

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-2626



July 30, 2007

Advice Letter 2135-E

Akbar Jazayeri
Vice President, Revenue and Tariffs
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Subject: August RA Compliance Filing

Dear Mr. Jazayeri,

Advice Letter 2135-E is effective July 31, 2007. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher
Director
Energy Division

PUBLIC VERSION

June 29, 2007

ADVICE 2135-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Month-Ahead Resource Adequacy Compliance Filing for
Compliance Month August 2007 of Southern California Edison
Company

In compliance with Decision No. (D.) 05-10-042, Southern California Edison Company (SCE) hereby submits its month-ahead resource adequacy (RA) compliance filing for August 2007. SCE's submission includes a completed RA Reporting Workbook for August 2007. This filing includes hard copies and a compact disc containing electronic versions of each workbook.

Through a ruling issued September 15, 2006, Administrative Law Judge (ALJ) Wetzell confirmed that the confidentiality requirements and procedures adopted in D.06-06-066 (in Rulemaking 05-06-040), as clarified by Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066, issued on August 22, 2006, would apply to RA compliance filings, effective September 2006. Accordingly, this filing includes a confidential version of SCE's month-ahead RA compliance filing for August 2007 (Attachment A hereto), a redacted (public) version of SCE's month-ahead RA compliance filing for August 2007 (Attachment B hereto), and the Declaration of Marc L. Ulrich regarding the confidentiality of data included in SCE's month-ahead RA compliance filing for August 2007 (Attachment C hereto). Attachment A and Attachment B are not included in the version of this advice letter that is being publicly posted on www.sce.com. The complete advice filing (which includes a compact disc containing an electronic confidential version of SCE's month-ahead RA compliance filing for August 2007) is being submitted to the Energy Division of the California Public Utilities Commission (Commission) and served on the California Independent System Operator (CAISO) and the California Energy Commission (CEC), in accordance with the 2007 Filing Guide for RA Compliance Filings. SCE will make Attachment B available to parties upon request.

PURPOSE

The purpose of this advice letter is to request the Commission confirm that SCE has met its month-ahead RA obligation for August 2007. The completed RA templates included with this advice letter demonstrate that SCE has acquired sufficient resources to satisfy the 100% forward commitment obligation for loads plus reserve requirements for August 2007 as required by D.05-10-042.

BACKGROUND

To help ensure that customers receive reliable electric service at a reasonable cost, the Commission established a Resource Adequacy Requirement (RAR) on Investor-Owned Utilities (IOUs), electric service providers (ESPs) and community choice aggregators (CCAs) – collectively the load serving entities (LSEs). Under the RAR, LSEs are required to demonstrate to the Commission that they have acquired the capacity needed to serve their forecast retail customer load plus reserve requirements (15-17%) beginning in June 2006. This demonstration is to take place through year-ahead and month-ahead advice letter compliance filings. For the year-ahead compliance filing, LSEs must demonstrate that they have acquired sufficient resources to serve 90% of their loads plus reserve requirements for the five summer months (May-September). For the month-ahead compliance filing, LSEs must demonstrate that they have acquired sufficient resources to serve 100% of their loads plus reserve requirements for each of the 12 months of the year.

To facilitate the compliance filings, RA templates were developed in the RA workshop process. The templates provide the form for LSEs to identify the resources they are relying upon to satisfy their RAR.¹

Pursuant to D.05-10-042, the Commission requires all LSEs to submit their 2007 month-ahead compliance filing for August 2007 by July 2, 2007.

SCE is submitting its 2007 month-ahead compliance filing for August 2007 via this advice letter.

EFFECTIVE DATE

SCE requests the Commission to confirm that SCE has met its August 2007 month-ahead RA obligation by July 31, 2007.

¹ Pursuant to the instruction of the Energy Division, SCE used the Commission's 2006 version of the month-ahead RA compliance filing template (with a modification to the minimum percentage of required non-LD contracts) to prepare this August 2007 compliance filing.

NOTICE

This advice filing is made pursuant to D.05-10-042. Further "Notice" in accordance with Section III, Paragraph G of General Order No. 96-A is not deemed necessary.

All correspondence regarding this advice letter should be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri
Vice President, Revenue and Tariffs
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President of Regulatory Operations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2040
San Francisco, California 94102
Facsimile: (415) 673-1116
E-mail: Karyn.Gansecki@sce.com

For questions, please contact Marc Ulrich at (626) 302-3348 or by electronic mail at Marc.Ulrich@sce.com.

Southern California Edison Company

Akbar Jazayeri

AJ:mu:sq

cc: Mike Jaske, CEC (w/enclosures)
CAISO, Attn: RAR Filing (w/enclosures)

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 Edison Company (U 338-E)

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: James.Yee@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2135-E

Subject of AL: Month-Ahead Resource Adequacy Compliance Filing for Compliance Month August 2007 of Southern California Edison Company

Keywords (choose from CPUC listing): Compliance

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.05-10-042

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

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

Resolution Required? Yes No

Requested effective date: 7/31/07 No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): N/A

Estimated system average rate effect (%): N/A

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: None

Service affected and changes proposed¹: Retail Electric Service

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

¹ Discuss in AL if more space is needed.

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
jj@cpuc.ca.gov and mas@cpuc.ca.gov

Akbar Jazayeri
Vice President, Revenue and Tariffs
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President of Regulatory Operations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2040
San Francisco, California 94102
Facsimile: (415) 673-1116
E-mail: Karyn.Gansecki@sce.com

PLEASE NOTE: ADVICE 2135-E, RA COMPLIANCE FILING, IS NOT SUBJECT TO PROTEST.

ATTACHMENT A

SCE's Month-Ahead RA Compliance Filing for
August 2007

(Confidential Version)

**ATTACHMENT B
IS AVAILABLE UPON REQUEST**

SCE's Month-Ahead RA Compliance Filing for
August 2007

(Public Version)

CONFIDENTIAL INFORMATION REDACTED

ATTACHMENT C

Declaration

**DECLARATION OF MARC L. ULRICH REGARDING THE
CONFIDENTIALITY OF CERTAIN DATA**

I, Marc L. Ulrich, declare and state:

1. I am the Director of Energy Planning in the Energy Supply & Management Department at Southern California Edison Company (SCE). As such, I had responsibility for assisting in the preparation of SCE’s Month-Ahead Resource Adequacy Compliance Filing for August 2007. I make this declaration in accordance with the Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066, issued on August 22, 2006 in Rulemaking 05-06-040. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

2. I have reviewed SCE’s Month-Ahead Resource Adequacy Compliance Filing for August 2007. Identified below are the data in SCE’s Month-Ahead Resource Adequacy Compliance Filing for August 2007 for which SCE is seeking confidential protection and the categories on the Matrix of Allowed Confidential Treatment Investor Owned Utility (IOU) Data (Matrix) to which these data correspond. Also set forth is an explanation of why the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure:

Redacted Data	Template Tab	Line, Column or Table	Matrix Category	Reason why data cannot be aggregated, etc.
Forecasted August 2007 Resource Planning Information for Resources Procured By SCE, including “Contract Identifier,” “Resource ID in CAISO Master File,” the monthly RA Capacity claimed by SCE for each resource, the RA Capacity effective start and end	I. Physical Resources in ISO Control Area	All columns and rows for resource information qualifying for protection under Matrix categories specified in next cell.	IV.A. [Forecast of IOU Generation Resources (MW and MWh)]; IV.B [Forecast of Qualifying Facility Generation]; IV.E. [Forecast of Pre-1/1/2003 (“Old World” Bilateral Contracts)]; IV.F. [Forecast of Post-1/1/2003 (“New World”) Bilateral Contracts]	Template calls for the data only in its submitted form

<p>dates for the given month, SCE's contract number for the resource, the minimum monthly hours the resource is expected to be contractually or physically available during peak load hours, and the CPUC resource "bucket" that the resource qualifies for.</p>			<p>Based on the type of resource included in the worksheet, at least one of the foregoing Matrix categories applies to the planning information that has been redacted for each resource. The planning information sought in the worksheet, and provided by SCE, constitutes SCE's forecast of the resources and amount of RA Capacity from those resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p>	
<p>Forecasted August 2007 Resource Planning Information for Resources Procured By SCE, including "Contract Identifier," "Resource ID in CAISO Master File," the monthly RA Capacity claimed by SCE for each resource, the RA Capacity effective start and end dates for the given month, SCE's contract number for the resource, the minimum monthly hours the resource is expected to be contractually or physically available during peak load hours, the ISO branch group applicable to the</p>	<p>II. Unit Contingent Resource from Outside the ISO Control Area</p>	<p>All columns and rows for resource information qualifying for protection under Matrix categories specified in next cell.</p>	<p>IV.A. [Forecast of IOU Generation Resources (MW and MWh)]; IV.E. [Forecast of Pre-1/1/2003 ("Old World" Bilateral Contracts]; IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts]</p> <p>Based on the type of resource included in the worksheet, at least one of the foregoing Matrix categories applies to the planning information that has been redacted for each resource. The planning information sought in the worksheet, and provided by SCE, constitutes SCE's</p>	<p>Template calls for the data only in its submitted form</p>

<p>resource, the RA import capacity available to SCE at the specified branch group, and the CPUC resource "bucket" that the resource qualifies for.</p>			<p>forecast of the resources and amount of RA Capacity from those resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p>	
<p>Forecasted August 2007 Resource Planning Information for Resources Procured By SCE, including "Contract Identifier," the monthly RA Capacity claimed by SCE for each resource, the RA Capacity effective start and end dates for the given month, SCE's contract number for the resource, the minimum monthly hours the resource is expected to be contractually or physically available during peak load hours, the ISO branch group applicable to the resource, the RA import capacity available to SCE at the specified branch group, and the CPUC resource "bucket" that the resource qualifies for.</p>	<p>III. Non-Unit Contingent Resource From Outside the ISO Control Area</p>	<p>All columns and rows for resource information qualifying for protection under Matrix categories specified in next cell.</p>	<p>IV.E. [Forecast of Pre-1/1/2003 ("Old World" Bilateral Contracts)]; IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts]</p> <p>Based on the type of resource included in the worksheet, at least one of the foregoing Matrix categories applies to the planning information that has been redacted for each resource. The planning information sought in the worksheet, and provided by SCE, constitutes SCE's forecast of the resources and amount of RA Capacity from those resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p>	<p>Template calls for the data only in its submitted form</p>
<p>Forecasted August 2007 Resource Planning Information for Resources Procured By SCE, including "Contract Identifier," the</p>	<p>IV. Liquidated Damages Contracts that do not specify a Physical</p>	<p>All columns and rows for resource information qualifying for protection under Matrix</p>	<p>IV.E. [Forecast of Pre-1/1/2003 ("Old World" Bilateral Contracts)]; IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts]</p>	<p>Template calls for the data only in its submitted form</p>

<p>monthly RA Capacity claimed by SCE for each resource, the RA Capacity effective start and end dates for the given month, SCE's contract number for the resource, the minimum monthly hours the resource is expected to be contractually or physically available during peak load hours, the CAISO congestion zone applicable to the resource, and the CPUC resource "bucket" that the resource qualifies for.</p>	<p>Source or a Tie Point for the Energy</p>	<p>categories specified in next cell.</p>	<p>Based on the type of resource included in the worksheet, at least one of the foregoing Matrix categories applies to the planning information that has been redacted for each resource. The planning information sought in the worksheet, and provided by SCE, constitutes SCE's forecast of the resources and amount of RA Capacity from those resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p>	
<p>Forecasted August 2007 Resource Planning Information for DWR Contracts Allocated to SCE, including "Contract Identifier," the monthly RA Capacity claimed by SCE for each resource, the RA Capacity effective start and end dates for the given month, SCE's contract number for the resource, the minimum monthly hours the resource is expected to be contractually or physically available during peak load hours, the CAISO congestion zone or branch group</p>	<p>V. DWR Contracts</p>	<p>All columns and rows for resource information qualifying for protection under Matrix categories specified in next cell.</p>	<p>IV.G. [Forecast of DWR contracts] The planning information sought in the worksheet, and provided by SCE, constitutes SCE's forecast of the resources and amount of RA Capacity from those resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p>	<p>Template calls for the data only in its submitted form</p>

<p>applicable to the resource, the RA import capacity available to SCE at the specified branch group if the resource is a DWR import, and the CPUC resource “bucket” that the resource qualifies for.</p>				
<p>Forecasted August 2007 Resource Planning Information for SCE’s Demand Response Resources, including “Contract Identifier,” “Program Name,” the RA Capacity claimed by SCE for each resource for the compliance month, the Program Operator, the Program Capacity for each resource, the Authorized Operation Start and End Dates, and the Total Authorized Hours of Operation</p>	<p>Worksheet DR-a</p>	<p>All columns and rows for resource information qualifying for protection under Matrix categories specified in next cell.</p>	<p>V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)].</p> <p>This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE’s Bundled Customers.</p>	<p>Template calls for the data only in its submitted form</p>
<p>Forecast of August 2007 SCE Bundled Customer Peak Demand</p>	<p>Summary</p>	<p>Summary Table 1, Column 2, Row “Peak Demand”</p>	<p>V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)].</p>	<p>Template calls for the data only in its submitted form; data is provided confidentially to SCE by the CEC in its submitted form</p>

SCE August 2007 RA Forward Commitment Obligation for Month-Ahead	Summary	Summary Table 1, Column 2, Row "Forward Commitment Obligation for Year (sic)-Ahead"	V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)]. This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.	Template calls for the data only in its submitted form
SCE August 2007 Demand Response available more than 2 hours per day	Summary	Summary Table 1, Column 2, Row "Demand Response available more than 2 hours per day"	V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)]. This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.	Template calls for the data only in its submitted form
SCE August 2007 RA Forward Commitment Obligation for Month-Ahead Minus Demand Response	Summary	Summary Table 1, Column 2, Row "Forward Commitment Obligation for Month-Ahead Minus Demand Response"	V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)]. This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.	Template calls for the data only in its submitted form

RMR Condition 2 Allocation to SCE	Summary	Summary Table 2, Columns B, F, and G, Row "RMR Condition 2 Allocation"	V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)]. This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.	Template calls for the data only in its submitted form
Maximum Cumulative Countable Capacity Levels (MW) By CPUC Resource "Buckets"	Summary	Summary Table 3, Column J	V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)]. This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.	Template calls for the data only in its submitted form
Claimed Resource RA Capacity Plus Countable RA Capacity from Prior Bucket (MW)	Summary	Summary Table 3, Column K	IV.A. [Forecast of IOU Generation Resources (MW and MWh)]; IV.B [Forecast of Qualifying Facility Generation]; IV.E. [Forecast of Pre-1/1/2003 ("Old World" Bilateral Contracts)]; IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts]; IV.G [Forecast of DWR contracts] The planning information sought in this column of the summary table, and provided by SCE, constitutes SCE's	Template calls for the data only in its submitted form

			<p>forecast of the amount of RA Capacity from the various resources that SCE is claiming to satisfy its System RA obligation for August 2007.</p> <p>In addition, this data is entitled to protection under Matrix category: VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]</p>	
Countable Cumulative Resource Adequacy Capacity (MW)	Summary	Summary Table 3, Column L	<p>IV.A. [Forecast of IOU Generation Resources (MW and MWh)]; IV.B [Forecast of Qualifying Facility Generation]; IV.E. [Forecast of Pre-1/1/2003 (“Old World” Bilateral Contracts)]; IV.F. [Forecast of Post-1/1/2003 (“New World”) Bilateral Contracts]; IV.G [Forecast of DWR contracts]</p> <p>The planning information sought in this column of the summary table, and provided by SCE, constitutes SCE’s forecast of the amount of RA Capacity from the various resources procured by SCE that is countable to satisfy SCE’s System RA obligation for August 2007.</p>	Template calls for the data only in its submitted form

			In addition, this data is entitled to protection under Matrix category: VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]	
Countable Resource Adequacy Capacity (%)	Summary	Summary Table 3, Column M	VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)] This data, if combined with other public data could be used to calculate SCE's Net Open position for System RA Capacity	Template calls for the data only in its submitted form
Claimed Resource Adequacy Capacity By CPUC "Bucket" (MW)	Summary	Summary Table 4, Column O	Bilateral Contracts]; IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts]; IV.G [Forecast of DWR contracts] The planning information sought in this column of the summary table, and provided by SCE, constitutes SCE's forecast of the amount of RA Capacity from the various resources that SCE is claiming to satisfy its System RA obligation for August 2007. In addition, this data is entitled to protection under Matrix category: VI.A [Utility Bundled	Template calls for the data only in its submitted form

			Net Open (Long or Short) Position for Capacity (MW)]	
Countable Resource Adequacy Capacity by Bucket (MW)	Summary	Summary Table 4, Column P	<p>IV.A. [Forecast of IOU Generation Resources (MW and MWh)];</p> <p>IV.B [Forecast of Qualifying Facility Generation];</p> <p>IV.E. [Forecast of Pre-1/1/2003 (“Old World” Bilateral Contracts];</p> <p>IV.F. [Forecast of Post-1/1/2003 (“New World”) Bilateral Contracts];</p> <p>IV.G [Forecast of DWR contracts]</p> <p>The planning information sought in this column of the summary table, and provided by SCE, constitutes SCE’s forecast of the amount of RA Capacity from the various resources procured by SCE that is countable to satisfy SCE’s System RA obligation for August 2007.</p> <p>In addition, this data is entitled to protection under Matrix category: VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]</p>	Template calls for the data only in its submitted form

Resource Adequacy Capacity Relative to 115% of RAR (expressed as a percentage)	Summary	Summary Table 4, Column Q	<p>VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]</p> <p>This data, if combined with other public data could be used to calculate SCE's Net Open position for System RA Capacity</p>	Template calls for the data only in its submitted form
Minimum Capacity Levels (MW)	Summary	Summary Table 5, Column T	<p>V.B. [LSE Total Peak Load Forecast-Bundled Customer (MW)].</p> <p>This data, if combined with other public data could be used to calculate the August 2007 Peak Load Forecast for SCE's Bundled Customers.</p>	Template calls for the data only in its submitted form
Countable Resource Adequacy Capacity (MW)	Summary	Summary Table 5, Column U	<p>IV.A. [Forecast of IOU Generation Resources (MW and MWh)];</p> <p>IV.B [Forecast of Qualifying Facility Generation];</p> <p>IV.E. [Forecast of Pre-1/1/2003 ("Old World" Bilateral Contracts];</p> <p>IV.F. [Forecast of Post-1/1/2003 ("New World") Bilateral Contracts];</p> <p>IV.G [Forecast of DWR contracts]</p> <p>The planning information sought in this column of the summary table, and provided by SCE, constitutes SCE's forecast of the amount</p>	Template calls for the data only in its submitted form

			<p>of RA Capacity from the various resources procured by SCE that is countable to satisfy SCE's System RA obligation for August 2007.</p> <p>In addition, this data is entitled to protection under Matrix category: VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]</p>	
(Short)/Long on Capacity (MW)	Summary	Summary Table 5, Column V	VI.A [Utility Bundled Net Open (Long or Short) Position for Capacity (MW)]	Template calls for the data only in its submitted form

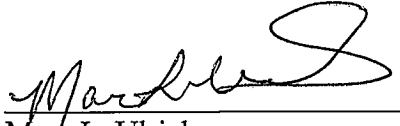
3. SCE is complying with the limitations on confidentiality specified in the Matrix that pertain to the data listed in the table above.

4. I am informed and believe and thereon allege that the data in the table above cannot be aggregated, redacted, summarized, masked or otherwise protected in a manner that would allow partial disclosure of the data while still protecting confidential information.

5. I am informed and believe and thereon allege that the data in the table in paragraph 2 above has never been made publicly available.

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

Executed on June 21, 2007 at Rosemead, California.



 Marc L. Ulrich