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JUN 7 1991

Decision 91-06-015 June 5, 1991

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

George M. Sawaya,

Complainant,

vs.

Pacific Bell,

Defendant.

ORIGINAL

Case 86-07-013
(Petition for Modification
Filed September 10, 1990
amended October 1, 1990)

O P I N I O N

Complainant originally brought this action on behalf of a large group of consumers. Even though his complaint and his subsequent petition for rehearing were dismissed, he now seeks compensation for his advocacy. He claims $12,750 for advocate's fees plus $115.48 for expenses.

He calculated the fees by estimating that the Commission has historically allowed an average hourly fee of $134 to intervenors' attorneys. He concedes that since he is a nonattorney, his hourly rate should be somewhat less. He is therefore willing to accept $100 per hour as a fair rate. For reasons detailed below, he seeks an enhancement of the hourly fee of 25%. This would make his total claim $15,827.98.

He claims that his activities in this complaint directly caused defendant (PacBell) to correct an unqualified representation that its Touch-Tone service permitted faster dialing. He further claims that his advocacy was instrumental in causing the utility to make a refund estimated at $7 million to Touch-Tone customers served by step-by-step central offices. He finally claims some responsibility for further developments in which PacBell no longer

the Sawaya case".[1] The refund would be limited to "existing residential customers who receive Touch-Tone service through a step-by-step central office." Even though we accept the view that this proceeding and the advice letters are separate transactions, it would be disingenuous to assert that Sawaya's efforts were not a primary cause of the refunds and rate relief.

The Advice Letter was protested by complainant and others. As a result of the protests, refunds were made available to previous, as well as existing, Touch-Tone customers and to business customers. Refunds were to be based on the full amounts paid by customers for the service, rather than being a pro rata share of the $5 million. Refunds were required for all charges paid in the three years preceding the Resolution which adopted the final plan. These protests thus increased the amount of the refund from $5 million to an estimated $7 million.

Another Advice Letter, 15657, cancelled the ongoing charges for Touch-Tone customers in step-by-step territory. Complainant estimates the annual consumers savings to be in excess of $1 million.

The Evidence

The evidence elicited from defendant's witnesses at hearing indicated that step-by-step central offices could not recognize Touch-Tone signals. Rather than refraining from offering Touch-Tone service through such offices, defendant had installed a device which would convert consumers' Touch-Tone signals back into pulse signals, thereby simulating the signals emitted by an old-fashioned rotary dial phone. This conversion was, for most

1 A letter from a Commission attorney took the position that the filing of the promised Advice Letter, while "related" to this proceeding, was entirely separate, and that the petition for rehearing was resolved entirely "on its own procedural and substantive merits..."

> "Complainant neither obtained the signatures of 25 customers nor did he obtain the support of any elected officials. We therefore have no authority to entertain his complaint questioning the reasonableness of the existing charge for Touch-Tone service in step-by-step territories."

Citing § 734, the Commission went on to say:

> "Since the rate for Touch-Tone service was declared reasonable in D.84-06-111, the Commission, if it is to comply with § 734, may not order reparation to be paid to complainant. In any event, Pacific has refunded to complainant everything he paid for Touch-Tone service, including the installation charge."

> "Complainant also seeks an order requiring Pacific to refund Touch-Tone charges to other similarly situated customers. Neither the PU Code nor our rules contain any provisions for class action complaints, beyond the 25 customer rule, supra. Since complainant has not complied with § 1702, he is in no position to represent the interests of anyone but himself. Moreover, § 734 would have prevented us from granting reparations or refunds to similarly situated customers, even if complainant had complied with § 1702."

The decision did not discuss whether it was discriminatory for defendant to offer a different service in step-by-step territory than in areas served by modern central offices while charging the same price. This was apparently due to the fact that complainant failed to raise the issue. Nor did it discuss whether either § 734 or § 1702 would bar reparations based on a discrimination theory. Finally, it did not respond to complainant's theory that PacBell was collecting for a non-service.

Complainant's petition for rehearing contended that his claim for reparations was never intended to retry the issue of reasonableness covered in the ratemaking proceeding.

Rather, he asserted that his demand for refunds was based on both the alleged misrepresentation and on the utility's failure

Under the CLAM/TURN holding, a reparations case is a quasi-judicial proceeding, while a rate case would be a quasi legislative proceeding.

The Trust instrument also provides that a consumer advocate can receive compensation from the trust corpus only if he or she makes a "direct, primary and substantial" contribution to the outcome of the proceeding. Fees are to be charged against the fund only

> "...where complainants have generated a common fund but that fund is inadequate to meet reasonable attorney or expert witness fees, where a substantial benefit has been conferred upon a party or members of an ascertainable class of persons but no convenient means are available for charging those benefited with the cost of obtaining the benefit, or where complainants have acted as private attorneys general in indicating an important principle of statutory or constitutional law, but no other means or fund is available for award of fees."

The trust instrument provides that each Commissioner is ex officio a member of a committee; the committee controls disbursements under the fund. Therefore, when the Commissioners approve a disbursement from the trust corpus, they act as fiduciaries, rather than as government officials. While the committee has discretion under the trust instrument, its discretion is narrower than the Commission's discretion under the Public Utilities Code; this fiduciary discretion must be exercised within the guidelines established in the trust instrument.

In particular, each Commissioner has a duty to preserve the trust assets; if a claimant might have received compensation from another source, then the committee must decide for itself whether it would be appropriate to allow him to collect from the fund.

What Hourly Rate should Be Employed?

At least theoretically, complainant's request for compensation fails to satisfy the Trust's requirement that we consider the amounts paid to other persons who practice public utility law. Complainant's methodology was based solely on the compensation of practitioners who have been awarded fees under this Commission's Rules of Practice and Procedure. His analysis omits those who practice utility law as independent practitioners, as employees of corporations, or of customers' associations.

However, since complainant's claim almost certainly errs on the conservative side, we will not require additional data.

Should the Basic Hourly Rate Be Enhanced?

Complainant argues that the basic hourly rate should be enhanced by 25% or $3,142.50. He bases this claim for enhancement on the following points:

"1. The complainant's dedication to pursuing to its final and successful resolution an issue that benefited a large and herethereto unrepresented group of utility customers over an extensive portion of the State --and an issue that experienced, professional intervenor organizations had ignored, avoided, or had failed to perceive.

2. The degree of success obtained by the complainant in achieving his original objectives.

3. The large total dollar amount recovered for the benefited class and the dollar amount of prospective benefits that will accrue to them.

4. The societal importance of the public policy vindicated by the results of the case.

5. The novelty of the issue, the absence of guiding precedent, and the difficulties encountered because of the limited

makes it unnecessary to consider the other factors mentioned by complainant.

Necessity of Private Enforcement

We have found that complainant attempted to persuade the Commission's Division of Ratepayer Advocates (DRA) to undertake the responsibility for litigating on behalf of consumers. He believes that it refused on the grounds of insufficient staff resources. He also claims to have attempted to persuade two recognized consumer advocacy groups to prosecute this complaint, but with no success.

In future cases, we wish to encourage persons who think they have uncovered utility violations to seek experienced advocates before themselves assuming the responsibility of representing large number of fellow consumers. If DRA and intervenor organizations are unwilling to act, we believe the consumer should also attempt to obtain private expert representation, before assuming the responsibilities of lay advocacy.

Findings of Fact

1. Without the filing of this proceeding and petition for rehearing and the evidence received at hearing, Touch-Tone customers in step-by-step territory would have received no reparations or prospective rate relief.

2. Complainant unsuccessfully attempted to persuade DRA and two consumer groups to prosecute this complaint. Without private enforcement, consumer rights would not have been protected.

3. Complainant spent 97.2 hours on the complaint, petition for rehearing and advice letters. He spent 28.5 hours on his claim for compensation. He spent $115.48 on expenses, including postage copying, and travel.

4. Complainant made a major contribution toward obtaining $7 million in refunds and prospective rate relief of over $1 million per year for consumers. He was also instrumental in

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OPINION

Complainant originally brought this action on behalf of a large group of consumers. Even though his complaint and his subsequent petition for rehearing were dismissed, he now seeks compensation for his advocacy. He claims $12,750 for advocate's fees plus $115.48 for expenses.

He calculated the fees by estimating that the Commission has historically allowed an average hourly fee of $134 to intervenors' attorneys. He concedes that since he is a nonattorney, his hourly rate should be somewhat less. He is therefore willing to accept $100 per hour as a fair rate. For reasons detailed below, he seeks an enhancement of the hourly fee of 25%. This would make his total claim $15,827.98.

He claims that his activities in this complaint directly caused defendant (PacBell) to correct an unqualified representation that its Touch-Tone service permitted faster dialing. He further claims that his advocacy was instrumental in causing the utility to make a refund estimated at $7 million to Touch-Tone customers served by step-by-step central offices. He finally claims some responsibility for further developments in which PacBell no longer

accesses a separate charge for Touch-Tone service in such areas. Dropping such charges will have a revenue effect of roughly $1 million per year.

The request for compensation is unopposed.

History

Complainant filed this complaint to correct what he characterized as a marketing abuse (cf. PacBell (1986) 21 CPUC 2d 182, 21 CPUC 2d 500). He alleged that the defendant had misrepresented Touch-Tone service as enabling subscribers served by a step-by-step office to dial faster. He had subscribed and had discovered that there was no difference in speed (his residence is served by a step-by-step office is in Pollock Pines.) He had already received a refund for the short time he had been a Touch-Tone subscriber. On behalf of all others similarly situated, he sought to have PacBell correct the alleged misleading representation, notify them that there was no speed advantage, and refund the extra charges for Touch-Tone service.

Pacific moved to dismiss and answered. Its motion to dismiss pointed out that the Commission cannot entertain a complaint on the grounds of rate unreasonableness, except upon its own motion or upon a complaint signed by 25 customers or certain elected officials. (§ 1702, Public Utilities (PU) Code.)

A hearing was held before Administrative Law Judge (ALJ) Gilman in Placerville. After filing of briefs, the matter was submitted. Decision (D.) 88-11-028 (29 CPUC 2d 485) dismissed the action. Complainant filed a timely Petition for Rehearing; this was denied by D.89-05-075.

Contemporaneously with the denial of the petition for rehearing, PacBell filed its Advice Letter 15658 to make a $5 million refund to such customers. According to a PacBell letter, PacBell had committed itself to refund that sum "in connection with

the Sawaya case".[1] The refund would be limited to "existing residential customers who receive Touch-Tone service through a step-by-step central office." Even though we accept the view that this proceeding and the advice letters are separate transactions, it would be disingenuous to assert that Sawaya's efforts were not a primary cause of the refunds and rate relief.

The Advice Letter was protested by complainant and others. As a result of the protests, refunds were made available to previous, as well as existing, Touch-Tone customers and to business customers. Refunds were to be based on the full amounts paid by customers for the service, rather than being a pro rata share of the $5 million. Refunds were required for all charges paid in the three years preceding the Resolution which adopted the final plan. These protests thus increased the amount of the refund from $5 million to an estimated $7 million.

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The Evidence

The evidence elicited from defendant's witnesses at hearing indicated that step-by-step central offices could not recognize Touch-Tone signals. Rather than refraining from offering Touch-Tone service through such offices, defendant had installed a device which would convert consumers' Touch-Tone signals back into pulse signals, thereby simulating the signals emitted by an old-fashioned rotary dial phone. This conversion was, for most

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customers, unnecessary: most modern phones have a self-contained capability to emit either Touch-Tone or pulse signals.

Strikingly, the same conversion capability was available to all customers, not just Touch-Tone subscribers, throughout each step-by-step territory. This meant that a customer who did not apply for this "service" would nevertheless receive it if he inadvertently switched his phone to the tone mode. Likewise, a customer who knowingly wished to use tone signals without paying for the conversion could do so without subscribing or being billed for the service. The defendant had no program to detect and bill nonsubscribers who generated tone signals.

Complainant's brief argued that defendant, as well as profiting from a deceptive representation, was in addition collecting money for a non-service.

Defendant's brief argued that the failure to join 25 customers merited dismissal, since complainant himself had received a full refund and was no longer a Touch-Tone subscriber.

It argued that "...class actions are inappropriate before the Commission." In support of this concept, it cited Stypmann v P.T.& T. (1978) 84 CPUC 373 and Wood v PG&E (1969) 70 CPUC 38.[2]

The Decisions

D.88-11-028 dismissed the complaint, explaining:

> "Even if complainant had expressly asked us to terminate for unreasonableness the Touch-Tone charge in step-by-step territories, we could not entertain his request [citing PU Code § 1702].

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2 Counsel for PacBell cited these cases without also citing CLAM/TURN v CPUC (1979) 25 C 3d 891. In that case a consumer advocate successfully sued PacBell's predecessor and won a refund on behalf of similarly situated consumers. While the Supreme Court did not directly pass on the question of whether the Commission can entertain complaints on behalf of similarly situated customers, the outcome is hardly consistent with defendant's interpretation of Wood, supra.

> "Complainant neither obtained the signatures of 25 customers nor did he obtain the support of any elected officials. We therefore have no authority to entertain his complaint questioning the reasonableness of the existing charge for Touch-Tone service in step-by-step territories."

Citing § 734, the Commission went on to say:

> "Since the rate for Touch-Tone service was declared reasonable in D.84-06-111, the Commission, if it is to comply with § 734, may not order reparation to be paid to complainant. In any event, Pacific has refunded to complainant everything he paid for Touch-Tone service, including the installation charge."

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The decision did not discuss whether it was discriminatory for defendant to offer a different service in step-by-step territory than in areas served by modern central offices while charging the same price. This was apparently due to the fact that complainant failed to raise the issue. Nor did it discuss whether either § 734 or § 1702 would bar reparations based on a discrimination theory. Finally, it did not respond to complainant's theory that PacBell was collecting for a non-service.

Complainant's petition for rehearing contended that his claim for reparations was never intended to retry the issue of reasonableness covered in the ratemaking proceeding.

Rather, he asserted that his demand for refunds was based on both the alleged misrepresentation and on the utility's failure

to deliver any useful service in exchange for the rate charged. He contended that the "service" actually provided was so useless that a decision assessing any charge at all transcended unreasonableness.

In denying the petition for rehearing, D.89-05-075 reasoned that since complainant had not complied with the procedural requirements of § 1702, no good cause for granting rehearing had been shown.[3]

Discussion

The Trust

The Advocate's Trust Fund is intended to compensate those who successfully advocate a position on behalf of consumers in litigation before the Commission. The trust corpus was created from that sum of reparations paid by defendant's predecessor as a result of a stipulation explained in CLAM/TURN v PT&T (supra). The actual creation of the Trust is discussed in CLAM v PT&T Co., 6 CPUC 2d 374 (1981). Recognizing that intervenors in noncomplaint cases can claim compensation from other sources,[4] the Trust instrument provides that awards from the Fund are available only to those who represent consumers in "quasi judicial" proceedings.

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3 Citation of D.88-12-028 in this proceeding could be misleading unless accompanied by the observation that PacBell willingly provided the refunds and rate relief by Advice letter. [cf. Rule 1 of the Commission's Rules of Procedure (Title 20, Chapter 1, subchapter 3, California Code of Regulations).]

4 Intervenors who successfully protect consumers' interests in utility applications can receive compensation under Rule 18.7 or for certain energy issues, under Rule 18.5, of the Commission's Rules of Practice and Procedure, supra. Under the holding of CLAM/TURN, one who promotes consumer interests in "quasi-judicial" proceedings, i.e., complaints, can ask the Commission to exercize the inherent equitable powers described in that opinion to receive compensation. The Commission has not yet adopted rules for equitable compensation.

Under the CLAM/TURN holding, a reparations case is a quasi judicial proceeding, while a rate case would be a quasi legislative proceeding.

The Trust instrument also provides that a consumer advocate can receive compensation from the trust corpus only if he or she makes a "direct, primary and substantial" contribution to the outcome of the proceeding. Fees are to be charged against the fund only

> "...where complainants have generated a common fund but that fund is inadequate to meet reasonable attorney or expert witness fees, where a substantial benefit has been conferred upon a party or members of an ascertainable class of persons but no convenient means are available for charging those benefited with the cost of obtaining the benefit, or where complainants have acted as private attorneys general in indicating an important principle of statutory or constitutional law, but no other means or fund is available for award of fees."

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In particular, each Commissioner has a duty to preserve the trust assets; if a claimant might have received compensation from another source, then the committee must decide for itself whether it would be appropriate to allow him to collect from the fund.

Is Complainant Entitled to Compensation From the Advocate's Trust Fund?

Beyond dispute, complainant's actions made a major contribution to the rate relief and refund even though his complaint was dismissed. The benefit to affected customers, worth many millions of dollars, is very large in relationship to the modest number of compensable hours claimed. Complainant has therefore amply demonstrated that he is entitled to compensation for each hour claimed.

Normally, an advocate who has created a large common fund of reparations, as Mr. Sawaya has, would be expected to seek his compensation from the common fund. Under this form of funding, a proportionate amount is deducted from each customer's recovery to pay the fees expended for creation of this recovery. Under the provision of the Advocate's Trust instrument quoted above, such funding, when available, is to be preferred over an expenditure of funds from the Advocate's Trust.

Here, however, it is now too late to arrange for a proportionate payment from benefited customers. Well before the request for compensation was filed, PacBell had paid reparations to those customers at the rate of 100 cents on the dollar. (Any unrefundable reparations must be paid in full as an escheat to the state.) (Cory v CPUC (1983) 33 C 3d 522.)

The delay in applying for reparations should not be found to be the kind of negligence which would bar complainant from recovery. We note that he is not an attorney and has relied heavily on our staff for procedural advice. We are informed that he was not advised to seek compensation from the common fund of reparations before disbursement was complete.

Consequently, we will find that the common fund is no longer adequate to meet reasonable fees; therefore, we can authorize payment from the Advocate's Trust Fund.

What Hourly Rate should Be Employed?

At least theoretically, complainant's request for compensation fails to satisfy the Trust's requirement that we consider the amounts paid to other persons who practice public utility law. Complainant's methodology was based solely on the compensation of practitioners who have been awarded fees under this Commission's Rules of Practice and Procedure. His analysis omits those who practice utility law as independent practitioners, as employees of corporations, or of customers' associations.

However, since complainant's claim almost certainly errs on the conservative side, we will not require additional data.

Should the Basic Hourly Rate Be Enhanced?

Complainant argues that the basic hourly rate should be enhanced by 25% or $3,142.50. He bases this claim for enhancement on the following points:

"1. The complainant's dedication to pursuing to its final and successful resolution an issue that benefited a large and herethereto unrepresented group of utility customers over an extensive portion of the State --and an issue that experienced, professional intervenor organizations had ignored, avoided, or had failed to perceive.

2. The degree of success obtained by the complainant in achieving his original objectives.

3. The large total dollar amount recovered for the benefited class and the dollar amount of prospective benefits that will accrue to them.

4. The societal importance of the public policy vindicated by the results of the case.

5. The novelty of the issue, the absence of guiding precedent, and the difficulties encountered because of the limited

financial and support resources available to the complainant.

6. The complainant's significant role in assisting the Commission staff to represent a facet of the public interest that the staff could not fully and adequately represent because of constraints on its available manpower."

We are particularly impressed with the substantial amount of reparations and prospective rate relief resulting from complainant's efforts. We also agree that this was a novel issue, with little in the way of precedent to guide the advocate. A sophisticated practitioner, viewing the case at the time of filing, would have seen that the odds were greatly against winning any significant refunds or prospective rate relief for customers. Consequently such a practitioner would have predicted that he would have a very small chance of being compensated for his services.

We doubt if any law firm would have been willing to undertake the burden of prosecuting this complaint, without a clear precedent authorizing enhancement in novel cases. We also note that complainant was unable to persuade established intervenors to prosecute the consumers' side of this dispute. It seems reasonable to assume that they were unwilling to risk a substantial commitment of time and effort with what must have seemed very little hope of being compensated.

In contrast, complainant was willing to take such risks. As in other fields of endeavor, the rewards for succeeding in a very risky enterprise should be higher than those for a venture which has a higher potential for success. Unless we award appropriate enhancement, we will deter private enforcement of consumer rights in novel but meritorious cases.

We have therefore found that the contingency value of this proceeding, coupled with the finding that private action was required, warrant the modest amount of enhancement requested. This

makes it unnecessary to consider the other factors mentioned by complainant.

Necessity of Private Enforcement

We have found that complainant attempted to persuade the Commission's Division of Ratepayer Advocates (DRA) to undertake the responsibility for litigating on behalf of consumers. He believes that it refused on the grounds of insufficient staff resources. He also claims to have attempted to persuade two recognized consumer advocacy groups to prosecute this complaint, but with no success.

In future cases, we wish to encourage persons who think they have uncovered utility violations to seek experienced advocates before themselves assuming the responsibility of representing large number of fellow consumers. If DRA and intervenor organizations are unwilling to act, we believe the consumer should also attempt to obtain private expert representation, before assuming the responsibilities of lay advocacy.

Findings of Fact

1. Without the filing of this proceeding and petition for rehearing and the evidence received at hearing, Touch-Tone customers in step-by-step territory would have received no reparations or prospective rate relief.

2. Complainant unsuccessfully attempted to persuade DRA and two consumer groups to prosecute this complaint. Without private enforcement, consumer rights would not have been protected.

3. Complainant spent 97.2 hours on the complaint, petition for rehearing and advice letters. He spent 28.5 hours on his claim for compensation. He spent $115.48 on expenses, including postage copying, and travel.

4. Complainant made a major contribution toward obtaining $7 million in refunds and prospective rate relief of over $1 million per year for consumers. He was also instrumental in

persuading defendant utility to clarify its representations concerning the usefulness of Touch-Tone service.

5. $100 per hour is reasonable compensation for a lay advocate under the circumstances of this case.

6. At the time the complaint was filed, an experienced consumer advocate would have viewed the proceedings as a high-risk venture. An enhancement of 25% is warranted.

7. The amount of reparations paid is more than enough to support an award of the total amount claimed.

8. The present corpus of the fund is more than adequate for anticipated future claims. Compensating complainant from the corpus will not diminish the principal.

9. Complainant was not afforded timely opportunity to seek compensation from a common fund.

10. It is just and equitable to compensate Complainant from the Fund.

11. Complainant had no economic interest in the amount of refunds or rate relief sought.

12. Since the request is unopposed, it should be made effective today.

13. The common fund arising from this proceeding is no longer large enough to meet reasonable fees.

Conclusions of Law

1. In adopting this Order, each Commissioner acts as an ex officio member of the Disbursements Committee of the Advocate's Trust.

2. Complainant is entitled to be compensated from the Fund in the full amount sought.

O R D E R

IT IS ORDERED that:

1. The Trustee of the Advocates' Trust Fund shall disburse the sum of $15,827.98 to George M. Sawaya. The Executive Director of the Commission shall transmit a copy of this decision to the Trustee.

2. This is a final order which closes the proceeding.

This order is effective today.

Dated June 5, 1991, at San Francisco, California.

PATRICIA M. ECKERT
President
G. MITCHELL WILK
JOHN B. OHANIAN
DANIEL Wm. FESSLER
NORMAN D. SHUMWAY
Commissioners

I CERTIFY THAT THIS DECISION WAS APPROVED BY THE ABOVE COMMISSIONERS TODAY

NEAL J. SHULMAN, Executive Director