BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect.	)))))	Application 10-07-001 (Filed July 6, 2010)

Reply Brief of The Nevada Hydro Company in Response to the Administrative Law Judge's Ruling Establishing Date for Service of Supplemental Testimony and Setting Briefing Dates Dated October 6, 2010

Arnold B. Podgorsky
Patrick L. Morand
WRIGHT & TALISMAN, P.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 393-1200 (phone)
(202) 393-1240 (fax)
podgorsky@wrightlaw.com
morand@wrightlaw.com

Attorneys for
The Nevada Hydro Company

December 10, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect.	)))))	Application 10-07-001 (Filed July 6, 2010)

This reply brief of The Nevada Hydro Company ("Nevada Hydro") responds to the opening briefs filed by the intervenors in the above-captioned proceeding.[1] Like Nevada Hydro's opening brief,[2] this reply brief is submitted pursuant to the briefing requirements set forth in the Administrative Law Judge's Ruling Establishing Date for Service of Supplemental Testimony and Setting Briefing Dates, dated October 6, 2010 ("ALJ Ruling").

I. INTRODUCTION

On September 22, 2010, the California Public Utilities Commission ("Commission") held a prehearing conference regarding Nevada Hydro's application for a certificate of public convenience and necessity ("CPCN") for the Talega-Escondido/Valley-Serrano 500 kV Interconnect ("TE/VS Interconnect") project. On October 6, 2010, the Administrative Law

---

[1] Brief of the Center for Biological Diversity on Threshold Issues Pursuant to October 6, 2010 Ruling ("Center Brief"); Brief of the Division of Ratepayer Advocates in Response to the Administrative Law Judge's October 6, 2010 Ruling ("DRA Brief"); Opening Brief on Threshold Issues by Elsinore Valley Municipal Water District; Frontlines Opening Brief on Threshold Issues ("Frontlines Brief"); Brief of John Pecora on Four Threshold Issues ("Pecora Brief"); Opening Brief of San Diego Gas & Electric Company ("SDG&E Brief"); Concurrent Brief on Threshold Issues of Santa Ana Mountains Task Force of the Sierra Club & Friends of the Forest (Trabuco District) and the Santa Rosa Plateau ("Conservation Groups Brief"); Opening Brief of the Southern California Edison Company (U 338-E) on Threshold Issues ("SCE Brief").

[2] Brief of The Nevada Hydro Company in Response to the Administrative Law Judge's Ruling Establishing Date for Service of Supplemental Testimony and Setting Briefing Dates, Dated October 6, 2010 ("Nevada Hydro Brief").

Judge issued the ALJ Ruling which identified four issues for briefing prior to the issuance of a Scoping Memo Ruling ("Briefing Issues"). Nevada Hydro and the intervenors addressed the four Briefing Issues in their opening briefs.

II. DISCUSSION

As now explained, the intervenors' assertions as to each Briefing Issue lack merit.

1. ***Entities applying for a Certificate of Public Convenience and Necessity ("CPCN") at the Commission are generally certificated as public utilities if and when the project is approved. If the project is not approved, for some reason, the entity would not be determined to be a public utility. Is there a reason to proceed any differently in this matter? Why or why not?***

Nevada Hydro would be a public utility upon issuance of the CPCN. There is no reason, based in public policy or otherwise, to proceed differently.

San Diego Gas & Electric Company ("SDG&E") asserted that "[o]btaining a CPCN to build electrical plant appears to be a necessary but not sufficient condition for certification to become a 'public utility'" and that "[t]he entity holding the CPCN for the electrical plant that is not otherwise qualified as an electrical corporation would also need to own, operate, or manage that plant before it is certified as a public utility."[3] This assertion is erroneous. The Commission routinely certificates entities as public utilities upon the issuance of a CPCN.[4]

---

[3] SDG&E Brief at 3.

[4] *See Application of Gill Ranch Storage, LLC for a Certificate of Public Convenience and Necessity for Construction and Operation of Natural Gas Storage Facilities and Related Matter*, Decision 09-10-035, 2009 Cal. PUC LEXIS 555, at *3 (2009) ("As a result of our approval of [the CPCN application], GRS will be certificated as a public utility with respect to the Proposed Project"); *Application of Lodi Gas Storage, LLC for Certificate of Public Convenience and Necessity for Construction and Operation of Gas Storage Facilities*, Decision 00-05-048, 2000 Cal. PUC LEXIS 394, at *89 (2000) (The (cont. . . .)

SDG&E's apparent reliance on the definition of "electrical corporation" as the basis for its assertion is misplaced. After quoting the definition of "electrical corporation," SDG&E explained that "the certification of a public utility requires, at a minimum, the existence of 'electrical plant' that is owned, operated, or managed by the entity seeking to be a public utility."[5] Yet, the definition of "gas corporation" is virtually identical to the "electrical corporation" definition: "'Gas corporation' includes every corporation or person owning, controlling, operating, or managing any gas plant for compensation within this state . . . ."[6] The Commission certificates entities as public utilities upon the issuance of a CPCN, and not upon the showing of owning, controlling, operating, or managing electrical/gas plant.

Frontlines asserted that the Commission determined that Nevada Hydro is an "electrical corporation" and a "public utility" when it accepted for filing Nevada Hydro's CPCN application and commenced these proceedings.[7] This assertion also appears erroneous. As discussed above, the Commission certificates entities as public utilities upon the issuance of a CPCN, not upon acceptance of the CPCN application.[8]

(. . . cont.)

Commission explained that it "interpret[ed] the Public Utilities Code to provide that once LGS obtains a CPCN, it is a gas corporation"); *Application of Wild Goose Storage Inc. for a Certificate of Public Convenience and Necessity to Construct Facilities for Gas Storage Operations*, Decision 97-06-091, 1997 Cal. PUC LEXIS 503, at **28-29 (1997) (after receiving its CPCN, Wild Goose became a public utility).

5 SDG&E Brief at 3 (*quoting* Cal. Pub. Utils. Code § 218(a) ("'Electrical corporation' includes every corporation or person owning, controlling, operating, or managing any electrical plant for compensation within this state . . . .")).

6 Cal. Pub. Utils. Code § 222(a) (Deering 2009).

7 Frontlines Brief at 2, 9 & 10.

8 *See supra* note 4.

2. ***There was some discussion at the Pre-hearing Conference ("PHC") as to whether the transmission line proposed by Nevada Hydro is a stand-alone project. Since Nevada Hydro has co-applied with the Elsinore Valley Municipal Water District (the "District") to the Federal Energy Regulatory Commission ("FERC") for a license to construct and operate the Lake Elsinore Advanced Pumped Storage ("LEAPS") facility, does this imply that Nevada Hydro will own any generation generated by LEAPS? If so, must Nevada Hydro seek a CPCN at this Commission for LEAPS? If not, how is this different from the Helms pumped storage project?***

If Nevada Hydro becomes a public utility and owns the LEAPS project, under principles of Constitutional preemption, Nevada Hydro would not be required to obtain a CPCN for LEAPS. The licensing of construction and operation of hydroelectric power projects on these waterways is exclusively subject to the Federal Power Act and the jurisdiction of the Federal Energy Regulatory Commission ("FERC").[9] The Helms pumped storage project[10] is not precedent for issuance of a CPCN for a hydroelectric project subject to the Federal Power Act, but rather an anomaly that is contradictory to the well-established federal preemption for licensing of hydroelectric projects. It appears that PG&E sought a CPCN for Helms and a CPCN was issued, but preemption was not raised or addressed.

---

[9] As noted in its opening brief (Nevada Hydro Brief at 11), Nevada Hydro states this point of law bearing in mind its respect for and full recognition of the Commission's jurisdiction. By way of example, should a CPCN be required to participate in an energy storage program of the type contemplated by Assembly Bill 2514, then Nevada Hydro would comply with such requirements.

[10] *PG&E Issued Certificate to Construct and Operate the Helms Pumped Storage Project Together with Transmission Lines and Related Facilities*, Decision 85910, 1976 Cal. PUC LEXIS 211 (1976).

Relying on Helms, the Center for Biological Diversity and Frontlines assert that Nevada Hydro is required to obtain a CPCN for LEAPS.[11] Neither intervenor analyzes why preemption would not apply; neither reconciles its position with Constitutional law, as Nevada Hydro explained it in its opening brief.[12]

3. ***If, for some reason, the Talega-Escondido/Valley-Serrano project is not approved and Nevada Hydro is not determined to be a public utility under Pub. Util. Code § 218, should eligible intervenors receive intervenor compensation under Pub. Util. Code §§ 1801 et seq.? If so, who would be responsible for paying those intervenors?***

If Nevada Hydro is not determined to be a public utility, then there is no legal predicate under which Nevada Hydro would be responsible for intervenor compensation.

The intervenor compensation program socializes intervenor costs among the applicable utility's ratepayers. The Commission explained that "[t]o the extent a utility is the subject of a proceeding, it is appropriate that that utility's ratepayers fund intervenor compensation."[13] Accordingly, where an entity does not have a rate base and ratepayers to fund intervenor compensation, it is *not* appropriate, and in fact there is no legal predicate, to require that entity to pay intervenor compensation. Thus, if Nevada Hydro is not determined to be a public utility, then the intervenor compensation provisions would not apply to it.[14] Because the intervenor

---

[11] Center Brief at 4; Frontlines Brief at 6.

[12] Nevada Hydro Brief at 10-16.

[13] *Order Instituting Rulemaking on the Commission's Intervenor Compensation Program; Order Instituting Investigation on the Commission's Intervenor Compensation Program*, Decision 98-04-059, 1998 Cal. PUC LEXIS 429, at * 107 (1998).

[14] *See Rulemaking for Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006*, Decision 07-03-014, 2007 Cal. PUC LEXIS 281, at *340 (2007) ("Our review of the Public Utilities Code and comments
(cont. . . .)

compensation provisions apply only to a "public utility which is the subject of the hearing, investigation, or proceeding,"[15] no other entity in the TE/VS Interconnect proceeding would be responsible for paying intervenor compensation.

The Division of Ratepayer Advocates ("DRA") contrary assertions lack any basis in the statute. DRA urges that "[t]he award of intervenor compensation should not depend on whether or not TE/VS is granted a CPCN or [Nevada Hydro] is determined to be a public utility because this would frustrate the purpose of intervenor compensation," and that "[i]f the TE/VS facility is not granted a CPCN, in part because of intervenor contributions to the record, it would not make public policy sense not to award those same intervenors for a contribution to the record."[16]

If the language of a statute is clear and unambiguous, the plain meaning of the statute governs.[17] Section 1801 states plainly that the purpose of the intervenor compensation provisions "is to provide compensation for reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs to public utility customers of participation or intervention in any proceeding of the commission."[18] Section 1801.3 states that "[i]t is the intent of the Legislature

---

(. . . cont.)

leads us to . . . find that these statutes limit the intervenor compensation program to proceedings involving utilities").

15 Cal. Pub. Utils. Code § 1807 (Deering 2009).

16 DRA Brief at 3.

17 *See Pineda v. Bank of America, N.A.*, 2010 Cal. LEXIS 11678, at **5-6 (Cal. Nov. 18, 2010) (the California Supreme Court explained that "it is well settled that we must look first to the words of the statute, because they generally provide the most reliable indicator of legislative intent" and that "[i]f there is no ambiguity in the language, we presume the Legislature meant what it said and the plain meaning of the statute governs.") (internal quotations and citations omitted).

18 Cal. Pub. Utils. Code § 1801 (Deering 2009).

that . . . [the intervenor compensation provisions] shall apply to all formal proceedings of the commission involving electric . . . utilities."[19] The payment obligation could not be more plainly limited to public utilities. These statutory provisions clearly and unambiguously provide that the intervenor compensation provisions apply only to public utilities and their customers. Any extension of the obligation to entities that are not public utilities would violate the plain, unambiguous statutory language. Stated differently, any such extension would require a new and different statute.

Other intervenors make similarly faulty assertions. Mr. Pecora asserts that "the intent of [the intervenor compensation] section is to have the applicant pay for the intervenor compensation program" while acknowledging that "[t]he language describes a 'public utility' as the applicant."[20] Frontlines asserts that "eligible intervenors should receive intervenor compensation . . . regardless of how the Commission perceives [Nevada Hydro's] status as a public utility."[21] SDG&E asserts that the fact that "[Nevada Hydro] is proposing to construct and own 'electric plant'" and that Nevada Hydro represented that it would become an "electrical corporation" upon issuance of the CPCN "provide ample basis for the Commission to require [Nevada Hydro] to satisfy [the intervenor compensation] statutory obligations."[22] Finally, Southern California Edison Company ("SCE") characterized Nevada Hydro's status during this proceeding as a "virtual public utility" and, consequently, asserted that Nevada Hydro "should be

---

[19] *Id.* § 1801.3.

[20] Pecora Brief at 5.

[21] Frontlines Brief at 9.

[22] SDG&E Brief at 4-5 (Nevada Hydro notes the irony of this argument given SDG&E's assertion that merely holding a CPCN, without owning, controlling, operating, or managing any electrical plant, is insufficient for becoming a public utility).

subject to the application process' requirements, such as responsibility for paying intervenor compensation."[23] The weakness of these assertions is manifest; each is a reach beyond the statute, ignoring its plain language and obvious intent. The Commission should apply the law as the legislature intended and find no "virtual" facts.

DRA asserts that the Commission has awarded intervenor compensation where the position advanced by the intervenor was rejected even though its contributions were relevant and useful to the Commission's decision, and where an application had been dismissed without adjudication.[24] These assertions are equally unavailing if not irrelevant. They do not resolve the issue of whether the Commission should grant intervenor compensation where the entity that is the subject of the proceeding is determined not to be a public utility at all.

4. Should Nevada Hydro be required to post a bond or provide some other guarantee of payment for intervenors or for payment to the Division of Ratepayer Advocates ("DRA") for consultant services pursuant to Pub. Util. Code § 631?

Nevada Hydro is not required to post a bond or provide some other guarantee of payment for intervenor compensation or for reimbursement to the Commission for consultant expenses. Nothing in the applicable statutes or Commission precedent appears to support such a requirement. This is made clear by the fact that those intervenors who asserted that the

---

23 SCE Brief at 4 (*citing* Cal. Pub. Utils. Code § 1801).

24 DRA Brief at 3 (*citing Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service*, Decision 06-11-010, 2006 Cal. PUC LEXIS 488 (2006)).

Commission should require Nevada Hydro to post a bond or provide some other guarantee of payment provided no legal basis to support their assertions.[25]

SCE blithely asserts that the "Commission has the discretion to require applicants to post a bond where appropriate."[26] But SCE nowhere notes that the Commission's decision to require MCI WorldCom to post a bond for payment of intervenor compensation occurred *after* the Commission's decision on the merits in that proceeding and as part of the Commission's opinion granting intervenor compensation. Very significantly, SCE neglects to note that MCI WorldCom at that time was a public utility subject to the Commission's jurisdiction.[27]

SCE appears to acknowledge that the Commission required Lodi Gas Storage, LLC ("LGS") to obtain a surety or performance bond *as a condition of* issuance of a CPCN.[28] The Commission "require[d] as a condition of issuance of the CPCN that, . . . LGS . . . provide a surety or performance bond in the amount of $20 million to cover the costs of . . . [among other

---

25 Center Brief at 7; DRA Brief at 4; Pecora Brief at 5; SDG&E Brief at 5; and Conservation Groups Brief at 4.

26 SCE Brief at 5 (*citing In re Request of MCI WorldCom, Inc. and Sprint Corporation for Approval to Transfer Control of Sprint Corporation's California Operating Subsidiaries to MCI WorldCom, Inc.*, Decision 02-07-030, 2002 Cal. PUC LEXIS 438, at **56-57 (2002); *Application of Lodi Gas Storage, LLC for a Certificate of Public Convenience and Necessity for Construction and Operation of Gas Storage Facilities*, Decision 00-05-048, 2000 Cal. PUC LEXIS 394, at **1, 33, 49-53, 113-14 (2000)).

27 *See In re Application of WorldCom, Inc. and MCI Communications Corporation for Approval to Transfer Control of MCI Communications Corporation to WorldCom, Inc.*, Decision 98-08-068, 1998 Cal. PUC LEXIS 912 (1998).

28 SCE Brief at n.7 ("the Commission may also require applicants, when necessary, to post a bond to guarantee payment even after the issuance of a CPCN").

things] reburial of the pipeline in the event of subsidence of the soil covering the pipeline, costs of restoring the area in the event of abandonment or bankruptcy, etc."[29]

Thus, the *MCI WorldCom* and *Lodi Gas Storage* cases are inapplicable to the fourth Briefing Issue. Unlike the *MCI WorldCom* case, the Commission has not yet rendered a decision on the merits of Nevada Hydro's application or granted intervenor compensation. Nor has the Commission determined whether to issue Nevada Hydro a CPCN conditioned upon certain requirements (e.g., providing a surety or performance bond) as it did in the *Lodi Gas Storage* case. It should also be noted that, unlike MCI WorldCom and LGS (upon issuance of its CPCN), Nevada Hydro is not at this time a public utility.

[29] Decision 00-05-048, 2000 Cal. PUC LEXIS 394, at *50.

III. CONCLUSION

For the foregoing reasons and the reasons stated in its opening brief, Nevada Hydro respectfully requests that the Commission make the findings specified in the conclusion of its opening brief.

<u>/s/ Patrick L. Morand</u>
Arnold B. Podgorsky
Patrick L. Morand
Wright & Talisman, P.C.
1200 G Street, N.W., Suite 600
Washington, D.C. 20005
(202) 393-1200
podgorsky@wrightlaw.com
morand@wrightlaw.com

Attorneys for
The Nevada Hydro Company

December 10, 2010

K:\Hydro\TEVS CPCN\Pleadings\Brief on Oct. 6 Ruling\Reply Brief 121010(final).doc

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of

"REPLY BRIEF OF THE NEVADA HYDRO COMPANY IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE'S RULING ESTABLISHING DATE FOR SERVICE OF SUPPLEMENTAL TESTIMONY AND SETTING BRIEFING DATES DATED OCTOBER 6, 2010"

on all known parties to A.10-07-001 by transmitting an electronic mail message with the document attached to each person named in the official service list who provided an electronic mail address.

Executed this 10th day of December, 2010 at Washington, D.C.

/s/ Patrick L. Morand
Patrick L. Morand
Wright & Talisman, P.C.
(202) 393-1200
morand@wrightlaw.com

Service List
A.10-07-001

Last Updated November 23, 2010

Parties

ARNOLD B. PODGORSKY
WRIGHT & TALISMAN, P.C.
1200 G STREET, N.W., SUITE 600
WASHINGTON, DC 20005
FOR: WRIGHT & TALISMAN, P.C.

PATRICK L. MORAND
WRIGHT & TALISMAN, P.C.
1200 G STREET NW, SUITE 600
WASHINGTON, DC 20005
FOR: THE NEVADA HYDRO COMPANY

ROBERT KANG
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WLANUT GROVE AVE., PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

PAUL A. SZYMANSKI
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET HQ 12
SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

CHARITY SCHILLER
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE
RIVERSIDE, CA 92502-1028
FOR: ELSINORE VALLEY MUNICIPAL WATER DISTRICT

GENE FRICK
4271 BAGGETT DR
RIVERSIDE, CA 92505
FOR: SANTA ANA MOUNTAINS TASK FORCE OF THE SIERRA CLUB/FRIENDS OF THE FOREST (TRABUCO DISTRICT)/THE SANTA ROSA PLATEAU

JACQUELINE AYER
40701 ORTEGA HIGHWAY
LAKE ELSINORE, CA 92530
FOR: FOREST RESIDENTS OPPOSING NEW TRANSMISSION LINES (FRONTLINES)

JOHN PECORA
16336 GRAND AVENUE
LAKE ELSINORE, CA 92530
FOR: JOHN PECORA

GREGORY HEIDEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5039
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYER ADVOCATES

JONATHAN EVANS
CENTER FOR BIOLOGICAL DIVERSITY
351 CALIFORNIA ST., SUITE 600
SAN FRANCISCO, CA 94104
FOR: CENTER FOR BIOLOGICAL DIVERSITY

Information Only

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

CAL. INDEPENDENT SYSTEM OPERATOR CORP.
EMAIL ONLY
EMAIL ONLY, CA 00000

JENNIFER M. HALEY
BEST BEST & KRIEGER LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JUDITH SANDERS
CAL. INDEPENDENT SYSTEM OPERATOR CORP.
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

NATHAN JACOBSEN
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

SOPHIE A. AKINS
BEST BEST AND KRIEGER, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

MAYA LOPEZ GRASSE
4209 E. VERMONT ST.
LONG BEACH, CA 90814

LUPE GARCIA
ELECTRIC POWER GROUP
201 S. LAKE AVENUE, STE. 400
PASADENA, CA 91101

DAVID KATES
THE NEVADA HYDRO COMPANY
2416 CADES WAY
VISTA, CA 92083
FOR: THE NEVADA HYDRO COMPANY

KEVIN O'BEIRNE
REGULATORY CASE MGR.
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123

JOHN E. BROWN
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
RIVERSIDE, CA 92502
FOR: ELSINORE VALLEY MUNICIPAL WATER DISTRICT

LINDA LOU RIDENOUR
33628 BRAND ST.
LAKE ELSINORE, CA 92530
FOR: LAKE ELSINORE HISTORICAL SOCIETY

RONALD E. YOUNG
DISTRICT GEN. MANAGER
ELSINORE VALLEY MUNICIPAL WATER DISTRICT
3131 CHANEY STREET / PO. BOX 3000
LAKE ELSINORE, CA 92531-3000

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO, CA 94117-2242

RUSS KANZ
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JOHN BUSE
CENTER FOR BIOLOGICAL DIVERSITY
5656 S. DORCHESTER AVE. NO 3
CHICAGO, IL 60637

FRED MOBASHERI
CONSULTANT
ELECTRIC POWER GROUP, LLC
201 SOUTH LAKE AVE., SUITE 400
PASADENA, CA 91101

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770

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

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK CT, CP32D, RM CP31-E
SAN DIEGO, CA 92123-1530

KRISTIN ESTENGER
RANCHO CAPISTRANO PROPERTY OWNERS ASS
34655 ARROYO ROAD
LAKE ELSINORE, CA 92530

MARTIN RIDENOUR
33628 BRAND ST.
LAKE ELSINORE, CA 92530
FOR: BUTTERFIELD MULTIUSE TRAILS

PETER LEWANDOWSKI
THE NEVADA HYDRO COMPANY
26051 VIA CONCHA
MISSION VIEJO, CA 92691

STEPHEN E. VEVLVIS
ATTORNEY AT LAW
MILLER, STARR & REGALIA

1331 N. CALIFORNIA BLVD., 5TH FL.
WALNUT CREEK, CA 94596
FOR: FRIESIAN FOCUS, LLC, THE FERNANDEZ TRUST, AND JOSEPH AND JOAN FERNANDEZ

State Service

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

ANGELA K. MINKIN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5017
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL YEO
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NICHOLAS SHER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4007
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214