



Ken Deremer
Director
Tariffs & Regulatory Accounts

8330 Century Park Court CP32C
San Diego, CA 92123-1548
Tel: 858.654.1756
Fax: 858.654.1788
KDeremer@SempraUtilities.com

June 30, 2008

Advice No. 3877
(U 904 G)

Public Utilities Commission of the State of California

Subject: Proposed High-Efficiency, Ultra Low NOx Water Heater Replacement Program

Purpose

Southern California Gas Company (SoCalGas) requests California Public Utilities Commission (Commission) approval to 1) expand the existing residential water heater replacement component of its Low Income Energy Efficiency (LIEE) program to include the replacement of operational water heaters found in LIEE-eligible homes with high-efficiency, ultra low nitrogen oxides (NOx) water heaters (ultra low NOx units),¹ and 2) apply unspent LIEE program funds from previous years to pay for the program. SoCalGas has established a cost sharing partnership with Operation Clean Air, Inc. (OCA)² whereby OCA will provide funding to cover approximately 30% (or \$250) of the total installation costs of the new water heaters and SoCalGas will use LIEE program dollars to fund the remaining cost of the installation. The source of OCA's funds is the Environmental Protection Agency (EPA) heating grant for which funds must be expended by August 31, 2008. **As such, SoCalGas is requesting the protest period be shortened to 10 days and the Commission review and approve SoCalGas' request as expeditiously, as possible, to avoid the possibility of a lost opportunity to achieve energy savings.** The shortened timeframe is being requested as SoCalGas is required to invoice OCA for all ultra low NOx unit installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008. Should Commission approval not be received on or prior to July 15, 2008, SoCalGas believes it will be difficult to install 120 ultra low NOx units and invoice OCA for all installations prior to August 15, 2008.

¹ Nitrous oxide is a greenhouse gas with an atmospheric lifetime of approximately 120 years. Nitrous oxide's chemical characteristics and interactions in the atmosphere contribute to its significance as a greenhouse gas. Source: <http://www.epa.gov/nitrousoxide/index.html>

² OCA is a broad based coalition of all stakeholders in the overlapping issues of air quality and economic prosperity in the San Joaquin Valley of California. Organized as a nonprofit, public benefit corporation, OCA represents numerous key sectors of public and private interests. See http://www.operationcleanair.org/about_us.htm (June 18, 2008).

SoCalGas' proposal assists with California's goal of reducing greenhouse gas emissions by 25% by the year 2020³ and is aligned with Strategy 2 of the LIEE Section of the California Energy Efficiency Strategic Plan (CEESP).⁴

Background

Water heater replacement is currently a LIEE program measure as adopted by the Commission in Decision (D.) 06-12-038 and replacement generally occurs when there is water leaking from the water heater tank. The water heater replacement criteria is provided within the Statewide LIEE Installation Standards adopted by the Commission in an Assigned Commissioner's Ruling dated March 29, 2006 in Rulemaking (R.) 04-01-006 and replacing operational water heaters is not one of the approved criteria. The utilities' LIEE programs are currently not replacing operational water heaters because the energy savings are small in relation to the total installation cost, resulting in low benefit-cost ratios. Should the water heater energy savings increase or the total LIEE program funds required to install a unit decrease, the result is a rise in the benefit-cost ratios to levels where the replacement of an operational water heater may pass the cost-effectiveness methodology as adopted in D.02-08-034.

D.02-08-034 adopted a methodology for testing the cost-effectiveness of the LIEE program as a whole and of the specific measures offered under that program. This adopted methodology considers the cost-effectiveness of the LIEE program and measures from two perspectives: 1) cost efficiency from the perspective of the non-participant - Utility Cost Test (UCT), and 2) hardship reductions from the perspective of the participant - Modified Participant Test (MPT). To determine LIEE measure cost effectiveness, the measure-specific benefit-cost ratio is compared to average program level ratio for both the UCT and MPT. For a new measure to "pass" and be considered cost effective, its measure-specific benefit-cost ratio must be at least as high as the average program level ratio for both the UCT and MPT. As shown in Table 1, this proposal meets the criteria as required in D.02-08-034 as both the UCT and MPT benefit-cost ratios for ultra low NOx units are well above the 2007 LIEE program level ratios.

Table 1

Measure-Specific Benefit-Cost Ratios vs. Program Level Ratios

	UCT	MPT	TRC
High Efficiency, Ultra Low NOx Water Heaters ⁵	0.54	0.82	0.28
2007 LIEE Program Level Cost Effectiveness ⁶	0.28	0.68	0.20

³ Assembly Bill 32, the California Global Warming Solutions Act of 2006.

⁴ Strategy 2 of LIEE Section of CEESP, "Pursue collaboration and leveraging of other programs"

⁵ UCT and MPT are calculated using the LIEE program dollars required to install an ultra low NOx water heater, which is the total install cost reduced by \$250 per unit (OCA contribution). TRC is calculated using the full installation cost and does not incorporate OCA's contribution.

⁶ 2007 Low Income Energy Efficiency Programs Annual Summary and Technical Appendix – Table A-3

Proposal

SoCalGas continues to seek opportunities to reduce energy usage and costs for low-income customers through its LIEE program, and believes that its strategic partnership with OCA will provide customer and societal and environmental benefits. The replacement of standard water heaters with high-efficiency low NOx units will not only provide many years of future energy savings for low-income customers, but will also provide years of future emission reductions and help reduce greenhouse gases. SoCalGas' proposed cost sharing partnership with OCA for the installation of ultra low NOx water heaters follows the Commission's directive that "The utilities' LIEE programs should emphasize long term energy savings that leverage all available resources and are, to the extent cost-effective and practical, integrated with other demand-side programs, such as energy efficiency programs, solar installations, demand response and other programs."⁷

SoCalGas proposes in Application (A.) 08-05-025 to continue water heater replacement under the policies as provided within the Statewide LIEE Installation Standards adopted by the Commission in an Assigned Commissioner's Ruling dated March 29, 2006 in R. 04-01-006. SoCalGas did not propose in A.08-05-025 to replace operational water heaters because of the low benefit-cost ratios when using 100% of LIEE program funding to support the installation.

In an effort to reduce NOx and carbon dioxide emissions, SoCalGas will partner with OCA to fund the installation of ultra low NOx units in LIEE-eligible homes. Such leveraging of funds will reduce the amount of program funding required to install ultra low NOx units and provides benefit-cost ratios that are at or above average program level ratios consistent with the methodology articulated in D.02-08-034. SoCalGas will utilize the existing LIEE contractor infrastructure for the installation of the ultra low NOx units and will claim 100% of the energy savings from the installations.

SoCalGas has already received a commitment from OCA to share the costs for the "early retirement" of approximately 120 operational water heaters. OCA has approval from EPA Region IX and the San Joaquin Valley Air Pollution Control District to use remaining funds from their EPA heating grant for this cost sharing partnership. OCA will contribute up to \$250 or 40% of the total water heater installation cost, whichever is lower. SoCalGas is projecting the total water heater installation cost to be approximately \$900 per unit. Based on this cost, OCA will be contributing \$250 per installation as this amount is less than 40% of the total installation cost. SoCalGas will invoice OCA for all water heater installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008.

Table 2 provides the estimated annual achievements associated with replacement of 120 standard water heaters with ultra low NOx units. The therm savings assumes a baseline energy factor of 0.54⁸ for existing units and annual domestic hot water energy use of 219 therms.⁹

⁷ Decision 07-12-051, dated December 20, 2007, Conclusions of Law 7

⁸ DOE Water Heater Rulemaking Technical Support Document (December 2000). See http://www.eere.energy.gov/buildings/appliance_standards/residential/waterheat_0300_r.html

⁹ *California Statewide Residential Appliance Saturation Study*, Volume 2 Study Results Final Report prepared for California Energy Commission, prepared by KEMA-XENERGY, Itron, and RoperASW, June 2004, Report No. 300-00-004, Table 2-22.

Table 2**Estimated Annual Achievements**

Number of Installations	Therm Savings	NOx Reductions (lbs)	CO2 Reduction (lbs)
120	3,600	19.3 ¹⁰	42,120 ¹¹

Funding for Proposal

SoCalGas' LIEE funding level required for the partnership with OCA is approximately \$78,000 and it covers the costs to install 120 ultra low NOx units prior to August 15th, 2008. SoCalGas does not seek an increase in its LIEE rate or authorized 2008 funding. Rather, SoCalGas proposes to fund this partnership using unspent LIEE program funds from previous years. As such, this filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 10 days of the date this Advice Letter. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
 Attn: Tariff Unit
 505 Van Ness Avenue
 San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of both Maria Salinas (mas@cpuc.ca.gov) and to Honesto Gatchalian (jnj@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

¹⁰ Super Efficient Gas Water Heating Appliance Initiative, prepared for California Energy Commission, prepared by Valley Energy Efficiency Corporation, May 2008, Report No. CEC-500-2007-105, page 23. 40 ng/J (or 0.0071 lbs/therm) is assumed to be the baseline unit and the 10 ng/J (or 0.00175 lbs/therm) is for the ultra low NOx unit.

¹¹ PG&E Carbon Footprint Calculator. Each therm of natural gas savings corresponds to a reduction of 11.7 lbs of CO2. See <http://www.pge.com/myhome/environment/calculator/>

Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

Effective Date

SoCalGas believes that this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SoCalGas respectfully requests that this filing be effective on July 15, 2008, which is 15 calendar days after the date filed. The shortened timeframe is being requested as SoCalGas is required to invoice OCA for all water heater installations by August 15, 2008 as the EPA heating grant funds need to be expended by August 31, 2008. Should Commission approval not be received on or prior to July 15, 2008, SoCalGas believes it will be difficult to install 120 ultra low NOx units and invoice OCA for all installations prior to August 15, 2008.

Notice

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes distribution lists from A.08-05-022 and R.07-01-042.

KEN DEREMER
Director
Tariffs and Regulatory Accounts

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904-G)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: snewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3877

Subject of AL: Proposed High-Efficiency, Ultra Low NOx Water Heater Replacement Program

Keywords (choose from CPUC listing): LIEE

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 7/15/08

No. of tariff sheets: 0

Estimated system annual revenue effect (%): None

Estimated system average rate effect (%): None

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

Southern California Gas Company

Attention: Sid Newsom

555 West Fifth Street, GT14D6

Los Angeles, CA 90013-1011

snewsom@semprautilities.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 3877

(See Attached Service Lists)

Aglet Consumer Alliance
James Weil
jweil@aglet.org

Alcantar & Kahl
Kari Harteloo
klc@a-klaw.com

Alcantar & Kahl
Seema Srinivasan
sls@a-klaw.com

Alcantar & Kahl LLP
Annie Stange
sas@a-klaw.com

Ancillary Services Coalition
Jo Maxwell
jomaxwell@ascoalition.com

Ancillary Services Coalition
Nick Planson
nplanson@ascoalition.com

Ancillary Services Coalition
Terry Rich
TRich@ascoalition.com

BP Amoco, Reg. Affairs
Marianne Jones
501 West Lake Park Blvd.
Houston, TX 77079

Barkovich & Yap
Catherine E. Yap
ceyap@earthlink.net

Beta Consulting
John Burkholder
burkee@cts.com

CPUC
Consumer Affairs Branch
505 Van Ness Ave., #2003
San Francisco, CA 94102

CPUC
Pearlie Sabino
pzs@cpuc.ca.gov

CPUC
Energy Rate Design & Econ.
505 Van Ness Ave., Rm. 4002
San Francisco, CA 94102

CPUC - DRA
Galen Dunham
gsd@cpuc.ca.gov

CPUC - DRA
R. Mark Pocta
rmp@cpuc.ca.gov

CPUC - DRA
Jacqueline Greig
jnm@cpuc.ca.gov

California Energy Market
Lulu Weinzimer
luluw@newsdata.com

Calpine Corp
Avis Clark
aclark@calpine.com

City of Anaheim
Ben Nakayama
Public Utilities Dept.
P. O. Box 3222
Anaheim, CA 92803

City of Azusa
Light & Power Dept.
215 E. Foothill Blvd.
Azusa, CA 91702

City of Banning
Paul Toor
P. O. Box 998
Banning, CA 92220

City of Burbank
Fred Fletcher/Ronald Davis
164 West Magnolia Blvd., Box 631
Burbank, CA 91503-0631

City of Colton
Thomas K. Clarke
650 N. La Cadena Drive
Colton, CA 92324

City of Long Beach, Gas & Oil Dept.
Chris Garner
2400 East Spring Street
Long Beach, CA 90806

City of Los Angeles
City Attorney
200 North Main Street, 800
Los Angeles, CA 90012

City of Pasadena - Water and Power
Dept.
G Bawa
GBawa@cityofpasadena.net

City of Riverside
Joanne Snowden
jsnowden@riversideca.gov

City of Vernon
Daniel Garcia
dgarcia@ci.vernon.ca.us

Commerce Energy
Brian Patrick
BPatrick@commerceenergy.com

Commerce Energy
Glenn Kinser
gkinser@commerceenergy.com

Commerce Energy
Lynelle Lund
llund@commerceenergy.com

County of Los Angeles
Stephen Crouch
1100 N. Eastern Ave., Room 300
Los Angeles, CA 90063

Crossborder Energy
Tom Beach
tomb@crossborderenergy.com

Culver City Utilities
Heustace Lewis
Heustace.Lewis@culvercity.org

DGS
Henry Nanjo
Henry.Nanjo@dgs.ca.gov

Davis Wright Tremaine, LLP
Edward W. O'Neill
505 Montgomery Street, Ste 800
San Francisco, CA 94111

Davis, Wright, Tremaine
Judy Pau
judypau@dwt.com

Dept. of General Services
Celia Torres
celia.torres@dgs.ca.gov

Douglass & Liddell
Dan Douglass
douglass@energyattorney.com

Douglass & Liddell
Donald C. Liddell
liddell@energyattorney.com

Downey, Brand, Seymour & Rohwer
Ann Trowbridge
atrowbridge@downeybrand.com

Downey, Brand, Seymour & Rohwer
Dan Carroll
dcarroll@downeybrand.com

Dynegy
Joseph M. Paul
jmpa@dynegy.com

Gas Purchasing
BC Gas Utility Ltd.
16705 Fraser Highway
Surrey, British Columbia, V3S 2X7

Gas Transmission Northwest
Corporation
Bevin Hong
Bevin_Hong@transcanada.com

General Services Administration
Facilities Management (9PM-FT)
450 Golden Gate Ave.
San Francisco, CA 94102-3611

Goodin, MacBride, Squeri, Ritchie &
Day, LLP
J. H. Patrick
hpatrick@gmssr.com

Goodin, MacBride, Squeri, Ritchie &
Day, LLP
James D. Squeri
jsqueri@gmssr.com

Hanna & Morton
Norman A. Pedersen, Esq.
npedersen@hanmor.com

Imperial Irrigation District
K. S. Noller
P. O. Box 937
Imperial, CA 92251

JBS Energy
Jeff Nahigian
jeff@jbsenergy.com

Jeffer, Mangels, Butler & Marmaro
2 Embarcaero Center, 5th Floor
San Francisco, CA 94111

Kern River Gas Transmission Company
Janie Nielsen
Janie.Nielsen@KernRiverGas.com

LADWP
Nevenka Ubavich
nevenka.ubavich@ladwp.com

LADWP
Randy Howard
P. O. Box 51111, Rm. 956
Los Angeles, CA 90051-0100

Law Offices of Diane I. Fellman
Diane Fellman
diane_fellman@fpl.com

Law Offices of William H. Booth
William Booth
wbooth@booth-law.com

Luce, Forward, Hamilton & Scripps
John Leslie
jleslie@luce.com

MRW & Associates
Robert Weisenmiller
mrw@mrwassoc.com

Manatt Phelps Phillips
Randy Keen
rkeen@manatt.com

Manatt, Phelps & Phillips, LLP
David Huard
dhuard@manatt.com

March Joint Powers Authority
Lori Stone
PO Box 7480,
Moreno Valley, CA 92552

Matthew Brady & Associates
Matthew Brady
matt@bradylawus.com

Julie Morris
Julie.Morris@PPMEnergy.com

National Utility Service, Inc.
Jim Boyle
One Maynard Drive, P. O. Box 712
Park Ridge, NJ 07656-0712

Navigant Consulting, Inc.
Ray Welch
ray.welch@navigantconsulting.com

PG&E Tariffs
Pacific Gas and Electric
PGETariffs@pge.com

Pacific Gas & Electric Co.
John Clarke
jpc2@pge.com

Praxair Inc
Rick Noger
rick_noger@praxair.com

Questar Southern Trails
Lenard Wright
Lenard.Wright@Questar.com

R. W. Beck, Inc.
Catherine Elder
celder@rwbeck.com

Regulatory & Cogen Services, Inc.
Donald W. Schoenbeck
900 Washington Street, #780
Vancouver, WA 98660

Richard Hairston & Co.
Richard Hairston
hairstonco@aol.com

Sempra Global
William Tobin
wtobin@sempraglobal.com

Sierra Pacific Company
Christopher A. Hilén
chilen@sppc.com

Southern California Edison Co
Fileroom Supervisor
2244 Walnut Grove Ave., Rm 290, G01
Rosemead, CA 91770

Southern California Edison Co
Karyn Gansecki
601 Van Ness Ave., #2040
San Francisco, CA 94102

Southern California Edison Co.
Colin E. Cushnie
Colin.Cushnie@SCE.com

Southern California Edison Co.
Kevin Cini
Kevin.Cini@SCE.com

Southern California Edison Co.
John Quinlan
john.quinlan@sce.com

Southern California Edison Company
Michael Alexander
Michael.Alexander@sce.com

Southwest Gas Corp.
John Hester
P. O. Box 98510
Las Vegas, NV 89193-8510

Suburban Water System
Bob Kelly
1211 E. Center Court Drive
Covina, CA 91724

Sutherland, Asbill & Brennan
Keith McCrea
kmccrea@sablaw.com

TURN
Marcel Hawiger
marcel@turn.org

TURN
Mike Florio
mflorio@turn.org

The Mehle Law Firm PLLC
Colette B. Mehle
cmehle@mehlelaw.com

Western Manufactured Housing
Communities Assoc.
Sheila Day
sheila@wma.org

<p>CALIF PUBLIC UTILITIES COMMISSION Zaida Amaya-Pineda zca@cpuc.ca.gov</p>	<p>SAN DIEGO GAS & ELECTRIC/SOCAL GAS GEORGETTA J. BAKER gbaker@sempra.com</p>	<p>CALIFORNIA ENERGY COMMISSION DENNIS L. BECK JR. dbeck@energy.state.ca.us</p>
<p>RESIDENTIAL WALL INSULATION CRISTAL BEDORTHA cristalfour@aol.com</p>	<p>RICHARD HEATH AND ASSOCIATES, INC. ART BRICE abrice@rhainc.com</p>	<p>A WORLD INSTITUTE FOR SUSTAINABLE HUMANI SUSAN E. BROWN sebesq@comcast.net</p>
<p>PACIFIC GAS AND ELECTRIC COMPANY DANIEL F. COOLEY dfc2@pge.com</p>	<p>CAROLYN COX carolyncox2@sbcglobal.net</p>	<p>WEST COAST GAS COMPANY RAYMOND J. CZAHR, C.P.A. westgas@aol.com</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Mariana C. Campbell mcl@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Melicia Charles mvc@cpuc.ca.gov</p>	<p>MOUNTAIN UTILITIES JOHN DUTCHER ralf1241a@cs.com</p>
<p>PACIFICORP RYAN FLYNN ryan.flynn@pacificorp.com</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Hazlyn Fortune hcf@cpuc.ca.gov</p>	<p>LATINO ISSUES FORUM ENRIQUE GALLARDO enriqueg@lif.org</p>
<p>THE GREENLINING INSTITUTE THALIA N.C. GONZALEZ thaliag@greenlining.org</p>	<p>THE UTILITY REFORM NETWORK HAYLEY GOODSON hayley@turn.org</p>	<p>PERKINS, MANN & EVERETT, A.P.C. JERRY H. HANN jmann@pmelaw.com</p>
<p>SAN DIEGO GAS & ELECTRIC COMPANY KIM F. HASSAN khassan@sempra.com</p>	<p>ACCES JAMES HODGES hodgesjl@surewest.net</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Risa Hernandez rhh@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Kelly Hymes khy@cpuc.ca.gov</p>	<p>BILL JULIAN billjulian@sbcglobal.net</p>	<p>DISABILITY RIGHTS ADVOCATES MELISSA W. KASNITZ pucservice@dralegal.org</p>
<p>UTILITY COST MANAGEMENT, LLC PAUL KERKORIAN pk@utilitycostmanagement.com</p>	<p>DISABILITY RIGHTS ADVOCATES MARY - LEE KIMBER pucservice@dralegal.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Robert Kinosian gig@cpuc.ca.gov</p>
<p>ALPINE NATURAL GAS OPERATING COMPANY MICHAEL LAMOND Mike@alpinenaturalgas.com</p>	<p>SUNDOWNER INSULATION CO., INC. TIMOTHY J. LAWLER sundnr2@sbcglobal.net</p>	<p>SOUTHWEST GAS CORPORATION KEITH LAYTON keith.layton@swgas.com</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Alik Lee ayo@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Robert Lehman leh@cpuc.ca.gov</p>	<p>PERKINS, MANN & EVERETT JERRY H. MANN jmann@pmelaw.com</p>

SIERRA PACIFIC POWER COMPANY
 ELENA MELLO
 emello@sppc.com

PACIFICORP
 MICHELLE MISHOE
 michelle.mishoe@pacificorp.com

SOUTHERN CALIFORNIA EDISON
 MICHAEL MONTOYA
 montoym1@sce.com

GOLDEN STATE WATER/BEAR
 VALLEY ELECTRIC
 RONALD MOORE
 rkmoore@gswater.com

WESTERN MANUFACTURED HOUSING
 COMM. SVCS.
 IRENE K. MOOSEN
 irene@igc.org

CALIF PUBLIC UTILITIES COMMISSION
 Harvey Y. Morris
 hym@cpuc.ca.gov

SOUTHERN CALIFORNIA FORUM
 ARLEEN NOVOTNEY
 social.forum@yahoo.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 CHONDA J. NWAMU
 cjn3@pge.com

CALIF PUBLIC UTILITIES COMMISSION
 David Ng
 dhn@cpuc.ca.gov

SOUTHWEST GAS CORPORATION
 VALERIE J. ONTIVEROZ
 valerie.ontiveroz@swgas.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 PETER OUBORG
 pxo2@pge.com

CALIF PUBLIC UTILITIES COMMISSION
 Dan Olson
 do2@cpuc.ca.gov

COMMUNITY ACTION AGENCY OF
 SAN MATEO
 WILLIAM F. PARKER
 wparker@baprc.com

RANCHO VALLEY BUILDERS, INC.
 BRUCE PATTON
 bpatton_rancho@sbcglobal.net

COMMUNITY RESOURCE PROJECT,
 INC.
 LOUISE A. PEREZ
 lperez@cresource.org

ANDERSON & POOLE
 EDWARD G. POOLE
 epoole@adplaw.com

COMMUNITY ACTION AGENCY OF
 SAN MATEO
 GREGORY REDICAN
 gredican@caasm.org

CALIF PUBLIC UTILITIES COMMISSION
 Sarvjit S. Randhawa
 ssr@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Rashid A. Rashid
 rhd@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Thomas M. Renaghan
 tmr@cpuc.ca.gov

SOUTHERN CALIFORNIA EDISON
 COMPANY
 STACIE SCHAFFER
 stacie.schaffer@sce.com

MARAVILLE FOUNDATION
 ALEX SOTOMAYOR
 alexsot@aol.com

SOUTHWEST GAS CORPORATION
 BOBBI J. STERRETT
 bobbi.sterrett@swgas.com

BEAR VALLEY ELECTRIC SERVICE
 KEITH SWITZER
 kswitzer@gswater.com

CALIF PUBLIC UTILITIES COMMISSION
 Sarita Sarvate
 sbs@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Johanna M. Sevier
 msj@cpuc.ca.gov

SOCALGAS AND SDG&E
 MICHAEL R. THORP
 mthorp@sempra.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 LUKE TOUGAS
 77 BEALE STREET, B9A
 SAN FRANCISCO, CA 94105

CALIF PUBLIC UTILITIES COMMISSION
 Sarah R. Thomas
 srt@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Matthew Tisdale
 mwt@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Ava N. Tran
atr@cpuc.ca.gov

TELACU
RICHARD VILLASENOR
richvilla4@hotmail.com

ELLISON SCHNEIDER & HARRIS L.L.P.
GREGGORY L. WHEATLAND
glw@eslawfirm.com

**GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP**
JOSEPH F. WIEDMAN
jwiedman@goodinmacbride.com

PACIFIC ENERGY POLICY CENTER
DON WOOD SR.
dwood8@cox.net

**PACIFIC GAS AND ELECTRIC
COMPANY**
JOSEPHINE WU
jwwd@pge.com

CALIF PUBLIC UTILITIES COMMISSION
Karen Watts-Zagha
kwz@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Sean Wilson
smw@cpuc.ca.gov

**SAN DIEGO GAS & ELECTRIC
COMPANY**
JOY C. YAMAGATA
jyamagata@semprautilities.com

<p>CALIF PUBLIC UTILITIES COMMISSION Zaida Amaya-Pineda zca@cpuc.ca.gov</p>	<p>SAN DIEGO GAS & ELECTRIC/SOCAL GAS GEORGETTA J. BAKER gbaker@sempra.com</p>	<p>CALIFORNIA ENERGY COMMISSION DENNIS L. BECK JR. dbeck@energy.state.ca.us</p>
<p>RESIDENTIAL WALL INSULATION CRISTAL BEDORTHA cristalfour@aol.com</p>	<p>RICHARD HEATH AND ASSOCIATES, INC. ART BRICE abrice@rhainc.com</p>	<p>A WORLD INSTITUTE FOR SUSTAINABLE HUMANI SUSAN E. BROWN sebesq@comcast.net</p>
<p>PACIFIC GAS AND ELECTRIC COMPANY DANIEL COOLEY dfc2@pge.com</p>	<p>CAROLYN COX carolyncox2@sbcglobal.net</p>	<p>WEST COAST GAS COMPANY RAYMOND J. CZAHR, C.P.A. westgas@aol.com</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Mariana C. Campbell mcl@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Melicia Charles mvc@cpuc.ca.gov</p>	<p>MOUNTAIN UTILITIES JOHN DUTCHER ralf1241a@cs.com</p>
<p>PACIFICORP RYAN FLYNN ryan.flynn@pacificorp.com</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Hazlyn Fortune hcf@cpuc.ca.gov</p>	<p>LATINO ISSUES FORUM ENRIQUE GALLARDO enriqueg@lif.org</p>
<p>THE GREENLINING INSTITUTE THALIA N.C. GONZALEZ thaliag@greenlining.org</p>	<p>THE UTILITY REFORM NETWORK HAYLEY GOODSON hayley@turn.org</p>	<p>PERKINS, MANN & EVERETT, A.P.C. JERRY H. HANN jmann@pmelaw.com</p>
<p>SAN DIEGO GAS & ELECTRIC COMPANY KIM F. HASSAN khassan@sempra.com</p>	<p>ACCES JAMES HODGES hodgesjl@surewest.net</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Risa Hernandez rhh@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Kelly Hymes khy@cpuc.ca.gov</p>	<p>BILL JULIAN billjulian@sbcglobal.net</p>	<p>DISABILITY RIGHTS ADVOCATES MELISSA W. KASNITZ pucservice@dralegal.org</p>
<p>UTILITY COST MANAGEMENT, LLC PAUL KERKORIAN pk@utilitycostmanagement.com</p>	<p>DISABILITY RIGHTS ADVOCATES MARY - LEE KIMBER pucservice@dralegal.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Robert Kinosian gig@cpuc.ca.gov</p>
<p>ALPINE NATURAL GAS OPERATING COMPANY MICHAEL LAMOND Mike@alpinenaturalgas.com</p>	<p>SUNDOWNER INSULATION CO., INC. TIMOTHY J. LAWLER sundnr2@sbcglobal.net</p>	<p>SOUTHWEST GAS CORPORATION KEITH LAYTON keith.layton@swgas.com</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Alik Lee ayo@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Robert Lehman leh@cpuc.ca.gov</p>	<p>PERKINS, MANN & EVERETT JERRY H. MANN jmann@pmelaw.com</p>

SIERRA PACIFIC POWER COMPANY
 ELENA MELLO
 emello@sppc.com

PACIFICORP
 MICHELLE MISHOE
 michelle.mishoe@pacificorp.com

SOUTHERN CALIFORNIA EDISON
 MICHAEL MONTOYA
 montoym1@sce.com

GOLDEN STATE WATER/BEAR
 VALLEY ELECTRIC
 RONALD MOORE
 rkmoore@gswater.com

WESTERN MANUFACTURED HOUSING
 COMM. SVCS.
 IRENE K. MOOSEN
 irene@igc.org

CALIF PUBLIC UTILITIES COMMISSION
 Harvey Y. Morris
 hym@cpuc.ca.gov

SOUTHERN CALIFORNIA FORUM
 ARLEEN NOVOTNEY
 social.forum@yahoo.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 CHONDA J. NWAMU
 cjn3@pge.com

CALIF PUBLIC UTILITIES COMMISSION
 David Ng
 dhn@cpuc.ca.gov

SOUTHWEST GAS CORPORATION
 VALERIE J. ONTIVEROZ
 valerie.ontiveroz@swgas.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 PETER OUBORG
 pxo2@pge.com

CALIF PUBLIC UTILITIES COMMISSION
 Dan Olson
 do2@cpuc.ca.gov

COMMUNITY ACTION AGENCY OF
 SAN MATEO
 WILLIAM F. PARKER
 wparker@baprc.com

RANCHO VALLEY BUILDERS, INC.
 BRUCE PATTON
 bpatton_rancho@sbcglobal.net

COMMUNITY RESOURCE PROJECT,
 INC.
 LOUISE A. PEREZ
 lperez@cresource.org

ANDERSON & POOLE
 EDWARD G. POOLE
 epoole@adplaw.com

COMMUNITY ACTION AGENCY OF
 SAN MATEO
 GREGORY REDICAN
 gredican@caasm.org

CALIF PUBLIC UTILITIES COMMISSION
 Sarvjit S. Randhawa
 ssr@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Rashid A. Rashid
 rhd@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Thomas M. Renaghan
 tmr@cpuc.ca.gov

SOUTHERN CALIFORNIA EDISON
 COMPANY
 STACIE SCHAFFER
 stacie.schaffer@sce.com

MARAVILLE FOUNDATION
 ALEX SOTOMAYOR
 alexsot@aol.com

SOUTHWEST GAS CORPORATION
 BOBBI J. STERRETT
 bobbi.sterrett@swgas.com

BEAR VALLEY ELECTRIC SERVICE
 KEITH SWITZER
 kswitzer@gswater.com

CALIF PUBLIC UTILITIES COMMISSION
 Sarita Sarvate
 sbs@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Johanna M. Sevier
 msj@cpuc.ca.gov

SOCALGAS AND SDG&E
 MICHAEL R. THORP
 mthorp@sempra.com

PACIFIC GAS AND ELECTRIC
 COMPANY
 LUKE TOUGAS
 77 BEALE STREET, B9A
 SAN FRANCISCO, CA 94105

CALIF PUBLIC UTILITIES COMMISSION
 Sarah R. Thomas
 srt@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Matthew Tisdale
 mwt@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Ava N. Tran
atr@cpuc.ca.gov

TELACU
RICHARD VILLASENOR
richvilla4@hotmail.com

ELLISON SCHNEIDER & HARRIS L.L.P.
GREGGORY L. WHEATLAND
glw@eslawfirm.com

PACIFIC ENERGY POLICY CENTER
DON WOOD SR.
dwood8@cox.net

**PACIFIC GAS AND ELECTRIC
COMPANY**
JOSEPHINE WU
jwwd@pge.com

CALIF PUBLIC UTILITIES COMMISSION
Karen Watts-Zagha
kwz@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Sean Wilson
smw@cpuc.ca.gov

**SAN DIEGO GAS & ELECTRIC
COMPANY**
JOY C. YAMAGATA
jyamagata@semprautilities.com