

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2012.

Application 10-12-005
(Filed December 15, 2010)

Application of Southern California Gas Company (U904G) for authority to update its gas revenue requirement and base rates effective on January 1, 2012.

Application 10-12-006
(Filed December 15, 2010)

**PROTEST
OF THE DIVISION OF RATEPAYER ADVOCATES**

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January 18, 2011

BEFORE THE PUBLIC UTILITIES COMMISSION
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**PROTEST
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I. INTRODUCTION

On December 15, 2010, San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company (SCG) filed their Test Year (TY) 2012 general rate case (GRC) applications with the California Public Utilities Commission (Commission). SDG&E requests a revenue requirement of \$1.867 billion, an increase over 2010 authorized levels of \$276 million, \$238 million for electric distribution and generation and \$39 million for gas distribution. SCG requests a revenue requirement of \$2.124 billion, and increase over 2010 authorized levels of \$308 million for gas storage, transmission, and distribution.

SDG&E and SCG also request Commission authority to implement a Post Test Year (PTY) ratemaking mechanism for subsequent years, such that each utility's next rate case would be filed for Test Year 2016, resulting in a four-year rate cycle. The

proposed PTY ratemaking mechanism would be adjusted annually using separate update formulae for capital-related and operations and maintenance (O&M) expenses.

Pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) protests these Applications. As the Applications first appeared in the Commission’s Daily Calendar on December 16, 2010, this Protest is timely filed.

II. BACKGROUND

On August 6, 2010, SCG and SDG&E tendered their 2012 GRC Notice of Intent (NOI) in accordance with the Rate Case Plan. On October 15, 2010, the Commission’s Executive Director accepted the tendered documents for filing.

As shown in Table 1, SCG is requesting \$2.021 billion in base margin¹ for TY2012, which represents a 25.5% increase relative to the authorized base margin for 2008:

Table 1
SCG is Seeking Over \$2.0 Billion in 2012 Base Margin for
Gas Storage, Gas Transmission, and Gas Distribution²
(in Millions of Nominal Dollars)

	SCG’s Requested 2012 Base Margin	2008 Authorized Base Margin	“Current” Base Margin	\$ Increase over Current Base Margin	% Increase over Current Base Margin	\$ Increase over 2008 Authorized Base Margin	% Increase over 2008 Authorized Base Margin
<i>Total</i>	\$2,021	\$1,611	\$1,715	\$306	17.8%	\$410	25.5%

As shown in Table 2, SDG&E is requesting \$1.842 billion in base margin for TY2012, which represents a 38.2% increase relative to what the Commission authorized for 2008:

¹ Base margin is equal to revenue requirement less miscellaneous revenues.

² SCG does not provide a breakdown for each of these functional areas.

Table 2
SDG&E is Seeking Over \$1.8 Billion in 2012 Base Margin for
Electric Distribution, Electric Generation, and Gas Distribution
(in Millions of Nominal Dollars)

Area	SDG&E's Requested 2012 Base Margin	2008 Authorized Base Margin	"Current" Base Margin	\$ Increase over Current Base Margin	% Increase over Current Base Margin	\$ Increase over 2008 Authorized Base Margin	% Increase over 2008 Authorized Base Margin
Electric Distribution	\$1,225		\$1,011	\$214	21.2%		
Electric Generation (excluding SONGS)	\$135		\$128	\$7	5.5%		
SONGS	\$164		\$121	\$43	35.5%		
Electric Total	\$1,524	\$1,098	\$1,260	\$264	21.0%	\$426	38.8%
Gas Distribution	\$319	\$235	\$253	\$56	22.1%	\$84	35.7%
Total	\$1,842	\$1,333	\$1,513	\$329	21.7%	\$509	38.2%

SCG asserts that its proposal would increase a typical residential customer's monthly bill by \$3.35 (7.7%), assuming 38 therms of usage.³ SDG&E asserts that its proposal would increase a typical inland residential customer's monthly winter bill by \$3.62 (4.5%) for electricity and \$2.93 (6.7%) for gas, assuming 500 kWh and 33 therms of usage,⁴ respectively.

SCG and SDG&E are also proposing a framework for Post Test Year (PTY) ratemaking mechanisms to allow for revenue requirement increases from 2013 through 2015, which they state is necessary to allow them to continue providing safe and reliable service to their customers and the opportunity to earn its authorized rate of return. The proposal includes an earnings sharing mechanism based on relative earnings above and below the authorized Rate of Return. The framework would also include continued use of a "Z-factor."

³ In its previous rate case application, SCG projected a rate increase based on 50 therms of usage per month, and does not explain in this application why it has reduced its monthly usage calculation. Had SCG used the same calculation in this rate case, the monthly gas bill would increase by \$4.41 (10.1%).

⁴ In its previous rate case application, SDG&E projected a rate increase based on 40 therms of usage per month, and does not explain in this application why it has reduced its monthly usage calculation. Had SDG&E used the same calculation in this rate case, the monthly gas bill would increase by \$3.55 (8.1%).

In the 2008 SCG and SDG&E GRC proceedings, the Commission adopted settlements in D.08-07-046 authorizing: (1) \$1,610.5 million in base margin for SCG; and (2) \$1,097.9 million in electric base margin and \$235.1 million in gas base margin for SDG&E for a total of \$1,330.0 million. (See D.08-17-046, pp. 17, 18). As seen in the tables above, base margin has already grown by over \$100 million for SCG and about \$180 million for SDG&E over 2008 authorized amounts even before the requested increases in these consolidated proceedings.

III. DRA'S REVIEW

DRA intends to investigate and analyze all aspects of the utilities' requests, and to develop independent forecasts in the following areas: revenues, electric generation, gas and electric distribution, gas transmission and gas storage expenses and plant, administrative and general expenses, depreciation, working cash, *etc.* DRA is also conducting an audit and evaluating the utilities' post test year ratemaking proposals and performance incentives. DRA will present its estimates, recommendations and findings in its Results of Operations and related reports.

As the Commission is aware, there are now three separate large energy utility rate cases pending, and DRA's resources to process these are severely constrained. Just last month, the Commission issued a decision directly addressing this issue. In that decision, the Commission noted that:

[i]n order to protect and advance ratepayer interests, the California Legislature enacted section 309.5. Pursuant to this statutory provision, the Commission must consist of, among other things, a division of ratepayer advocates 'to represent and advocate on behalf of the interest of public utility customers and subscribers within the jurisdiction of the [C]ommission.' Pursuant to subdivision (c) of section 309.5, the Division Director is charged with developing the budget for DRA, which is subject to final approval by the Commission. However, it is the Commission which is required to 'provide for the assignment of personnel to, and the functioning of, the division.'... *'Personnel and resources, including attorneys and other legal support, shall be provided by the [C]ommission to the division at a level sufficient to*

*ensure that customer and subscriber interests are effectively represented in all significant proceedings.”*⁵

Moreover, although the Commission denied rehearing of the modified D.10-04-003, after acknowledging the current situation where the Commission is “simultaneously entertaining three overlapping energy rate cases,”⁶ the Commission stated that “the matter should be resolved in-house,” and that resolution of this issue depends on whether DRA staffing is adequate under Public Utilities Code § 309.5(c).⁷ The Commission also granted DRA the right to petition the Commission to propose a solution for the staffing issue if it cannot be resolved in-house.

Since DRA initially filed a joint petition in November 2009 with SDG&E and SCG to modify D.08-07-046, significant events have occurred that have further constrained the ability of DRA and the Commission to carry out its function of ensuring safe and reliable public utility service to California ratepayers. Most notably, the September, 2010, explosion on a gas transmission line of Pacific Gas and Electric Company (PG&E) in San Bruno has commanded much of the attention of the Commission’s Consumer Protection and Safety Division, and the very small gas section in Energy Division that will review the two gas General Rate Cases. It is unclear how much additional work will inure on DRA as a result of the accident, but there clearly will be an increased emphasis on reviewing safety programs and their costs. In addition, 2010 will be the first complete year that one-day-a-month furloughs will be mandatory on Commission staff, despite the need to process three significant rate cases. This loss of almost 5% of work days will hinder the Commission’s ability to handle all of its workload as quickly as in the past. Furthermore, the state’s difficult budget situation, and the prospect of wage cuts, has induced numerous staffers to retire, and DRA’s gas section in particular has been disproportionately impacted by this trend in recent months.

⁵ D. 10-12-018, Order Modifying Decision 10-04-003, mimeo, pp. 4-5 (emphasis added).

⁶ *Id.*, p. 8.

⁷ *Id.*, p. 9.

Finally, Legal Division staff assigned to this proceeding have other responsibilities as well, including litigation on behalf of the Commission (and coordinated with the major California utilities, including SDG&E and SCG) at the Federal Energy Regulatory Commission (FERC) in gas matters such as El Paso Natural Gas' 2012 GRC, currently set for hearings in late October, 2011.⁸

DRA's proposal at this time to handle all of these matters requests that the SCG/SDG&E GRCs lag by about four months behind the SCE GRC (A.10-12-015), such that DRA testimony would be filed in early September 2011, and hearings would be held in December 2011. On January 10, 2011, SCG and SDG&E filed a Joint Petition to Establish Memorandum Accounts in order to enable the Commission to decide the proceeding after the close of 2011 but have rate increases go into effect as if they were enacted on January 1, 2012. Of the twenty DRA staff members assigned to the Sempra GRCs, five are working on the SCE GRC, making it challenging for DRA to manage the SCE GRC and the Sempra GRCs simultaneously. Sempra itself has acknowledged some staffing issues associated with litigating Phase II of this GRC, and DRA has supported Sempra's request to postpone its Phase II filing. DRA still retains the right to petition the Commission to resolve the staffing issue pursuant to D.10-12-018.

IV. IDENTIFIED RATE CASE ISSUES

The rate increases sought by SCG and SDG&E are quite substantial. For the test year 2012, SCG is proposing a 25.5% increase compared to its authorized 2008 base margin, and 17.8% above SCG's current base margin. SDG&E is seeking a 38.2% increase compared to its authorized 2008 base margin, and 21.7% above SDG&E's current base margin. These increases are being sought as California still struggles mightily with the effects of the biggest economic downturn in the United States in almost eighty years, and greatly exceed the general rate of inflation or increases in costs in other substantial categories of consumer spending. Yet SCG and SDG&E pay scant attention

⁸ See Order Establishing Procedural Schedule, El Paso Natural Gas Co., FERC Docket No. 10-1398-000 (December 3, 2010).

to the general economic climate in which their proposal is being presented. DRA is conducting extensive discovery on the issues raised by these Applications and will make recommendations to the Commission as appropriate. The following is a non-exhaustive list of the issues DRA presently intends to explore. Discovery and analysis may eliminate some of these issue areas and others may arise.

The majority of SCG/SDG&E requested increases for 2012 are in the following areas: (1) operation and maintenance (O&M) expenses; (2) administrative and general (A&G) expenses, including insurance, pensions, and post-retirement benefits other than pensions (PBOPs); (3) information technology expenses; (4) capital expenditures to replace aging infrastructure and expand the system to accommodate load growth; and (5) depreciation expenses.

Potential issues in this rate case are likely to include, but are not limited to, the following:

- SCG/SDG&E's proposed level of staffing (i.e., new Full-Time Equivalent positions, or FTEs);
- 2010 reorganization costs;
- costs associated with addressing various governmental requirements and regulations;
- the level of settlements, claims, workers compensation, insurance and benefits costs;
- the amount of incentives or awards that should be paid out to the utility's employees;
- costs associated with replacing aging and/or obsolete equipment;
- the reasonableness of new programs or initiatives;
- SCG/SDG&E's Post Test-Year Ratemaking Framework;
- the appropriate framework for non-tariffed products & services;
- SCG/SDG&E's forecasting methodologies; and
- the reasonableness and adequacy of SCG/SDG&E's justifications and supporting documentation associated with its requests.

O&M Expenses

SDG&E forecasts a \$159.3 million (or 18%) increase in O&M expenses for 2012 over 2009 recorded, from \$885 million to \$1.044 billion.²

SDG&E Operation & Maintenance Expenses (Millions of 2009 Dollars)

Description (a)	2009 Recorded (b)	2012 Forecast (c)	\$ Difference (d=c-b)	% Difference (e=d/b)
Distribution	\$124.5	\$148.1	\$23.6	19%
Gas Transmission	\$3.7	\$4.0	\$0.3	8%
Generation	\$28.9	\$33.7	\$4.8	17%
Nuclear Generation (SONGS)	\$127.3	\$120.2	-\$7.1	-6%
Engineering	\$3.5	\$13.7	\$10.2	291%
Procurement	\$8.6	\$10.4	\$1.8	21%
Customer Services	\$87.4	\$93.3	\$5.9	7%
Information Technology	\$40.5	\$54.8	\$14.3	35%
Support Services	\$79.4	\$93.0	\$13.6	17%
Administrative and General	\$381.2	\$473.1	\$91.9	24%
Total	\$885.0	\$1044.3	\$159.3	18%

SCG forecasts a \$166 million (or 17%) increase in O&M expenses for 2012 over 2009 recorded, from \$998.7 million to \$1.164 billion.¹⁰

SCG Operation & Maintenance Expenses (Millions of 2009 Dollars)

Description (a)	2009 Recorded (b)	2012 Forecast (c)	\$ Difference (d=c-b)	% Difference (e=d/b)
Gas Distribution	\$93.4	\$132.3	\$38.9	42%
Transmission	\$29.3	\$32.4	\$3.1	11%
Underground Storage	\$26.6	\$28.9	\$2.3	9%

² Ex. SDG&E-45.

¹⁰ Exh. SCG-38.

Engineering	\$40.4	\$94.4	\$54.0	134%
Procurement	\$3.5	\$3.6	\$0.1	3%
Customer Services	\$291.4	\$324.5	\$33.1	11%
Information Technology	\$49.9	\$47.5	-\$2.4	-5%
Support Services	\$114.7	\$121.3	\$6.6	6%
Administrative and General	\$349.5	\$379.8	\$30.3	9%
Total	\$998.7	\$1164.7	\$166.0	17%

Capital Expenditures

SCG and SDG&E's testimonies do not appear to include a summary of forecast capital expenditures. Some examples of significant capital expenditures areas are in the following tables.

SCG Capital Expenditures (millions of nominal dollars)

Description	2009	2010	2011	2012
Distribution	\$158.8	\$187.8	\$224.2	\$212.6
Underground Storage	\$33.6	\$27.7	\$31.6	\$30.6
Gas Engineering	\$85.9	\$94.8	\$114.3	\$158.3
Information Technology	\$34.4	\$68.6	\$110.3	\$91.7
Customer Services	NA	\$12.4	\$11.9	\$20.5
Operational Excellence	NA	\$56.1	\$51.1	\$17.4
Real Estate	NA	\$27.2	\$51.4	\$22.9

SDG&E Capital Expenditures (millions of nominal dollars)

Description	2009	2010	2011	2012
Electric Distribution	NA	\$190.1	\$246.1	\$252.5
Property Insurance	\$4.0	\$4.8	\$5.1	\$5.4
Liability Insurance	\$51.2	\$85.3	\$88.6	\$92.1
SONGS (before AFUDC)	NA	\$35.1	\$38.0	\$45.7
Real Estate	\$13.8	\$20.3	\$32.6	\$26.8
Information Technology	\$15.5	\$46.3	\$100.9	\$70.5
Customer Services	NA	\$0	\$6.3	\$17.9
Smart Meter	NA	\$0.643	\$0.630	\$2.1

Smart Grid	\$0	\$0	\$25.2	\$29.8
Gas Engineering	\$8.2	\$10.2	\$12.3	\$12.4
Gas Distribution	\$31.8	\$75.1	\$42.2	\$30.7
Electric Generation	\$26.8	\$12.0	\$12.0	\$15.0

Depreciation Expense

SCG forecasts an increase of depreciation expense from \$290.8 million in 2009 to \$369.5 million in TY 2012, an increase of \$78.7 million (27%). SDG&E forecasts an increase of depreciation expense from \$223.3 million in 2009 to \$280.1 million in TY 2012, an increase of \$56.8 million (25%). Cost drivers for both SoCalGas and SG&E are net salvage rates.

Rate Base

Rate Base is the depreciated asset value of a utility's net investments used to provide service to its customers. SCG forecasts about \$3.665 billion in weighted-average rate base for 2012, an increase of \$830 million (29%) compared to recorded 2009 levels of \$2.8 billion.¹¹ SDG&E forecasts about \$4.406 billion in weighted-average rate base for 2012, an increase of \$1.049 billion (31%) compared to recorded 2009 levels of \$3.357 billion.¹²

SCG Weighted-Average Rate Base (Millions of Nominal Dollars)

Description (a)	2009 Recorded (b)	2012 Forecast (c)	\$ Difference (d=c-b)	% Difference (e=d/b)
Fixed Capital	\$8,413.7	\$9,929.0	\$1,515.3	18%
Customer Advances for Construction, Deferred Rev.	-\$151.9	-\$165.3	-\$13.4	9%
Working Capital	-\$64.8	\$17.2	\$82.2	127%
Deductions for Reserves	-\$5,362.2	-\$6,115.6	-\$753.4	14%

¹¹ Ex. SCG-26.

¹² Ex. SDG&E-32.

Total	\$2,834.8	\$3,665.3	\$830.5	29%
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**SDG&E Weighted-Average Rate Base
(Millions of Nominal Dollars)**

Description (a)	2009 Recorded (b)	2012 Forecast (c)	\$ Difference (d=c-b)	% Difference (e=d/b)
Fixed Capital	\$6,615.8	\$8,895.2	\$2,279.4	34%
Customer Advances for Construction	-\$16.2	-\$29.6	-\$13.4	83%
Working Capital	\$45.4	\$56.3	\$10.9	24%
Deductions for Reserves	-\$3,287.6	-\$4,015.4	-\$727.8	22%
Total	\$3,357.5	\$4,406.5	\$1,049.0	31%

SCG and SDG&E propose to capitalize ad valorem taxes associated with capital construction projects and SCG proposes to remove two deductions from rate base.

Cost Escalation

Escalation is the rate of inflation for the costs of the utility's purchase of labor and materials. For forecast labor and non-labor escalation, SCG and SDG&E rely on indexes provided by Global Insight. DRA will review SCE's estimating methodology.

Taxes

DRA will review the appropriateness of SCG and SDG&E's tax deductions, and evaluate the utility's forecasts of income taxes, property taxes, payroll taxes, and other taxes.

Customer Changes

SCG estimates that the number of customers in 2012 will be about 2.6% higher than in 2009.¹³ SDG&E estimates that its gas customers will increase by 2.0% from 2009

¹³ Exh. SCG-30.

to 2012, while its electric customers will increase by 0.7%.¹⁴ DRA will review SCG and SDG&E's forecasting methodologies.

Total Factor Productivity

SCG and SDG&E served Total Factor Productivity¹⁵ studies for their operations. DRA will replicate and carefully review the company's model and data.

Post-Test Year Ratemaking

SCG proposes a Post-Test Year (PTY) Ratemaking mechanism consisting of six components: (1) O&M Expense Adjustment, (2) Capital-Related Cost Adjustment, (3) Medical Cost Adjustment, (4) Z-factor Adjustment (if applicable), (5) an Earnings Sharing Mechanism, and (6) a Productivity Investment Sharing Mechanism.¹⁶ SDG&E PTY mechanism consists of the same components, plus one additional component covering proposed incremental capital investment and O&M programs not included in the Test Year.¹⁷ Both utilities recommend a four-year rate cycle, with the PTY mechanism adjusting revenue requirement and rates in the interim. DRA will review and evaluate the proposed PTY Ratemaking mechanisms.

V. CATEGORIZATION OF PROCEEDING

DRA recommends that this proceeding be categorized as "ratesetting."

VI. PROCEDURAL ISSUES

SCG and SDG&E propose a procedural schedule in their Applications that includes evidentiary hearings. DRA agrees that hearings are likely to be needed to resolve the numerous issues raised by these Applications.

SCG and SDG&E suggest that, rather than holding separate sets of evidentiary hearings on Applicants' direct and rebuttal testimony, that the hearings be consolidated.

¹⁴ Exhs. SDG&E-37, SDG&E-36.

¹⁵ Total Factor Productivity (TFP) essentially measures how efficiently a company combines its various resources to achieve a given level of output. See Exhs. SCG-37 and SDG&E-44.

¹⁶ SCG Application, p. 10.

¹⁷ SDG&E Application, p. 9.

DRA agrees with this proposal whereby Applicants' witnesses testify on both their direct and rebuttal testimony, and then DRA and other intervenors present their witnesses' testimony. This approach was used in the most recent GRCs of Southern California Edison Company and Pacific Gas & Electric Company and is more efficient than the Rate Case Plan process.

Given the workload issues discussed above, DRA expects to be able to serve its testimony around September 8, 2011, approximately four months after serving testimony in the Southern Edison Company GRC. At present, DRA proposes the following schedule through the start of evidentiary hearings:

December 15, 2010	Applications Appear on Daily Calendar
January 14, 2011	Protests to Applications Due
January 31, 2011	Joint Pre-hearing Conference
September 1, 2011	DRA Testimony Served
September 29, 2011	Intervenor Testimony Served
November 3, 2011	Applicants' Rebuttal Testimony Served
TBD	Public Participation Meetings
December 5, 2011	Evidentiary Hearings Begin

VII. CONCLUSION

DRA respectfully recommends that the proceeding be categorized as ratesetting, that a reasonable schedule be set that includes adequate time for evidentiary hearings, and that the scope of the proceeding include, but not be limited to, the issues identified in this Protest.

Respectfully submitted,

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January 18, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document “**PROTEST OF THE DIVISION OF RATEPAYER ADVOCATES**” in **A.10-12-005** and **A.10-12-006**.

A copy was served as follows:

BY E-MAIL: I sent a true copy via e-mail to all known parties of record who have provided e-mail addresses.

BY MAIL: I sent a true copy via first-class mail to all known parties of record.

Executed in San Francisco, California, on the **18th** day of **January, 2011**.

/s/ JOANNE LARK

Joanne Lark

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