

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

<p>Order Instituting Rulemaking on the Commission's Own Motion to Address the Issue of Customers' Electric and Natural Gas Service Disconnection</p>	<p>Rulemaking 10-02-005</p>
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CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

<p>Claimant: The Greenlining Institute</p>	<p>For contribution to D.10-07-048</p>		
<p>Claimed (\$): \$41,284.50</p>	<p>Awarded (\$):</p>		
<p>Assigned Commissioner: Grueneich</p>	<p>Assigned ALJ: Bruce DeBerry</p>		
<p>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>			
		<p>Signature: /s/ Samuel S. Kang</p>	
<p>Date:</p>	<p>September 28, 2010</p>	<p>Printed Name:</p>	<p>Samuel S. Kang</p>

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

A. Brief Description of Decision:

The decision resolved this phase of the proceeding requiring that PG&E, SDG&E, SCE, and SoCal Gas ("Utilities") implement several practices by October 1, 2010 in order to reduce the number of utility disconnections and mitigate future spikes in the number of disconnections. The decision also ordered further investigation of additional practices and policies in Phase II to reduce the number of disconnections.

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:	[REDACTED]	
2. Other Specified Date for NOI:	March 5, 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.10-07-48	
14. Date of Issuance of Final Decision:	July 29, 2010	
15. File date of compensation request:	September 28, 2010	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment

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

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

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p>Issue A – Payment Plans</p> <ul style="list-style-type: none"> - Argued for a permanent shift to the practice adopted in Order Instituting Rulemaking 10-02-005 (OIR), which requires all Customer Service Representatives (CSRs) to offer payment plans for a minimum of three months and up to twelve months, depending on the particulars of the customer’s situation and ability to pay. (Reply Comments on OIR, pp. 3-5; Opening Comments on Proposed Decision (PD), p. 2; Reply Comments on PD, pp. 1-4) - While longer payment plans may be statistically more likely to be broken, it has not been demonstrated that the length of the payment plan causes the increase in likelihood the plan will be broken. (Reply Comments on OIR, pp. 4-5) 	<p>D.10-07-048 (Decision), pp. 1-2, 11-12, 31-32 (Order #1): Requires that Utilities offer payments plan for a minimum of three months and up to twelve as appropriate.</p> <p>While the Decision did not adopt Greenlining’s argument for a permanent minimum payment plan period, it did extend the requirement through January 1, 2012 and possibly beyond. In considering how long the minimum payment plan should remain in effect, the Commission benefitted from Greenlining’s advocacy for a permanent minimum.</p> <p>Decision pp. 12, 30 (Finding of Fact (FOF) 5): Acknowledges that factors other than the length of the payment plan may affect the likelihood that it will be broken.</p>	

<p>Issue B – Deposits</p> <ul style="list-style-type: none"> - Reestablishment of credit deposits should be waived for all customers. (Reply Comments on the OIR, pp. 5-6; Opening Comments on the PD, pp. 5-6; Reply Comments on the PD, pp. 3-4) - Argued that the amount charged for reestablishment of credit deposits should be based on the demonstrated risk incurred by the utility. (Opening Comments on the PD, p. 6) - Argued that interim waiver of late payment deposits for all customers should be made permanent, with no sunset. (Opening Comments on the PD, p. 6; Reply Comments on the PD, pp. 1-2) 	<p>D.10-07-048 pp. 2, 15, 32 (Orders 3 and 4): Waives reestablishment of credit deposits for late payment for all customers. Decision pp. 2, 14, 29, 32 (Order 2a): Waives reestablishment of credit deposits for FERA customers</p> <p>Decision pp. 2, 15, 33 (Orders 8 and 9): Reduces non-CARE reestablishment of credit deposits from twice the maximum bill to twice the average bill.</p> <p>Decision pp. 3, 25, 34 (Orders 15 and 16): Waiver of late payment deposits will be in effect until effective date of next GRCs in the cases of SCE and the Joint Utilities, and in the case of PG&E, until a comparable date to be determined later. Decision specifically cites Greenlining’s argument in discussion.</p> <p>While the decision ultimately did not go as far as Greenlining recommended on any of these points, it did address each one. As such, Greenlining’s arguments made a substantial contribution to the Commission’s consideration of these issues.</p>	
<p>Issue C – Notification, Communications and Customer Service Issues</p> <ul style="list-style-type: none"> - Argued that current practices for notification are too varied across utilities and are not effective. Utilities need to create a set standard for notification procedures and for improving customer outreach efforts. (Opening 	<p>D.10-07-048 pp. 3, 20, 33 (Order 10): Utilities must collaborate to establish best practices and adopt uniform procedures. Best practices for providing notice will also be further explored in Phase II (Decision, p. 27).</p>	

<p>Comments on OIR, pp. 28-29;</p> <ul style="list-style-type: none"> - Live person-to-person conversations are the best means of communicating with customers, preferable to automated calls. (Opening Comments on OIR, p. 5; Reply Comments on OIR, p. 7) - Customers should not be required to initiate contact with the utility regarding available assistance with arrearage management. (Opening Comments on the OIR, pp. 14-15; Reply Comments on the OIR, p. 11) - Customer service representatives (CSRs) should use conversation guidelines, rather than scripts, when dealing with customers facing a shutoff. (Opening Comments on the OIR, pp. 16-17; Reply Comments on OIR, p. 12; Opening Comments on the PD, pp. 3-4) - Utilities must provide an in-person visit by a field worker prior to disconnection for all customers, to identify any health or safety risks associated with disconnection and to make arrangements for payment. (Opening Comments on the PD, pp. 8-9; Reply Comments on the PD, pp. 4-5) - The Commission must inclusively define “sensitive customers” in the context of in-person field visits prior to shutoff and limits on 	<p>Decision, p. 27: The role of CSRs in educating customers about assistance programs will be explored in Phase II.</p> <p>Issues of how best to communicate with customers, who should be responsible for initiating the conversation about financial assistance, and the way CSRs should conduct conversations with customers will presumably all be addressed as part of this assessment of the role of CSRs. Since this Decision only addresses directly those provisions that can be quickly implemented at relatively low cost, deferral of these issues to Phase II indicates that the Commission considers them important enough to warrant more time for assessment. Greenlining’s arguments contributed to the Commission’s assessment and deferral of these issues.</p> <p>Decision pp. 2, 21-22, 30 (FOF 15), 32 (Order 2b), 34 (Orders 11 and 12): Requires an in-person visit from a utility representative prior to shutoff for customers on medical baseline or life support.</p> <p>The Commission weighed its options regarding provision of in-person visits prior to disconnection, and while Greenlining’s full recommendation was not ultimately adopted, it did make a substantial contribution to the Commission’s decision-making process.</p> <p>Decision p. 28: Definition of sensitive customers, as well as how best to identify such customers, will be addressed in Phase II.</p>	
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<p>remote disconnections. Recommended including medical baseline, life support, residents over 62 years of age, and the disabled and others for whom disconnection may pose unusual health or safety risks. (Reply Comments on Proposed Decision, p. 4)</p> <ul style="list-style-type: none"> - Advocated for alternate billing and payment dates to maximize customers' ability to pay. (Reply Comments on the OIR, pp. 15-16; Opening Comments on the PD, pp. 2-3; Reply Comments on the PD, p. 3) 	<p>Deferral of this issue to Phase II indicates that the Commission acknowledges the need to address it, and elects to do so in a forum that allows more time for careful consideration.</p> <p>Decision p. 28: Phase II of the proceeding will address whether customer should be allowed to choose a monthly billing date for their payments.</p>	
<p>Issue D – Language Access</p> <ul style="list-style-type: none"> - Utilities should identify the most frequently spoken non-English languages among their customer bases. (Opening Comments on the OIR, pp. 8-9, 9-11; Reply Comments on the OIR, pp. 8-9, 10) - Utilities should strive to provide all written communications in the customer's preferred language, of those languages that are most frequently spoken, for those who have limited English proficiency. Should costs or implementation prove too burdensome, at a minimum the utilities should provide in-language disconnection notices and information on where the customer can seek assistance. (Opening Comments on the OIR, pp. 8-9; Reply Comments on the OIR, pp. 7, 8, 9; Opening Comments on the PD, p. 7) - Utilities should make available CSRs fluent in the most frequently spoken languages during all hours of call center operation. Further, all CSRs should be provided with 	<p>D.10-07-048, p. 30 (FOF 11): Decision found that “[i]t is desirable that the utilities offer to communicate with customers using the customer’s language of choice.”</p> <p>Decision, p. 17-18: Encourages collection of language preference data by the utilities. Further, as part of Phase II, plans a workshop on identification of customer language choices, and plans to explore the potential for use of a single third-party language service entity.</p> <p>Decision, p. 27: States that the rulemaking will explore language selection options in Phase II.</p> <p>Since issues that may require more time to resolve have been deferred to Phase II, a deferral on this issue indicates that Greenlining’s contribution was substantial, in that it has been deemed to warrant further, closer consideration in the next phase.</p>	

<p>cultural competency training to enable them to better communicate with limited English proficient customers. (Opening Comments on the OIR, pp. 8-9, 11, 17)</p>		
<p>Issue E – Remote Shutoffs</p> <ul style="list-style-type: none"> - Opposed remote disconnections while this new technology is under investigation by the Commission, and until customer side benefits of Smart Meters are more fully deployed. (Opening Comments on the OIR, pp. 30-31; Opening Comments on the PD, p. 10; Reply Comments on the PD, p. 5) - Utilities should provide an in-person visit by a field representative prior to remote disconnection, to check for unsafe conditions and allow a chance for in-person payment resolution to avoid disconnection. (Reply Comments on the OIR, pp. 13-14, 16; Reply Comments on the PD, p. 5) - Advocated for increased customer outreach and education as well as a one year transition period, during which no remote disconnections would be permitted (as an alternative to the above). (Opening Comments on the PD, p. 10; Reply Comments on the PD, p. 5) - There should be no charges for remote disconnection or reconnection. If a customer is remotely disconnected but settles the arrearage within 48 hours, no fees or reestablishment of credit deposit should be assessed. (Reply Comments on the OIR, p. 13; Opening Comments on the PD, p. 10; Reply Comments on the PD, p. 5) 	<p>D.10-07-048, p. 27: Phase II of the proceeding will address establishing a uniform protocol for remote disconnections.</p> <p>Decision, pp. 2, 21-22, 30 (FOF 15), 32 (Order 2b), 34 (Orders 11 and 12): Acknowledges that sensitive customers may not respond to various notices, letters, or phone calls. Requires an in-person visit from a utility representative prior to shutoff for a customer who is on medical baseline or life support.</p> <p>While the Decision did not ultimately go as far as Greenlining advocated, Greenlining made substantial contributions on the issue that were undoubtedly weighed in the Commission’s consideration of how best to protect customers’ health and safety once remote disconnections become the norm. Further, the issue remains open for consideration in Phase II, indicating that there are unresolved issues raised in Phase I, including those raised by Greenlining, that the Commission believes must be resolved (the issue of charges or fees for remote disconnection, for example). The Decision refers to Greenlining’s arguments specifically at p. 22.</p>	

<p>Issue F – Outreach and Education</p> <ul style="list-style-type: none"> - Utilities should collaborate with community based organizations and faith based organizations to better reach customers with language, cultural, or physical barriers. (Opening Comments on the OIR, pp. 11, 16. 24-27; Reply Comments on the OIR, pp. 16-17; Opening Comments on the PD, pp. 4, 7, 12) - Utilities should utilize ethnic media as part of their outreach and education strategy. (Opening Comments on the OIR, p. 26; Reply Comments on the OIR, p. 10) 	<p>D.10-07-048, p. 27: Phase II of the proceeding will address the role of CSRs in educating customers about assistance programs and for completing CARE applications.</p> <p>The Decision leaves somewhat vague the contemplated parameters of this discussion, presumably to be fleshed out when the Commission is ready to engage in it. However, the utilities have some long-standing partnerships with community based organizations to provide assistance in completing CARE applications. As such, in addressing the role of CSRs in this activity, it is certain that the role of CBOs and FBOs will also be discussed.</p>	
<p>Issue G - Benchmarks</p> <ul style="list-style-type: none"> - The Commission should establish benchmarks for each utility to serve as an early warning system so that future increases in disconnection rates can be quickly identified and addressed. (Opening Comments on the PD, p. 11; Reply Comments on the PD, pp. 1-2). 	<p>D.10-07-048, pp. 9, 27: Expressed concern over the discrepancy between CARE and non-CARE disconnection rates, and over the discrepancy in disconnection rates between the utilities. Plans to explore the issue further in Phase II.</p> <p>Throughout the proceeding, in discussions with the Commissioners, staff, and the utilities, the issues of benchmarking and the above-identified discrepancies went hand in hand. The Commission clearly intends to examine what might be acceptable rates of disconnection</p>	

	<p>statewide and for each utility in addressing the above issues, which aligns with the issue of benchmarking. It has been indicated to consumer groups that these issues will be addressed together. Since the issue remains live for consideration, it stands to reason that Greenlining's contribution to Phase I discussions of the issue was substantial.</p>	
<p>Settlement Agreement with the Sempra Utilities</p> <p>Greenlining was an active participant in the extensive settlement discussions that were conducted first among all parties, and later between the consumer parties and the Sempra utilities.</p> <p>With respect to the agreement with the Sempra utilities, currently before the Commission for adoption, Greenlining was especially vocal around issues of language access, in-person and telephone 48 hour disconnection notices, remote disconnections, and benchmarks.</p>	<p>While the agreement that resulted from these discussions is still awaiting Commission approval, the parties are hopeful that it will be approved, in keeping with the Commission's stated policy encouraging settlements between the parties. In many ways, especially on the language access issues that were central to Greenlining's participation in this proceeding, the agreement goes further toward protecting consumers than the Commission's decision does, and it does so with the express sanction of the utilities. Greenlining's substantial contributions to this agreement, which significantly advances consumer protections through direct cooperation between consumer parties and utilities, should be recognized and compensated.</p>	

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 names of other parties: The City and County of San Francisco (San Francisco), Disability Rights Advocates (DisabRA), The Division of Ratepayer		

<p>Advocates (DRA), National Consumer Law Center (NCLC), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Gas (SoCalGas), Southern California Edison Company (SCE), The Utility Reform Network (TURN).</p>	
<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>Greenlining coordinated with the Division of Ratepayer Advocates and with other consumer advocates to ensure that our efforts were not duplicated. Where our issues overlapped, we sought to coordinate strategies to minimize duplication and maximize efficacy. For example, Greenlining coordinated with Disability Rights Advocates to jointly file opening comments on similar issues regarding effective communications and protections for vulnerable residential customers. Where parties made similar arguments, the reasoning in support of each differed, allowing the Commission a broader range of opinions on the issues.</p> <p>As the proceeding progressed, especially in the context of the settlement conversations with the Sempra utilities, the consumer parties worked together on all aspects of the negotiation, including collaboration to debate our positions on key issues and identify the best platform for the groups to advance together. These conversations directly informed Greenlining’s participation in the formal proceeding, and helped the parties to coordinate rather than duplicate in their filings.</p> <p>Furthermore, Greenlining’s specific constituents are communities of color and low income communities. Therefore, Greenlining’s perspective on issues differs from that of general ratepayer advocates, and supplements it by providing analysis specific to vulnerable and/or underserved segments of the ratepayer population. For example, our advocacy sought to ensure that utility practices regarding payment plans and deposits were established to protect low-income ratepayers with an arrearage. Also, our advocacy sought to ensure that non-English speaking ratepayers did not receive sub-par customer service and would be able to understand important information regarding disconnections and various assistance programs. Greenlining was the only participating party whose mission is to advocate for low income consumers and, in this case, limited English proficient consumers. As such, our efforts did not duplicate those of any other party.</p>	

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

#	Claimant	CPUC	Comment
§II(A)	X		Although ultimately Greenlining’s position did not fully prevail on some of the issues identified above, Greenlining’s participation substantially contributed to the decision by providing a meaningful

			opposition to other parties' proposals as well as justification to certain alternative views. Greenlining brought to the proceeding perspectives of the low-income and minority ratepayers regarding customer communications and language access, perspectives not voiced by any other party. This contribution should be deemed substantial.
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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>It is difficult to assign a precise dollar value to Greenlining's participation. However, Greenlining brought to the proceeding perspectives of the low-income and minority ratepayers regarding customer communications and language access, perspectives not voiced by any other party.</p> <p>The contributions described above informed the record and the Commission's decision-making process. Although some were not ultimately adopted, they were all effort to ensure financial protections for the most vulnerable classes of customers. These customers will realize savings, for example through waived or reduced deposit requirements, though the amount of these savings will depend on factors such as the number of customers who would have been subject to such requirements, and the dollar amounts at issue in each customer's individual case. Given that the economy, at least in terms of the job market, shows no signs of improving and in fact continues to decline, it is all too likely that low income customers will continue to encounter difficulties in paying their utility bills. Those who do will benefit from Greenlining's advocacy in this proceeding, with respect to the issues outlined above, and the amount by which they benefit will likely exceed the cost of Greenlining's participation by a substantial margin.</p>	

B. Specific Claim:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Enrique	2010	2	\$350	See	\$700				

Gallardo									
Samuel Kang	2010	10.7	\$220	See Attachment A	\$2,354				
Stephanie Chen	2010	39.5	\$210	See Attachment A	\$8,295				
Jean Chung	2010	148.9	\$150	See Attachment A	\$22,335				
Alicia Miller	2010	42.2	\$150	See Attachment A	\$6,330				
Subtotal:					\$40,014	Subtotal:			

EXPERT FEES

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Subtotal:						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 \$
Subtotal:						Subtotal:			

INTERVENOR COMPENSATION CLAIM PREPARATION **

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Jean Chung	2010	6	\$75	See Attachment A	\$450				
Stephanie Chen	2010	7.5	\$105	See Attachment A	\$787.50				
Samuel Kang	2010	0.3	\$110	See Attachment A	\$33				
Subtotal:					\$1,270.50	Subtotal:			

COSTS

#	Item	Detail	Amount	Amount
Subtotal:				Subtotal:
TOTAL REQUEST \$:			\$41,284.50	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
	Greenlining waives claims for costs.
Attachment A	Basis for Rates Claimed in Section III.B
Attachment B	Allocation of Time by Issue
Attachment C	Time Recordkeeping for Greenlining's Attorneys & Experts
Attachment 1	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(c)(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 A

Basis for Rates Claimed in Section III.B

Enrique Gallardo

Enrique Gallardo is a Staff Attorney with the Greenlining Institute. Mr. Gallardo last had rates awarded to him by the Commission for work performed in 2008 (\$315).¹ Mr. Gallardo is a 1997 graduate of the University of California at Berkeley School of Law. In 2010, Mr. Gallardo enters into a new range of experience, now having 13 years of experience, much of that experience before the Commission. Thus, a new rate for 2010 in the amount of \$350, at the bottom of the range for attorneys with 13+ years of experience, is appropriate.

Samuel Kang

Samuel Kang is the Managing Attorney for the Greenlining Institute. A May 2007 graduate of the University of San Francisco Law School, Mr. Kang in 2010 has four years of experience. He has worked for Greenlining in various capacities for over three years, and his responsibilities throughout this time have included representing the organization before the California Public Utilities Commission (CPUC). Mr. Kang also has experience working in the CPUC Legal Division in 2006.

Mr. Kang had rates set by D.10-05-010, p.5. His rates awarded were \$180 for 2008 and \$190 for 2009. The rate previously awarded for 2009 was below the range for attorneys with three years of experience. The range for attorneys with 3-4 years of experience in 2009 is \$200-\$235.² Therefore, Greenlining believes a rate of \$210 for Mr. Kang for 2009 would be more appropriate. As Mr. Kang now has four years of experience, we request a 5% step increase³ to a rate of \$220 for 2010.

Stephanie Chen

Stephanie Chen is Legal Counsel for the Greenlining Institute. Ms. Chen had rates set by D.10-05-010, p.5. Her rates awarded were \$125 for 2008 and \$125 for 2009. However, these rates were awarded for her position of a Legal Fellow.⁴ The decision noted that as Ms. Chen obtained the position of Legal Counsel with Greenlining in September 2009, that the Commission would consider a rate for her as Legal Counsel in future claims.⁵

In 2010, she entered a new range of rates for attorneys, as she now has three years of experience. The range of rates for 2010 for attorneys with 3-4 years of experience is \$200-235.⁶ Greenlining requests are rate of \$210 for Ms. Chen for

¹ See D.09-02-027, pp. 13-14.

² See Resolution ALJ-247, p. 5.

³ Up to two 5% step increases are allowable within each experience range. See D.07-01-009, pp. 5-6

⁴ See D.10-05-010, p. 6, Sec. III.C.13. This decision referred to Ms. Chen as "Legal Associate."

⁵ See *id.*

⁶ See *id.*

2010. This rate reflects Ms. Chen's experience before the Commission, including participation in general rate cases.

Jean Chung

Jean Chung is the Legal Fellow at the Greenlining Institute. Ms. Chung is a 2009 graduate of Santa Clara University School of Law and has approximately one year of experience. Thus, a new rate for 2010 in the amount of \$150, at the bottom of the range for attorneys with 0-2 years of experience, is appropriate.

Alicia Miller

Alicia Miller is a Staff Attorney at the Greenlining Institute. Ms. Miller is a 2009 graduate of University of California Hastings College of the Law and has approximately one year of experience. Thus, a new rate for 2010 in the amount of \$150, at the bottom of the range for attorneys with 0-2 years of experience, is appropriate.

Attachment B

Allocation of Time by Issue

In the foregoing time sheets, the attorneys worked on a number of specific issues as well as on general issues, identified below with a number code.

The identification of each issue within the scope of the proceeding is discussed for each issue in section II.B, above and in the attached attorney time records. Greenlining estimates approximately the following allocation of total resource time (attorney and witness) by issue in this proceeding:

Issue Areas (with number code)	% of Time
General (Time not properly allocable to the below categories, including reading Commission rulings and filings of other parties. Also includes time in settlement negotiations, which covered the full range of issues.)	35.14%
A. Payment Plans	8.8%
B. Deposits	10.07%
C. Notification, Communication and Customer Service	8.47%
D. Language Access	20.63%
E. Remote Shutoffs	4.23%
F. Outreach & Education	7.27%
G. Benchmarks	5.38%

Attachment C

Time Recordkeeping for Greenlining's Attorneys & Experts

Hours of Enrique Gallardo, Staff Attorney, in 2010

Date	Description	General	A	B	C	D	E	F	G	Total
6/24/10	Conference call with Semptra and consumer groups to discuss settlement	1.5								1.5
7/1/10	Meeting with Jean Chung and Alicia Miller to discussing proceeding and transition	.5								.5
Issue Areas		General	A	B	C	D	E	F	G	Total
Total Hours for Enrique Gallardo		2								2

Hours of Samuel Kang, Managing Attorney, in 2010

Date	Explanation	General	A	B	C	D	E	F	G	Total
2/6/2010	Read OIR	0.7								0.7
2/10/2010	Meeting with Jean Chung and Stephanie Chen to discuss OIR and litigation strategies	0.4								0.4
2/22/2010	Meeting with Jean Chung to discuss OIR and litigation strategies	0.2								0.2
2/23/2010	Meeting with Jean Chung to discuss OIR and litigation strategies	0.2								0.2
3/10/2010	Edit opening comments		0.1	0.2		0.5	0.3			1.1
3/10/2010	Discuss edits to opening comments with Jean Chung					0.5	0.2			0.7
3/11/2010	Discuss edits to opening comments with Jean Chung	0.1								0.1
3/13/2010	Read opening comments		0.5	0.5	0.5	0.5	0.5	0.5	0.5	3.5
3/15/2010	Discuss reply comments strategy with Jean Chung	0.1								0.1
4/2/2010	Review of reply comments			0.3		0.3				0.6
4/6/2010	Discuss settlement strategy with Stephanie Chen and Jean Chung	0.2								0.2
4/19/2010	Meeting with Stephanie Chen and Alicia Miller re: settlement strategy	0.2								0.2
4/21/2010	Strategy meeting with Jean Chung re: settlement negotiations	0.2								0.2

4/21/2010	Strategy meeting with Stephanie Chen after settlement meeting	0.2									0.2
5/5/2010	De-briefed on May 4th settlement discussion with Stephanie Chen	0.2									0.2
6/17/2010	Read draft proposed decision		0.1	0.1	0.1	0.1	0.1			0.1	0.6
Date	Explanation	General	A	B	C	D	E	F	G	Total	
6/17/2010	Meeting with Jean Chung on proposed decision	0.2									0.2
6/22/2010	Meeting with Jean Chung and Stephanie Chen re settlement negotiations and proposed decision	0.2									0.2
7/7/2010	Edit opening comments to proposed decision		0.1	0.1		0.3					0.5
7/10/2010	Edit reply comments to proposed decision					0.2				0.2	0.4
7/19/2010	Meeting with Alicia Miller and Stephanie Chen re: settlement strategy	0.2									0.2
Issue Areas		General	A	B	C	D	E	F	G	Total	
Total Hours for Samuel Kang		3.3	0.8	1.2	0.6	2.4	1.1	0.5	0.8	10.7	

Hours of Stephanie Chen, Legal Counsel, in 2010

Date	Explanation	General	A	B	C	D	E	F	G	Total
2/10/2010	Read OIR		0.1	0.1	0.1			0.1		0.4
2/10/2010	Meeting with Sam Kang and Jean Chung to discuss OIR and litigation strategies	0.4								0.4
2/12/2010	Conference call with other consumer advocates re OIR and to discuss how intervenor groups can coordinate efforts	1.4								1.4
2/19/2010	Meeting with J.Chung to discuss OIR and debrief about 2/12/10 consumer advocate conference call	0.5								0.5
2/22/2010	Meeting with DisabRA to coordinate joint draft for opening comments				1	1		0.5		2.5
3/3/2010	Read draft of opening comments			0.1	0.2	0.2	0.1			0.6
3/3/2010	Strategy meeting with Jean Chung to discuss edits for opening comments	0.5								0.5
3/9/2010	Review draft opening comments		0.1	0.1	0.1	0.1	0.1	0.1		0.6
3/9/2010	Meeting with Jean Chung to discuss edits for opening comments draft	0.6								0.6

3/11/20 10	Conference call with Jean Chung and Anna Levine (DisabRA) to discuss edits to opening comments	0.4									0.4
3/11/20 10	Discuss edits to opening comments and plan of action with Jean Chung	0.1									0.1
3/12/20 10	Review final draft of opening comments		0.5	0.5	0.2	0.6	0.2				2
3/12/20 10	Review edits to opening comments with Jean Chung	0.1									0.1
4/1/201 0	Edit draft of reply comments		0.2	0.3		0.5					1
4/1/201 0	Review edits to reply comments with Jean Chung	0.2									0.2

Date	Explanation	General	A	B	C	D	E	F	G	Total
4/2/2010	Finalize reply comments and file with commission		0.5	0.5	0.2	0.3		0.2		1.7
4/6/2010	Discuss settlement strategy with Sam Kang and Jean Chung	0.2								0.2
4/16/2010	Meeting with Jean Chung re settlement meeting	0.7								0.7
4/21/2010	Settlement negotiations with IOUs and consumer groups	3								3
4/21/2010	Follow-up meeting with Alicia Miller and Jean Chung re: settlement discussion	0.5								0.5
4/21/2010	Strategy meeting with Sam Kang after settlement meeting	0.2								0.2
5/4/2010	Attend settlement conference	3.8								3.8
5/5/2010	Debrief May 4th settlement negotiations with Sam Kang	0.2								0.2
5/13/2010	Meeting with Jean Chung re Settlement meeting to discuss data responses from Semptra and SCE and form disconnection notices for all three IOUs					0.2				0.2
5/13/2010	Attend settlement conference	4.5								4.5
5/13/2010	Discuss settlement issues with Jean Chung and consumer groups (DRA and TURN)		0.1	0.1					0.1	0.3
5/18/2010	Conference call with Consumer groups re: settlement negotiations and positions on key issues	1.1								1.1
5/18/2010	Meeting with Jean Chung to discuss settlement proposals					0.3				0.3
5/18/2010	Draft email to Melissa Kassnitz and Anna Levine at Disability Rights Advocates to coordinate positions, strategy	0.1								0.1
5/20/2010	Review joint intervenor settlement proposal		0.1	0.1						0.2
5/20/2010	Conference call with Consumer groups re: settlement negotiations and joint intervenor settlement proposal	1.6								1.6
6/22/2010	Meeting with Jean Chung and Sam Kang re: settlement negotiations and proposed decision	0.2								0.2
6/25/2010	Meeting with Jean Chung to discuss proposed decision and prep for opening comments	0.3								0.3
6/28/2010	Read Proposed Decision	0.4								0.4

7/6/2010	Review edits to opening comments to proposed decision with Alicia Miller		0.1	0.1	0.1	0.1	0.1				0.5
7/7/2010	Review final draft of opening comments to proposed decision		0.2	0.2	0.1	0.2					0.7

Date	Explanation	General	A	B	C	D	E	F	G	Total
7/7/2010	Meeting with Alicia Miller to discuss edits to opening comments	0.1								0.1
7/9/2010	Meeting with Alicia Miller to discuss opening comments of other parties	0.2								0.2
7/9/2010	Meeting with A. Miller and K. Watts-Zagha to discuss Sempra settlement issues in GRC		0.1	0.1		0.2			0.2	0.6
7/13/2010	Conference call with consumer parties re: Sempra settlement terms and language	1								1
7/19/2010	Meeting with Sam Kang and Alicia Miller re: settlement strategy	0.2								0.2
7/20/2010	Conference call with consumer parties re: Sempra settlement	0.6								0.6
7/20/2010	Conference call with Alicia Miller and Karen Watts-Zagha in preparation for meetings with Commissioners' offices		0.1	0.1	0.1	0.1			0.1	0.5
7/26/2010	Debrief with A. Miller on DRA-Greenlining meeting with Comm. Grueneich & strategize for upcoming Commissioner meetings	0.5								0.5
7/26/2010	Meeting with A. Miller; Harvey Morris and K. Watts-Zagha from DRA; Hayley Goodson from TURN; Commissioner Bohn, Amy Yip-Kikugawa, and Robert Kinosian. Advocating for benchmarks & expanded language access.					0.3			0.5	0.8
7/26/2010	Meeting with Alicia Miller; Harvey Morris and Karen Watts-Zagha from DRA; Hayley Goodson from TURN; Commissioner Ryan and S.Kosrowjah. Advocating primarily for the establishment of a benchmark.								0.5	0.5
7/26/2010	Debrief with TURN and DRA re Commissioner meetings	0.2								0.2
7/28/2010	Meeting with President Peevey and Alicia Miller to discuss proposed decision								0.5	0.5
8/2/2010	Debrief with Alicia Miller and Jean Chung on events around Sempra settlement and final decision that transpired during Jean Chung's absence, as Jean Chung resumes primary stewardship of the proceeding for Greenlining	0.7								0.7

8/6/2010	Meeting with Jean Chung and Alicia Miller to debrief from the 8/5/2010 settlement conference	0.6										0.6
8/10/2010	Meeting with Alicia Miller and Jean Chung to discuss settlement negotiation strategies and status.	0.5										0.5
Issue Areas		General	A	B	C	D	E	F	G	Total		
Total Hours for Stephanie Chen		25.6	2.1	2.3	2.1	4.1	0.5	0.9	1.9	39.5		

Hours of Jean Chung, Legal Fellow, in 2010

Date	Explanation	Gen.	A	B	C	D	E	F	G	Total
2/4/2010	Review OIR		0.1	0.1	0.1	0.1		0.1		0.5
2/5/2010	Conference call with other consumer advocates re OIR	1								1
2/9/2010	Conversation with Community Resources Project (prep for drafting comments)							0.2		0.2
2/10/2010	Meeting with Sam Kang and Stephanie Chen to discuss OIR and litigation strategies	0.4								0.4
2/10/2010	Outreach to coalition members and CBOs (prep for drafting comments)		0.2		0.5	0.5				1.2
2/11/2010	Outreach to coalition members and CBOs (prep for drafting comments)				0.5	0.5				1
2/12/2010	Conference call with other consumer advocates re OIR and to discuss how intervenor groups can coordinate efforts	1.4								1.4
2/19/2010	Meeting with Stephanie Chen to discuss OIR and debrief about 2/12/10 consumer advocates conference call	0.5								0.5
2/22/2010	Outreach to coalition members and CBOs (prep for drafting comments)			0.3	0.5	0.7				1.5
2/22/2010	Draft internal strategy memo	0.1								0.1
2/22/2010	Meeting with Sam Kang to discuss OIR and litigation strategies	0.2								0.2
2/22/2010	Meeting with DisabRA to coordinate joint draft for opening comments				1	1		0.5		2.5
2/22/2010	Outline opening comments		0.3	0.2						0.5

2/23/2010	Outreach to coalition members and CBOs (prep for drafting comments)					0.5				0.5
2/23/2010	Strategy meeting with Sam Kang to discuss OIR and litigation strategies	0.2								0.2
2/24/2010	Outreach to coalition members and CBOs (prep for drafting comments)				0.3	0.4		0.3		1
2/24/2010	Outline opening comments				0.3					0.3
2/25/2010	Outreach to coalition members and CBOs (prep for drafting comments)							0.1		0.1
2/25/2010	Conversation with Community Resources Project (prep for drafting comments)					0.9	0.1	0.3		1.3
2/26/2010	Outreach to coalition members and CBOs (prep for drafting comments)	0.1								0.1
2/28/2010	Draft Opening Comments		0.5	0.5						1
3/1/2010	Draft Opening Comments				0.5	2		0.5		3
Date	Explanation	Gen.	A	B	C	D	E	F	G	Total
3/1/2010	Outreach to coalition members and CBOs (prep for drafting comments)					0.2				0.2
3/2/2010	Draft Opening Comments		0.5	0.5	1	2		1		5
3/3/2010	Draft Opening Comments					1	1	1		3
3/3/2010	Strategy meeting with Stephanie Chen to discuss edits for opening comments	0.5								0.5
3/4/2010	Outreach to coalition members and CBOs (prep for drafting comments)		0.2		0.1	0.5		0.2		1
3/4/2010	Draft Opening Comments		0.5	0.5						1
3/5/2010	Conference call with other consumer advocates re opening comments	1								1
3/8/2010	Meeting with TURN to discuss opening comments	0.1								0.1
3/9/2010	Draft opening comments					0.2				0.2
3/9/2010	Draft opening comments					0.2		0.2		0.4
3/9/2010	Meeting with Stephanie Chen to discuss edits for opening comments draft	0.6								0.6
3/9/2010	Meeting with John Howat at NCLC to discuss strategies for opening comments							0.6		0.6
3/9/2010	Draft opening comments		1	1	0.3	1	0.4	1		4.7
3/10/2010	Discuss edits to opening comments with Sam Kang					0.5	0.2			0.7
3/11/2010	Discussion with Sam Kang on edits for opening comments	0.1								0.1
3/11/2010	Draft opening comments		1	1	0.5	2.5	0.5	1	0.5	7

3/11/2010	Conference call with Stephanie Chen and Anna Levine (DisabRA) to discuss edits to opening comments	0.4									0.4
3/11/2010	Review draft comments from consumer advocacy groups		0.3	0.3	0.1		0.1	0.1	0.1		1
3/11/2010	Discuss edits to opening comments and plan of action with Stephanie Chen	0.1									0.1
3/12/2010	Draft opening comments		0.1	0.1	1.8	2.5	0.5	1.5	0.5		7
3/12/2010	Review edits to opening comments with Stephanie Chen	0.1									0.1
3/15/2010	Discuss reply comments strategy with Sam Kang	0.1									0.1
3/15/2010	Call with Reverend Buford to discuss shutoffs and utility outreach							0.6			0.6
3/17/2010	Review opening comments submitted by parties to this proceeding		0.2	0.3	0.2		0.1	0.1	0.1		1
3/24/2010	Review opening comments submitted by parties to this proceeding		0.2	0.3							0.5
3/29/2010	Review opening comments submitted by parties to this proceeding; draft outline for reply comments		1	1	1	2		1			6
3/30/2010	Draft reply comments		1	1	1	2.5	0.5	1			7
Date	Explanation	Gen.	A	B	C	D	E	F	G	Total	
3/31/2010	Draft reply comments		1	2	1	3	1	1			9
4/1/2010	Draft reply comments		1	1	1	3		1			7
4/1/2010	Review edits to reply comments with Stephanie Chen	0.2									0.2
4/6/2010	Discuss settlement strategy with Sam Kang and Stephanie Chen	0.2									0.2
4/6/2010	Amend reply comments and re-file with CPUC	0.2									0.2
4/13/2010	Review reply comments submitted by other parties		0.5	0.5	0.2	0.1	0.2				1.5
4/14/2010	Prepare for settlement meeting (create internal chart of issues and settlement negotiation tactics)		0.5	0.5	0.5	0.5					2
4/15/2010	Prepare for settlement meeting (create internal chart of issues and settlement negotiation tactics)				0.7	0.7	0.4				1.8
4/15/2010	Prepare for settlement meeting (create internal chart of issues and settlement negotiation tactics)					0.5	0.5				1
4/16/2010	Meeting with Stephanie Chen re Settlement meeting	0.7									0.7

4/16/2010	Prepare for settlement meeting (create internal chart of issues and settlement negotiation tactics)		0.4	0.4	0.4	0.4	0.2			2
4/19/2010	Meeting with consumer groups re settlement negotiations	1								1
4/20/2010	Prepare for settlement meeting (create internal chart of issues and settlement negotiation tactics)		0.8	0.8	0.5	1		0.4		3.5
4/21/2010	Strategy meeting with Sam Kang re settlement negotiations	0.2								0.2
4/21/2010	Settlement negotiations with IOUs and consumer groups	3								3
4/21/2010	Follow-up meeting with Stephanie Chen and Alicia Miller re: settlement discussion	0.5								0.5
4/26/2010	Prepare for settlement discussions					1				1
4/27/2010	Prepare for settlement discussions		0.3	0.3		0.5		0.1		1.2
4/29/2010	Conference call with consumer groups re settlement negotiations; draft meeting notes	2								2
5/4/2010	Attend settlement conference	3.8								3.8
5/13/2010	Meeting with Stephanie Chen re Settlement meeting to discuss data responses from Semptra and SCE and form disconnection notices for all three IOUs					0.2				0.2
5/13/2010	Attend settlement conference	4.5								4.5
5/13/2010	Discuss settlement issues with Stephanie Chen and consumer groups (DRA and TURN)		0.1	0.1					0.1	0.3
Date	Explanation	Gen.	A	B	C	D	E	F	G	Total
5/14/2010	Prepare settlement proposals for further negotiations					0.2				0.2
5/17/2010	Prepare settlement proposals for further negotiations					0.5		0.5		1
5/18/2010	Conference call with Consumer groups re: settlement negotiations and positions on key issues	1.1								1.1
5/18/2010	Meeting with Stephanie Chen to discuss settlement proposals					0.3				0.3
5/18/2010	Draft settlement proposal language regarding utility disconnection notices				0.1	0.4				0.5
5/20/2010	Draft settlement proposal language regarding utility disconnection notices					0.1				0.1
5/20/2010	Review joint intervenor settlement proposal		0.2	0.3						0.5

5/20/2010	Conference call with Consumer groups re: settlement negotiations and joint intervenor settlement proposal	1.6									1.6
5/21/2010	Review draft settlement proposal document		0.2	0.2		0.2	0.2		0.2		1
6/1/2010	Prepare for settlement meeting				0.4	0.4					0.8
6/2/2010	Confidential settlement meeting	5									5
6/14/2010	Review revised settlement documents from other consumer parties		0.1	0.1					0.1		0.3
6/15/2010	Conference call with consumer groups re: settlement negotiations; review and edit new settlement document	2									2
6/17/2010	Review Proposed Decision;		0.1	0.1	0.1	0.1	0.1				0.5
6/17/2010	Meeting with Sam Kang re: Proposed Decision	0.2									0.2
6/18/2010	Review Proposed Decision		0.2	0.2	0.1	0.1					0.6
6/18/2010	Confidential settlement meeting	1.5									1.5
6/22/2010	Meeting with consumer groups re: settlement negotiations	1									1
6/22/2010	Review proposed decision; draft internal document about proposed decision		0.1	0.1	0.2	0.4		0.1	0.1		1
6/22/2010	Meeting with Sam Kang and Stephanie Chen re settlement negotiations and proposed decision	0.2									0.2
6/23/2010	Draft outline for reply comments to proposed decision		0.1								0.1
6/24/2010	Conference call with Sempra and consumer groups to discuss settlement	1.5									1.5
6/25/2010	Meeting with Stephanie Chen to discuss proposed decision and prep for opening comments	0.3									0.3
6/30/2010	Draft opening comments in response to PD		1	1							2
Date	Explanation	Gen.	A	B	C	D	E	F	G	Total	
7/1/2010	Draft opening comments in response to PD				0.5	1.3		0.5		2.3	
7/2/2010	Draft opening comments in response to PD		0.5	0.5	0.5		0.5		1	3	
7/1/2010	Meeting with Enrique Gallardo and Alicia Miller to discuss proceeding and transition	0.5								0.5	
8/2/2010	Review Interim Decision issued 7/30/2010		0.1	0.1	0.1	0.1	0.1			0.5	

8/2/2010	Debrief with Alicia Miller and Stephanie Chen on events around Sempra settlement and final decision that transpired during Jean Chung's absence, as Jean Chung resumes primary stewardship of the proceeding for Greenlining	0.7									0.7
8/3/2010	Review revised term sheet and prepare for conference call	0.2									0.2
8/3/2010	Conference call with Settling Parties regarding Settlement Conference on 8/5/2010	0.6									0.6
8/5/2010	Attend settlement conference	1.5									1.5
8/6/2010	Meeting with Stephanie Chen and Alicia Miller to debrief from the 8/5/2010 settlement conference	0.6									0.6
8/10/2010	Meeting with Stephanie Chen and Alicia Miller to discuss settlement negotiation strategies and status.	0.5									0.5
Issue Areas		Gen.	A	B	C	D	E	F	G	Total	
Total Hours for Jean Chung		42.2	14.3	15.3	16	36.7	6.6	15.1	2.7	148.9	

Hours of Alicia Miller, Staff Attorney in 2010

Date	Explanation	General	A	B	C	D	E	F	G	Total
4/21/2010	Settlement negotiations with IOUs and consumer groups	3								3
4/21/2010	Follow-up meeting with Stephanie Chen and Jean Chung re: settlement discussion	0.5								0.5
6/24/2010	Review Proposed Decision		0.1	0.1	0.1	0.1	0.1	0.1		0.6
6/24/2010	Review Sempra Settlement Agreement		0.1	0.1			0.1			0.3
6/24/2010	Conference call with Sempra and consumer groups to discuss settlement	1.5								1.5
7/1/2010	Meet with Jean Chung and Enrique Gallardo to discuss proceeding and transition	0.5								0.5
7/2/2010	Review revised settlement agreement		0.1	0.1		0.1	0.1			0.4
7/6/2010	Review and revise draft opening comments on the PD		0.5	0.5		0.6		0.5	0.5	2.6
7/6/2010	Review edits to opening comments to proposed decision with Stephanie Chen		0.1	0.1	0.1	0.1	0.1			0.5
Date	Explanation	General	A	B	C	D	E	F	G	Total

		al								
7/7/2010	Finalize substance of draft opening comments on the PD		0.5	0.5		1.3	0.1	0.2	0.5	3.1
7/7/2010	Incorporate edits for opening comments		0.2	0.5	0.5	0.5		0.1	0.2	2
7/7/2010	Meeting with Stephanie Chen to discuss edits to opening comments	0.1								0.1
7/7/2010	Incorporate feedback from Stephanie Chen & Sam Kang to final opening comments on PD		0.2	0.3	0.1	0.3			0.1	1
7/7/2010	File and serve opening comments on PD	0.5								0.5
7/8/2010	Discuss Sempra settlement & email proposed language to Karen Watts-Zagha re: language issues in GRC versus Phase II					0.5				0.5
7/8/2010	Review opening comments of other parties		0.5	0.6	0.1	0.5	0.2	0.1	0.1	2.1
7/9/2010	Finish review of other parties comments and draft reply		0.5	1.4			1		2	4.9
7/9/2010	Meeting with Stephanie Chen to discuss opening comments of other parties	0.2								0.2
7/9/2010	Meeting with Stephanie Chen and Karen Watts-Zagha to discuss Sempra settlement issues in GRC		0.1	0.1		0.2			0.2	0.6
7/12/2010	Finalize reply comments, file and serve		0.8	0.8	0.5				0.7	2.8
7/13/2010	Conference call with consumer parties re: Sempra settlement terms and language	1								1
7/13/2010	Review parties reply comments to PD		0.2	0.2	0.2	0.2	0.2			1
7/19/2010	Meeting with Sam Kang and Stephanie Chen re: settlement strategy	0.2								0.2
7/19/2010	Compare changes to effective communication section of Sempra Settlement					0.4				0.4
7/19/2010	Respond to emails of Karen Watts-Zagha (DRA) regarding effective communication language and consumer groups conference call schedule	0.1								0.1
7/20/2010	Conference call with consumer parties re: Sempra settlement	0.6								0.6
7/20/2010	Conference call with Stephanie Chen and Karen Watts-Zagha in preparation for meetings with Commissioners' offices		0.1	0.1	0.1	0.1			0.1	0.5
7/22/2010	Meet with Karen Watts-Zagha to discuss proposed decision	0.2								0.2

7/22/2010	Meet with Comm. Grueneich, Advisor K. Hymes, H. Morris & K. Watts-Zagha to discuss Proposed Decision					0.2			0.3	0.5
7/22/2010	Review data in record to confirm shutoff rates have been established								1	1
7/22/2010	Reschedule meeting with Advisor to Comm. Simon	0.5								0.5
Date	Explanation	General	A	B	C	D	E	F	G	Total
7/26/2010	Debrief with Stephanie Chen on DRA-Greenlining meeting with Commissioner Grueneich and strategize for upcoming Commissioner meetings	0.5								0.5
7/26/2010	Meeting with S. Chen; Harvey Morris and Karen Watts-Zagha from DRA; Hayley Goodson from TURN; Commissioner Bohn, Amy Yip-Kikugawa, and Robert Kinosian. Advocating for benchmarks and expanded language access					0.3			0.5	0.8
7/26/2010	Meeting with S. Chen; Harvey Morris and Karen Watts-Zagha from DRA; Hayley Goodson from TURN; Commissioner Ryan and S.Kosrowjah. Advocating primarily for the establishment of a benchmark								0.5	0.5
7/26/2010	Meet with K.Koss, Advisor to Comm. Simon, to discuss Shutoffs proposed decision					0.2			0.3	0.5
7/26/2010	Debrief with TURN and DRA re: commissioner meetings	0.2								0.2
7/28/2010	Review Draft of Sempra Settlement Agreement & suggest Severance Language	0.3				0.6				0.9
7/28/2010	Review revised proposed interim decision.		0.2	0.3	0.2	0.2	0.2	0.2	0.2	1.5
7/28/2010	Meeting with President Peevey and Stephanie Chen to discuss proposed decision.								0.5	0.5
8/2/2010	Debrief with Stephanie Chen and Jean Chung on events around Sempra settlement and final decision that transpired during Jean Chung's absence, as Jean Chung resumes primary stewardship of the proceeding for Greenlining	0.7								0.7
8/3/2010	Review revised term sheet and prepare for conference call					0.6				0.6
8/3/2010	Conference call with Settling Parties regarding Settlement Conference on 8/5/2010	0.6								0.6

8/3/2010	Review bankruptcy code and protections for customers & utilities for Sempra Settlement. Email consumer groups.	0.5									0.5
8/6/2010	Meeting with Stephanie Chen and Jean Chung to debrief from the 8/5/2010 settlement conference	0.6									0.6
8/10/2010	Meeting with Stephanie Chen and Jean Chung to discuss settlement negotiation strategies and status	0.1									0.1
Issue Areas		General	A	B	C	D	E	F	G	Total	
Total Hours for Alicia Miller		12.4	4.2	5.7	1.9	7	2.1	1.2	7.7	42.2	

Hours of Stephanie Chen, Legal Counsel, on Intervenor Compensation in 2010

Date	Explanation	Hours
3/4/2010	Review draft notice of intent to file intervenor compensation	0.8
3/4/2010	Discuss edits to NOI with Jean Chung	0.1
9/24/2010	Completing Request for Intervenor Compensation	6.6
Total		7.5

Hours of Samuel Kang, Managing Attorney, on Intervenor Compensation in 2010

Date	Explanation	Hours
3/3/10	Review NOI for intervenor compensation	0.3
Total		0.3

Hours of Jean Chung, Legal Fellow, on Intervenor Compensation in 2010

Date	Explanation	Hours
3/3/10	Draft Notice of Intent to file Intervenor Compensation	2
8/24/10	Prepare application for intervenor compensation	2
8/26/10	Prepare application for intervenor compensation	2
Total		6

Attachment 1:

Certificate of Service

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 parties appearing on the official Service List for R.10.02.005

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

/s/ Enrique Gallardo

Enrique Gallardo
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