

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine the Commission's Energy Efficiency Risk/Reward Incentive Mechanism.	R0901019
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**WEM AMENDED CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION**

<b>Claimant: Women's Energy Matters</b>	<b>For contribution to D. 0 9 - 1 2 - 0 4 5 .</b>
<b>Claimed (\$): \$8,347.50</b>	<b>Awarded (\$):</b>
<b>Assigned Commissioner: Bohn</b>	<b>Assigned ALJ:</b>
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature: /s/ Barbara George</b>	
<b>Date: 7/21/10</b>	<b>Printed Name: Barbara George</b>

Note: WEM files this Amended Request pursuant to requests by the Intervenor Compensation Coordinator. We made the following changes from our original request:

- Part III.C lists new and amended attachments
- Certificate of Service (Attachment 1) has changed date and title
- Attachment 2 was added: WEM Time-Allocation by Issue
- Amended Time Sheets are included as Attachment 3
- Attachment 4 added: WEM Bylaws (demonstrating customer status)
- Changed amount of request: when we updated our time sheets to calculate issues, we removed a 6/22/09 item which pertained to a separate track of the proceeding; we also corrected mathematical errors in the compensation hours and total amount. These changes are reflected in the introduction, the charts on p. 7, and the time sheets.

**PART I: PROCEDURAL ISSUES (to be completed by Claimant except where indicated)**

**A. Brief Description of Decision:** Decision awarded 12% profits to utilities for the second claim for 2006-08 EE. It rejected the proposed Settlement.

**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	Claimant	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	4/7/09	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	5/7/09	
4. Was the notice of intent timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D0906016; see also, attachment 4	
8. Has the claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	0906016; see also, our NOI	
12. Has the claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D0912045	
14. Date of Issuance of Final Decision:	12/29/09	
15. File date of compensation request:	3/1/10	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I (use line reference # as appropriate):**

#	Claimant	CPUC	Comment

**PART II: SUBSTANTIAL CONTRIBUTION** (to be completed by Claimant except where indicated)

A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059) (For each contribution, support with specific reference to final or record.)

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p>1. Introduction: Overall, WEM’s participation sought to reduce costs to ratepayers by reducing undeserved awards of EE profits. We rejected the Settlement because it would have discarded EM&amp;V findings. We provided historic perspective that demonstrated why the Commission should respect Energy Division’s implementation of the first-ever fully independent EM&amp;V and reject IOUs’ efforts to undermine it.</p>	<p>The Commission chose to alter some of the goals and EM&amp;V parameters to ensure profits in this claim, however it rejected the proposed Settlement, which would have discarded the findings of expensive EM&amp;V and the final true-up. The decision preserved these important ratepayer protections, citing many of the issues that WEM raised in its comments.</p>	
<p>2. WEM encouraged CPUC to reject the Proposed Settlement. 6/12/09 Comments, pp 2-8. WEM discussed the problem with IOU-caused delays in 2008, and warned that IOUs could easily delay the 2009 VR and/or the true-up, thereby derailing them. 6/12/09 Comments, pp. 2; 4; 6. We pointed out that the Settlement would result in discarding tens of million worth of EM&amp;V work and using IOU self-reports or more utility-friendly processes that were inadequate to protect ratepayers. 6/12/09 Comments, pp. 6-7; 6/26/09 Motion, p. 2.</p>	<p>The decision rejected the Settlement for a variety of reasons, many of which WEM had expressed. The decision noted that the Settlement “lacks the sponsorship of parties representing ratepayer advocates (i.e., DRA, TURN, and WEM).” Ibid, p. 27.</p> <p>The decision specifically acknowledged WEM’s warnings that the Settlement would allow IOUs to cause delays in the 2009 Verification Report (VR) (Ibid, p. 21), and would also restrict the true-up. Ibid, p. 27. COL3 confirmed that “previously adopted program” for awards would be followed, and COL4 stated the second interim award would be based on ED’s “independent evaluation of performance results” produced in the ED’s Second VR. OP 4 specifically</p>	

	rejected the Settlement’s restrictions to the true-up, and ordered the true-up to proceed. OP 4.	
3. WEM brought attention and clarity to the dispute about the CFL split between Residential/non-Residential customers. Our analysis described the substantial impact on energy savings (therefore increased profits) that would result from the IOUs proposal to allocate 10% of the CFLs to non-Res instead of the 5% in ED’s VR. We noted that the Settlement would remove the section of the VR that dealt with this issue, which would also delete the VR’s point that only 2 out of 3 CFLS are in-service. We pointed out that utilities’ ex ante assumptions re upstream CFLs assumed 100% Residential. We noted that IOUs cited an out-of-date 1994 study to support their requested changes to the VR. 6/12/09 Comments, pp. 4-5. See also 6/29/09 Motion, p. 2.	FOF 11 noted that the Settlement differed with ED regarding the CFL split as well as in-service rates; FOF 16 noted differences regarding upstream CFL splits. The text noted that SCE cited a 1994 report. Ibid, p. 49. While the decision did not specifically mention WEM’s input on these points, the Commission has stated previously: “[T]he fact that WEM is not specifically credited with making a substantial contribution on a particular issue does not mean that a substantial contribution was not made. Where a decision states a position that is consistent with that asserted by a party we may infer that the party made a contribution on that issue. D0903043, pp. 7-8.	
WEM repudiated the Settling Parties claim that ED’s report was not “vetted” and defended ED for following agreed-on procedures.	The decision stated that ED “properly followed adopted procedures” (p. 56). It largely restored due process, taking care to describe the vetting process. Ibid, pp. 56-59. FOF 23.	
WEM filed a Motion for Evidentiary Hearings 6/26/09, in part to determine to what extent the IOUs had knowingly misled the Commission in their 2006-08 applications.	The decision took note of WEM’s Motion for hearings. Decision, p. 13. The Motion was denied, but WEM’s request alerted the Commission that there were serious factual disputes that Settling Parties wanted the Commission to ignore.	
In this phase, as well as concurrent efforts related to future RRIM, WEM demonstrated that the current RRIM exacerbates the conflicts of interest of the utilities and their allies, tending to undermine the best use of EE dollars. WEM recommended extreme caution lest the desire to gain maximum EE profits (without being required to	The decision reflected WEM’s position, stating, “Independent verification of claimed savings is essential...” Ibid, p. 7. It faulted the utilities pre-Settlement position, which “relies upon utility self-reported earnings without independent verification.” Ibid, p. 34. The final decision noted ongoing	



<p>demonstrate specific reductions in supply side resources or profits) leads to exaggerated savings claims and undeserved profits. All WEM's comments addressed these concerns, as well as our NOI, Petition to Intervene, and 6/29/09 Ex Parte with Commissioner Bohn's advisor.</p>	<p>controversy regarding the RRIM, and stressed the Commission's intention to pursue reforms. Ibid, p. 4.</p>	
<p>WEM preferred the ALJ's Proposed Decision to the Alternate. 12/7/09 Comments, p. 2.</p>	<p>The ALJ's Proposed Decision (which was rejected in favor of Commissioner Bohn's Alternate) was even more cautious about overpayment, as it more closely followed the original protocols and goals, resulting in a lower award.</p> <p>The Commission has stated that a contribution to a Proposed Decision may be considered in determining the value of an intervenor's participation.</p>	
<p>Conclusion: WEM's participation clearly resulted in a very substantial contribution and should be compensated in full.</p>	<p>In this case, the Commission specifically recognized WEM's input on several important points, and adopted many of our major recommendations.</p> <p>Even where the decision did not agree with WEM's recommendations, it is clear that WEM contributed substantially. The Commission has previously determined that an intervenor may make a substantial contribution by "providing a unique perspective that enriched the Commission's deliberations and the record" even if it did not adopt any of the customer's recommendations. (D0506027, p. 3)</p> <p>It is clear that all of WEM's participation made a substantial contribution to this proceeding and should be compensated in full.</p>	

**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y)		
b. Were there other parties to the proceeding? (Y)		
c. If so, provide name of other parties: TURN, NRDC, NAESCO, CLECA, IOUs		
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>WEM has discussed with DRA and TURN generally which issues we are following, to reduce duplication. As noted in our 6/12/09 Comments, pp. 5-6, WEM was one of the first parties to analyze the exaggerations of CFL savings, well before DRA and TURN; attendance by WEM's principal advocate at nearly all utility-run EM&amp;V meetings (CALMAC) since 2002 enables us to offer important historical perspective.</p> <p>Where there was duplication, WEM supplemented and complemented others' comments. For example, both TURN and WEM discussed the problem with IOU-caused delays in 2008, but as the decision acknowledged, WEM took this a step further in its analysis of the flawed process that the Settlement proposed going forward. WEM warned that the IOUs could cause delays in the 2009 Verification Report, (Decision, p. 21), and also restrict the True-up (Ibid p. 27).</p> <p>Regarding the other parties: NRDC and WEM seldom overlap. NAESCO and CLECA were not very active in this phase.</p>		

**C. Additional Comments on Part II (use line reference # or letter as appropriate):**

#	Claimant	CPUC	Comment

**PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)**

**A. General Claim of Reasonableness (§§ 1801 & 1806):**

Concise explanation as to how the cost of claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
The Decision rejected the Proposed Settlement, in part because of WEM's strong objections to it, and our support of Energy Division's EM&V efforts, which the Settlement would have largely discarded. The decision preserved the process — including the Second Verification Report and the final True-Up, without which utilities would very likely have been able to base claims on self-reported earnings. Thus, WEM's participation saved ratepayers from potentially paying tens of	

millions in undeserved claims. WEM's participation overall was very efficient, thanks to our extensive nine years experience in CPUC proceedings addressing RRIM and EM&V issues, which enabled us to quickly understand and provide substantive comments on the issues here.

**B. Specific Claim:**

CLAIMED						CPUC AWARD			
<b>ATTORNEY AND ADVOCATE FEES</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Barbara George	2009	38.25	\$180	D0906016	\$6885.00				
[Atty 2]									
<i>Subtotal:</i>					<b>\$6,885.00</b>	<i>Subtotal:</i>			
<b>EXPERT FEES</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
[Expert 1]									
[Expert 2]									
<i>Subtotal:</i>						<i>Subtotal:</i>			
<b>OTHER FEES</b>									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
[Person 1]									
[Person 2]									
<i>Subtotal:</i>						<i>Subtotal:</i>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Barbara George	2010	16.25	\$90	D0906016	\$1,462.50				
[Preparer 2]									
<i>Subtotal:</i>					<b>\$1,462.50</b>	<i>Subtotal:</i>			
<b>COSTS</b>									
#	Item	Detail			Amount	Amount			
<i>Subtotal:</i>						<i>Subtotal:</i>			
<b>TOTAL REQUEST \$:</b>					<b>\$8,347.50</b>	<b>TOTAL AWARD \$:</b>			
When entering items, type over bracketed text; add additional rows as necessary.									

\*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.  
 \*\*Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.

**C. Attachments or Comments Documenting Specific Claim** (Claimant completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
1	Amended Certificate of Service
2	(New section in Amendment) Time-Allocation by Issue
3	Amended Time Sheets
4	WEM Bylaws

**D. CPUC Disallowances & Adjustments** (CPUC completes):

#	Reason



**PART IV: OPPOSITIONS AND COMMENTS**  
 Within 30 days after service of this claim, Commission Staff  
 or any other party may file a response to the claim (see § 1804(c))

(CPUC completes the remainder of this form)

**A. Opposition: Did any party oppose the claim (Y/N)?**

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If so:

Party	Reason for Opposition	CPUC Disposition

**B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6)) (Y/N)?**

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If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

1. Claimant [has/has not] made a substantial contribution to Decision (D.) \_\_\_\_\_.
2. The claimed fees and costs [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$\_\_\_\_\_.

**CONCLUSION OF LAW**

1. The claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Claimant is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime,

three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning \_\_\_\_\_, 200\_\_, the 75<sup>th</sup> day after the filing of claimant's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.
4. [This/these] proceeding[s] [is/are] closed.
5. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**Attachment 1:  
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **AMENDED CLAIM AND ORDER ON REQUEST FOR INTERVENOR COMPENSATION** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail

to the following persons appearing on the official Service List:

donaldgilligan@comcast.net,spatrick@sempra.com,larry.cope@sce.com,dil@cpuc.ca.gov,achang@nrdc.org,bfinkelstein@turn.org,lhj2@pge.com,Mike@pge.com,wbooth@booth-law.com,wem@igc.org,gandhi.nikhil@verizon.net,jerickson@summitblue.com,fstern@summitblue.com,Scott.Dimetrosky@cadmusgroup.com,ckmitchell@sbcglobal.net,david@nemtow.com,darren.hanway@sce.com,don.arambula@sce.com,kathleen.a.qumbleton@sce.com,tory.weber@sce.com,case.admin@sce.com,jennifer.shigekawa@sce.com,monica.ghattas@sce.com,liddell@energyattorney.com,ygross@sempra.com,CentralFiles@semprautilities.com,jyamagata@semprautilities.com,sephira.ninow@energycenter.org,bob.ramirez@itron.com,Jeff.Hirsch@DOE2.com,ddavis@cecmail.org,tam.hunt@gmail.com,ABesa@semprautilities.com,john.stoops@rlw.com,pvillegas@semprautilities.com,jeanne.sole@sfgov.org,FSmith@sfwater.org,mramirez@sfwater.org,tburke@sfwater.org,jchou@nrdc.org,lettenson@nrdc.org,marcel@turn.org,nlong@nrdc.org,pmiller@nrdc.org,cjn3@pge.com,efm2@pge.com,yxg4@pge.com,filings@aklaw.com,ldri@pge.com,nes@a-klaw.com,sls@a-klaw.com,SRRd@pge.com,SRH1@pge.com,cassandra.sweet@dowjones.com,sdhilton@stoel.com,cem@newsdata.com,RegRelCPUCcases@pge.com,slida@pge.com,rsridge@comcast.net,cadickerson@cadconsulting.biz,Michael.Rufo@itron.com,rmurray@us.kema.com,stevek@kromer.com,dwang@nrdc.org,sberlin@mccarthylaw.com,brbarkovich@earthlink.net,bill@jbsenergy.com,erik@erikpage.com,mjaske@energy.state.ca.us,rliibert@cfbf.com,grover@portland.econw.com,Allen.Lee@cadmusgroup.com,ppl@cpuc.ca.gov,aeo@cpuc.ca.gov,cbe@cpuc.ca.gov,cfl@cpuc.ca.gov,cxc@cpuc.ca.gov,css@cpuc.ca.gov,jbf@cpuc.ca.gov,jl2@cpuc.ca.gov,cln@cpuc.ca.gov,jst@cpuc.ca.gov,jnc@cpuc.ca.gov,kwz@cpuc.ca.gov,keh@cpuc.ca.gov,lp1@cpuc.ca.gov,mmw@cpuc.ca.gov,mkh@cpuc.ca.gov,pw1@cpuc.ca.gov,pcf@cpuc.ca.gov,rhh@cpuc.ca.gov,srm@cpuc.ca.gov,tcx@cpuc.ca.gov,tp@cpuc.ca.gov,ter@cpuc.ca.gov,zap@cpuc.ca.gov,ztc@cpuc.ca.gov,awp@cpuc.ca.gov

Executed this [21st] day of [July], 2010, at [Fairfax], California.

/s/ Barbara George

Barbara George, Executive Director  
Women's Energy Matters  
P.O. Box 548  
Fairfax CA 94978  
(c) 510-915-6215 (O) 415-457-1737  
bgwem@igc.org  
www.womensenergymatters.org

Attachment 2:  
**WEM Time-Allocation by Issue**

In this Amended Request, WEM responds to the request by the Intervenor Compensation Coordinator to provide a time-allocation by issue pursuant to Rule 17.4(b)(3) and (4) and D98-04-059 (at 47-48). We respond in this section and in our time sheets.

We provide an Issue Allocation Chart, below, and we have amended our timesheets to reflect the major issues we addressed in our comments and in our review of the Settlement proposals, ED’s Report, and the PD and Alternate. See our timesheets for our method of calculating the Issue Allocation in this chart. (Note: it would be very difficult — virtually impossible after the fact — to determine exactly how much time was spent on each major issue or the many sub-issues.)

<b>Issue allocation</b>	
ED process	\$1,644.00
EM&V	\$1,644.00
GP	\$810.00
EE resource	\$99.00
Misuse	\$99.00
Settlement	\$2,589.00
Total	\$6,885.00

We provide the following key to major issues, sub-issues, and abbreviations:

<b>Issues</b>	<b>Sub-issues</b>	<b>Issue description</b>
Settlement		Pertaining to proposed settlement(s)
	GS	General – re Settlement
	Audit	Financial Audit (which IOUs proposed to substitute for the VR)
EM&V	IOU Reports	Utility-reported savings claims
		Evaluation, Measurement, and Verification
	CS	Cumulative Savings
	DEER	DEER values & updates (e.g. for Estimated Useful Life (EULs); Net to Gross (NTG), interactive effects, CFLs (compact fluorescent lights))
ED Process	Ex Ante, Ex Post	Predictions in program planning documents (Ex ante); Completed & measured savings (ex post)
	TRUE	Final True-Up (final comprehensive EM&V report for a whole cycle)
EE Resource	VR	Verification Report (interim limited EM&V report for part of a cycle)
Misuse		EE as a reliable resource for the grid
GP		Improper use of EE funds
		General Practice (generic responsibilities of any party in a proceeding)

## **Discussion of Issues in R0901019**

They say the devil is in the details, and this is an apt description of the issues in the Commission's current Risk Reward Incentive Mechanism, the subject of this proceeding.

As the Scoping Memo stated:

[E]valuation, measurement and verification EM&V of RRIM earnings claims, have proved to be highly controversial, quite complex, and not as easily or as timely resolved as had been hoped. Scoping Memo, p 2.

The parallel (concurrent) track of this proceeding hopes to “develop a more transparent, more streamlined and less controversial RRIM process.” However, the track addressed by this decision is still in the midst of the devilish details, working at “resolving outstanding disputes relating to incentive earnings for the 2006-2008 program cycles.”

WEM's original request reflected the fact that the overall issue in this decision was whether or not to approve Settlements proposed by IOUs or to follow through with determining the RRIM using ED's reports, as originally planned. The decision determined the amount of the second interim earnings claims for each utility and also set ground rules for the upcoming decision on overall 2006-08 claims (still to come in 2010).

The Commission chose to rely primarily on ED reports for the 2009 interim claim, but the final decision made significant changes to the inputs to earnings calculations, which resulted in increased earnings for utilities.

### **Description of Issues and Sub-Issues WEM Addressed**

During the decade WEM has participated in EE Rulemakings and Applications before the Commission, Energy Division, utilities and parties (and Commissioners and ALJs) have literally spent years arguing over a multitude of EM&V issues. Major points of contention include what should be the correct EM&V input values for the Estimated Useful Life (EUL) of EE measures, their Net-to-Gross (NTG – i.e. how many of a given EE item was purchased because of the EE program vs. other motivations<sup>1</sup>), and Interactive Effects (for example, CFL bulbs run cooler than incandescents so they reduce air conditioning needs in summer but raise heating needs in winter).

Further controversial issues involve the process and timing of updating these and other values in the DEER (Database for EE Resources) and non-DEER measurements; to

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<sup>1</sup> The closely related and similarly explosive issue of Market Transformation is



what extent interim Verification Reports (VR) and the final True-Up for the program cycle (TRUE) should use updated DEER values and *ex ante* or *ex post* data (i.e. predictions at the start of the program or after the fact accomplishments); and whether and how to count cumulative savings (CS).

Tens, even hundreds of millions of dollars of profits or penalties for utilities rest on these details. WEM pointed out that this is a powerful incentive for utilities to bend energy savings data to benefit their shareholders in their annual reports (IOU Reports). We also expressed concern that the important question of whether EE Resources - what EE actually does or does not defer or displace at particular locations on the grid — tends to get lost because it is not reflected in any specific way in EM&V. WEM has shown how PG&E has an opportunity to misuse EE funds by funneling them into communities where the company has certain political objectives.

Meanwhile, the utilities have taken aim at the umpire in the game, Energy Division, attacking the process and timing of ED's EM&V studies and reports, helping to delay them, and pressuring the Commission to adopt settlement proposals that would to a greater or lesser extent derail and discard ED's reports in favor of a much more limited financial audit and/or utilities' own reports that tend to pick and choose whether to use updated or *ex ante* values depending on what values would lead to more profits for the utilities.

In the broadest sense, WEM's time in this proceeding (beyond General Practice tasks necessary to participate in any proceeding) was about evenly split between advocating why the Commission should reject the Settlement and why it should adopt the conclusions in ED's Reports. The PD discussed at length why the Commission rejected the Settlement, but then it and the Alternate PD diverged from ED and from each other regarding which values would be left as *ex ante* or updated (and updated according to what) and how the goals should or should not be adjusted. At this point, many of the EM&V sub-issues (which WEM had addressed as reasons to approve ED's conclusions or reject the Settlement) became significant in themselves.

Attachment 3 – WEM Amended Time Sheets  
(see separate file, attached)

Attachment 4: WEM Bylaws

See attached file