

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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| Order Instituting Rulemaking on the Commission's Own Motion to Address the Issue of Customer's Electric and Natural Gas Service Disconnection | Rulemaking 10-02-005 (Filed February 4, 2010) |
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CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

| | | | |
|--|--|----------------------|--------------------------------|
| Claimant: The Utility Reform Network (TURN) | For contribution to D.10-07-048 | | |
| Claimed (\$): \$42,849.71 | Awarded (\$): | | |
| Assigned Commissioner: Dian Grueneich | Assigned ALJ: Bruce DeBerry | | |
| 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). | | | |
| Signature: /S/ | | | |
| Date: | 9-28-10 | Printed Name: | Hayley Goodson, Staff Attorney |

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

A. Brief Description of Decision:

In D.10-07-048, *Interim Decision Implementing Methods to Decrease the Number of Gas and Electric Utility Service Disconnections*, the Commission adopted certain low-cost measures to reduce the number of utility service disconnections in the service territories of PG&E, SDG&E, SCE, and SoCalGas, starting this fall and continuing until Jan. 1, 2012 (for SDG&E, SCE and SoCalGas, as the sunset date for PG&E is yet to be determined).

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: | N/A | |
| 2. Other Specified Date for NOI: | March 8, 2010 | |
| 3. Date NOI Filed: | March 5, 2010 | |
| 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.10-02-005 | |
| 6. Date of ALJ ruling: | March, 29, 2010 | |
| 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.10-02-005 | |
| 10. Date of ALJ ruling: | March, 29, 2010 | |
| 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.10-07-048 | |
| 14. Date of Issuance of Final Decision: | July 30, 2010 | |
| 15. File date of compensation request: | Sept. 28, 2010 | |
| 16. Was the request for compensation timely? | | |

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

| # | Claimant | CPUC | Comment |
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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 |
|---|--|--------------------------|
| TURN demonstrated that the Commission should prohibit late-payment deposits for all residential customers. [Hours coded as “Dep”] | <input type="checkbox"/> D.10-07-048, Ordering Paragraph (OP) 3, 4 <input type="checkbox"/> TURN Opening Comments, 3-12-10, pp. 25-27 | |
| TURN demonstrated that the Commission should prohibit post-shutoff deposits for CARE customers. [Hours coded as “Dep”] | <input type="checkbox"/> D.10-07-048, OP 2.a (providing this protection to CARE and FERA customers) <input type="checkbox"/> TURN Opening Comments 3-12-10, pp. 27-28 | |
| TURN demonstrated that the Commission should extend the interim measure required by R.10-02-005 regarding payment plans. [Hours coded as “CPO”] | <input type="checkbox"/> D.10-07-048, OP 1 <input type="checkbox"/> D.10-07-048, p. 8 (“DRA and TURN recommend that the two interim customer service disconnection practices adopted in R.10-02-005 be continued into 2011.”) <input type="checkbox"/> TURN Reply Comments, pp. 9-11 (supporting DRA’s and NCLC’s proposals) | |
| TURN demonstrated that the Proposed Decision’s discussion of the correlation between payment plan duration and risk of default should be modified. [Hours coded as “CPO”] | <input type="checkbox"/> <i>Compare</i> D.10-07-048, p. 12 (“Although it appears from the information provided that longer payment periods result in an increased likelihood that payment plans will be broken, there may be other variables affecting these payment agreements.”) and Finding of Fact 5 (“Information from PG&E and the Joint Utilities shows that the greater the payment period, the more likely it is that a customer will default on a pay plan, however other variables may effect those payment agreements.”) <i>with</i> Proposed Decision, p. 11 (“However, it does appear from the information | |

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| | <p>provided that longer payment periods result in an increased likelihood that payment plans will be broken.”) and Finding of Fact 5 (“Information from PG&E and the Joint Utilities shows that the greater the payment period, the more likely it is that a customer will default on a pay plan.”)</p> <ul style="list-style-type: none"> <input type="checkbox"/> TURN Comments on PD, pp. 3-4 | |
| <p>TURN demonstrated that the Commission should consider allowing customers to choose their billing date as a means of reducing late payment and disconnection. [Hours coded as “CPO”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, pp. 27-28 (“In the second phase of this proceeding we will address the following issues... k. Should customers be allowed to choose a monthly billing date for their payments?”) <input type="checkbox"/> TURN Opening Comments 3-12-10, p. 32 | |
| <p>TURN demonstrated that the Commission should address the need to reduce the discrepancy among utilities in disconnection rates, as well as the discrepancy between CARE and non-CARE disconnection rate for all utilities. [Hours coded as “Ben”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, pp. 9-10 (discussing the disconcerting differences in shutoff rates among utilities and between CARE and non-CARE customers) and p. 27 (determining that these issues and how the Commission should respond will be addressed in the second phase of R.10-02-005); <i>compare with</i> Proposed Decision, pp. 8-9 and p. 25 (silent on these issues) <input type="checkbox"/> TURN Reply Comments 4-2-10, pp. 6-8 (supporting DRA’s recommendation for disconnection benchmarks as a tool for reducing disconnection rates, especially for PG&E and SCE) <input type="checkbox"/> TURN Reply Comments on the PD, p. 3 (supporting DRA’s and Greenlining’s recommendations that benchmarks and shutoff rates be addressed in the proceeding) | |
| <p>TURN demonstrated that the Commission should review the reasonableness of costs the utilities may record in their R.10-02-</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, p. 29 (“The second phase of this proceeding will address the categories and significant costs | |

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| <p>005 memorandum accounts from a holistic perspective, such as that afforded by a GRC, rather than quickly authorize cost recovery without a full exploration of pertinent issues, such as embedded versus incremental costs. [Hours coded as “Cost”]</p> | <p>associated with compliance with the practices in this proceeding. However, memorandum account cost recovery will be determined in the next GRC for each utility.”); <i>compare with Proposed Decision</i>, p. 26 (“The second phase of this proceeding will determine the process for addressing both cost reasonableness and recovery of the categories and significant costs associated with compliance with the practices in this proceeding.”)</p> <ul style="list-style-type: none"> <input type="checkbox"/> TURN Reply Comments 4-2-10, pp. 12-16 <input type="checkbox"/> TURN Reply Comments on PD, pp. 3-4 (advocating modifications to the PD to make clear that cost reasonableness will be fully explored prior to utility cost recovery, in agreement with DRA) | |
| <p>TURN demonstrated that the reporting requirements proposed by R.10-02-005 should be continued and expanded to include data points recommended by TURN. [Hours coded as “RR”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-02-005, p. 25-26 and Appendix A; <i>compare with R.10-02-005, Appendix A</i> (requiring a more narrow set of data points) <input type="checkbox"/> TURN Opening Comments 3-12-10, pp. 18-24 (recommending the addition of the following data points which were added in D.10-07-048: <ul style="list-style-type: none"> <input type="checkbox"/> total number of active accounts for CARE, FERA and non-CARE/FERA customers; <input type="checkbox"/> billing cycle data, indicating the number of customers paying 100% of the billed amount, 50-99% of the billed amount, and >50% of the billed amount, separately reported for CARE, FERA, non-CARE/FERA, and Medical Baseline residential accounts; <input type="checkbox"/> data for Medical Baseline customers, including number of active accounts, non-pay disconnections, reconnections, | |

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| | <p>and % reconnected;</p> <ul style="list-style-type: none"> <input type="checkbox"/> additional time periods for arrearage tracking, and on a <i>quarterly</i> basis, include monthly arrearage dollars in each vintage category.) | |
| <p>TURN demonstrated that the Commission should adopt protections related to service disconnection for customers who are especially sensitive to the health and safety risks associated with loss of utility service. While the Commission did not adopt the additional limits on remote disconnection proposed by TURN, the Commission agreed to consider additional consumer protections related to remote disconnection in the second phase of R.10-02-005. [Hours coded as “DP”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-02-005, p. 20, fn. 40 (offering a temporary definition of “sensitive customers” to be re-considered in Phase 2 of R.10-02-005); pp. 21-22 (requiring that all utilities “provide a field representative who can collect a payment in-person or make arrangements for payment from those customers who are on medical baseline or life-support prior to any disconnection” as a last attempt to avoid disconnection of this “vulnerable customer group”) <input type="checkbox"/> D.10-07-048, pp. 27-28 (“In the second phase of this proceeding we will address the following issues... (k.) How should sensitive customers be defined, and how can utilities identify such customers?”) <input type="checkbox"/> D.10-07-048, pp. 27-28 (“In the second phase of this proceeding we will address the following issues...(e.) Should the utilities establish a uniform protocol for remote disconnections?”) <input type="checkbox"/> TURN Opening Comments 3-12-10, pp. 14-18 (discussing the need for such protections, proposing a definition of “sensitive customers”; and discussing the challenges of and some methods for identifying sensitive customers) <input type="checkbox"/> TURN Reply Comments on PD, pp. 1-3 (advocating a clear and consistent definition of customers to be subject to heightened protections surrounding service disconnection) | |
| <p>TURN demonstrated the importance of</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, pp. 17-18 (citing the | |

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| <p>utility communications with their customers in the customer’s preferred language. [Hours coded as “Com”]</p> | <p>comments of TURN and Greenling, “We agree that many important communications may not be received when there is a language barrier... As discussed below, a topic of the next workshop in this proceeding will be identification of language choice by the customer.”)</p> <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, p. 27 (determining that the issue of customer choice of language for utility communications should be explored in the second phase of R.10-02-005) <input type="checkbox"/> TURN Opening Comments 3-12-10, pp. 4-7 | |
| <p>TURN demonstrated that the Commission should consider clarifying the role of utility customer service representatives (CSRs) in educating customers about assistance programs. [Hours coded as “Com”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, p. 27 (determining that the issue of the role of CSRs should be explored in the second phase of R.10-02-005) <input type="checkbox"/> TURN Opening Comments 3-12-10, p. 7 (advocating more standardization in CSR communications with customers) <input type="checkbox"/> TURN Reply Comments 4-2-10, pp. 4-6 (advocating that CSRs educate customers about assistance programs) | |
| <p>TURN contributed to the Commission’s evaluation of the utility proposals to use CARE funds to leverage federal dollars for emergency financial assistance grants for low-income utility customers. [Hours coded as “TEAF”]</p> | <ul style="list-style-type: none"> <input type="checkbox"/> D.10-07-048, pp. 6-7 (generally discussing the Commission’s adoption of each utility’s Temporary Energy Assistance for Families (TEAF) program via 4 resolutions issued in April 2010) <input type="checkbox"/> Res. G-3444 (analyzing PG&E’s TEAF proposal in terms of the following criteria: consistency with R.10-02-005; benefits to customers in need; shareholder vs. ratepayer contributions; minimization of administrative costs; and consumer protections, including transparency and accountability of program spending and results); <i>see also</i> Res. E-4327 (analyzing SCE’s proposal | |

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| | <p>using this same framework), Res. E-4328 (SDG&E), and Res. G-3446 (SoCalGas).</p> <ul style="list-style-type: none"> □ TURN Response to PG&E AL G-3097-G/3622-E (recommending the adoption of PG&E’s proposal because it would deliver significant benefits to PG&E’s customers at a time when this assistance is greatly needed; it includes a meaningful financial contribution from PG&E’s shareholders; it maximizes direct benefits to customers from ratepayer funds by keeping administrative costs to a minimum; and it incorporates important ratepayer protections related to program transparency and accountability, consistent with R.10-02-005); <i>see also</i> TURN Protest of SCE AL 2448-E-A, TURN Protest of SDG&E AL 2151-E-A/1937-G-A, and TURN Protest of SoCalGas AL 4086-A (using this same framework in all cases) □ <i>See i.e.</i>, Res. G-3444, p. 10 (discussing TURN’s analysis of and support for PG&E’s proposal) | |
| <p>TURN demonstrated that the Commission should ensure that the utility TEAF programs maximize direct benefits to customers in need by limiting the use of ratepayer funds on administrative costs. [Hours coded as “TEAF”]</p> | <ul style="list-style-type: none"> □ Res. G-3444, pp. 7-8 (requiring PG&E to keep ratepayer funded administrative costs to a minimum, consistent with TANF guidelines) □ TURN Response to PG&E AL G-3097-G/3622-E, pp. 5-6 (discussing PG&E’s proposed administrative costs and arguing, “Using the bulk of ratepayer funds to provide direct benefits to customers, as PG&E has proposed, maximizes the ratepayer payback from this investment. The Commission should ensure that this remains the case in approving PG&E’s proposal.”). □ Res. E-4327, p. 13 (discussing TURN’s protest related to SCE’s administrative costs proposal, SCE’s | |

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| | <p>clarifications, and stating, “SCE’s clarifications are satisfactory to TURN concerns. Therefore, the Commission finds TURN’s protest moot and SCE’s allocation for administrative costs to be reasonable.”)</p> <ul style="list-style-type: none"> □ Res. E-4328, pp. 17-18 (discussing TURN’s protest related to SDG&E’s administrative costs proposal, SDG&E’s clarifications, and finding that because SDG&E’s clarifications about administrative costs satisfy TURN’s concerns, the Commission should authorize SDG&E’s proposed allocation.) □ Res. G-3446, pp. 17-18 (discussing TURN’s protest related to SoCalGas’ administrative costs proposal, SoCalGas’ clarifications, and finding that because SoCalGas’ clarifications about administrative costs satisfy TURN’s concerns, the Commission should authorize SoCalGas’ proposed allocation.) | |
| <p>TURN demonstrated that the Commission, as part of its approval of the TEAF programs, should encourage the utilities to increase their charitable contributions to emergency financial assistance programs. [Hours coded as “TEAF”]</p> | <ul style="list-style-type: none"> □ Res. E-4327, p. 13 (discussing TURN’s recommendation that SCE further increase shareholder contributions for emergency financial assistance for customers and responding, “Additionally, the Commission highly encourages SCE to continually increase shareholders [sic] contribution towards payment assistance for needy customers as it would help to maximize benefits.”) □ Res. E-4328, p. 19 (“We do agree with TURN that during these economic conditions, any increased contribution [from shareholders] would provide greater program benefits to the utility’s customers and so we continue to encourage SDG&E to increase its shareholder contributions to NTN [Neighbor-to-Neighbor] in 2010 in order to provide the maximum program | |

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| | <p>benefits to its customers if possible.”)</p> <p><input type="checkbox"/> Res. G-3446, p. 19 (“We do agree with TURN that during these economic conditions, any increased contribution [from shareholders] would provide greater program benefits to their customers. Therefore, we encourage SoCalGas to continually increase its shareholder contributions to GAF [Gas Assistance Fund] in 2010 in order to provide the maximum program benefits to its customers if possible.”)</p> | |
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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 | |
| c. If so, provide name of other parties: The City and County of San Francisco, Disability Rights Advocates, The Greenlining Institute, the National Consumer Law Center, Pacific Gas and Electric Company, San Diego Gas and Electric Company / Southern California Gas Company, Southern California Edison Company | | |
| <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>From the outset of this proceeding, TURN has been coordinating our coverage of issues with DRA and the other consumer groups to avoid duplication to the extent possible. For instance, the consumer groups agreed on an allocation of issue coverage in opening comments filed March 12, 2010, with each party taking the lead on certain issues. (See TURN Opening Comments 3-12-2010, p. 3.) TURN provided an extensive showing on remote disconnections, especially the need for in-person contact with particularly sensitive customers during service disconnection; on reporting requirements; on re-establishment of credit deposits; and on limited issues associated with customer communications, including language access and the role of CSRs. Also, because of TURN’s work directly with consumers, TURN was also able to provide unique anecdotal information about the experiences of consumers interfacing with utility credit and collections practices. In reply comments filed April 2, 2010, TURN complemented the showing of other consumer groups on issues we had not addressed in opening comments, including tracking disconnection rates with benchmarks; payment plans; and utility cost recovery. This close coordination reduced the total amount of time TURN (and the other consumer groups) needed to devote to researching and drafting opening and reply comments, while</p> | | |

providing the Commission with a full record upon which to resolve the issues before it. Additionally, TURN was the only party to file a response or protest to the utility advice letters proposing programs to implement the Commission’s directive in R.10-02-005 regarding using CARE funds to leverage federal ARRA/TANF funds for emergency financial assistance for low-income utility customers. These programs, called Temporary Energy Assistance for Families (TEAF) in D.10-07-048, were adopted by the Commission in resolutions adopted in April 2010.

For these reasons, TURN submits that there was no undue duplication between TURN’s participation and that of DRA and the other consumer groups, and that any duplication served to supplement, complement or contribute to the showing of other consumer groups in the proceeding.

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

| # | Claimant | CPUC | Comment |
|---|----------|------|---------|
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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 |
|---|---------------|
| <p>TURN cannot easily identify precise monetary benefits to ratepayers from our work in related to D.10-07-048, given the nature of the issues presented. However, the Commission should treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with TURN’s participation.</p> <p>TURN’s advocacy reflected in D.10-07-048 addressed policy matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot identify precise monetary benefits to ratepayers from our participation. However, our efforts will afford residential customers greatly expanded opportunities to avoid service termination and continue receiving gas and electricity service. Because utility shutoffs trigger all</p> | |

¹ See, i.e. D.06-10-013, p. 23, issued in R.04-01-006, addressing post-2003 low-income policies and programs (finding that TURN’s efforts had been productive under the meaning of the intervenor compensation statute, since TURN’s efforts “influenced the Commission to adopt policies that will increase the likelihood that low-income customers will continue to receive gas and electricity service during the winter of 2005-2006.”).

kinds of financial impacts, including service reinstatement costs, food spoilage and replacement costs, and possibly eviction, in addition to a host of health and safety issues, policies that assist consumers in being able to pay their bills, manage arrearages, and avoid shutoffs bestow enormous benefits upon those Californians most in need of assistance. Accordingly, the Commission should find that TURN's efforts have been productive.

B. Specific Claim:

| CLAIMED | | | | | | CPUC AWARD | | | |
|--|------|--------|---------|--|--------------------|------------------|-------|---------|----------|
| ATTORNEY AND ADVOCATE FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| Hayley Goodson, TURN Staff Attorney | 2010 | 128.25 | \$295 | D.08-04-010, p. 8 (authorizing "step" increases) | \$37,833.75 | | | | |
| Robert Finkelstein, TURN Litigation Director | 2010 | 3.00 | \$470 | Res. ALJ-247 | \$1,140.00 | | | | |
| Marcel Hawiger, TURN Staff Attorney | 2010 | 0.75 | \$325 | D.10-04-050, p. 7 | \$243.75 | | | | |
| Subtotal: | | | | | \$39,487.50 | Subtotal: | | | |
| EXPERT FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| Jeffrey A. Nahigian, JBS Energy, Inc. | 2010 | 8.25 | \$190 | D.09-04-027, p. 10 | \$1,567.50 | | | | |
| Subtotal: | | | | | \$1,567.50 | 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 \$ |
| N/A | | | | | \$0 | | | | |
| Subtotal: | | | | | \$0 | Subtotal: | | | |

| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | | |
|--|--------------|--|----------|-----------------------|--------------------|------------------------|-------|---------|----------|
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| Hayley Goodson | 2010 | 11.75 | \$147.50 | ½ regular hourly rate | \$1,733.13 | | | | |
| Subtotal: | | | | | \$1,733.13 | Subtotal: | | | |
| COSTS | | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | | |
| 1 | Photocopying | Photocopies of TURN's pleadings related to Phase 1 of R.10-02-005 | | | \$44.40 | | | | |
| 2 | Phone | Telecommunications related to TURN's participation in Phase 1 of R.10-02-005 | | | \$2.50 | | | | |
| 3 | Postage | Postage costs related to TURN's participation in Phase 1 of R.10-02-005 | | | \$14.68 | | | | |
| Subtotal: | | | | | \$61.58 | Subtotal: | | | |
| TOTAL REQUEST \$: | | | | | \$42,849.71 | TOTAL AWARD \$: | | | |
| <p>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.</p> | | | | | | | | | |

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

| Attachment or Comment # | Description/Comment | | | | | | | | |
|-------------------------|--|------|-------------|-----|---|-----|---|------|--|
| 1 | Certificate of Service | | | | | | | | |
| Attachment 2 | Time sheets for TURN's attorneys and expert consultant showing coded time entries | | | | | | | | |
| Attachment 3 | TURN direct expenses associated with Phase 1 of R.10-02-005 | | | | | | | | |
| Comment 1 | <p>Allocation of TURN Attorney Hours by Issue/Activity Code: TURN has allocated all of our attorney time by issue area or activity, as evident on our attorney timesheets attached to this request for compensation.</p> <p>The following codes relate to specific substantive issue areas addressed by TURN:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Code</th> <th>Stands For:</th> </tr> </thead> <tbody> <tr> <td>Ben</td> <td>Benchmarks – work related to comparing utility disconnection rates and eliminating the discrepancy between utilities and CARE / non-CARE customer shutoff rates within each utility</td> </tr> <tr> <td>Com</td> <td>Customer Communications – work related to utility communications with their customers</td> </tr> <tr> <td>Cost</td> <td>Cost Recovery – work related to utility recovery of costs associated with the Commission's orders in R.10-02-005</td> </tr> </tbody> </table> | Code | Stands For: | Ben | Benchmarks – work related to comparing utility disconnection rates and eliminating the discrepancy between utilities and CARE / non-CARE customer shutoff rates within each utility | Com | Customer Communications – work related to utility communications with their customers | Cost | Cost Recovery – work related to utility recovery of costs associated with the Commission's orders in R.10-02-005 |
| Code | Stands For: | | | | | | | | |
| Ben | Benchmarks – work related to comparing utility disconnection rates and eliminating the discrepancy between utilities and CARE / non-CARE customer shutoff rates within each utility | | | | | | | | |
| Com | Customer Communications – work related to utility communications with their customers | | | | | | | | |
| Cost | Cost Recovery – work related to utility recovery of costs associated with the Commission's orders in R.10-02-005 | | | | | | | | |

| | CPO | Customer Payment Options -- work related to payment plans and other payment options, including customer choice of billing date | | | | | | | | | |
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| | Dep | Customer Deposits -- work related to deposits, particularly, re-establishment of credit deposits following late payment or service termination for non-payment, intended to reduce the financial burden on customers already struggling to keep up with bills and prevent shutoff | | | | | | | | | |
| | DP | Disconnection Protections – work related to consumer protections associated with service disconnection, including protections for “sensitive customers” and remote disconnections | | | | | | | | | |
| | RR | Reporting Requirements – advocacy related to reporting requirements | | | | | | | | | |
| | TEAF | Temporary Energy Assistance for Families – work related to Res. G-3444, Res. E-4327, Res. 4328, and Res. G-3446, which authorized the use of CARE funds by PG&E, SCE, SDG&E, and SoCalGas (respectively) as matching funds to leverage federal grants for customer emergency financial assistance available through the TANF Emergency Fund | | | | | | | | | |
| | TURN has additionally allocated attorney time to the following codes: | | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th data-bbox="430 948 568 991">Code</th> <th data-bbox="568 948 1461 991">Stands For:</th> </tr> </thead> <tbody> <tr> <td data-bbox="430 991 568 1078">Coord</td> <td data-bbox="568 991 1461 1078">Coordination with other parties -- meetings, phone calls, e-mails with DRA and other intervenors about issue coverage, strategy, etc.</td> </tr> <tr> <td data-bbox="430 1078 568 1153">GP</td> <td data-bbox="568 1078 1461 1153">General Participation -- work that spans multiple issues and/or would not vary with the number of issues that TURN addresses, for the most part</td> </tr> <tr> <td data-bbox="430 1153 568 1282">PD</td> <td data-bbox="568 1153 1461 1282">Proposed Decision -- work on analyzing, commenting on, lobbying on, strategizing on the PD and revisions thereto</td> </tr> </tbody> </table> | | | Code | Stands For: | Coord | Coordination with other parties -- meetings, phone calls, e-mails with DRA and other intervenors about issue coverage, strategy, etc. | GP | General Participation -- work that spans multiple issues and/or would not vary with the number of issues that TURN addresses, for the most part | PD | Proposed Decision -- work on analyzing, commenting on, lobbying on, strategizing on the PD and revisions thereto |
| Code | Stands For: | | | | | | | | | | |
| Coord | Coordination with other parties -- meetings, phone calls, e-mails with DRA and other intervenors about issue coverage, strategy, etc. | | | | | | | | | | |
| GP | General Participation -- work that spans multiple issues and/or would not vary with the number of issues that TURN addresses, for the most part | | | | | | | | | | |
| PD | Proposed Decision -- work on analyzing, commenting on, lobbying on, strategizing on the PD and revisions thereto | | | | | | | | | | |
| | Finally, TURN has coded hours “ Comp ” that were devoted to preparation of this request for compensation. | | | | | | | | | | |
| Comment 2 | <p>Hourly Rates for TURN Attorneys:</p> <p><u>Hayley Goodson’s 2010 Rate</u></p> <p>In Res. ALJ-247, the Commission did not adopt any COLA adjustment for 2010. However, it explicitly continued the previously adopted policy of “step increases” for 2008 and beyond. Res. ALJ-247, pp. 4-5. In D.08-04-010, the Commission had provided for up to two annual 5% “step increases” in hourly rates within each experience level for all intervenor representatives, and specifically explained that an attorney would be eligible for additional step increases upon reaching the next higher experience level. D.08-04-010, pp. 2, 11-12.</p> <p>TURN seeks an hourly rate of \$295 for Ms. Goodson’s work in 2010. This figure represents the hourly rate previously adopted for her work in 2008 and 2009 escalated by a 5% step increase (rounded to the nearest \$5 increment). Ms. Goodson is a 2003 law school graduate.</p> | | | | | | | | | | |

| | |
|-----------|---|
| | <p>In 2008, TURN sought and was awarded an hourly rate of \$280, the low end of the range set for attorneys with 5-7 years of experience. D.08-08-027, p. 5 (adopting the requested rate), and D.08-04-010, p. 5 (setting the ranges for 2008). This is the first step increase TURN has sought for Ms. Goodson upon reaching this experience level.</p> <p>TURN's showing in support of this requested increase is based on and consistent with the showing UCAN made in C.08-08-026 in support of the requested increase for its attorney's hourly rate. The Commission approved the requested increase in D.10-08-018 (p. 8).</p> <p><u>Marcel Hawiger's 2010 Rate</u></p> <p>TURN requests that the Commission apply the 2009 rate for Marcel Hawiger to his very limited number of hours in 2010 in this proceeding. However, we reserve the right to seek a higher billing rate for Mr. Hawiger's work in 2010 in future requests for compensation.</p> |
| Comment 3 | <p>TURN asked Mr. Nahigian of JBS Energy to attend PG&E's focus groups on customer communication that were held in Sacramento, whereas the Bay Area focus groups were attended by TURN employees. TURN used the data obtained from PG&E's focus groups in preparing our comments in this proceeding. By sending Mr. Nahigian rather than TURN attorney Hayley Goodson (TURN's lead on this case), TURN was able to avoid travel-related expense because Mr. Nahigian lives and works in the Sacramento area. Mr. Nahigian's time devoted to participating in these focus groups and reporting back to TURN was a significantly more efficient use of resources than would have been required for Ms. Goodson to attend.</p> |

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:
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:

akbar.jazayeri@sce.com
aliciam@greenlining.org
Ariel.Son@PacifiCorp.com
atr@cpuc.ca.gov
austin.yang@sfgov.org
Barb.Coughlin@PacifiCorp.com
bmd@cpuc.ca.gov
BWT4@pge.com
bxlc@pge.com
californiadockets@pacificorp.com
case.admin@sce.com
cassandra.sweet@dowjones.com
catherine.mazzeo@swgas.com
cem@newsdata.com
CentralFiles@SempraUtilities.com
chris.dominski@sce.com
d1ct@pge.com
dadelloso@sgvwater.com
darlenewong@nclc.org
debra.gallo@swgas.com
dfc2@pge.com
dlf@cpuc.ca.gov
Don.soderberg@swgas.com
DxPU@pge.com
ELL5@pge.com
emello@sppc.com
GHealy@SempraUtilities.com
hayley@turn.org
hodgesjl@surewest.net

holly.lloyd@swgas.com
hym@cpuc.ca.gov
jackk@mid.org
james.yee@sce.com
jason.dubchak@niskags.com
jeanne.smith@sce.com
jeanne.sole@sfgov.org
Jennifer.Shigekawa@sce.com
jhowat@nclc.org
John.Montanye@sce.com
joyw@mid.org
kaf4@pge.com
KHassan@SempraUtilities.com
kristien.tary@swgas.com
KWickware@SempraUtilities.com
kwz@cpuc.ca.gov
lindaf@mid.org
llsm@pge.com
louh@mid.org
lwt@cpuc.ca.gov
map@cpuc.ca.gov
Marisa.Decristoforo@PacifiCorp.com
Marybeth.quinlan@sce.com
mday@goodinmacbride.com
michaelebailey@cox.net
michelle.mishoe@pacificorp.com
mike@alpinenaturalgas.com
mjd@cpuc.ca.gov
MLW3@pge.com
monica.ghattas@sce.com
pucservice@dralegal.org
ralf1241a@cs.com
regrelcpucases@pge.com
rhd@cpuc.ca.gov
rkmoore@gswater.com
rla4@pge.com
samuelk@greenlining.org
smithsj@sce.com
SRRd@pge.com
stephaniec@greenlining.org
tburke@sflower.org
TCahill@SempraUtilities.com
tdillard@sppc.com

tjryan@sgvwater.com
TNF@cpuc.ca.gov
trdill@westernhubs.com
valerie.ontiveroz@swgas.com
wamer@kirkwood.com
westgas@aol.com
zca@cpuc.ca.gov

Executed this 28th day of September, 2010, at San Francisco,
California.

/S/

Larry Wong
The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104
Tel: (415) 929-8876

Attachment 2

Time sheets for TURN's attorneys and expert consultant showing coded time entries

| Date | Attorney | Activity | Description | Time Spent |
|---------------------|----------|----------|---|------------|
| <u>Attorney: BF</u> | | | | |
| 3/10/2010 | BF | Cost | Review HG e-mail memo re: disconnection position for cmmts; draft response | 0.50 |
| 4/2/2010 | BF | Cost | Review reply cmmts; email HG re: same | 0.50 |
| Total: Cost | | | | 1.00 |
| 3/18/2010 | BF | TEAF | Review and edit protest to SCG A.L. on fed funds | 0.75 |
| 3/18/2010 | BF | TEAF | Review HG drafts of protests to util ALs on fed funding | 0.75 |
| 3/23/2010 | BF | TEAF | Discuss fed funding issues w/ HG; e-mail to DRA | 0.50 |
| Total: TEAF | | | | 2.00 |
| Total: BF | | | | 3.00 |
| <u>Attorney: HG</u> | | | | |
| 4/2/2010 | HG | Ben | reply cmnts -- benchmarking disconnection rates | 2.00 |
| Total: Ben | | | | 2.00 |
| 2/4/2010 | HG | COM | review PG&E focus group materials, compile input from colleagues for PG&E | 1.00 |
| 2/8/2010 | HG | COM | discuss focus groups coverage internally & with JBS and DRA; attend 2 Oakland focus groups | 5.00 |
| 2/9/2010 | HG | COM | prep Jeff Nahigian for Sacto focus groups tonight | 0.75 |
| 2/10/2010 | HG | COM | prep Larry for focus groups in SF on Thursday; review Jeff's notes from Sacto focus groups; review Lee-Whei's notes from Oak groups | 1.50 |
| 3/4/2010 | HG | COM | review notes fm PG&E focus gps, gather data re TURN complaints, draft cmnts (customer communications) | 1.75 |
| 3/8/2010 | HG | COM | talk to GL about customer outreach/education issues in OIR; review doc fm GL | 0.75 |
| 3/11/2010 | HG | COM | edit, finalize cmnts on customer communications | 0.75 |
| 4/1/2010 | HG | COM | reply cmnts -- customer communications | 2.00 |
| 4/2/2010 | HG | COM | reply cmnts -- cont. customer communications | 0.50 |
| Total: COM | | | | 14.00 |
| 3/10/2010 | HG | CPO | work on cmnts re customer payment options | 1.00 |
| 4/2/2010 | HG | CPO | reply cmnts -- customer payment options, finalize | 3.75 |
| Total: CPO | | | | 4.75 |
| 2/26/2010 | HG | Comp | discuss NOI and comp request for P.09-06-022 with Bob | 0.25 |
| 3/4/2010 | HG | Comp | draft NOI | 2.00 |
| 9/27/2010 | HG | Comp | work on comp req /D.10.07-048 | 7.00 |
| 9/28/2010 | HG | Comp | cont. work on comp req /D.10-07-048 | 2.50 |
| Total: Comp | | | | 11.75 |
| 2/5/2010 | HG | Coord | prep for conf call w/ consumer groups re new OIR, attend conf call | 2.00 |

| Date | Attorney | Activity | Description | Time Spent |
|---------------------|----------|----------|--|--------------|
| 2/11/2010 | HG | Coord | prep for tomorrow's conf call w/ consumer groups re coordinating cmts | 0.50 |
| 2/12/2010 | HG | Coord | prep for, attend consumer coordination conference call | 2.00 |
| 3/5/2010 | HG | Coord | prep for conf call with intervenors; coordination conf call w/ intervenors | 1.50 |
| 3/10/2010 | HG | Coord | discuss remote shutoff coverage w/ DRA; start to review draft cmts fm DRA, DisabRA/GL | 0.50 |
| 3/11/2010 | HG | Coord | coordination w/ DRA, NCLC | 0.50 |
| 3/17/2010 | HG | Coord | talk to DRA about discovery on IOU op cmts (DRA will send DR) | 0.25 |
| 3/19/2010 | HG | Coord | discuss IOU op cmts w/ DisabRA | 0.25 |
| 3/29/2010 | HG | Coord | discuss reply cmts with NCLC | 0.25 |
| Total: Coord | | | | 7.75 |
| 4/1/2010 | HG | Cost | reply cmts -- cost issues | 6.00 |
| 5/3/2010 | HG | Cost | read IOU responses to ALJ ruling; notes; | 3.50 |
| Total: Cost | | | | 9.50 |
| 2/9/2010 | HG | DP | rsch NY remote shutoff protections | 1.50 |
| 3/4/2010 | HG | DP | talk to Nina, Jeff re AMI benefits/costs re remote disconnection | 0.25 |
| 3/8/2010 | HG | DP | talk to Jeff about remote disconnect charges | 0.25 |
| 3/9/2010 | HG | DP | rsch, draft cmts (shutoff protections) | 5.75 |
| 3/10/2010 | HG | DP | cont work on shutoff protections | 1.00 |
| 3/12/2010 | HG | DP | input fm Marcel; edits fm Jeff, Nina on shutoff protections; edit, finalize that section | 3.00 |
| 4/28/2010 | HG | DP | discovery -- draft DR to all IOUs re shutoff protocols for weather and high sensitivity customers | 0.50 |
| 5/3/2010 | HG | DP | read IOU responses to TURN DR | 2.00 |
| Total: DP | | | | 14.25 |
| 3/10/2010 | HG | Dep | work on cmts on re-establishment of credit deposits | 4.75 |
| 3/11/2010 | HG | Dep | rsch United Way study re making ends meet, edit; references to DRA recs; finalize cmts on deposits | 2.75 |
| 4/2/2010 | HG | Dep | reply cmts -- deposits | 1.00 |
| Total: Dep | | | | 8.50 |
| 2/4/2010 | HG | GP | attend CPUC meeting for discussion of new OIR; discuss w/ DRA and internally | 1.00 |
| 3/3/2010 | HG | GP | review OIR, start working on opening comments, outline | 1.50 |
| 3/12/2010 | HG | GP | finalize cmts (procedural issues, conclusion, cross ref other parties, etc) | 3.00 |
| 3/16/2010 | HG | GP | begin reading op cmts of parties, notes for reply cmts | 2.75 |
| 3/31/2010 | HG | GP | cont reading op cmts, notes for reply cmts | 7.50 |
| 4/2/2010 | HG | GP | begin reading reply cmts of other parties | 1.00 |
| 4/5/2010 | HG | GP | cont. reading other parties reply cmts | 1.75 |
| Total: GP | | | | 18.50 |
| 6/17/2010 | HG | PD | read PD | 0.25 |

| Date | Attorney | Activity | Description | Time Spent |
|--------------------|----------|----------|---|--------------|
| 7/6/2010 | HG | PD | discuss cmts on PD w/ DRA, DisabRA | 0.25 |
| 7/6/2010 | HG | PD | review materials, begin drafting cmts on PD | 2.00 |
| 7/7/2010 | HG | PD | cont drafting cmts on PD | 3.00 |
| 7/7/2010 | HG | PD | begin review of other parties op cmts | 1.50 |
| 7/12/2010 | HG | PD | cont review of other parties op cmts & draft reply cmts | 4.00 |
| 7/12/2010 | HG | PD | skim other parties' reply cmts | 0.50 |
| 7/22/2010 | HG | PD | talk with DRA re exparte meetings | 0.25 |
| 7/26/2010 | HG | PD | prep for, attend ex parte meetings with consumer gps | 2.00 |
| 7/28/2010 | HG | PD | review revised PD; attend ex parte meeting with consumer gps | 2.50 |
| Total: PD | | | | 16.25 |
| 3/10/2010 | HG | RR | review proposed rep. reqs in OIR, compare with data being provided to TURN fm SCE and Sempra; draft cmts re importance of rep reqs and recommend expanded data points | 3.00 |
| 3/11/2010 | HG | RR | continue, finalize cmts on reporting reqs | 1.00 |
| 7/19/2010 | HG | RR | discuss reporting reqs meeting w/ DRA | 0.50 |
| 7/23/2010 | HG | RR | conf call w/ IOUs on reporting reqs | 1.50 |
| 7/28/2010 | HG | RR | reporting reqs conf call with IOUs | 1.00 |
| Total: RR | | | | 7.00 |
| 2/8/2010 | HG | TEAF | rsch, edit PG&E's REACH advice letter; discuss w/ DRA | 1.25 |
| 2/9/2010 | HG | TEAF | add to edits - PG&E REACH advice letter, discuss w/ DRA, PG&E; review DRA edits | 1.00 |
| 2/10/2010 | HG | TEAF | (PG&E's REACH AL) rsch, respond to DRA's request for info | 0.50 |
| 2/11/2010 | HG | TEAF | materials to DRA re PG&E REACH proposal | 0.50 |
| 2/12/2010 | HG | TEAF | discuss PG&E REACH proposal w/ DRA | 0.25 |
| 2/12/2010 | HG | TEAF | discuss SF focus groups w/ Larry | 0.25 |
| 2/18/2010 | HG | TEAF | discuss PG&E REACH proposal w/ DRA | 0.25 |
| 2/22/2010 | HG | TEAF | review latest draft of PG&E AL edits fm DRA | 0.25 |
| 2/24/2010 | HG | TEAF | read PG&E's REACH AL; outline TURN's response | 1.50 |
| 2/25/2010 | HG | TEAF | draft response to PG&E's REACH AL | 5.50 |
| 2/26/2010 | HG | TEAF | edit response to PG&E's REACH AL; discuss w/ DRA | 0.50 |
| 3/2/2010 | HG | TEAF | discuss PG&E's REACH AL w/ DRA; discuss progress by other IOUs on putting together similar proposals w/ DRA; finalize TURN response | 1.00 |
| 3/16/2010 | HG | TEAF | read SCE, SDG&E, SoCalGas ALs re CARE/TANF program | 0.50 |
| 3/17/2010 | HG | TEAF | talk to DRA about CARE/TANF advice letters (SCE, Sempra) -- TURN will prepare responsive pleadings; discuss strategy with Bob; rsch for protests | 2.50 |
| 3/18/2010 | HG | TEAF | draft protest of SoCalGas AL; draft protest of SDG&E AL; notes for SCE protest | 6.50 |
| 3/19/2010 | HG | TEAF | draft SCE AL protest, discuss w/ BF; finalize all 3 protests | 2.00 |
| 3/22/2010 | HG | TEAF | read SCE, Sempra replies to TURN protests of TANF/CARE Als | 0.25 |
| 3/23/2010 | HG | TEAF | Sempra CARE/TANF Als -- discuss next steps re Sempra IOUs' reply to TURN protest / ED draft resolution w/ DRA, BF | 0.75 |
| 3/29/2010 | HG | TEAF | Sempra CARE/TANF Als -- discuss next steps w/ DRA and draft follow-up email | 0.50 |
| Total: TEAF | | | | 25.75 |

| Date | Attorney | Activity | Description | Time Spent |
|----------------------------------|-----------------|----------|---|------------|
| Total: HG | | | | 140.00 |
| <u>Attorney: JBS--J Nahigian</u> | | | | |
| 2/8/2010 | JBS--J Nahigian | COM | discuss focus group stuff w/Hayley | 0.25 |
| 2/9/2010 | JBS--J Nahigian | COM | prep for and attend focus group | 6.00 |
| 2/10/2010 | JBS--J Nahigian | COM | debrief TURN/JBS and brainstorm solutions | 1.50 |
| Total: COM | | | | 7.75 |
| 3/8/2010 | JBS--J Nahigian | DP | discuss remote disconnect costs/policies | 0.25 |
| 3/11/2010 | JBS--J Nahigian | DP | review TURN draft comments | 0.25 |
| Total: DP | | | | 0.50 |
| Total: JBS--J Nahigian | | | | 8.25 |
| <u>Attorney: MH</u> | | | | |
| 3/12/2010 | MH | DP | Research tariffs and decisions re termination of service; propose rule re termination in winter | 0.75 |
| Total: DP | | | | 0.75 |
| Total: MH | | | | 0.75 |
| Grand Total | | | | 152.00 |

Attachment 3

TURN direct expenses associated with Phase 1 of R.10-02-005

| Date | Activity | Description | Billed |
|----------------------------|-------------|--|---------|
| <u>Activity: \$Copies</u> | | | |
| 3/2/2010 | Photocopies | Advise letter. 7pp x 2cc | \$2.80 |
| 3/5/2010 | Photocopies | NOI. 10pp x 2cc | \$4.00 |
| 3/12/2010 | Photocopies | Opening Comment. 58pp x 2cc | \$23.20 |
| 4/2/2010 | Photocopies | Reply Comments. 18cc x 2pp | \$7.20 |
| 7/7/2010 | Photocopies | Comment on the Proposed Decision of Commissioner Grueneich. 10pp x 2cc | \$4.00 |
| 7/12/2010 | Photocopies | Reply Comments on the Proposed Decision of Commissioner Grueneich. 8pp x 2cc | \$3.20 |
| Total: \$Copies | | | \$44.40 |
| <u>Activity: \$Phone</u> | | | |
| 4/15/2010 | Phone/Fax | Sprint Invoice; \$2.01 | \$2.01 |
| 6/15/2010 | Phone/Fax | Sprint Invoice; \$0.49 | \$0.49 |
| Total: \$Phone | | | \$2.50 |
| <u>Activity: \$Postage</u> | | | |
| 3/2/2010 | Postage | Advise letter | \$2.10 |
| 3/5/2010 | Postage | NOI. | \$2.10 |
| 3/12/2010 | Postage | Opening Comment. | \$3.50 |
| 4/2/2010 | Postage | Reply Comments. | \$2.78 |
| 7/7/2010 | Postage | Comment on the Proposed Decision of Commissioner Grueneich. | \$2.10 |
| 7/12/2010 | Postage | Reply Comments on the Proposed Decision of Commissioner Grueneich. | \$2.10 |
| Total: \$Postage | | | \$14.68 |
| Grand Total | | | \$61.58 |