

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

| | |
|---|---|
| Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program. | <p align="center">Rulemaking No. 05-12-013 (Filed December 15, 2005)</p> <p align="center">Phase 2, Track 2</p> |
|---|---|

CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

| | |
|--|---|
| Claimant: The Utility Reform Network | For contribution to D.10-06-018 |
| Claimed (\$): \$ 238,366 | Awarded (\$): |
| Assigned Commissioner: Peevey | Assigned ALJ: Wetzell |
| 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). | |
| <p align="right">Signature: _____ /s/</p> | |
| Date: August 4, 2010 | Printed Name: Michel Peter Florio, Senior Attorney |

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

A. Brief Description of Decision: D.10-06-018 determined that a centralized capacity market should not be adopted in California at this time and found that the proposal of the Bilateral Trading Group (BTG), of which TURN was an active member, best met the Commission's policy goals for Resource Adequacy (RA). The decision also closed R.05-12-013, and brought an end to five years of work for TURN and other parties on capacity market structure and related issues.

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

| | Claimant | CPUC Verified |
|---|-------------------------------------|---------------|
| Timely filing of notice of intent to claim compensation (§ 1804(a)): | | |
| 1. Date of Prehearing Conference: | February 3, 2006 | |
| 2. Other Specified Date for NOI: | | |
| 3. Date NOI Filed: | March 6, 2006 | |
| 4. Was the notice of intent timely filed? | | |
| Showing of customer or customer-related status (§ 1802(b)): | | |
| 5. Based on ALJ ruling issued in proceeding number: | R.05-12-013, the instant proceeding | |
| 6. Date of ALJ ruling: | April 10, 2006 | |
| 7. Based on another CPUC determination (specify): | | |
| 8. Has the claimant demonstrated customer or customer-related status? | | |
| Showing of "significant financial hardship" (§ 1802(g)): | | |
| 9. Based on ALJ ruling issued in proceeding number: | R.05-12-013, the instant proceeding | |
| 10. Date of ALJ ruling: | April 10, 2006 | |
| 11. Based on another CPUC determination (specify): | | |
| 12. Has the claimant demonstrated significant financial hardship? | | |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision | D.10-06-018 | |
| 14. Date of Issuance of Final Decision: | June 7, 2010 | |
| 15. File date of compensation request: | August 4, 2010 | |
| 16. Was the request for compensation timely? | | |

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

| # | Claimant | CPUC | Comment |
|---|----------|------|--|
| 1 | X | | This is TURN's third request for compensation in this docket. TURN's prior requests in Phase 1 and in Phase 2, Track 1 were addressed by D.07-03-011 and D.08-04-034. None of the hours or expenses claimed in those earlier requests are included in this filing. |

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>TURN was instrumental in forming, and an active member of, the Bilateral Trading Group (BTG). The BTG’s proposal for incremental improvements to the existing bilateral RA procurement framework, rather than adoption of a centralized capacity market, was found most consistent with the Commission’s RA policy goals.</p> | <p>BTG proposal filed 3/30/07 and subsequent written comments; D.10-06-018, page 3.</p> | |
| <p>TURN filed individual reply comments on 3/14/08 opposing AReM’s proposal for an opt-out from the CAM cost allocation mechanism.</p> | <p>D.10-06-018 rejected AReM’s proposal, citing TURN’s criticisms, at page 74.</p> | |
| <p>TURN filed separate opening and reply comments on the original PD on 12/2/09 and 12/11/09, arguing that the PD’s legal analysis was incorrect and opposing the multi-year forward procurement obligation adopted by the PD.</p> | <p>The original PD was revised in a manner consistent with TURN’s comments on 3/30/10 and ultimately adopted by the Commission in D.10-06-018.</p> | |
| <p>TURN’s initial comments and reply comments regarding the staff Capacity Markets White Paper, filed 9/23/05 and 10/11/05 in R.04-04-003 and incorporated into the record of this proceeding by the 12/15/05 OIR (OP 3, page 11) urged a “go slow” approach with respect to this Commission’s consideration of a centralized capacity market.</p> | <p>The scoping memo for Phase 2 issued 12/22/06 found that “great care must be taken in developing a complete, fully vetted record on centralized capacity markets and alternatives such as bilateral trading” (p.14) and adopted a schedule that allowed time for TURN and other like-minded parties to form the BTG coalition and develop a comprehensive alternative proposal, which the Commission largely adopted in D.10-06-018.</p> | |
| <p>In the ALJ ruling dated 2/28/07 parties were “encouraged to form coalitions and file joint proposals on as many Track 2</p> | <p>TURN took this advice to heart and worked with a diverse group of parties to form the BTG and present</p> | |

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| topics as possible” (p.3). | a joint proposal that was supported by many different interests throughout the industry. | |
|----------------------------|--|--|

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

| | Claimant | CPUC Verified |
|--|------------------|----------------------|
| a. Was DRA a party to the proceeding? (Y/N) | Yes | |
| b. Were there other parties to the proceeding? (Y/N) | Yes, many | |
| c. If so, provide name of other parties: See service list for R.05-12-013 in attached certificate of service. Virtually all entities involved in the California electric industry were parties to this proceeding, including the IOUs, the CAISO, generators, marketers, retailers, and end users. The BTG included, at various times, in addition to TURN and DRA, APS Energy Services, the California Electricity Oversight Board, the California Large Energy Consumers Association, the California Manufacturers and Technology Association, the City and County of San Francisco, the Energy Users Forum, J. Aron and Company, Direct Energy, L.L.C., and Shell Energy North America (US), L.P., or their predecessor organizations. | | |
| 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: TURN actively worked with a broad coalition of parties with diverse interests to develop a consensus set of proposals for presentation as the “BTG proposal” in this docket. TURN was a “charter member” of the BTG, and DRA joined the effort shortly thereafter. All of the BTG members worked together to develop a joint position and prepare joint comments throughout the proceeding. While the development of such a diverse coalition necessarily required time in group discussions to come up with a broadly acceptable consensus position, any inefficiency inherent in that process was more than outweighed by the <i>far greater efficiency</i> achieved by the filing of joint comments on behalf of a number of parties. This coalition approach greatly reduced the amount of time that TURN staff had to spend preparing written comments, because the members of the BTG shared drafting duties among them. This enabled TURN to make a far more comprehensive and convincing presentation than would have ever been possible for a single party acting alone. | | |

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 |
|--|----------------------|
| TURN's work in this proceeding, in coalition with other like-minded parties, achieved an extremely successful result against great odds, since the BTG position was opposed by the entire generator community and two of the three large IOUs, as well as the CAISO. TURN believes that the ratepayers of the three large IOUs will save hundreds of millions of dollars in future years as a result of the rejection of the centralized capacity market proposal. TURN's costs of participation in this proceeding were quite modest in relative to its degree of success in the proceeding and the magnitude of the issues at stake. | |

B. Specific Claim:

| CLAIMED | | | | | | CPUC AWARD | | | |
|---|------|--------|---------|-------------------------------|---------------------|-------------------|-------|---------|----------|
| ATTORNEY AND ADVOCATE FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| M.P. Florio | 2005 | 37.75 | \$470 | D.06-07-011, p. 11 | \$ 17,742.50 | | | | |
| M.P. Florio | 2006 | 43.50 | \$485 | D.06-11-039, p. 8 | \$ 21,097.50 | | | | |
| M.P. Florio | 2007 | 200.50 | \$520 | D.08-04-027 | \$104,260.00 | | | | |
| M.P. Florio | 2008 | 98.00 | \$535 | D.08-07-043, p.8 | \$ 52,430.00 | | | | |
| M. P. Florio | 2009 | 19.50 | \$535 | Res. ALJ-235 | \$ 10,432.50 | | | | |
| M.P. Florio | 2010 | 19.00 | \$535 | Res. ALJ-247. | \$ 10,165.00 | | | | |
| B.Finkelstein | 2007 | 1.25 | \$435 | D.07-12-026, p. 24 | \$ 543.75 | | | | |
| Subtotal: | | | | | \$216,671.25 | Subtotal: | | | |
| EXPERT FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| Kevin Woodruff | 2005 | 0.50 | \$200 | D.04-05-050 | \$ 100.00 | | | | |
| Kevin Woodruff | 2006 | 2.50 | \$225 | D.07-06-045 (on rehearing) | \$ 562.50 | | | | |
| Kevin Woodruff | 2007 | 64.50 | \$225 | D.07-06-045 | \$ 14,512.50 | | | | |
| Kevin Woodruff | 2008 | 1.00 | \$225 | D.07-06-045 | \$ 225.00 | | | | |
| Subtotal: | | | | | \$ 15,400.00 | Subtotal: | | | |
| OTHER FEES | | | | | | | | | |
| Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.): | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| M.P. Florio (Travel time) | 2007 | 12.00 | \$260 | 50% of 2007 rate | \$ 3,120.00 | | | | |

| | | | | | | | | | | | |
|---|--------------------------|---|----------------|------------------------|--------------------------|------------------|--------------|----------------|-----------------|--|------------------------|
| | | | | | Subtotal: | \$ 3,120.00 | | | | | Subtotal: |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ | | |
| M. P. Florio | 2010 | 8.50 | \$267.50 | 50% of 2010 rate | \$ 2,237.75 | | | | | | |
| | | | | | Subtotal: | \$ 2,237.75 | | | | | Subtotal: |
| COSTS | | | | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | | | | |
| 1 | Expert Travel Expenses | Auto mileage and parking, Amtrak and BART fares, and meals (SF and Folsom). | | | \$ 209.50 | | | | | | |
| 2 | Attorney Travel Expenses | Mileage roundtrip to CAISO stakeholder meetings in Folsom. | | | \$ 320.10 | | | | | | |
| 3 | Photocopies | Copies of TURN's pleadings | | | \$ 383.40 | | | | | | |
| 4 | Postage | Mailing of TURN's pleadings | | | \$ 22.07 | | | | | | |
| 5 | Telephone | Calls related to this case | | | \$ 1.96 | | | | | | |
| | | | | | Subtotal: | \$ 937.03 | | | | | Subtotal: |
| | | | | | TOTAL REQUEST \$: | \$238,366 | | | | | TOTAL AWARD \$: |

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 1/2 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 |
|--------------------------------|---|
| Comment 1 | <p>In accordance with our typical practices, TURN allocated the time of its attorneys and expert consultant among the issues addressed in the proceeding. In Phase 2, Track 2 of this case, most of TURN's participation was focused on the issue of capacity market structure, and is coded as activity "CM" in the attached timesheets. Further, since D.10-06-018 closed R.05-12-013, this request includes a few hours of "clean-up" activity on issues from earlier phases, reflecting work performed subsequent to the filing of our last compensation request in this docket on 8/24/07. This includes 2.5 hours of Mr. Florio's time in September of 2007 on "Track 1" and "Track 3" issues, as well as 27.0 hours of Mr. Woodruff's time in July through October of 2007 and January of 2008, primarily on issues related to improvements in the Local Capacity Requirements ("LCR") study process that were addressed via an Assigned Commissioner's Ruling on 11/1/07 in this docket. The improvements to the LCR study process that Mr. Woodruff helped to develop have resulted in smoother integration of CAISO LCR studies into the Commission's RA proceedings in subsequent years.</p> <p>Initially the scope of Phase 2, Track 2 included an issue regarding potential changes to the Commission's adopted Planning Reserve Margin (PRM). Mr. Florio and particularly Mr. Woodruff devoted time in this docket to PRM-related issues during late 2007. However, on 11/19/07 the Assigned Commissioner issued a ruling stating that PRM matters would severed from this docket and subsequently considered in a new proceeding, which became R.08-04-012. Accordingly, TURN has removed most PRM-related hours from this request and will include them in a future request that may be filed in R.08-04-012.</p> |

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| | <p>Also, consideration of the capacity markets issue actually began in 2005 in R.04-04-003, pursuant to an Assigned Commissioner ruling issued 2/28/05 in that docket. A staff White Paper was released on 8/25/05, and TURN spent time discussing that report with staff and filing two rounds of comments in R.04-04-003. Thereafter, consideration of the capacity markets issue was transferred to this proceeding when R.05-12-013 was launched in December of 2005. The OIR specifically stated that the comments filed in R.04-04-003 on this issue would become part of the record in R.05-12-013 (OP 3, p.11). TURN therefore transferred the hours originally recorded in R.04-04-003 on the capacity markets issue to this docket, and they are included in this request. None of those hours were ever claimed for compensation purposes in R.04-04-003.</p> <p>Finally, the Assigned Commissioner ruling issued 5/25/07 in this docket provided that at least a portion of the analysis of alternative capacity market structures would take place in a CAISO stakeholder process, rather than in a CPUC proceeding, and that CAISO staff would assist in the preparation of the Energy Division's staff report in this case. Accordingly, TURN's representatives participated in several meetings at the CAISO related to the subject matter of this proceeding. The time and expenses involved in participating in those meetings are also included in this request, since participation at the CAISO was integral to the work before this Commission and directly contributed to the ultimate staff report.</p> <p>Especially given TURN's high degree of success in this proceeding, TURN submits that compensation is merited for the full amount of time that TURN's attorneys and expert consultant devoted to the proceeding, as reflected in the attached timesheets.</p> |
| Comment 2 | <p>Michel Peter Florio was TURN's lead attorney in this proceeding and recorded the lion's share of TURN's hours, as reflected in the attached timesheets. Bob Finkelstein devoted a few hours to this case in the July of 2007, while Mr. Florio was on vacation. Mr. Florio was also assisted by Kevin Woodruff of Woodruff Expert Services in Sacramento, who has acted as TURN's primary expert consultant on procurement, resource adequacy and PRM issues for several years. Mr. Woodruff devoted his efforts primarily to some of the more technical issues in this docket, but also participated in several meetings or conference calls of the BTG while the group's positions were being formulated, or when Mr. Florio was otherwise unavailable. All of the hours claimed in this request were reasonable and necessary to the achievement of TURN's substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets.</p> |
| Comment 3 | <p>The travel time and travel expenses requested here cover only travel that was necessary for TURN's effective participation in this proceeding and would not have been incurred but for TURN's participation in this case. As noted above, some of the analysis of alternative capacity market structures took place in a CAISO stakeholder process. TURN's attorney and expert consultant had to travel to the CAISO offices in Folsom (from their offices in San Francisco and Sacramento, respectively) in order to participate in those meetings. In addition, Mr. Woodruff was required to travel from his office in Sacramento to attend workshops held at the Commission's offices in San Francisco. TURN's travel time and associated travel expenses should be awarded in full.</p> |
| Comment 4 | <p>If the Commission has any questions regarding any of the time or expenses claimed for compensation in this docket, or any other concerns regarding the content of this request, TURN respectfully asks that it be given an opportunity to answer any such questions prior to the issuance of a decision on this request.</p> |
| Attachment 1 | Detailed Time Reports for TURN's Attorneys and Expert Consultant |
| Attachment 2 | Detail of TURN's Expenses |
| Attachment 3 | Certificate of Service |

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)?

If so:

| Party | Reason for Opposition | CPUC Disposition |
|-------|-----------------------|------------------|
| | | |
| | | |

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6)) (Y/N)?

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 75th 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:

**Detailed Time Reports for TURN's Attorneys and Expert Consultant
In Phase 2, Track 2 of R.05-12-013**

| Date | Attorney | Activity | Description | Time Spent |
|---------------------|----------|----------|--|--------------|
| Attorney: MF | | | | |
| 6/1/2005 | MF | CM | Meet w/ Auclair re: capacity markets | 2.50 |
| 6/27/2005 | MF | CM | Discuss capacity markets w/ Matt | 0.50 |
| 6/30/2005 | MF | CM | Meeting w/ Auclair | 1.50 |
| 8/30/2005 | MF | CM | Review capacity market white paper | 1.50 |
| 9/9/2005 | MF | CM | Meeting with ORA re: capacity markets | 0.75 |
| 9/21/2005 | MF | CM | Prep on capacity markets | 3.25 |
| 9/22/2005 | MF | CM | Draft capacity market comments | 6.00 |
| 9/23/2005 | MF | CM | Finish comments & review others' | 4.50 |
| 9/26/2005 | MF | CM | Discuss capacity markets w/ parties | 1.00 |
| 9/28/2005 | MF | CM | Review capacity market comments | 1.00 |
| 9/29/2005 | MF | CM | Review capacity market comments | 0.75 |
| 10/8/2005 | MF | CM | Review comments on Cap Mkts | 5.75 |
| 10/10/2005 | MF | CM | Reply comments on Cap Mkts | 6.50 |
| 10/11/2005 | MF | CM | Review cap mkt replies | 1.50 |
| 10/12/2005 | MF | CM | Review Oren paper re: capacity market | 0.75 |
| Total: 2005 | | | | 37.75 |
| 2/2/2006 | MF | CM | TC-SCE re: Coalition proposal | 0.50 |
| 2/10/2006 | MF | CM | Discuss capacity markets w/ Coalition | 2.75 |
| 2/12/2006 | MF | CM | Review SCE paper | 0.25 |
| 2/14/2006 | MF | CM | Discuss capacity markets w/ Sheffrin | 0.50 |
| 2/16/2006 | MF | CM | Review and send emails | 0.50 |
| 2/24/2006 | MF | CM | Review Coalition CM proposals | 0.50 |
| 2/25/2006 | MF | CM | Review SDG&E CM proposal | 0.25 |
| 2/28/2006 | MF | CM | Bilateral group meeting & discuss w/ staff | 3.25 |
| 3/8/2006 | MF | CM | Review LICAP settlement in NE | 2.00 |
| 4/6/2006 | MF | CM | Attend capacity market WG @ PG&E | 7.00 |
| 6/4/2006 | MF | CM | Review working group drafts | 0.50 |
| 6/19/2006 | MF | CM | Meeting w/ Bushnell & bilat group | 2.50 |
| 8/1/2006 | MF | CM | Review slides for bilat presentation | 0.75 |
| 8/8/2006 | MF | CM | Attend MSC CM discussion | 3.50 |
| 8/31/2006 | MF | CM | Bilateral group call | 1.50 |
| 9/4/2006 | MF | CM | Review paper on CM & alternative | 0.75 |
| 9/6/2006 | MF | CM | TC w/ EOB | 1.00 |
| 9/8/2006 | MF | CM | TC w/ Aglet | 0.25 |
| 9/20/2006 | MF | CM | Bilateral group meeting | 1.50 |
| 9/27/2006 | MF | CM | Review FERC decision re: NYISO | 0.50 |
| 10/2/2006 | MF | CM | Meeting on LE report and prep | 6.00 |
| 10/3/2006 | MF | CM | Meeting w/SCE | 0.75 |
| 10/5/2006 | MF | CM | Bilateral group meeting | 2.25 |
| 10/19/2006 | MF | CM | Bilateral group meeting | 2.00 |
| 11/7/2006 | MF | CM | Bilateral group meeting | 1.75 |
| 11/13/2006 | MF | CM | Review Harvey paper | 0.50 |
| Total: 2006 | | | | 43.50 |
| 1/7/2007 | MF | CM | Bilateral call | 1.00 |
| 1/24/2007 | MF | CM | Bilateral call | 0.25 |
| 1/30/2007 | MF | CM | Bilateral group meeting | 2.25 |
| 2/9/2007 | MF | CM | Bilateral group call | 1.25 |
| 2/15/2007 | MF | CM | Review bilat group materials | 0.50 |

| Date | Attorney | Activity | Description | Time Spent |
|-----------|----------|----------|--------------------------------|------------|
| 2/21/2007 | MF | CM | Discuss BTG principles w/ DRA | 1.00 |
| 3/5/2007 | MF | CM | DRA call | 0.75 |
| 3/6/2007 | MF | CM | ISO forum on capacity markets | 4.50 |
| 3/6/2007 | MF | Travel | Travel to CAISO & back | 4.00 |
| 3/9/2007 | MF | CM | BTG call; EOB call | 2.00 |
| 3/16/2007 | MF | CM | Draft and edit BTG comments | 1.50 |
| 3/18/2007 | MF | CM | Review and edit BTG draft | 0.75 |
| 3/19/2007 | MF | CM | BTG call | 1.25 |
| 3/20/2007 | MF | CM | Edit BTG draft | 3.75 |
| 3/21/2007 | MF | CM | Edit BTG draft | 0.50 |
| 3/22/2007 | MF | CM | BTG meeting | 3.25 |
| 3/26/2007 | MF | CM | Review ISO LMPM for RA | 0.75 |
| 3/26/2007 | MF | CM | Edit BTG comments | 3.50 |
| 3/29/2007 | MF | CM | BTG call and edit comments | 4.75 |
| 4/17/2007 | MF | CM | BTG call w/ PG&E | 0.75 |
| 4/18/2007 | MF | CM | Prep for BTG meeting w. PG&E | 0.50 |
| 4/19/2007 | MF | CM | BTG meeting w/ PG&E | 4.00 |
| 4/21/2007 | MF | CM | Review Track 2 comments | 2.25 |
| 4/21/2007 | MF | CM | BTG prep & review documents | 0.25 |
| 4/23/2007 | MF | CM | BTG call w/ PG&E & Prep slides | 2.00 |
| 4/24/2007 | MF | CM | BTG call | 1.00 |
| 4/24/2007 | MF | CM | Prep for workshop | 0.50 |
| 4/25/2007 | MF | CM | Workshop on Track 2 proposals | 7.50 |
| 5/1/2007 | MF | CM | BTG meeting | 2.00 |
| 5/2/2007 | MF | CM | BTG meeting w/ PG&E | 1.75 |
| 5/3/2007 | MF | CM | BTG work | 0.50 |
| 5/7/2007 | MF | CM | Prep materials for BTG | 0.50 |
| 5/14/2007 | MF | CM | BTG call & prep | 2.00 |
| 5/15/2007 | MF | CM | Work on BTG comments | 1.00 |
| 5/16/2007 | MF | CM | BTG call & work on comments | 7.25 |
| 5/17/2007 | MF | CM | Work on BTG Track 2 comments | 4.50 |
| 5/24/2007 | MF | CM | Meeting w/ Gallagher | 1.00 |
| 5/31/2007 | MF | CM | BTG conference call | 1.25 |
| 6/7/2007 | MF | CM | BTG call re: reply comments | 1.00 |
| 8/3/2007 | MF | CM | Review revised proposals | 0.50 |
| 8/7/2007 | MF | CM | Prep for workshop | 4.00 |
| 8/7/2007 | MF | CM | Review PG&E proposal and TC | 0.50 |
| 8/9/2007 | MF | CM | BTG call | 1.50 |
| 8/10/2007 | MF | CM | Work on BTG matrix | 1.25 |
| 8/13/2007 | MF | CM | CAISO CCM workshop | 7.50 |
| 8/13/2007 | MF | Travel | Travel to CAISO & back | 4.00 |
| 8/14/2007 | MF | CM | Prep for PUC workshop | 1.75 |
| 8/14/2007 | MF | CM | BTG call re: matrix | 1.75 |
| 8/15/2007 | MF | CM | Workshop and prep | 7.00 |
| 8/20/2007 | MF | CM | PUC workshop | 8.00 |
| 8/21/2007 | MF | CM | PUC workshop & discuss | 8.00 |
| 8/22/2007 | MF | CM | PUC workshop | 7.50 |
| 8/23/2007 | MF | CM | Discuss case w/ Bob F | 0.50 |
| 8/24/2007 | MF | CM | TC w/ PG&E | 0.50 |
| 8/24/2007 | MF | CM | BTG call | 1.50 |
| 8/27/2007 | MF | CM | PUC workshop & discuss | 8.00 |
| 8/28/2007 | MF | CM | PUC workshop & discuss | 7.50 |
| 8/29/2007 | MF | CM | PUC workshop & discuss | 7.00 |
| 9/5/2007 | MF | CM | Meeting w/ SCE re: CCM | 2.25 |

| Date | Attorney | Activity | Description | Time Spent |
|------------|----------|----------|---|------------|
| 9/5/2007 | MF | CM | BTG meeting w/ SCE & SDG&E | 2.25 |
| 9/9/2007 | MF | Track 1 | Review RA templates & guides | 0.75 |
| 9/11/2007 | MF | CM | TC w/ EOB | 1.50 |
| 9/13/2007 | MF | CM | BTG call | 1.00 |
| 9/13/2007 | MF | Track 3 | Review SMJU filings | 1.75 |
| 9/14/2007 | MF | CM | Review ISO paper on CCM | 1.25 |
| 9/15/2007 | MF | CM | Review report on NYISO CCM | 1.25 |
| 9/19/2007 | MF | CM | Review LE study | 0.75 |
| 9/27/2007 | MF | CM | BTG call | 0.50 |
| 9/28/2007 | MF | CM | Review materials | 0.50 |
| 10/1/2007 | MF | CM | MSC meeting @ PUC | 7.25 |
| 10/12/2007 | MF | CM | BTG call re: ICPM | 0.75 |
| 10/15/2007 | MF | CM | ISO meeting re: ICPM | 5.00 |
| 10/15/2007 | MF | Travel | Travel to CAISO & back | 4.00 |
| 10/18/2007 | MF | CM | Review ISO straw proposal | 1.25 |
| 10/19/2007 | MF | CM | BTG call re: comments to ISO on CCM | 1.75 |
| 10/22/2007 | MF | CM | Work on BTG comments to ISO on CCM | 1.25 |
| 10/23/2007 | MF | CM | Prep comments to ISO on ICPM | 4.50 |
| 10/23/2007 | MF | CM | BTG comments to ISO on CCM paper | 0.50 |
| 10/25/2007 | MF | CM | Review other party comments to ISO on CCM | 0.75 |
| 10/28/2007 | MF | CM | Review draft BTG comments to ISO on PER | 0.50 |
| 10/29/2007 | MF | CM | Review draft BTG comments to ISO on PER | 0.50 |
| 11/1/2007 | MF | CM | BTG call: meeting prep | 1.75 |
| 11/5/2007 | MF | CM | Review MSC opinion | 0.25 |
| 11/7/2007 | MF | CM | BTG meetings w/ E.D. & advisors | 3.00 |
| 11/11/2007 | MF | CM | Review CAISO ICPM draft | 1.25 |
| 11/15/2007 | MF | CM | Review Calpine Std Prdt proposal | 2.50 |
| 11/16/2007 | MF | CM | Emails re: Calpine proposal | 1.25 |
| 11/20/2007 | MF | CM | BTG comments to MSC on ICPM | 1.00 |
| 11/27/2007 | MF | CM | Discuss Calpine language w/ BTG | 0.25 |
| 11/28/2007 | MF | CM | TC w/ PG&E | 0.50 |
| 12/5/2007 | MF | CM | Review comments on ICPM proposal | 0.50 |
| 12/7/2007 | MF | CM | BTG call | 0.75 |
| 12/12/2007 | MF | CM | Discuss w/ PG&E & BTG | 0.50 |

Total: 2007

212.50

| | | | | |
|-----------|----|----|---------------------------------------|------|
| 1/5/2008 | MF | CM | Comments on Final ICPM proposal | 0.75 |
| 1/18/2008 | MF | CM | Review Staff report | 2.00 |
| 1/23/2008 | MF | CM | BTG call re: staff report | 1.75 |
| 1/23/2008 | MF | CM | Review proposed ICPM tariff | 0.75 |
| 1/25/2008 | MF | CM | TC - ISO re: ICPM proposal to board | 0.25 |
| 1/28/2008 | MF | CM | Prep for ISO meeting on ICPM | 1.25 |
| 1/29/2008 | MF | CM | ISO board meeting on ICPM | 2.00 |
| 1/29/2008 | MF | CM | Read staff report in detail | 5.00 |
| 1/30/2008 | MF | CM | Meeting w/ PG&E re: staff report | 1.75 |
| 1/31/2008 | MF | CM | BTG call & follow-up re: staff report | 2.00 |
| 2/6/2008 | MF | CM | BTG meeting w/ PG&E | 2.00 |
| 2/7/2008 | MF | CM | BTG call & review PG&E draft | 2.50 |
| 2/8/2008 | MF | CM | TCs -- BTG & PG&E | 2.50 |
| 2/11/2008 | MF | CM | BTG call re: comments | 1.00 |
| 2/13/2008 | MF | CM | BTG call re: comments | 0.50 |
| 2/14/2008 | MF | CM | Discuss w/ PG&E | 0.25 |

| Date | Attorney | Activity | Description | Time Spent |
|--------------------|----------|----------|--|--------------|
| 2/18/2008 | MF | CM | Review ICPM tariff filing | 0.75 |
| 2/20/2008 | MF | CM | Work on BTG comments | 2.00 |
| 2/21/2008 | MF | CM | BTG-PG&E call | 1.00 |
| 2/22/2008 | MF | CM | Work on BTG comments | 3.00 |
| 2/23/2008 | MF | CM | Work on BTG comments | 2.75 |
| 2/25/2008 | MF | CM | BTG call | 0.75 |
| 2/26/2008 | MF | CM | BTG-PG&E call | 0.50 |
| 2/29/2008 | MF | CM | BTG call & review comments | 1.00 |
| 3/3/2008 | MF | CM | Review party comments | 1.00 |
| 3/4/2008 | MF | CM | Review party comments | 0.50 |
| 3/5/2008 | MF | CM | Review party comments | 3.00 |
| 3/5/2008 | MF | CM | BTG call | 0.75 |
| 3/6/2008 | MF | CM | Meeting w/ PG&E | 1.50 |
| 3/7/2008 | MF | CM | Meeting w/ Energy Division & prep | 2.00 |
| 3/9/2008 | MF | CM | Prep for reply comments | 3.50 |
| 3/10/2008 | MF | CM | BTG call re: reply comments | 1.00 |
| 3/11/2008 | MF | CM | Work on BTG reply comments | 4.00 |
| 3/12/2008 | MF | CM | BTG call re: reply comments | 1.25 |
| 3/13/2008 | MF | CM | Work on BTG reply comments | 2.50 |
| 3/14/2008 | MF | CM | Draft TURN's separate reply comments | 3.50 |
| 3/14/2008 | MF | CM | Review party comments | 2.25 |
| 3/26/2008 | MF | CM | BTG call re: study and meetings | 0.75 |
| 3/27/2008 | MF | CM | Prep for ex parte meeting w/ PG&E | 0.50 |
| 3/28/2008 | MF | CM | Ex parte meeting w/ PG&E | 1.50 |
| 4/3/2008 | MF | CM | Draft PG&E ex parte & discuss | 1.00 |
| 4/4/2008 | MF | CM | BTG ex parte meeting & discuss | 1.50 |
| 4/17/2008 | MF | CM | Review ISO Roadmap re: Stnd Cap Prdt | 2.50 |
| 5/6/2008 | MF | CM | Meeting w/ PG&E and Cho | 1.00 |
| 5/8/2008 | MF | CM | BTG call | 0.75 |
| 5/15/2008 | MF | CM | Cho meeting and prep | 1.50 |
| 5/21/2008 | MF | CM | Review PJM results | 0.25 |
| 5/29/2008 | MF | CM | BTG call re: meeting prep | 1.25 |
| 5/30/2008 | MF | CM | Meeting w/ Deal and others from BTG | 3.25 |
| 8/22/2008 | MF | CM | Review presentation slides & questions | 0.50 |
| 9/3/2008 | MF | CM | CAISO standard capacity product call | 3.00 |
| 9/10/2008 | MF | CM | Mtg w/ PG&E; Conf call w/ BTG | 2.50 |
| 9/10/2008 | MF | CM | Comments on Standard Capacity Product | 2.75 |
| 9/25/2008 | MF | CM | Review Energy Division report on MCM | 0.75 |
| 9/26/2008 | MF | CM | BTG call re: comments on MCM | 0.50 |
| 9/29/2008 | MF | CM | Edit BTG comments on MCM | 0.50 |
| 9/30/2008 | MF | CM | BTG call re: comments on MCM | 1.00 |
| 9/30/2008 | MF | CM | Edit BTG comments on MCM | 0.50 |
| 10/1/2008 | MF | CM | Review parties' comments on MCM | 1.25 |
| 10/8/2008 | MF | CM | Review reply comments | 0.50 |
| 10/20/2008 | MF | CM | Review FERC order on ICPM | 1.25 |
| 10/20/2008 | MF | CM | Standard Capacity Product call | 1.00 |
| 11/12/2008 | MF | CM | Review Standard Capacity proposal | 1.00 |
| 11/19/2008 | MF | CM | BTG call re: Standard Capacity Product | 0.50 |
| Total: 2008 | | | | 98.00 |
| 2/28/2009 | MF | CM | Edit BTG comments | 1.00 |
| 4/29/2009 | MF | CM | Review PJM decision | 0.50 |

| Date | Attorney | Activity | Description | Time Spent |
|-----------------------------|------------|----------|---|---------------|
| 8/5/2009 | MF | CM | Meeting w/ Kinosian | 1.00 |
| 8/5/2009 | MF | CM | BTG call & memo | 1.00 |
| 8/6/2009 | MF | CM | Meeting w/ Cho | 0.50 |
| 8/31/2009 | MF | CM | Meeting w/ Lindh, Fitch, et al. | 1.50 |
| 11/3/2009 | MF | CM | Review Proposed Decision | 1.00 |
| 11/12/2009 | MF | CM | BTG call re: comments | 1.25 |
| 11/13/2009 | MF | CM | Review PD | 0.50 |
| 11/23/2009 | MF | CM | Work on PD comments | 1.50 |
| 11/24/2009 | MF | CM | Work on PD comments | 2.75 |
| 12/1/2009 | MF | CM | Finish drafting comments on PD | 2.50 |
| 12/10/2009 | MF | CM | Review comments and draft reply | 3.75 |
| 12/11/2009 | MF | CM | Review reply comments | 0.75 |
| Total: 2009 | | | | 19.50 |
| 3/8/2010 | MF | CM | Review revised PD | 1.25 |
| 3/24/2010 | MF | CM | Review SCE motion & emails | 0.50 |
| 3/26/2010 | MF | CM | Meeting w/ Stoddard | 0.75 |
| 4/1/2010 | MF | CM | Meetings @ PUC re: revised PD | 7.00 |
| 4/14/2010 | MF | CM | Review and edit BTG comments on RPD | 1.00 |
| 4/16/2010 | MF | CM | Review party comments on RPD | 1.50 |
| 4/20/2010 | MF | CM | BTG call re: reply comments | 0.75 |
| 4/21/2010 | MF | CM | Draft section of BTG reply comments | 3.00 |
| 4/22/2010 | MF | CM | BTG call & work on reply comments | 1.25 |
| 4/23/2010 | MF | CM | Review reply comments | 0.50 |
| 4/29/2010 | MF | CM | Review further revised PD | 0.75 |
| 5/26/2010 | MF | CM | Review revised PD | 0.50 |
| 6/7/2010 | MF | CM | Quick Review of final decision | 0.25 |
| 7/28/2010 | MF | Comp3 | Prep for comp request | 2.50 |
| 7/30/2010 | MF | Comp3 | Draft comp request | 6.00 |
| Total: 2010 | | | | 27.50 |
| Total: MF | | | | 438.75 |
| <u>Attorney: K Woodruff</u> | | | | |
| 10/11/2005 | K Woodruff | CM | Reviewed client's Reply Comments on capacity markets. | 0.50 |
| Total: 2005 | | | | 0.50 |
| 2/10/2006 | K Woodruff | CM | Reviewed and discussed capacity market proposal with PG&E, SCE and client | 2.50 |
| Total: 2006 | | | | 2.50 |
| 4/24/2007 | K Woodruff | CM | Prepared for RAR Phase 2, Track 2 workshop. | 0.50 |
| 4/25/2007 | K Woodruff | CM | Prepared for and attended RAR Phase 2, Track 2 workshop | 9.50 |
| 5/29/2007 | K Woodruff | CM | Reviewed Track 2 Assigned Commissioner Ruling; communicated to client and others regarding scope and schedule matters | 0.50 |

| Date | Attorney | Activity | Description | Time Spent |
|--------------------|------------|----------|---|--------------|
| 6/15/2007 | K Woodruff | CM | Participated in conference call with Bilateral Trading Group | 1.00 |
| 6/27/2007 | K Woodruff | CM | Discussed capacity market issues with utility; reported to client | 0.50 |
| 7/1/2007 | K Woodruff | CM | Communicated with other parties' regarding PRM issues at issue in RAR case | 0.50 |
| 7/3/2007 | K Woodruff | CM | Prepared draft portion of comments for client/Bilateral Trading Group on PRM issues. | 1.00 |
| 7/5/2007 | K Woodruff | CM | Completed draft portion of comments for client/BTG on PRM issues. | 1.00 |
| 7/6/2007 | K Woodruff | CM | Discussed comments with BTG members; prepared revised version. | 1.50 |
| 7/10/2007 | K Woodruff | CM | Reviewed BTG draft comments; replied to BTG members. | 0.50 |
| 7/15/2007 | K Woodruff | CM | Communicated with client regarding RAR and BTG issues. | 0.50 |
| 8/2/2007 | K Woodruff | LCR | Provided client comments for August 8 workshop on LCR Study transparency. | 1.00 |
| 8/15/2007 | K Woodruff | LCR | Reviewed 8/8 LCR Transparency workshop materials and other RA issues; commented to client. | 0.50 |
| 8/16/2007 | K Woodruff | CM | Communicated with client regarding Monday's workshop and related issues. | 0.50 |
| 8/17/2007 | K Woodruff | CM | Prepared for Monday's workshop; reviewed agenda and communicated with client and Energy Division. | 1.50 |
| 8/20/2007 | K Woodruff | CM | Prepared for and participated in workshop. | 7.50 |
| 8/21/2007 | K Woodruff | CM | Prepared materials for Wednesday's workshop; communicated with client and ED. | 2.50 |
| 8/22/2007 | K Woodruff | CM | Prepared for and participated in workshop. | 8.50 |
| 8/27/2007 | K Woodruff | CM | Communicated with ED staff regarding PRM workshop issues; reviewed portion of RAR workshop via web. | 0.50 |
| 9/10/2007 | K Woodruff | LCR | Reviewed LCR issues potentially at issue at CAISO Grid Planning meeting; discussed issues with other consultant. | 1.00 |
| 9/14/2007 | K Woodruff | LCR | Prepared for Grid Planning meeting of 9/17. | 0.50 |
| 9/17/2007 | K Woodruff | LCR | Attended CAISO Grid Planning Standards review meeting regarding implications for Local Capacity Requirements and other LSE obligations. | 4.50 |
| 9/18/2007 | K Woodruff | LCR | Communicated with client regarding Grid Planning meeting. | 0.50 |
| 10/8/2007 | K Woodruff | LCR | Reviewed CAISO ICPM White Paper; commented to client regarding CONE estimate. | 0.50 |
| 10/10/2007 | K Woodruff | LCR | Reviewed CAISO LCR meeting materials; communicated with other party regarding issues for 10/11 meeting. | 0.50 |
| 10/11/2007 | K Woodruff | LCR | Participated in CAISO LCR meeting. | 6.00 |
| 10/12/2007 | K Woodruff | LCR | Reported on CAISO LCR meeting to client. | 1.00 |
| 10/18/2007 | K Woodruff | LCR | Reviewed materials related to CAISO 10/22 Grid Planning Standards meeting as they related to LCR requirements. | 1.00 |
| 10/22/2007 | K Woodruff | LCR | Attended CAISO Grid Planning Standards meeting. | 3.50 |
| 10/23/2007 | K Woodruff | LCR | Reported on CAISO GPS meeting to client. | 0.50 |
| 10/29/2007 | K Woodruff | LCR | Reviewed information regarding CAISO ""Old Thermal"" Study. | 0.50 |
| 10/30/2007 | K Woodruff | LCR | Attended CAISO meeting on ""Old Thermal"" study. | 4.50 |
| 10/31/2007 | K Woodruff | LCR | Reported on ""Old Thermal"" study to client. | 0.50 |
| Total: 2007 | | | | 64.50 |
| 1/8/2008 | K Woodruff | LCR | Reviewed status of RA-related topics being considered by CAISO (Local Capacity Requirements, Planning Reserve Margin study, etc.) | 0.50 |
| 1/17/2008 | K Woodruff | LCR | Provided comments on LCR and old plant retirement issues to CAISO (L.Tobias) in connection with ongoing studies. | 0.50 |
| Total: 2008 | | | | 1.00 |

| Date | Attorney | Activity | Description | Time Spent |
|---------------------|----------|----------|--------------------------------|------------|
| Total: K Woodruff | | | | 68.50 |
| <u>Attorney: BF</u> | | | | |
| 7/11/2007 | BF | CM | Review BTG pre-ws rep cmmts | 0.75 |
| 7/12/2007 | BF | CM | Finish review pre-ws rep cmmts | 0.50 |
| Total: 2007 | | | | 1.25 |
| Total: BF | | | | 1.25 |
| Grand Total | | | | 508.50 |

Attachment 2:

**Detail of TURN's Expenses
In Phase 2, Track 2 of R.05-12-013**

| Date | Activity | Description | Billed |
|-----------------------------------|---------------|---|----------|
| <u>Activity: \$Atty Travel</u> | | | |
| 3/6/2007 | Travel | ISO Folsom (220mi x .485) | \$106.70 |
| 8/13/2007 | Travel | roundtrip mileage to Folsom (220mi x .485) | \$106.70 |
| 10/15/2007 | Travel | Round trip mileage to Folsom (220mi x .485) | \$106.70 |
| Total: \$Atty Travel | | | \$320.10 |
| <u>Activity: \$Auto/Park/Toll</u> | | | |
| 8/20/2007 | Parking/Tolls | Parking in Sacramento train station | \$6.50 |
| 8/22/2007 | Parking/Tolls | Parking in Sacramento at train station | \$6.50 |
| Total: \$Auto/Park/Toll | | | \$13.00 |
| <u>Activity: \$Cons Travel</u> | | | |
| 8/20/2007 | Cons. Travel | Round trip to Richmond on Amtrak. | \$36.00 |
| 8/20/2007 | Cons. Travel | Round trip on BART from Richmond to S.F. | \$7.60 |
| 8/22/2007 | Cons. Travel | Round trip to Richmond on Amtrak. | \$36.00 |
| 8/22/2007 | Cons. Travel | Round trip on BART from Richmond to S.F. | \$7.60 |
| 9/17/2007 | Cons. Travel | Round trip to CAISO in Folsom. | \$19.40 |
| 10/11/2007 | Cons. Travel | Round trip to CAISO in Folsom (40mi x .485) | \$19.40 |
| 10/22/2007 | Cons. Travel | Round trip to CAISO in Folsom (40mi x .485) | \$19.40 |
| 10/30/2007 | Cons. Travel | Round trip to CAISO in Folsom (40mi x .485) | \$19.40 |
| Total: \$Cons Travel | | | \$164.80 |
| <u>Activity: \$Copies</u> | | | |
| 9/23/2005 | Photocopies | Comments on capacity mkts; 23cc x 61pp | \$280.60 |
| 10/11/2005 | Photocopies | Reply Comments on Capacity Markets; 17cc x 26pp | \$88.40 |
| 3/14/2008 | Photocopies | Separate Reply Comments on the Staff Report on Phase 2, Track 2 Issues. 2cc x 9pp | \$3.60 |
| 4/3/2008 | Photocopies | Notice of Ex Parte Communication. 6cc x 3pp | \$3.60 |
| 12/2/2009 | Photocopies | Comments on the Proposed Decision of ALJ Wetzell. 2cc x 11pp | \$4.40 |
| 12/11/2009 | Photocopies | Reply to Comments on the Proposed Decision of ALJ Wetzell. 2cc x 7pp | \$2.80 |
| Total: \$Copies | | | \$383.40 |
| <u>Activity: \$Meals</u> | | | |
| 8/20/2007 | Working Meals | Dinner on train | \$6.25 |
| 8/20/2007 | Working Meals | Lunch in S.F. | \$9.52 |
| 8/20/2007 | Working Meals | Breakfast in S.F. | \$3.41 |
| 8/22/2007 | Working Meals | Dinner on train | \$7.00 |
| 8/22/2007 | Working Meals | Breakfast in S.F. | \$5.52 |
| Total: \$Meals | | | \$31.70 |
| <u>Activity: \$Phone</u> | | | |
| 2/15/2007 | Phone/Fax | Sprint Invoice; \$0.04 | \$0.04 |
| 3/15/2007 | Phone/Fax | Sprint Invoice; \$0.04 | \$0.04 |
| 5/15/2007 | Phone/Fax | Sprint Invoice; \$1.7 | \$1.70 |
| 4/15/2008 | Phone/Fax | Sprint Invoice; \$0.14 | \$0.14 |

| <u>Date</u> | <u>Activity</u> | <u>Description</u> | <u>Billed</u> |
|----------------------------|-----------------|--|-----------------|
| 3/15/2009 | Phone/Fax | Sprint Invoice; \$0.04 | \$0.04 |
| Total: \$Phone | | | \$1.96 |
| <u>Activity: \$Postage</u> | | | |
| 9/23/2005 | Postage | Comments on capacity mkts; 4cc x \$4.55 | \$18.20 |
| 10/11/2005 | Postage | Reply Comments on Capacity Markets; 3cc x \$1.29 | \$3.87 |
| Total: \$Postage | | | \$22.07 |
| Grand Total | | | \$937.03 |

Attachment 3:

Certificate of Service by Customer

I hereby certify that I have this day served a copy of the foregoing **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 for R.05-12-013:

| | | | | |
|----------|---|------------------------------------|--------------|-------------|
| R0512013 | P | CKebler@SempraGeneration.com | CURTIS | KEBLER |
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