reasonable grounds for pruning. It also ignores the fact that according to the stated criteria, tree health would be considered reasonable grounds *for* pruning beyond the minimum trim distance – for instance if the arborist were to decide that a more extensive cut would reduce the overall strain on the tree, or if the cut were extended to remove a diseased portion of the tree.

c) SDG&E

SDG&E expresses concern that “[p]roblem property owners would treat these as words of limitation, and claim that no additional trimming beyond the recommended minimums can take place because none of the three listed factors require trimming beyond the recommended minimums.”³⁷ By “these words” SDG&E means “*public safety, reliability or tree health*”, which is the phrase added to the original text offered by the IOUs. Unfortunately, SDG&E does not describe what legitimate purpose for tree trimming there might be that does not fall within these categories. As we explained in our opening brief, other electrical utilities were more explicit – they’d like to reduce costs through longer trim cycles, at the cost of greater impact to the quality of life in rural areas.³⁸

³⁶ PG&E Opening Brief; p. 13.

³⁷ SDG&E Opening Brief; p. 26.

³⁸ Alliance Opening Brief; pp. 28-29.

6. MAP No. 13 – General Order 165, Section V [Mussey Grade & CPSD; App. B – XIV.A.]

a) TURN

Both TURN³⁹ and Sierra Pacific⁴⁰ suggest that data collection for minor electric utility fires would be better conducted by fire agencies than by utility personnel. While this proposal looks reasonable on its face, there are two significant problems with it. For one, fire agencies may not respond to every fire if they are self-extinguishing. It may be that utility personnel discover that a fire has occurred when conducting an inspection or when investigating an outage. The second issue is that it is essential that the fire record contain an exact technical description of the utility components that are responsible for igniting the fire. Firefighters are trained to identify fire causes, and whether utility equipment is involved. However, they do not have the technical expertise of electric utility crews in identifying the components and failure mode involved in starting the fire.

It should be kept in mind that the primary beneficiary of fire data collection will be the utility that collects the data. This data will provide them with actionable information that they can apply to inspections, component selection and procedures in order to further their own fire prevention programs. Further value is added by pooling the data, which allows a broader range of incidents to be examined and compared between utility systems.

7. MAP No. 13 – General Order 165, Ordering Paragraph [PG&E; App. B – XIV.B.]

The Alliance opposed this proposed ordering paragraph in our opening brief.⁴¹

a) LA County

Los Angeles County strongly objects to the ordering paragraph proposed by PG&E as a replacement for the data collection rule sponsored by the Alliance and CPSD for reasons discussed in the Alliance opening brief. LA County's concern, like that of the Alliance, is that this proposed ordering paragraph is simply a delaying tactic. LA County goes further to state that "...the utilities

³⁹ TURN Opening Brief; p. 10.

⁴⁰ MJEU Opening Brief; p. 25.

⁴¹ Alliance Opening Brief; p. 40.

have been less than enthusiastic about sharing data related to fires caused by power lines and equipment. Postponing the establishment of a data collection rule until after the rulemaking has ended will offer little recourse to CPSD and other public safety agencies if data offered or collected is insufficient.”⁴²

b) SCE

The Alliance takes issue with SCE’s characterization of the Alliance’s and CPSD’s data collection rule as “hastily proposed”.⁴³ In fact, as we explained in our brief and comments, we originally proposed a data collection rule as early as Phase 1, and we had discussions with all electric utilities in order to garner support and explain the justification for the PRC. As noted by Los Angeles County,⁴⁴ utilities are loathe to divulge data even when required to do so by law. Therefore, it is not surprising that SCE and other electrical utilities have expressed opposition to this rule.

8. MAP No. 14 – Fire Maps [Mussey Grade & CPSD; App. B – XV.A.]

This PRC was co-sponsored by the Alliance and CPSD, and is discussed in the Alliance Opening Brief.⁴⁵

a) CAL FIRE

The proposed ordering paragraph was composed by CPSD and the Mussey Grade Road Alliance in consultation with CAL FIRE. It is specifically tailored to enable the full cooperation of CAL FIRE within the constraints CAL FIRE’s own policies. This is acknowledged in CAL FIRE’s opening brief:

“As stated in the Report, The Final Proposed Ordering Paragraph (Exhibit B, p. B-212) reflects Departmental staff input and, subject to staff availability and the ability to recover significant costs, CAL FIRE is willing to:

⁴² LA County Opening Brief; p. 6.

⁴³ SCE Opening Brief; p. 35.

⁴⁴ Op. Cite.

⁴⁵ Alliance Opening Brief; p. 42.

- *Participate with CPUC staff, utilities, and other stakeholders in developing a work plan for the generation, maintenance, and accessibility of more detailed and appropriate mapping.*
- *Participate in a study that may be developed under the work plan.*
- *Comment on the results of any fire mapping study presented in future CPUC workshops.”⁴⁶*

Due to its “inspection, law enforcement, and other governmental considerations that relate to utilities, power lines, and fires”⁴⁷, CAL FIRE has refrained from taking a position on many of the PRCs before the Commission. It should be noted that this PRC is the only one in Phase 2 receiving CAL FIRE’s active support.

It should also be noted that CAL FIRE also interprets the Ordering Paragraph to allow the use of the Reax maps in the mapping creation process.⁴⁸

b) CPSD

CPSD quotes CAL FIRE’s input from public agency workshops as to the key inputs for a state-wide utility-specific fire map would contain “updated or expanded data on vegetation and localized wind data...particularly extreme winds is critical to dealing with mapping that is responsive to the kinds of things that impact utility base.... [T]he main thing that’s missing is detailed localized wind data, especially extreme events to our modeling.”⁴⁹

c) SCE

SCE does not wish to have the CAL FIRE FRAP map permanently approved for inspection purposes. It was their hope that a replacement for it would be vetted in the Phase 2 workshops, but this did not occur.⁵⁰ The Alliance agrees and shares SCE’s concern. This was our primary

⁴⁶ R.08-11-005; OPENING BRIEF OF THE CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION(CAL FIRE); September 3, 2010; p. 2 (CAL FIRE Opening Brief)

⁴⁷ Id.

⁴⁸ Id.; p. 3: “Reax maps might serve as an appropriate starting point for developing a work plan.”

⁴⁹ Quoted in CPSD Opening Brief; pp. 35 -36.

⁵⁰ SCE Opening Brief; p. 10.

motivation for offering this proposed ordering paragraph – to create a process that will allow the Commission to create a scientifically defensible utility threat map.

d) TURN

In its opening brief, TURN states that: “The inputs to such a map (weather, wind, vegetation cover, vegetation growth, etc.) are variable from year to year...”⁵¹ Some discussion of map and condition variability occurred during the mapping subcommittee meetings, and there was general consensus that while conditions might change over a multi-year period, maps would remain essentially valid for an extended period of time. We note that the CAL FIRE FRAP maps currently in use were originally created in the 2001-2004 time frame.⁵² Likewise, the method used by the Reax consultants to create their fire map averaged weather over a multi-year period.⁵³

The assertion by TURN that maps would need to be updated yearly is incorrect.

e) PG&E

PG&E suggests an alternative process for map review and approval: “...the reasonable course is to allow CPSD time to review the REAX report, complete the peer review and publishing, and then have the Commission consider the adoption or approval of the REAX maps for CIPs use. This effort may be more appropriate for a Phase 3 of this proceeding.”⁵⁴

The Alliance has raised the point that CPSD does not have sufficient in-house fire expertise to be able to conduct a technical evaluation of the Reax report and map, which is why we felt it important to bring CAL FIRE into the process. We assume that CPSD would follow an evaluation process much like that described in the proposed ordering paragraph.

⁵¹ TURN Opening Brief; p. 10.

⁵² A.06-08-010; MG-1; PHASE 1 DIRECT TESTIMONY OF THE MUSSEY GRADE ROAD ALLIANCE; May 31, 2007; Appendix E; p. 3.

⁵³ Chris Lautenberger, et al; Communication Infrastructure Provider Assets in the Wildland Setting; CIP Fire Threat Map; June 9, 2010; Prepared for California CIP Coalition; Reax Engineering Inc. Job # 10-0134. (Workshop Report; Appendix E); p. 17.

⁵⁴ PG&E Opening Brief; p. 18.

We have one additional concern regarding the suggestion of a Phase 3 for this proceeding for this purpose. One of the problems that plagued progress on the issue of the creation of utility-specific fire maps throughout this rulemaking is that each phase has come with a specific (and short) deadline. This has led to each phase producing “the best we can do for now” rather than the best overall map. For example, it led to the adoption of the FRAP maps against CAL FIRE’s advice in Phase 1, and it has led to the submission of the CIP/Reax maps before they have been reviewed, not to mention leaving Southern California without a utility specific wind-map. We are concerned that the attempt to fit the review of the Reax map and / or development of a derivative or new state-wide map into the time constraints of a phased process would lead to more compromises on overall quality. This is why the Alliance favors the creation of a *process* through this ordering paragraph that will assure the production and maintenance of scientifically sound utility-specific maps for the entire state.

f) Multi-Jurisdictional Utilities

Sierra Pacific and PacifiCorp give a misleading interpretation of the working group process regarding map development: “All workshop participants, including CPSD and Mussey Grade, were invited to participate in the mapping working groups. Any efforts to develop new maps should have been coordinated with the mapping working groups that were formed during workshops in this proceeding.”⁵⁵ In fact, both CPSD and Mussey Grade were very actively involved in the mapping workshops, and were two of the parties that worked hardest in order to coordinate a unified approach. How this effort proceeded and failed due to legal concerns on the part of some working group members, leading to an independent process being spawned by the CIP Coalition, is described in the Alliance opening brief.⁵⁶

g) CIP Coalition

The CIP Coalition insists that the Reax map that it sponsored be immediately adopted without review because “the Commission does not require peer review with respect to expert reports submitted to the Commission. In fact, the Commission regularly reviews expert reports and

⁵⁵ MJEU Opening Brief; p. 25.

⁵⁶ Alliance Opening Brief; pp. 43-44.

testimony that have not undergone peer review and issues decisions addressing the merits of such reports.”⁵⁷

CSPD joined with the Alliance in sponsoring this proposed ordering paragraph precisely because neither CPSD nor any other division of the Commission has the relevant technical expertise to judge the correctness and completeness of the Reax map. As far as retaining external experts for this purpose, there is significant difficulty in choosing those as well – as those of us involved in the mapping working group learned. Because some experts have given testimony either in Commission proceedings or investigations, or in external litigation, there might very well be significant objections if the Commission were to choose an expert favored by either CPSD or by a utility. This is why we appealed to CAL FIRE as a neutral third party with technical expertise, and formulated an ordering paragraph that would allow their involvement.

The CIP Coalition also is the source of the commonly echoed complaint that the ordering paragraph would require that a map be generated “from scratch”, and goes on to state that “at a minimum MGRA appears to be confused about exactly what the effect of the ordering paragraph which they are cosponsoring with CPSD would have... The ordering paragraph does not just initiate the creation of a formal review process, but rather initiates the creation of a new high resolution map, of which peer review would just be one aspect.”⁵⁸ The Alliance does not interpret our ordering paragraph as *requiring* that a new map be created “from scratch” (and therefore that the Reax map be discarded or be precluded from forming the basis of a state-wide map), and neither does CPSD or CAL FIRE. If the Commission were to agree with the CIP Coalition that our interpretation of our language is “confused”, then the obvious remedy is to revise the language to make it more clear that existing work may be utilized. The CIP Coalition has offered no such revision – instead they attempt to push the straw-man “from scratch” argument to prevent a proper review of the Reax report and to prevent the creation of a utility-specific map for all of California.

⁵⁷ R.08-11-005; OPENING BRIEF OF THE CIP COALITION; September 3, 2010; p. 48. (CIP Coalition Opening Brief)

⁵⁸ Id.

9. MAP No. 14 – Fire Maps [CIP Coalition; App. B – XV.B.]

The Alliance has taken the position that while interim use of the Reax maps may be appropriate for CIP inspection purposes, these need to undergo a formal technical review before being adopted permanently or being incorporated into a state-wide utility hazard map.⁵⁹

a) CAL FIRE

CAL FIRE notes that “it was mentioned by PGE in the Report (Exhibit B, p. B-219) that the Reax fire threat maps were going to undergo peer review but that there had not been time to complete this process. The Report does not contain specific information about how this peer review would occur.”⁶⁰ It also notes that it would participate in the review if possible.⁶¹

Additionally, CPSD quotes Dean Cromwell of CAL FIRE from the transcript of the public workshops as stating that “[I]t’s difficult to determine the efficacy of the proposed approach particularly in regard to how you do a numerical estimation for refined wind data... And I think we’re certainly interested in understanding and cooperating more about the REAX kind of engineering methods that were suggested.”⁶²

CAL FIRE also maintains, however, that responsibility for final approval of the maps lies with the Commission.⁶³ Since neither the utilities nor the Commission have staff with expertise in fire map creation, it is incumbent upon the Commission to obtain such expert assistance in order to verify that the maps that it approves meet their public safety goals. The proposed Ordering Paragraph put forward by CPSD and the Alliance would lay out a structure that would allow the Commission to have confidence that any map that they approve has been vetted against the appropriate technical standards.

⁵⁹ Alliance Opening Brief; p. 59.

⁶⁰ CAL FIRE Opening Brief; p. 3.

⁶¹ Id.: “In the event that CAL FIRE is invited to participate in any peer review of the maps, CAL FIRE will provide input and analysis to the extent that staff and other resources are available.”

⁶² CPSD Opening Brief; p. 35.

⁶³ Id.: “CAL FIRE maintains the position that it is not appropriate for CAL FIRE to approve any maps, but rather the CPUC should have the responsibility to approve maps that are developed as part of its regulatory structure.”

10. MAP No. 14 – Fire Maps [CIP Coalition; App. B – XV.C.]

Argument and comments made by the Alliance in the previous section (regarding Appendix B, section XV. B.) are equally applicable to this section.

VI. ANCILLARY ISSUES

The Alliance has no comment at this time.

VII. CONCLUSION

The Alliance has deeply appreciated the opportunity to participate in this public rulemaking. We have endeavored to apply our knowledge regarding wildland fire and scientific methodology toward the goal of improving the safety of our fellow Californians. We request that the Commission accept the recommendations made by the Alliance in our opening brief.

Respectfully submitted this 17th day of September, 2010,

By: /S/ **Diane Conklin**

Diane Conklin
Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
(760) 787 – 0794 T
(760) 788 – 5479 F
dj0conklin@earthlink.net

TABLE OF AUTHORITIES

Commission Decisions

D.97-01-044.....13.

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have served a true copy of the **MUSSEY GRADE ROAD ALLIANCE REPLY BRIEF FOR ORDER INSTITUTING RULEMAKING R.08-11-005 PHASE 2** to all parties on the service list for R.08-11-005 via electronic mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 17th day of September, 2010 at Ramona, California.

/s/ Diane Conklin

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065

Parties

NELSON G. BINGLE, III
OSMOSE UTILITIES SERVICES, INC.
215 GREENCASTLE ROAD
TYRONE, GA 30290
FOR: OSMOSE UTILITIES SERVICES, INC.

MATTHEW YATES
LEGAL COUNSEL
WECC
615 ARAPEEN DRIVE, SUITE 210
SALT LAKE CITY, UT 84108
FOR: WESTERN ELECTRICITY COORDINATING
COUNCIL (WECC)

CHRISTOPHER A. HILEN
ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520
FOR: SIERRA PACIFIC POWER COMPANY

J. SCOTT KUHN
COUNTY OF LOS ANGELES
KENNETH HAHN HALL OF ADMINISTRATION
500 W. TEMPLE STREET, RM 648
LOS ANGELES, CA 90012
FOR: LOS ANGELES COUNTY

OSCAR A. ALVAREZ
REGULATORY STANDARDS AND COMPLIANCE
LOS ANGELES DEPT. OF WATER AND POWER
111 N. HOPE STREET, ROOM 1246
LOS ANGELES, CA 90012
FOR: L.A. DEPARTMENT OF WATER AND POWER

SHANISE BLACK
DEPUTY CITY ATTORNEY, LEGAL DIV.
LOS ANGELES DEPARTMENT OF WATER & POWER
111 NORTH HOPE STREET, ROOM 340
LOS ANGELES, CA 90012
FOR: CITY OF LOS ANGELES, DEPT OF WATER
AND POWER

STEVEN M. MEYER
PSC TECHNOLOGY INCORPORATED
21839 SADDLE PEAK RD
TOPANGA, CA 90290
FOR: PSC TECHNOLOGY INCORPORATED

JESUS G. ROMAN
VERIZON CALIFORNIA INC.
112 LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362
FOR: VERIZON CALIFORNIA

ROBERT F. LEMOINE
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

DIANE CONKLIN
MUSSEY GRADE ROAD ALLIANCE
PO BOX 683
RAMONA, CA 92065
FOR: MUSSEY GRADE ROAD ALLIANCE

KEITH MELVILLE
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL BAGLEY
VERIZON WIRELESS
15505 SAND CANYON AVENUE
IRVINE, CA 92612
FOR: VERIZON WIRELESS

JON DOHM
CROWN CASTLE USA, WEST AREA
510 CASTILLO STREET, SUITE 303
SANTA BARBARA, CA 93101
FOR: CALWA

JAMES E. BRITSCH
FACILITIES MANAGEMENT SPECIALISTS LLC
1231 CRESTLINE DRIVE
SANTA BARBARA, CA 93105
FOR: FACILITIES MANAGEMENT SPECIALISTS,
LLC.

CLEVELAND LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5122
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

KIMBERLY LIPPI
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5001
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: CPSD

NINA SUETAKE
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900

ROBERT FINKELSTEIN
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900

SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFROM NETWORK

SAN FRANCISCO, CA 94104
FOR: TURN

KRISTIN L. JACOBSON
SPRINT NEXTEL
201 MISSION STREET, SUITE 1500
SAN FRANCISCO, CA 94105
FOR: SPRINT NEXTEL

LISE H. JORDAN, ESQ.
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A. RM 3151
SAN FRANCISCO, CA 94105
FOR: PG & E

NELSONYA CAUSBY
AT&T CALIFORNIA
525 MARKET ST., STE 2025
SAN FRANCISCO, CA 94105
FOR: AT&T CALIFORNIA AND NEW CINGULAR
WIRELESS PCS, LLC

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107
FOR: COMCAST PHONE OF CALIFORNIA/TW
TELECOM OF CALIFORNIA, LLC/TIME WARNER
CABLE

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: CTIA-THE WIRELESS ASSOCIATION

MARLO A. GO
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: PACIFICORP

PATRICK M. ROSVALL
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: SMALL LECS, SUREWEST TELEPHONE

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL
50 CALIFORNIA STREET, SUITE 500
SAN FRANCISCO, CA 94111
FOR: CALTEL

EDWARD O'NEILL
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: COXCOM, INC./COX CALIFORNIA TELCOM
LLC

JANE WHANG
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: NEXTG NETWORKS OF CALIFORNIA, INC.

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR

SUZANNE TOLLER
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: SUNESYS, LLC

LARRY ABERNATHY
DAVEY TREE SURGERY COMPANY
PO BOX 5015
LIVERMORE, CA 94551
FOR: DAVEY TREE SURGERY COMPANY

JOHN GUTIERREZ
DRECTOR, GOVERNMENT AFFAIRS
COMCAST
3055 COMCAST PLACE
LIVERMORE, CA 94551-9559
FOR: COMCAST CABLE COMMUNICATIONS, INC.

ANITA TAFF-RICE
EXTENET SYSTEMS, LLC
1547 PALOS VERDES MALL, NO. 298
WALNUT CREEK, CA 94597
FOR: EXTENET SYSTEMS (CALIFORNIA) LLC

LEON M. BLOOMFIELD
WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612
FOR: T-MOBILE

WILLIAM P. ADAMS
ADAMS ELECTRICAL SAFETY CONSULTING
716 BRETT AVENUE
ROHNERT PARK, CA 94928-4012
FOR: ADAMS ELECTRICAL SAFETY CONSULTING

KEVIN COLLINS
LOMPICO WATERSHED CONSERVANCY
PO BOX 99
FELTON, CA 95018
FOR: LOMPICO WATERSHED CONSERVANCY

BARRY F. MCCARTHY
MCCARTHY & BERLIN, LLP

ROBERT L. DELSMAN
NEXTG NETWORKS OF CALIFORNIA, INC

100 W. SAN FERNANDO ST., SUITE 501
 SAN JOSE, CA 95113
 FOR: NORTHERN CALIFORNIA POWER AGENCY

2216 OTOOLE AVENUE
 SAN JOSE, CA 95131
 FOR: NEXTG NETWORKS OF CALIFORNIA, INC.

CASEY HASHIMOTO
 TURLOCK IRRIGATION DISTRICT
 333 CANAL DRIVE
 TURLOCK, CA 95380
 FOR: TURLOCK IRRIGATION DISTRICT

STEPHEN R. CIESLEWICZ
 CN UTILITY CONSULTING, INC
 120 PLEASANT HILL AVE. NORTH, STE.190
 SEBASTOPOL, CA 95472
 FOR: CN UTILITY CONSULTING, INC

JUDITH SANDERS
 CALIFORNIA ISO
 151 BLUE RAVINE ROAD
 FOLSOM, CA 95630
 FOR: CALIFORNIA INDEPENT SYSTEM
 OPERATOR CORPORATION

LANDIS MARTTILA
 IBEW 1245
 30 ORANGE TREE CIRCLE
 VACAVILLE, CA 95687
 FOR: IBEW

CHARLIE BORN
 FRONTIER COMMUNICATIONS
 PO BOX 340
 ELK GROVE, CA 95759
 FOR: FRONTIER COMMUNICATIONS

BRUCE MCLAUGHLIN
 BRAUN & BLAISING MCLAUGHLIN, P.C.
 915 L STREET, SUITE 1270
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA MUNICIPAL UTILITIES
 ASSOCIATIONS

JUSTIN C. WYNNE
 ATTORNEY AT LAW
 BRAUN BLAISING MCLAUGHLIN, P.C.
 915 L STREET, SUITE 1270
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA MUNICIPAL UTILITIES
 ASSOCIATION

JEROME F. CANDELARIA
 CALIFORNIA CABLE TV ASSOCIATION
 1001 K STREET, 2ND FLOOR
 SACRAMENTO, CA 95814-3832
 FOR: CCTA - CALIFORNIA CABLE &
 TELECOMMUNICATIONS ASSOCIATION

JEDEDIAH J. GIBSON
 ATTORNEY
 ELLISON, SCHNEIDER & HARRIS LLP
 2600 CAPITOL AVENUE, SUITE 400
 SACRAMENTO, CA 95816-5905
 FOR: SIERRA PACIFIC POWER

KAREN NORENE MILLS
 ATTORNEY AT LAW
 CALIFORNIA FARM BUREAU FEDERATION
 2300 RIVER PLAZA DRIVE
 SACRAMENTO, CA 95833
 FOR: CALIFORNIA FARM BUREAU FEDERATION

STEVEN M. COHN
 ASSISTANT GENERAL COUNSEL
 SACRAMENTO MUNICIPAL UTILITY DISTRICT
 6201 S ST., M.S. B406; PO BOX 15830
 SACRAMENTO, CA 95852-1830
 FOR: SMUD

Information Only

JEREMY SADLER
 EMAIL ONLY
 EMAIL ONLY, CA 00000

TARYN CIARDELLA
 SR. LEGAL SECRETARY
 NV ENERGY
 EMAIL ONLY
 EMAIL ONLY, NV 00000

MRW & ASSOCIATES, LLC
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: MRW & ASSOCIATES, INC

BOB RITTER
 CROWN CASTLE USA, INC.
 2000 CORPORATE DRIVE
 CANONSBURG, PA 15317

NICK LIMBEROPOULOS
 CROWN CASTLE
 2000 CORPORATE DRIVE
 CANONSBURG, PA 15317

MIKE RODEN
 EXECUTIVE DIR-REGULATORY
 CINGULAR WIRELESS SERVICES, LLC
 1057 LENOX PARK BLVD RM - 1C138
 ATLANTA, GA 30319

MATT PAWLOWSKI
 NEXTERA ENERGY RESOURCES
 RELIABILITY & COMPLIANCE GROUP
 700 UNIVERSE BLVD.
 JUNO BEACH, FL 33408-2683

KEVIN SAVILLE
 ASSOCIATE GENERAL COUNSEL
 FRONTIER COMMUNICATIONS
 2378 WILSHIRE BOULEVARD
 MOUND, MN 55364
 FOR: FRONTIER COMMUNICATIONS

MARJORIE HERLTH
 REGIONAL DIRECTOR, PUBLIC POLICY
 QWEST COMMUNICATIONS CORPORATION
 1801 CALIFORNIA ST., 10TH FL.
 DENVER, CO 80202

JORDAN A. WHITE
 SENIOR ATTORNEY
 PACIFICORP
 1407 W. NORTH TEMPLE, SUITE 320
 SALT LAKE CITY, UT 84116

JAMES COLE
 OSMOSE UTILITIES SERVICES, INC.
 4862 S PURPLE SAGE DRIVE
 CHANDLER, AZ 85248

LARI SHEEHAN
 COUNTY OF LOS ANGELES
 500 W. TEMPLE STREET, ROOM 723
 LOS ANGELES, CA 90012

DARYL A. BUCKLEY
 ELECTRICAL SERVICE MANAGER
 LOS ANGELES DEPT OF WATER AND POWER
 111 N. HOPE STREET, ROOM 856
 LOS ANGELES, CA 90012-2694

STANTON J. SNYDER, ESQ.
 DEPUTY CITY ATTORNEY, LEGAL DIV.
 DEPARTMENT OF WATER & POWER
 111 N. HOPE STREET, ROOM 340
 LOS ANGELES, CA 90012-2694
 FOR: CITY OF LOS ANGELES, DEPT OF WATER
 AND POWER

MICHAEL R. THORP
 SEMPRA ENERGY
 555 W. 5TH STREET
 LOS ANGELES, CA 90013-1011
 FOR: SAN DEIGO GAS & ELECTRIC COMPANY

JOHN R. TODD
 PREVENTION SERVICES BUREAU
 COUNTY OF LOS ANGELES FIRE DEPARTMENT
 1320 N. EASTERN AVENUE
 LOS ANGELES, CA 90063-3294

CRAIG HUNTER
 ATTORNEY AT LAW
 WILSON ELSER MOSKOWITZ EDELMAN & DICKER
 555 S. FLOWER STREET, SUITE 2900
 LOS ANGELES, CA 90071-2407

JACQUE LOPEZ
 VERIZON CALIFORNIA INC.
 112 LAKEVIEW CANYON ROAD, CA501LB
 THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
 SENIOR STAFF CONSULTANT
 VERIZON CALIFORNIA INC.
 112 S. LAKEVIEW CANYON ROAD, MC 501LS
 THOUSAND OAKS, CA 91362

STEVE FORD
 MANAGER, CONSTRUCTION METHODS
 CHINO OFFICE BUILDING
 14005 S. BENSON AVE.,
 CHINO, CA 91710-7026
 FOR: CONSTRUCTION METHODS

CASE ADMINISTRATION
 LAW DEPARTMENT
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE., ROOM 370
 ROSEMEAD, CA 91770

JAMES LEHRER
 SOUTHERN CALIFORNIA EDISON
 LAW DEPARTMENT
 2244 WALNUT GROVE AVENUE
 ROSEMEAD, CA 91770

NGUYEN QUAN
 BEAR VALLEY ELECTRIC SERVICE
 630 EAST FOOTHILL BLVD.
 SAN DIMAS, CA 91773

STEVE M. DUNN
 DEPARTMENT OF PUBLIC WORKS
 COUNTY OF LOS ANGELES
 PO BOX 1460
 ALHAMBRA, CA 91802-1460

SHAWN CAINE
 LAW OFFICE OF SHAWN CAINE
 1125 CAMINO DEL MAR, SUITE D
 DEL MAR, CA 92014

DAVE DOWNEY
 NORTH COUNTY TIMES
 207 E. PENNSYLVANIA AVENUE
 ESCONDIDO, CA 92025

JOSEPH W. MITCHELL, PH. D.

ALLEN K. TRIAL

M-BAR TECHNOLOGIES AND CONSULTING, LLC
19412 KIMBALL VALLEY RD
RAMONA, CA 92065

SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12B
SAN DIEGO, CA 92101

ESTHER NORTHRUP
COX COMMUNICATIONS
350 10TH AVENUE, SUITE 600
SAN DIEGO, CA 92101

LAURA M. EARL
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101

LISA URICK
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ-12B
SAN DIEGO, CA 92101

JOHN A. PACHECO
SEMPRA ENERGY
101 ASH STREET, HQ-12
SAN DIEGO, CA 92101-3017
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

STEVE CHRISTIANSON
TOSDAL SMITH STEINER & WAX
401 WEST A STREET, SUITE 320
SAN DIEGO, CA 92101-7911

DON LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

REBECCA BLAIN
THORSNES, BAROLOTTA & MCGUIRE
2550 FIFTH AVENUE, 11TH FLOOR
SAN DIEGO, CA 92103

DAVID DOHREN
SAN DIEGO GAS & ELECTRIC COMPANY
8316 CENTURY PARK COURT, CP51D
SAN DIEGO, CA 92123

GREGORY L. WALTERS
SAN DIEGO GAS & ELECTRIC COMPANY
8316 CENTURY PARK COURT
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS & ELECTRIC

REBECCA GILES
SDG&E AND SOCALGAS
8330 CENTURY PARK COURT - CP32D
SAN DIEGO, CA 92123
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

THE LAW OFFICES OF ALEXANDER M. SCHACK
16870 WEST BERNARDO DRIVE, SUITE 400
SAN DIEGO, CA 92127

JUSTIN CASHMER
VERIZON CALIFORNIA INC.
11 S. 4TH ST.
REDLANDS, CA 92373

BILL D. CARNAHAN
EXECUTIVE DIRECTOR
DIRECTOR, PUBLIC UTILITIES DEPARTMENT
3900 MAIN STREET
RIVERSIDE, CA 92522-0600

MITCHELL S. WAGNER
24641 WASHINGTON AVE
MURRIETA, CA 92562

LINDA BURTON
SIERRA TELEPHONE COMPANY, INC.
PO BOX 219
OAKHURST, CA 93644-0219
FOR: SIERRA TELEPHONE COMPANY, INC.

WILLIAM A.G. WILDE
PRESIDENT
CREATIVE INTERCONNECT COM. LLC
555 OLD COUNTY RD., SUITE 100
SAN CARLOS, CA 94070

ELAINE M. DUNCAN
VERIZON CALIFORNIA, INC.
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102
FOR: VERIZON CALIFORNIA INC.

WILLIAM K. SANDERS
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO, CA 94102-4682

JAMES HENDRY
UTILITIES SPECIALIST
SAN FRANCISCO PUBLIC UTILITIES COMM.
1155 MARKET STREET, FOURTH FLOOR
SAN FRANCISCO, CA 94103

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

MARISA MITCHELL
ENVIRONMENTAL SCIENTIST
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935

REGINA COSTA
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

SAN FRANCISCO, CA 94104

FOR: TURN

STEPHEN P. BOWEN
ATTORNEY AT LAW
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 742
SAN FRANCISCO, CA 94104

BARBARA H. CLEMENT
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PG&E

ERROL KISSINGER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET; MC B10A
SAN FRANCISCO, CA 94105

FASSIL FENIKILE
DIRECTOR-REGULATORY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

GWEN JOHNSON
AT&T CALIFORNIA
525 MARKET STREET, STE 1927
SAN FRANCISCO, CA 94105

KEITH KROM
GENERAL ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, SUITE 1904
SAN FRANCISCO, CA 94105

LAUREN ROHDE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

MARGARET M. DILLON
ASSOCIATE DIRECTOR
PACIFIC BELL TELEPHONE COMPANY
525 MARKET STREET, 18TH FL., NO. 15
SAN FRANCISCO, CA 94105

MICHELLE CHOO
AT&T CALIFORNIA
525 MARKET STREET, 20TH FLOOR
SAN FRANCISCO, CA 94105

PETER M. HAYES
PACIFIC BELL TELEPHONE COMPANY
525 MARKET STREET, RM 1919
SAN FRANCISCO, CA 94105

RACHEL A. BIRKEY
OFFICE OF THE GENERAL COUNSEL
U.S. DEPT. OF AGRICULTURE
33 NEW MONTGOMERY ST., 17TH FLOOR
SAN FRANCISCO, CA 94105

REGULATORY FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A / PO BOX 7442
SAN FRANCISCO, CA 94105

ROSS JOHNSON
AREA MGR - REGULATORY
AT&T CALIFORNIA
525 MARKET STREET, 19TH FL, RM 33
SAN FRANCISCO, CA 94105

SANDY LAMBOY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B13L
SAN FRANCISCO, CA 94105

THOMAS SELHORST
SENIOR PARALEGAL
AT&T CALIFORNIA
525 MARKET STREET, 20TH FLR, RM 2023
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

E. GARTH BLACK
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: SUREWEST TELEPHONE

MARK P. SCHREIBER
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

SUZY HONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JOSH DAVIDSON
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO, CA 94111-6533

MARIA CARBONE
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

IRENE K. MOOSEN
ATTORNEY AT LAW
53 SANTA YNEZ AVENUE
SAN FRANCISCO, CA 94112

HILARY CORRIGAN
 CALIFORNIA ENERGY MARKETS
 425 DIVISADERO STREET, SUITE 303
 SAN FRANCISCO, CA 94117-2242

CASE COORDINATION
 PACIFIC GAS AND ELECTRIC COMPANY
 PO BOX 770000; MC B9A
 SAN FRANCISCO, CA 94177

ROBIN HARRINGTON
 CAL.DEPT OF FORESTRY AND FIRE PROTECTION
 PO BOX 944246
 SACRAMENTO, CA 94244-2460

AMY BARTELL
 CITY OF PALO ALTO
 250 HAMILTON AVENUE, PO BOX 10250
 PALO ALTO, CA 94303

GRANT KOLLING
 CITY OF PALO ALTO
 250 HAMILTON AVENUE, PO BOX 10250
 PALO ALTO, CA 94303

ALEXIS K. WODTKE
 STAFF ATTORNEY
 CONSUMER FEDERATION OF CALIFORNIA
 520 S. EL CAMINO REAL, STE. 340
 SAN MATEO, CA 94402

GARRY J.D. HUBERT
 HUBERT & YASUTAKE
 1320 WILLOW PASS ROAD, SUITE 590
 CONCORD, CA 94520

DOUGLAS GARRETT
 COX COMMUNICATIONS
 2200 POWELL STREET, STE. 1035
 EMERYVILLE, CA 94608

CARLOS FERNANDEZ-PELLO
 UNIVERSITY OF CALIFORNIA BERKELEY
 DEPARTMENT OF MECHANICAL ENGINEERING
 6105 ETCHEVERRY HALL
 BERKELEY, CA 94720-1740

ROBERT WOLFE
 AT&T CALIFORNIA
 310 MARTIN AVENUE, ROOM 100A
 SANTA CLARA, CA 95050

MICHAEL G. NELSON, ESQ.
 MACCARTHY & BERLIN, LLP
 100 W. SAN FERNANDO STREET, SUITE 501
 SAN JOSE, CA 95113

SUSIE BERLIN
 ATTORNEY AT LAW
 MC CARTHY & BERLIN, LLP
 100 W SAN FERNANDO ST., STE 501
 SAN JOSE, CA 95113

LYNNE MARTINEZ
 DIRECTOR GOVERNMENT AFFAIRS
 PAC-WEST TELECOMM, INC.
 4210 CORONADO AVE.
 STOCKTON, CA 95204

THOMAS S. KIMBALL
 MODESTO IRRIGATION DISTRICT
 1231 11TH STREET
 MODESTO, CA 95352

JOY A. WARREN
 MODESTO IRRIGATION DISTRICT
 1231 11TH STREET
 MODESTO, CA 95354

BRIAN LAFOLLETTE
 TURLOCK IRRIGATION DISTRICT
 333 EAST CANAL DRIVE / PO BOX 949
 TURLOCK, CA 95381-0949

GAYATRI SCHILBERG
 JBS ENERGY
 311 D STREET, SUITE A
 WEST SACRAMENTO, CA 95605

SCOTT TOMASHEFSKY
 NORTHERN CALIFORNIA POWER AGENCY
 651 COMMERCE DRIVE
 ROSEVILLE, CA 95678

SCOTT BLAISING
 BRAUN BLAISING MCLAUGHLIN, P.C.
 915 L STREET, SUITE 1270
 SACRAMENTO, CA 95814

LESLA LEHTONEN
 VP LEGAL AND REGULATORY AFFAIRS
 CALIFORNIA CABLE & TELECOM ASSOCIATION
 1001 K STREET, 2ND FLOOR
 SACRAMENTO, CA 95814-3832

ANDREW B. BROWN
 ELLISON, SCHNEIDER & HARRIS LLP
 2600 CAPITOL AVENUE, SUITE 400
 SACRAMENTO, CA 95816-5905

CHASE B. KAPPEL
 ELLISON SCHNEIDER & HARRIS LLP
 2600 CAPITOL AVENUE, SUITE 400
 SACRAMENTO, CA 95816-5905

LYNN HAUG
 ATTORNEY AT LAW

MARGARET FELTS
 PRESIDENT

ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

CALIFORNIA COMMUNICATIONS ASSN
1321 HOWE AVE. SUITE 202
SACRAMENTO, CA 95825

DAVID L. BROWN, P.E.
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST., M.S. D-104; PO BOX 15830
SACRAMENTO, CA 95852-1830

CATHIE ALLEN
DIR - REGULATORY AFFAIRS
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232

HEIDE CASWELL
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 1500
PORTLAND, OR 97232

SHANNON M. MCWHINNEY
PACIFICORP
825 NE MULTNOMAH ST., STE. 1800
PORTLAND, OR 97232

CYNTHIA MANHEIM
GENERAL ATTORNEY
CINGULAR WIRELESS SERVICES, LLC
16331 NE 72ND WAY, ROOM RTC 1
REDMOND, WA 98052

ADAM L. SHERR
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, ROOM 1506
SEATTLE, WA 98191
FOR: QWEST COMMUNICATIONS CORP.

State Service

MELISSA SLAWSON, ESQ
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CYNTHIA LEE
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

MICHAEL ROBERTSON
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RAFFY STEPANIAN
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RAYMOND G. FUGERE
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

BREWSTER FONG
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER MYERS
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

DAVID K. LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ED MOLDAVSKY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5037
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ERIC CHIANG
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL GREER
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4211
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE WALES
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5141
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5212
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PEJMAN MOSHFEGH
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT ELLIOTT
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SCOTT MOSBAUGH
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY KENNEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5015
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MELODIE DURHAM
OFFICE OF THE STATE FIRE MARSHAL
WILDLAND FIRE PREVENTION
1131 S STREET
SACRAMENTO, CA 95811

STEPHEN BAKKEN
CALIFORNIA STATE PARKS
1416 9TH STREET
SACRAMENTO, CA 95814