

From: Fitch, Julie A. [mailto:julie.fitch@cpuc.ca.gov]
Sent: Tuesday, November 15, 2016 11:12 AM
To: [see Service List at end of document]
Subject: RE: R.13-11-005: Clarifications re: D.14-10-046 and D.16-08-019 for CAEECC Process

Parties to R.13-11-005 (energy efficiency rulemaking):

On October 31, 2016, I received the below inquiry from Mr. Ted Pope, co-chair of the California Energy Efficiency Coordinating Committee (CAEECC). I am responding to the inquiry with this email copied to the whole service list for the energy efficiency rulemaking, to ensure transparency and so that all parties have access to the same information.

This is an unusual inquiry from the CAEECC, because it seeks advice to help with planning the business plan filings for January 2017 previously ordered in D.16-08-019. I will respond because the CAEECC was set up in response to a Commission Decision and the CAEECC requests timely information to assist in developing business plans to be filed by January 15, 2017.

This email is not a formal ruling, and my responses should be considered advisory only. As is well-established, Commission decisions speak for themselves and this email does not amend or alter any Commission decision. These answers are offered solely as helpful guidance, and are non-binding. Parties may have different interpretations of decision language. To the extent there is ambiguity, parties are free to offer their interpretations in future filings. If there are different interpretations presented in the future, I will interpret past decisions based on the record and applicable legal principles. Parties also have formal avenues available to them, such as petitions to modify prior decisions, if definitive official Commission interpretations are needed or desired.

With these caveats, below I have included a response to each of the four questions posed by the CAEECC co-chair.

Best regards,

Julie A. Fitch
Administrative Law Judge
California Public Utilities Commission
(415) 703-3134

From: Ted Pope [mailto:TedPope@2050partners.com]
Sent: Monday, October 31, 2016 4:49 PM
To: Fitch, Julie A.
Cc: facilitator@caeccc.org; Ettenson, Lara
Subject: Clarifications re: D.14-10-046 and D.16-08-019 for CAEECC Process

Dear ALJ Fitch,

To aid the continued development of the Program Administrators' Business Plans, we seek clarification on four questions:

1. **Length of Business Plan Timeline:** D.14-10-046 Ordering Paragraph (OP) 21 established ten years of funding beginning in 2015 through 2025 (which in practice is 11 years of funding). Therefore, we seek confirmation that the Business Plans to be filed on January 15, 2017 should have a timeline from 2018-2025 given that new programs or strategies would unlikely launch until January 1, 2018. Alternatively, the plans could have a timeline of 2018-2027 (10 years from 2018), but this would be contingent on an extension of funding not yet requested by the PAs.

Response from ALJ Fitch:

Because D.14-10-046 only authorizes funding through the end of 2025, it is my expectation that this would be the timeframe for the business plans as well, covering calendar years 2018-2025.

2. **Statewide Administered programs and third party requirement:** The following language in OP5 suggests to many stakeholders that all statewide administered programs must be Third Party pursuant to the new definition. "One or more statewide implementers, under contract to the lead administrator, should design and deliver the program or subprogram."

However, OP10 states "Statewide programs may also be considered to be "third party" to the extent they meet this definition." [emphasis added]. Thus it is interpreted by others to suggest that it is at the discretion of the PAs to determine whether the statewide programs are bid out consistent with the new third party definition.

The difference between OP5 and OP10 is underlined in the following OP10 language: "the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator."

Is the assumption that all the statewide administered programs be Third Party per definition in OP10 unless the PA can provide sufficient rationale for why it should maintain implementation or outsource implementation but maintain design control? Or is it left up to the PA to determine how much should comply with the new definition versus leverage third party services that are not necessarily in full compliance with the new definition?

Response from ALJ Fitch:

A plain English explanation/interpretation of the decision language on possible overlap between statewide programs and third party program requirements is the following:

Commission direction in D.16-08-019 required moving the portfolios overall toward more statewide and more third party program delivery over time. At the beginning of this transition, it appears as though more program activities are required to be statewide (estimated at 25% of the portfolio) than the minimum percentage requirement for third party (20%). Thus, for example, as the decision language acknowledges, there are some aspects of statewide programs, such as some functional tasks, that would be logical to be outsourced to third party implementers, but that may not necessarily involve any design input from third parties.

So, the answer to your question hinges on the degree to which third parties are invited by the lead program administrator to propose the DESIGN of statewide programs. The presumption of Ordering Paragraph 5 is that third parties should be involved in the design of statewide programs by the new

definition. If they are, then those programs would also count as third party programs by the terms of Ordering Paragraph 10. If that is not yet happening for some aspects of statewide programs or subprograms, then those programs or subprograms would not count as third party.

Regardless, the decision's and Commission's expectation is that more statewide programs (and indeed more programs overall) would move toward being third party DESIGNED and implemented over time.

My key guidance in this area would be that the program administrators be careful to present in their proposals the rationale and logic behind the choices they are making for statewide and third party approaches. The business plan evaluation process overall will benefit from a clear and compelling articulation of the reasoning behind the proposals. Since the trend by the terms of D.16-08-019 is intended to be moving toward more third party program design over time, if a program administrator proposes that third parties not be invited to present design proposals for statewide programs, the proposal should explain why that approach is not advisable in the particular circumstance.

- 3. Next steps re: LGSEC draft proposal:** Per D.16-08-019 p.60 where it states "We are interested in LGSEC's proposal, and suggest that it be discussed among the program administrators at the CAEECC to see if consensus can be reached. While we are open to the idea, we ask that it be presented in a business plan proposal for our consideration if there is consensus to do so."

Consistent with this direction, CAEECC posted the LGSEC draft Business Plan on www.caeecc.org and discussed the proposal at two well-attended, public meetings. However, at least one Coordinating Committee member remains strongly opposed to the LGSEC Statewide Local Government Partnership Program Proposal, which indicates a non-consensus position by CAEECC. Based on the guidance quoted above, we understand the CAEECC role to be fulfilled.

We seek confirmation that this is accurate. If not, please indicate additional CAEECC responsibilities on this matter. We also note that the proponents of the proposal have stated their intention to continue forward with the proposal outside of the CAEECC process, using an alternative filing approach such as including the proposal as part of SoCalREN's Business Plan on January 15, 2017. They will seek additional guidance independent of the CAEECC Facilitator as needed.

Response from ALJ Fitch:

I believe CAEECC has fulfilled the obligations required in D.16-08-019 by hosting discussion of the LGSEC draft business plan in public meetings. Even without CAEECC consensus being reached, LGSEC still has procedural options for bringing forward its proposal, should it wish to do so. I also understood from Commission staff that the CAEECC may be compiling a "comparison" matrix that summarizes consensus and non-consensus outcomes from the CAEECC public vetting process; if that is still part of your plan, I would hope that the LGSEC proposal would be included in such a matrix or summary of items discussed.

- 4. Non-Statewide Midstream Program:** The decision noted that all midstream/upstream should be statewide with minimal to no variation at the local level. However, if a PA would like to run a midstream program that others do not want to run, could that utility propose a midstream program just for their territory?

Response from ALJ Fitch:

In answer to this question, I quote from Ordering Paragraph 5 of D.16-08-019, which states “Upstream (at the manufacturer level) and midstream (at the distributor or retailer level, but not the contractor or installer level) interventions are required to be delivered statewide.” I cannot predict what the Commission may or may not do if a non-statewide midstream program were presented in a business plan application in the future. However, I would not necessarily discourage a program administrator from making such a proposal, so long as a strong rationale is provided and the departure from Commission direction is acknowledged so that all parties are made aware.

Thank you in advance for your clarifications. Please let me know if you have questions.

Ted Pope
CAEECC Facilitator
415-246-2001 mobile
Facilitator@caeec.org

Service List:

'Ted Pope' <TedPope@2050partners.com>; Ettenson, Lara <lettenson@nrdc.org>;
facilitator@caeec.org; 'ahacker@co.santa-barbara.ca.us' <ahacker@co.santa-barbara.ca.us>;
'CarmelitaM@greenlining.org' <CarmelitaM@greenlining.org>; 'CCormany@EfficiencyFirstCa.org'
<CCormany@EfficiencyFirstCa.org>; 'hchoy@isd.lacounty.gov' <hchoy@isd.lacounty.gov>;
'hchoy@isd.lacounty.gov' <hchoy@isd.lacounty.gov>; 'jon@McHughEnergy.com'
<jon@McHughEnergy.com>; 'lettenson@nrdc.org' <lettenson@nrdc.org>; 'pmiller@nrdc.org'
<pmiller@nrdc.org>; 'dgilligan@naesco.org' <dgilligan@naesco.org>; 'Greg.Merritt@cree.com'
<Greg.Merritt@cree.com>; 'RobF@ncihvac.com' <RobF@ncihvac.com>;
'KAnderson@OccamsConsulting.com' <KAnderson@OccamsConsulting.com>;
'justin@SimpleEnergy.com' <justin@SimpleEnergy.com>; 'JPong@SempraUtilities.com'
<JPong@SempraUtilities.com>; 'paul@synergy.org' <paul@synergy.org>;
'Douglass@EnergyAttorney.com' <Douglass@EnergyAttorney.com>; 'Douglass@EnergyAttorney.com'
<Douglass@EnergyAttorney.com>; 'jane.lee.cole@sce.com' <jane.lee.cole@sce.com>;
'julie.wiley@sandag.org' <julie.wiley@sandag.org>; 'FOrtlieb@SanDiego.gov' <FOrtlieb@SanDiego.gov>;
'sachu.constantine@energycenter.org' <sachu.constantine@energycenter.org>;
'TBrill@SempraUtilities.com' <TBrill@SempraUtilities.com>; 'goderogoreadusa.org'
<goderogoreadusa.org>; 'tkeith@co.slo.ca.us' <tkeith@co.slo.ca.us>; 'ckalashian@pesc.com'
<ckalashian@pesc.com>; 'erussell@ambag.org' <erussell@ambag.org>; 'steve@hea.com'
<steve@hea.com>; 'Abhay@bidgely.com' <Abhay@bidgely.com>; 'jcammarata@firstfuel.com'
<jcammarata@firstfuel.com>; Clay, Christopher <christopher.clay@cpuc.ca.gov>;
'jeanne.sole@sfgov.org' <jeanne.sole@sfgov.org>; 'hayley@turn.org' <hayley@turn.org>;
'Ivan@BrightlineDefense.org' <Ivan@BrightlineDefense.org>; 'CalTF@CalTF.org' <CalTF@CalTF.org>;
'ek@a-klaw.com' <ek@a-klaw.com>; 'nes@a-klaw.com' <nes@a-klaw.com>;
'RossN@BlueGreenAlliance.org' <RossN@BlueGreenAlliance.org>; 'SWang@chpc.net'
<SWang@chpc.net>; 'Dan.Suyeyasu@CodeCycle.com' <Dan.Suyeyasu@CodeCycle.com>;
'lkoehler@edf.org' <lkoehler@edf.org>; 'california@opower.com' <california@opower.com>;
'BCragg@GoodinMacbride.com' <BCragg@GoodinMacbride.com>; 'JStoddard@crowell.com'
<JStoddard@crowell.com>; 'VidhyaPrabhakaran@dwt.com' <VidhyaPrabhakaran@dwt.com>;
'ECL8@pge.com' <ECL8@pge.com>; 'barbara.quittner@synergycompanies.org'
<barbara.quittner@synergycompanies.org>; 'Barbara.Quittner@SynergyCompanies.org'
<Barbara.Quittner@SynergyCompanies.org>; 'rfried@aalrr.com' <rfried@aalrr.com>;

'JerryL@abag.ca.gov' <JerryL@abag.ca.gov>; 'JerryL@abag.ca.gov' <JerryL@abag.ca.gov>;
'bruce@builditgreen.org' <bruce@builditgreen.org>; 'EastBayEnergyWatch@stopwaste.org'
<EastBayEnergyWatch@stopwaste.org>; 'kcornish@energy-solution.com' <kcornish@energy-
solution.com>; 'MCallahan-Dudley@mceCleanEnergy.org' <MCallahan-Dudley@mceCleanEnergy.org>;
'maldridge@ecoact.org' <maldridge@ecoact.org>; 'kfoley@sonomacleanpower.org'
<kfoley@sonomacleanpower.org>; 'Policy@EfficiencyCouncil.org' <Policy@EfficiencyCouncil.org>;
'KMessner@aham.org' <KMessner@aham.org>; 'NGillette@EnerNOC.com' <NGillette@EnerNOC.com>;
'Eric@CoalitionofEnergyUsers.org' <Eric@CoalitionofEnergyUsers.org>; 'jim.hawley@deweysquare.com'
<jim.hawley@deweysquare.com>; 'Wynne@braunlegal.com' <Wynne@braunlegal.com>;
'TEnslow@AdamsBroadwell.com' <TEnslow@AdamsBroadwell.com>; 'tenslow@adamsbroadwell.com'
<tenslow@adamsbroadwell.com>; 'TEnslow@adamsbroadwell.com' <TEnslow@adamsbroadwell.com>;
'john@clfp.com' <john@clfp.com>; 'KMills@cfbf.com' <KMills@cfbf.com>; 'Robert@RMA-energy.com'
<Robert@RMA-energy.com>; 'SamS@jacoinc.net' <SamS@jacoinc.net>; 'tom@ucons.com'
<tom@ucons.com>; 'jake@energysavvy.com' <jake@energysavvy.com>; 'YLu@SanDiego.gov'
<YLu@SanDiego.gov>; 'A8S8@pge.com' <A8S8@pge.com>; 'Alejandra.Mejia@futee.biz'
<Alejandra.Mejia@futee.biz>; 'astover@mceCleanEnergy.org' <astover@mceCleanEnergy.org>;
'Alissa.Burger@EnergyCenter.org' <Alissa.Burger@EnergyCenter.org>; 'allen.lee@cadmusgroup.com'
<allen.lee@cadmusgroup.com>; 'arago@qcscs.com' <arago@qcscs.com>; 'akp.servicelist@gmail.com'
<akp.servicelist@gmail.com>; 'acampbell@haas.berkeley.edu' <acampbell@haas.berkeley.edu>;
'Annette.Beitel@futee.biz' <Annette.Beitel@futee.biz>; 'akawnov@yahoo.com'
<akawnov@yahoo.com>; 'Barbara@BarkovichAndYap.com' <Barbara@BarkovichAndYap.com>;
'bmenten@mceCleanEnergy.org' <bmenten@mceCleanEnergy.org>; 'b2sg@pge.com'
<b2sg@pge.com>; 'cyin@yinsight.net' <cyin@yinsight.net>; 'ccchen@san.rr.com'
<ccchen@san.rr.com>; 'CMFH@pge.com' <CMFH@pge.com>; 'CMcCormack@chpc.net'
<CMcCormack@chpc.net>; 'RegRelCPUCCases@pge.com' <RegRelCPUCCases@pge.com>;
'ccfe@pge.com' <ccfe@pge.com>; 'californiadockets@pacificorp.com'
<californiadockets@pacificorp.com>; 'charlie.buck@oracle.com' <charlie.buck@oracle.com>;
'CSierzant@semprautilities.com' <CSierzant@semprautilities.com>; 'Cory.scott@pacificorp.com'
<Cory.scott@pacificorp.com>; 'craigtyler@comcast.net' <craigtyler@comcast.net>;
'dfranz@solarcity.com' <dfranz@solarcity.com>; 'davidh@greenlining.org' <davidh@greenlining.org>;
'd6cx@pge.com' <d6cx@pge.com>; 'eli.caudill@clearesult.com' <eli.caudill@clearesult.com>;
'Eli.Harland@energy.ca.gov' <Eli.Harland@energy.ca.gov>; 'EmilySangi@dwt.com'
<EmilySangi@dwt.com>; 'eric.eberhardt@ucop.edu' <eric.eberhardt@ucop.edu>;
'Greg.Wikler@Navigant.com' <Greg.Wikler@Navigant.com>; 'hdf2@pge.com' <hdf2@pge.com>;
'hanna.grene@energycenter.org' <hanna.grene@energycenter.org>; 'jean.shelton@itron.com'
<jean.shelton@itron.com>; 'Jennyb@abag.ca.gov' <Jennyb@abag.ca.gov>; 'jenny.roecks@futee.biz'
<jenny.roecks@futee.biz>; 'JWaen@mceCleanEnergy.org' <JWaen@mceCleanEnergy.org>;
'jcohen@isd.lacounty.gov' <jcohen@isd.lacounty.gov>; 'j6wv@pge.com' <j6wv@pge.com>;
'john.cavalli@itron.com' <john.cavalli@itron.com>; 'jjones@bpi.org' <jjones@bpi.org>;
'Jon.Vencil@dnvgl.com' <Jon.Vencil@dnvgl.com>; 'kelliott@mceCleanEnergy.org'
<kelliott@mceCleanEnergy.org>; 'klr@a-klaw.com' <klr@a-klaw.com>;
'Lindsey.Hawes@energycenter.org' <Lindsey.Hawes@energycenter.org>; 'Liz.Oh@EnergyCenter.org'
<Liz.Oh@EnergyCenter.org>; 'LLAA@pge.com' <LLAA@pge.com>; 'Imedina@semprautilities.com'
<Imedina@semprautilities.com>; 'mcosta@energycoalition.org' <mcosta@energycoalition.org>;
'mstamas@nrdc.org' <mstamas@nrdc.org>; 'regulatory@mceCleanEnergy.org'
<regulatory@mceCleanEnergy.org>; 'Meghan.Dewey@pge.com' <Meghan.Dewey@pge.com>;
'mborgeson@nrdc.org' <mborgeson@nrdc.org>; 'mpa@a-klaw.com' <mpa@a-klaw.com>;
'mnguyen@energycoalition.org' <mnguyen@energycoalition.org>; 'm1nz@pge.com' <m1nz@pge.com>;

'wmc@a-klaw.com' <wmc@a-klaw.com>; 'mike.rufo@itron.com' <mike.rufo@itron.com>;
'mistib@comcast.net' <mistib@comcast.net>; 'myron.j.graessle@lmco.com'
<myron.j.graessle@lmco.com>; 'nikhilvgandhi@gmail.com' <nikhilvgandhi@gmail.com>;
'PatrickFerguson@dwt.com' <PatrickFerguson@dwt.com>; 'pthacher@mcecleanenergy.org'
<pthacher@mcecleanenergy.org>; 'rafi@pge.com' <rafi@pge.com>; 'ramon@ucdavis.edu'
<ramon@ucdavis.edu>; 'SHarvey@kfwLaw.com' <SHarvey@kfwLaw.com>; 'scmr@pge.com'
<scmr@pge.com>; 'sephra.ninow@energycenter.org' <sephra.ninow@energycenter.org>;
'shahana.samiullah@sce.com' <shahana.samiullah@sce.com>; 'sguerry@bki.com' <sguerry@bki.com>;
'berlin@susieberlinlaw.com' <berlin@susieberlinlaw.com>; 'tolsen@energycoalition.org'
<tolsen@energycoalition.org>; 'mrw@mrwassoc.com' <mrw@mrwassoc.com>;
'dwtcpudockets@dwt.com' <dwtcpudockets@dwt.com>; 'filings@a-klaw.com' <filings@a-klaw.com>;
'rekl@pge.com' <rekl@pge.com>; 'jperkins@ers-inc.com' <jperkins@ers-inc.com>;
'diamond@energyhub.net' <diamond@energyhub.net>; 'kier@energyhub.net' <kier@energyhub.net>;
'rhupart@solarelectricpower.org' <rhupart@solarelectricpower.org>; 'KJohnson@JohnsonConsults.com'
<KJohnson@JohnsonConsults.com>; 'rholmes@arcainc.com' <rholmes@arcainc.com>;
'jcameron@arcainc.com' <jcameron@arcainc.com>; 'DLowrey@Comverge.com'
<DLowrey@Comverge.com>; 'CUPCdockets@eq-research.com' <CUPCdockets@eq-research.com>;
'lisa@simpleenergy.com' <lisa@simpleenergy.com>; 'adam@simpleenergy.com'
<adam@simpleenergy.com>; 'ca@e9insight.com' <ca@e9insight.com>; 'pjacobs@buildingmetrics.biz'
<pjacobs@buildingmetrics.biz>; 'DavidClarkFamily@gmail.com' <DavidClarkFamily@gmail.com>;
'JulieEnergyEfficiency@gmail.com' <JulieEnergyEfficiency@gmail.com>; 'cynthiakmitchell@gmail.com'
<cynthiakmitchell@gmail.com>; 'awilliamson@semprautilities.com'
<awilliamson@semprautilities.com>; 'anah@SempraUtilities.com' <anah@SempraUtilities.com>;
'ASteinberg@SempraUtilities.com' <ASteinberg@SempraUtilities.com>;
'DHanway@SempraUtilities.com' <DHanway@SempraUtilities.com>; 'DKim@semprautilities.com'
<DKim@semprautilities.com>; 'DClifton@SempraUtilities.com' <DClifton@SempraUtilities.com>;
'EBaires@SempraUtilities.com' <EBaires@SempraUtilities.com>; 'EPalermo@SempraUtilities.com'
<EPalermo@SempraUtilities.com>; 'JLSalazar@SempraUtilities.com' <JLSalazar@SempraUtilities.com>;
'jjmartinez@semprautilities.com' <jjmartinez@semprautilities.com>; 'JKwok@SempraUtilities.com'
<JKwok@SempraUtilities.com>; 'KTalley@SempraUtilities.com' <KTalley@SempraUtilities.com>;
'layala@semprautilities.com' <layala@semprautilities.com>; 'MReyna@SempraUtilities.com'
<MReyna@SempraUtilities.com>; 'mjhervey@semprautilities.com' <mjhervey@semprautilities.com>;
'mhuerta@semprautilities.com' <mhuerta@semprautilities.com>; 'PDeang@SempraUtilities.com'
<PDeang@SempraUtilities.com>; 'RVanderleeden@SempraUtilities.com'
<RVanderleeden@SempraUtilities.com>; 'CHVaquerano@SALEF.org' <CHVaquerano@SALEF.org>;
'David.Cohen@energycenter.org' <David.Cohen@energycenter.org>; 'Jay.Luboff@Navigant.com'
<Jay.Luboff@Navigant.com>; 'Mabell.Paine@icfi.com' <Mabell.Paine@icfi.com>;
'LLuna9624@yahoo.com' <LLuna9624@yahoo.com>; 'iGoodman@CommerceEnergy.com'
<iGoodman@CommerceEnergy.com>; 'AKlemm@CalState.edu' <AKlemm@CalState.edu>;
'klatt@energyattorney.com' <klatt@energyattorney.com>; 'case.admin@sce.com'
<case.admin@sce.com>; 'charisse.burnett@sce.com' <charisse.burnett@sce.com>;
'Frank.Harris@sce.com' <Frank.Harris@sce.com>; 'janet.combs@sce.com' <janet.combs@sce.com>;
'lisa.tobias@sce.com' <lisa.tobias@sce.com>; 'Liddell@EnergyAttorney.com'
<Liddell@EnergyAttorney.com>; 'Les.Owashi@dnvgl.com' <Les.Owashi@dnvgl.com>;
'afaustino@semprautilities.com' <afaustino@semprautilities.com>; 'CentralFiles@SempraUtilities.com'
<CentralFiles@SempraUtilities.com>; 'JYamagata@SempraUtilities.com'
<JYamagata@SempraUtilities.com>; 'ABesa@semprautilities.com' <ABesa@semprautilities.com>;
'Paul.Marconi@bves.com' <Paul.Marconi@bves.com>; 'Arlis.Reynolds@CadmusGroup.com'

<Arlis.Reynolds@CadmusGroup.com>; 'sheena.tran@icfi.com' <sheena.tran@icfi.com>;
'James.J.Hirsch@gmail.com' <James.J.Hirsch@gmail.com>; 'johnavina@abraxasenergy.com'
<johnavina@abraxasenergy.com>; 'JGriesser@co.slo.ca.us' <JGriesser@co.slo.ca.us>;
'DTozlian@RHAinc.com' <DTozlian@RHAinc.com>; 'Dolf.Joekes@innogy.com'
<Dolf.Joekes@innogy.com>; 'sstolte@smcgov.org' <sstolte@smcgov.org>; 'nick.brod@clearesult.com'
<nick.brod@clearesult.com>; 'kathleen.bryan@sfgov.org' <kathleen.bryan@sfgov.org>;
'RegCleanPowerSF@sfgov.org' <RegCleanPowerSF@sfgov.org>; 'ann.kelly@sfgov.org'
<ann.kelly@sfgov.org>; 'cal.broomhead@sfgov.org' <cal.broomhead@sfgov.org>; 'ETorres@turn.org'
<ETorres@turn.org>; 'jguild@enovity.com' <jguild@enovity.com>; 'amul.sathe@navigant.com'
<amul.sathe@navigant.com>; 'bperlstein@kpmg.com' <bperlstein@kpmg.com>;
'cara.goldenberg@grueneich.com' <cara.goldenberg@grueneich.com>; 'derek.jones@navigant.com'
<derek.jones@navigant.com>; 'GXPR@pge.com' <GXPR@pge.com>; 'MAGq@pge.com'
<MAGq@pge.com>; 'M3AK@pge.com' <M3AK@pge.com>; 'm2ld@pge.com' <m2ld@pge.com>;
'Mahmad@nexant.com' <Mahmad@nexant.com>; 'PXJJ@pge.com' <PXJJ@pge.com>; 'rysk@pge.com'
<rysk@pge.com>; 'tmfry@nexant.com' <tmfry@nexant.com>; 'Charlie.Buck@oracle.com'
<Charlie.Buck@oracle.com>; 'FWahl@SolarCity.com' <FWahl@SolarCity.com>;
'golding@communitychoicepartners.com' <golding@communitychoicepartners.com>;
'JJaffe@Nossaman.com' <JJaffe@Nossaman.com>; 'm3fi@pge.com' <m3fi@pge.com>;
'skrasnow@firstfuel.com' <skrasnow@firstfuel.com>; 'mmattes@nossaman.com'
<mmattes@nossaman.com>; 'irene@igc.org' <irene@igc.org>; 'Alejandra.Mejia@futee.biz'
<Alejandra.Mejia@futee.biz>; 'cem@newsdata.com' <cem@newsdata.com>;
'MeganMMyers@yahoo.com' <MeganMMyers@yahoo.com>; 'ssmyers@att.net' <ssmyers@att.net>;
'andrew.yip@us.bosch.com' <andrew.yip@us.bosch.com>; 'RCounihan@NestLabs.com'
<RCounihan@NestLabs.com>; 'dianmg52@gmail.com' <dianmg52@gmail.com>;
'David.Siddiqui@clearesult.com' <David.Siddiqui@clearesult.com>; 'bonnie.datta.ext@siemens.com'
<bonnie.datta.ext@siemens.com>; 'MDoran@MCECleanEnergy.org' <MDoran@MCECleanEnergy.org>;
'andrew@arc-alternatives.com' <andrew@arc-alternatives.com>; 'jim@betterclimate.info'
<jim@betterclimate.info>; 'DaveD@smw104.org' <DaveD@smw104.org>; 'RFried@aalrr.com'
<RFried@aalrr.com>; 'floyd.keneipp@tierrarc.com' <floyd.keneipp@tierrarc.com>;
'anngressani.biz@gmail.com' <anngressani.biz@gmail.com>; 'd1tq@pge.com' <d1tq@pge.com>;
'cadickerson@cadconsulting.biz' <cadickerson@cadconsulting.biz>; 'allan@luciddg.com'
<allan@luciddg.com>; 'AChase@Energy-Solution.com' <AChase@Energy-Solution.com>;
'Chenrikson@trcsolutions.com' <Chenrikson@trcsolutions.com>; 'fred.coito@dnvgl.com'
<fred.coito@dnvgl.com>; 'harnold@opiniondynamics.com' <harnold@opiniondynamics.com>;
'Jennifer.Canseco@DNVGL.com' <Jennifer.Canseco@DNVGL.com>; 'jmj@opiniondynamics.com'
<jmj@opiniondynamics.com>; 'mgardner@efficiencycouncil.org' <mgardner@efficiencycouncil.org>;
'msutter@opiniondynamics.com' <msutter@opiniondynamics.com>;
'mharamati@opiniondynamics.com' <mharamati@opiniondynamics.com>;
'NMerchantVega@opiniondynamics.com' <NMerchantVega@opiniondynamics.com>;
'opatterson@opiniondynamics.com' <opatterson@opiniondynamics.com>;
'Sepideh.Shahinfard@CadmusGroup.com' <Sepideh.Shahinfard@CadmusGroup.com>;
'Stephanie.Wang@EnergyCenter.org' <Stephanie.Wang@EnergyCenter.org>;
'tbuhr@opiniondynamics.com' <tbuhr@opiniondynamics.com>; 'TPope@energy-solution.com'
<TPope@energy-solution.com>; 'TLindl@kfwlaw.com' <TLindl@kfwlaw.com>; 'service@cforat.org'
<service@cforat.org>; 'JSKromer@mac.com' <JSKromer@mac.com>; 'elvine@lbl.gov' <elvine@lbl.gov>;
'john@proctoreng.com' <john@proctoreng.com>; 'nmalcolm@mcecleanenergy.org'
<nmalcolm@mcecleanenergy.org>; 'sswaroop@mceCleanEnergy.org'
<sswaroop@mceCleanEnergy.org>; 'hankryan2003@yahoo.com' <hankryan2003@yahoo.com>;

'demetra.mcbride@ceo.sccgov.org' <demetra.mcbride@ceo.sccgov.org>;
'natalie.deleon@ceo.sccgov.org' <natalie.deleon@ceo.sccgov.org>; 'dreynolds@ers-inc.com'
<dreynolds@ers-inc.com>; 'Justin.Leveque@SanJoseCa.gov' <Justin.Leveque@SanJoseCa.gov>;
'JFerrari@ConCol.ws' <JFerrari@ConCol.ws>; 'lcasey@sctainfo.org' <lcasey@sctainfo.org>;
'SShupe@SonomaCleanPower.org' <SShupe@SonomaCleanPower.org>;
'anne.policysolutions@gmail.com' <anne.policysolutions@gmail.com>; 'kheinemeier@ucdavis.edu'
<kheinemeier@ucdavis.edu>; 'smita.gupta@itron.com' <smita.gupta@itron.com>; 'dhou@caiso.com'
<dhou@caiso.com>; 'jpinjuv@caiso.com' <jpinjuv@caiso.com>; 'Stough@BraunLegal.com'
<Stough@BraunLegal.com>; 'griffiths@braunlegal.com' <griffiths@braunlegal.com>; 'jdecker@lgc.org'
<jdecker@lgc.org>; 'joldham@lgc.org' <joldham@lgc.org>; 'RobertPrm@gmail.com'
<RobertPrm@gmail.com>; 'STaheri@scppa.org' <STaheri@scppa.org>; 'blaising@braunlegal.com'
<blaising@braunlegal.com>; 'ssanders@ca-ilg.com' <ssanders@ca-ilg.com>; 'steven@iepa.com'
<steven@iepa.com>; 'tbrunello@greentechleadership.org' <tbrunello@greentechleadership.org>;
'dcardozo@adamsbroadwell.com' <dcardozo@adamsbroadwell.com>; 'RL@eslawfirm.com'
<RL@eslawfirm.com>; 'rob@clfp.com' <rob@clfp.com>; 'ATrowbridge@DayCarterMurphy.com'
<ATrowbridge@DayCarterMurphy.com>; 'jasong@energysavvy.com' <jasong@energysavvy.com>;
'deb@a-klaw.com' <deb@a-klaw.com>; 'dmoran@nexant.com' <dmoran@nexant.com>;
'jr_Don.Jones@PacifiCorp.com' <jr_Don.Jones@PacifiCorp.com>; 'Eli.Morris@PacifiCorp.com'
<Eli.Morris@PacifiCorp.com>; 'johnwgould@comcast.net' <johnwgould@comcast.net>;
'michael.r@twavetech.com' <michael.r@twavetech.com>; 'emibd@emiconsulting.com'
<emibd@emiconsulting.com>; Tran, Ava N. <ava.tran@cpuc.ca.gov>; Best, Carmen
<carmen.best@cpuc.ca.gov>; Fogel, Cathleen A. <cathleen.fogel@cpuc.ca.gov>; Myers, Christopher
<christopher.myers@cpuc.ca.gov>; Buch, Daniel <Daniel.Buch@cpuc.ca.gov>;
'David.Ismailyan@energy.ca.gov' <David.Ismailyan@energy.ca.gov>; Mackin, Dina S.
<dina.mackin@cpuc.ca.gov>; Reynolds, Frank Alan <FrankAlan.Reynolds@cpuc.ca.gov>; Fortune, Hazlyn
<hazlyn.fortune@cpuc.ca.gov>; Clinton, Jeanne <jeanne.clinton@cpuc.ca.gov>; Tagnipes, George S.
<george.tagnipes@cpuc.ca.gov>; Battis, Jeremy <jeremy.battis@cpuc.ca.gov>; Hardy, Katherine
<katherine.hardy@cpuc.ca.gov>; Wu, Katie <katie.wu@cpuc.ca.gov>; Kajopaiye, Kayode
<kayode.kajopaiye@cpuc.ca.gov>; Paulo, Lisa <lisa.paulo@cpuc.ca.gov>; 'Martha.Brook@energy.ca.gov'
<Martha.Brook@energy.ca.gov>; Colvin, Michael <michael.colvin@cpuc.ca.gov>; Dzvova, Mona Dee
<Mona.Dzvova@cpuc.ca.gov>; 'psaxton@energy.state.ca.us' <psaxton@energy.state.ca.us>;
Gruending, Paula <paula.gruending@cpuc.ca.gov>; Franzese, Peter <peter.franzese@cpuc.ca.gov>; Lai,
Peter <peter.lai@cpuc.ca.gov>; Skala, Pete <pete.skala@cpuc.ca.gov>; Cox, Rory
<rory.cox@cpuc.ca.gov>; Francisco, Tory <tory.francisco@cpuc.ca.gov>; Cole, Alexander
<Alexander.Cole@cpuc.ca.gov>; Merigan, Alexander "Sasha" <Alexander.Merigan@cpuc.ca.gov>; Kane,
Hal <Hal.Kane@cpuc.ca.gov>; Kalafut, Jennifer <jennifer.kalafut@cpuc.ca.gov>; Fitch, Julie A.
<julie.fitch@cpuc.ca.gov>; Odunlami, Lola <Lola.Odunlami@cpuc.ca.gov>; Worster, Chari
<chari.worster@cpuc.ca.gov>; Anning, Marna <Marna.Annings@cpuc.ca.gov>; Mozafari, Maryam
<Maryam.Mozafari@cpuc.ca.gov>; Biermayer, Peter <Peter.Biermayer@cpuc.ca.gov>; Hansen, Robert
<Robert.Hansen@cpuc.ca.gov>; O'Hara, Rosanne <Rosanne.O'Hara@cpuc.ca.gov>; Zhang, Zhen
<Zhen.Zhang@cpuc.ca.gov>; Kline, Zita <Zita.Kline@cpuc.ca.gov>; 'crogers@energy.state.ca.us'
<crogers@energy.state.ca.us>; Haramati, Mikhail <Mikhail.Haramati@cpuc.ca.gov>;
'DietrichW@earthlink.net' <DietrichW@earthlink.net>; Gamson, David M.
<david.gamson@cpuc.ca.gov>