

Decision _____

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

Application of Pacific Gas and Electric Company for Authority to Increase Revenue Requirements to Recover the Costs to Implement a Program to Improve the Reliability of its Electric Distribution System. (U39E) for Approval of its 2009-2011 Energy Efficiency Program Plans and Associated Public Goods Charge (PGC) and Procurement Funding Requests.	Application 08-05-023 (Filed May 15, 2008)
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CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

Claimant: The Utility Reform Network	For contribution to D.10-06-048
Claimed (\$): \$ 435,818 (\$349,823, plus enhancement of 25%, or \$85,995)	Awarded (\$):
Assigned Commissioner: Peevey	Assigned ALJ: Fukutome
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 4).	
<p align="right">Signature: /s/</p>	
Date: 8/24/10	Printed Name: Robert Finkelstein

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

A. Brief Description of Decision:

The decision addressed PG&E’s proposal for a Distribution Reliability Improvement Program (DRIP), which PG&E gave the moniker “Cornerstone Improvement Project.” PG&E proposed spending nearly \$2 billion in capital and \$60 million in expense over the period 2010 through 2016. In D.10-06-048 the Commission rejected PG&E’s proposal in favor of a scaled-back version generally consistent with an alternative recommendation put forward by TURN, with expenditures amounting to \$357.4 million in capital and \$9.2 million in expense for the period 2010 through 2013. The reduced program approved in D.10-06-

048 is estimated to achieve up to 68% of the quantifiable reliability improvement benefits, but at approximately 18% of the cost requested by PG&E. The adopted outcome on nearly all issues is far closer to TURN's position than PG&E's, and the decision cites with favor TURN's analysis throughout its discussion of the various elements of PG&E's proposal and the adopted outcome.

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:	January 26, 2009	
2. Other Specified Date for NOI:	None	
3. Date NOI Filed:	February 23, 2009	
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:	A.08-05-023	
6. Date of ALJ ruling:	April 22, 2009	
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:	A.08-05-023	
10. Date of ALJ ruling:	April 22, 2009	
11. Based on another CPUC determination (specify):		
12. Has the claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.10-06-048	
14. Date of Issuance of Final Decision:	6/25/10	
15. File date of compensation request:	8/24/10	
16. Was the request for compensation timely?		

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

#	Claim	CPUC	Comment

	ant		

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>As described in more detail below, TURN’s substantial contribution to D.10-06-048 is evident at all levels in the decision and on nearly all issues the decision addresses. PG&E’s application sought authorization to spend approximately \$2 billion over a six-year period. In D.10-06-048, the Commission largely agreed with TURN’s analysis as the basis for rejecting PG&E’s proposal, and adopted a TURN-developed alternative instead, authorizing spending at approximately 20% of the total level sought by the utility, yet still achieving nearly 70% of the quantifiable reliability improvement benefits.</p>	<p>TURN Testimony, <i>passim</i>. (pp. 93-98 for alternative recommendation).</p> <p>TURN Opening Brief, <i>passim</i>. (pp. 35-37 for alternative recommendation).</p> <p>D.10-06-048, §§8.1.2, 8.2.2, 8.3.2 and 8.4.2.</p>	
<p><u>Motion to Dismiss</u>: Shortly after PG&E filed its application, TURN took the lead role in preparing a joint motion to dismiss, filed with DRA and supported by several other consumer groups. In late 2008, the Assigned Commissioner and ALJ issued a joint ruling granting the motion to dismiss in part. The ruling noted that “Addressing distribution-related expenditures and reliability incentive mechanisms in between GRCs is contrary to established Commission GRC policies and procedures,” consistent with central arguments in the motion to dismiss. However, the ruling found that there was sufficient cause to make an exception to these established policies and procedures for purposes of PG&E’s request. The</p>	<p>TURN/DRA Motion to Dismiss (June 17, 2008); TURN/DRA Reply on Motion to Dismiss (July 18, 2008).</p> <p>Assigned Commissioners and Administrative Law Judge’s Joint Ruling Denying in Part and Granting in Part Motion to Dismiss the Application and Setting Prehearing Conference (December 19, 2008), pp. 5-8.</p>	

<p>ruling did prohibit rate recovery of any 2009 or 2010 of any revenue requirement associated with the distribution reliability improvement program.</p>		
<p><u>Scope of Proceeding:</u> After the Assigned Commissioner and ALJ set the first prehearing conference, PG&E served a prehearing conference statement that purported to identify all of the issues in dispute, as well as indicating the utility's intent to serve updated testimony to be consistent with the decision on the motion to dismiss. In coordination with several other consumer groups (DRA, California Farm Bureau Federation, and California Large Energy Consumers Association (CLECA)), TURN filed a responsive prehearing conference statement that identified a number of issues not included in PG&E's statement but that should be deemed within the scope of the proceeding; reaffirmed PG&E's burden of proof on the issues in the proceeding; and proposed an alternative schedule that provided more time to intervenors to review the utility's updated showing. The Assigned Commissioner's Ruling and Scoping Memo issued February 23, 2009, reflected many of the criticisms and concerns raised in the TURN-driven prehearing conference statement. It directed PG&E to include in its update testimony material that addressed several specific questions TURN had raised, it agreed with TURN's analysis of the burden of proof in the proceeding, and it adopted a procedural schedule very consistent with the on TURN had proposed.</p>	<p>Joint Consumer Prehearing Conference Statement (January 22, 2009), pp. 2-7 (scope of issues), 7-9 (burden of proof), and 9-11 (schedule).</p> <p>Assigned Commissioner's Ruling and Scoping Memo (February 23, 2009), pp. 8-11 (scope of issues), 11-12 (burden of proof), and 12-13 (schedule).</p>	
<p><u>The Need For PG&E's Proposed Program:</u> TURN's testimony and brief addressed at some length PG&E's failure to meet its burden of proof in support of its application and, in particular, its failure to demonstrate the need for its proposed distribution reliability improvement program or to explain why its approach to comparing reliability performance with other utilities was now reasonable when</p>	<p>TURN Testimony, pp. 2-37; TURN Opening Brief, pp. 4-35.</p>	

<p>PG&E had argued against that approach in the recent past.</p> <p>In D.10-06-048, the Commission agreed that the preponderance of the evidence did not support the need for a program with the scope and cost of PG&E’s proposal, and therefore denied PG&E’s request for cost recovery associated with that proposal.</p> <p>The Commission also rejected PG&E’s proposal to change the previous determination in D.04-10-034 with respect to reliability comparisons with other utilities.</p>	<p>D.10-06-048, pp. 15-18; also Conclusions of Law 1 and 2.</p> <p>D.10-06-048, p. 17; also Findings of Fact 3 and 4.</p>	
<p><u>Distribution Automation:</u> TURN’s testimony and brief presented a detailed analysis of PG&E’s proposed spending on distribution automation and the underlying equipment’s role in the distribution system. The testimony illustrated the poor cost-benefit ratios under PG&E’s approach. In an alternative described in the testimony, TURN called for funding an amount necessary to automate PG&E’s 400 worst-performing circuits, with the recognition that what gets done might be different than the 400 worst-performing circuits as identified in 2008 or 2009.</p> <p>In D.10-06-048, much of the material in section 8.1.2 (discussing the adopted outcome for distribution automation spending) paraphrases with favor TURN’s testimony and brief. For example, the decision states, “TURN’s alternative recommendation for distribution automation is a reasonable means for addressing our reliability concerns with respect to poorly performing circuits. We will adopt its recommendations as described above, but with a slightly modified cost as described below.”</p> <p>The Commission also adopted TURN’s “three zone assumption,” forecasted labor escalation factors, and lower per-unit cost for underground devices.</p>	<p>TURN Testimony, pp. 39-55; and 94-95.</p> <p>TURN Opening Brief, pp. 89-105.</p> <p>D.10-06-048, pp. 22-26 (quoted material from p. 25); Finding of Fact 13 and Conclusion of Law 7.</p> <p>D.10-06-048, p. 25; Findings of Fact 14-15 and Conclusions of Law 8-9.</p>	

<p><u>Feeder Interconnectivity</u>: TURN’s testimony and brief presented a detailed analysis of PG&E’s proposed spending on feeder connectivity and the underlying equipment’s role in the distribution system. After concluding that PG&E’s proposal overstated the need for connectivity to support its distribution automation proposal, TURN identified “low hanging fruit” that would obtain a significant portion of the emergency connectivity benefits for a small fraction of the cost. In an alternative described in the testimony, TURN called for funding an amount consistent with the recommendation regarding the 400 poorly performing circuits, including an amount necessary to capture this low-hanging fruit.</p> <p>In D.10-06-048, the Commission agreed with TURN that a broadly based connectivity program had not been justified. It went on to adopt TURN’s alternative funding recommendation based on the scaled back distribution automation program adopted earlier, and the low hanging fruit TURN had identified.</p>	<p>TURN Testimony, pp. 76-85; and 95-96.</p> <p>TURN Brief, pp. 69-85.</p> <p>D.10-06-048, p. 27-28; Findings of Fact 17-18; Conclusions of Law 12-13.</p>	
<p><u>Electric Distribution Capacity</u>: TURN’s testimony and brief presented a detailed analysis of PG&E’s proposal to change its planning process and, as a result, spend a half billion dollars to add emergency capacity such as substation transformers. TURN addressed the limited SAIDI and SAIFI benefits of such spending, the already-high reliability of PG&E’s substation transformers, the past success of PG&E’s substation asset management program, and the availability of mobile transformers to mitigate the impact of any substation outage, should one occur.</p> <p>In D.10-06-048, the Commission noted the inappropriateness of making the wholesale changes PG&E proposed for substation transformer emergency capacity in the face of the rejection of PG&E’s broader proposal. It also specifically cited as troubling PG&E’s specific proposal to rely less on mobile transformers. The decision then lists 13 “important points” made by</p>	<p>TURN Testimony, pp. 56-76</p> <p>TURN Opening Brief, pp. 40-69.</p> <p>D.10-06-048, pp. 31-34; Findings of Fact 19-23; Conclusion of Law 14.</p>	

<p>TURN on this issue, and points out that most of the points were not rebutted by PG&E. The decision then embraces TURN's arguments that PG&E had failed to demonstrate that a problem exists, or that its proposal was the best solution even if one were to concede that a problem exists. The decision goes so far as to suggest that PG&E take TURN's (and DRA's) criticisms of its proposals in this proceeding should it seek to establish the need for improving substation transformer emergency capacity in the future.</p> <p>The Commission authorized funding for the 23 substations for which PG&E reported deficiencies of greater than 15 MW. The authorized funding was approximately \$114.5 million, rather than the \$600 million PG&E requested.</p>	<p>D.10-06-048, pp. 34-35.</p>	
<p><u>Reliability Monitoring and Incentive Recommendations:</u> TURN (along with DRA and CUE) opposed PG&E's proposed Reliability Performance Incentive Mechanism. TURN's testimony first addressed the proposed changes to the method for monitoring reliability, agreeing with PG&E that a new definition is needed but disagreeing with PG&E's proposed new definition. TURN called for a different "Beta" and that human-caused outages not be excluded from the reliability measurement mechanism. TURN's approach resulted in more aggressive performance targets than PG&E proposed. Furthermore, because of the difficulty of establishing financial incentives in a manner that does not ultimately reward or penalize PG&E based on the weather, TURN recommended that no financial rewards or penalties be adopted.</p> <p>As noted in the decision, PG&E's rebuttal testimony withdrew the utility's proposal for a reliability performance metric with associated penalties and rewards.</p>	<p>TURN Testimony, pp. 99-108.</p>	

	D.10-06-048, p. 7.	
<p><u>Requirements for Future Proceedings:</u> From the very beginning of the proceeding, TURN’s criticisms of PG&E’s proposal included the utility’s failure to present a Value of Service (VOS) study or to perform cost-effectiveness analysis of its proposals. TURN maintained those criticisms throughout the proceeding.</p> <p>In D.10-06-048, the Commission directed that PG&E include a new VOS study in its next GRC for use, at least in part, in determining and justifying its electric distribution reliability needs. The Commission also made clear its expectation that PG&E conduct appropriate levels of cost-effectiveness analyses for proposed reliability programs or projects in the future.</p>	<p>Motion to Dismiss, pp. 4, and 25-26. Reply for Motion to Dismiss, pp. 9-10. Prehearing Conference Statement of Joint Consumers, pp. 7-9. TURN Reply Brief, pp. 7-8.</p> <p>D.10-06-048, p. 20; also Conclusion of Law 5.</p>	
<p><u>Limitation on Funding Flexibility:</u> The proposed decision included a short section on “Implementation Flexibility” that gave PG&E “flexibility as to how it implements the improvements and what it spends.” In its opening comments, PG&E called for clarification that this flexibility would permit it to shift funds within and between all of its reliability programs described in the PD. TURN’s reply comments urged the Commission to reject PG&E’s request and to instead explicitly <u>prohibit</u> shifting funds between programs, at least to the extent that funds might be shifted away from either the rural reliability or distribution automation programs in order to increase funding for emergency substation capacity projects. In D.10-06-048, the Commission adopted such a prohibition, with the authorization for emergency substation capacity limited to, at most, the identified projects with 15 MW deficiency or more.</p>	<p>TURN Reply Comments, pp. 4-5.</p> <p>D.10-06-048, p. 40.</p>	

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

	Claimant	CPUC Verified
a. Was DRA a party to the	Yes	

proceeding? (Y/N)		
b. Were there other parties to the proceeding? (Y/N)	Yes	
c. If so, provide name of other parties:	California Farm Bureau Federation (CFBF); California Large Energy Consumers Association (CLECA); City and County of San Francisco (CCSF); Engineers and Scientists of California (ESC); and Coalition of California Utility Employees (CUE).	
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>TURN took the lead role among the parties opposed to PG&E's application for a distribution reliability improvement program. When PG&E filed its application, TURN was primarily responsible for developing and implementing the strategy of pursuing a motion to dismiss the application. When a prehearing conference was scheduled, TURN again played a lead role in preparing a prehearing conference statement to counter PG&E's, and sought out and obtained the support of a wider array of consumer groups (with CFBF and CLECA joining TURN and DRA on the pleading). Prior to drafting testimony, TURN met with other consumer groups to ensure a minimum of overlap in the issues covered in each party's testimony.</p> <p>TURN submits that the Commission should find that TURN took all reasonable steps to avoid duplication and, to the extent that there was any overlap, TURN's work supplemented and complemented that of DRA and the other parties opposed to the application. This is especially true in light of the repeated favorable references to TURN's advocacy efforts in D.10-06-048.</p>	

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

#	Claimant	CPUC	Comment

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

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

Concise explanation as to how the cost of claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
TURN's participation helped to convince the Commission to reject PG&E's proposal for a \$2 billion program in the name of distribution reliability improvement in favor of an alternative recommendation put forward by TURN with a price tag of approximately \$370 million. This reduction in capital spending means PG&E's rate base will be approximately \$1.4 billion lower in 2016 than the utility had proposed. Assuming a revenue requirement of 18% of rate base to collect depreciation, tax and return on this amount, PG&E ratepayers avoided an increased revenue requirement of approximately \$250 million <u>per year</u> in 2017 and continuing at nearly that level for many years beyond.	

In considering the reasonableness of TURN's requested amount of compensation, the Commission should also compare the overall benefits with the overall amount TURN is requesting. As described below, TURN's costs of participation sought in this request are approximately \$350,000. Even with the requested 25% multiplier, the total request is below \$450,000, which is approximately two-tenths of 1% of the \$250 million of revenue requirement savings each year from 2017 and for many years thereafter, as described earlier in this subsection.

B. Specific Claim:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Robert Finkelstein	2008	51.7	\$470	D.08-08-027, p. 5	\$ 24,299				
R. Finkelstein	2009	265.8	\$470	Res. ALJ-235; D.09-10-051, p. 20.	\$124,926				
R. Finkelstein	2010	15.5	\$470	Res. ALJ-247	\$ 7,285				
Hayley Goodson	2009	137.2	\$280	Res. ALJ-235; D.09-10-051, p. 20.	\$ 38,416				
H. Goodson	2010	3.5	\$280	Res. ALJ-247	\$ 980				
Nina Suetake	2009	89.5	\$280	See Comment 3, below.	\$ 25,060				
N. Suetake	2010	1.5	\$280	Res. ALJ-247	\$ 420				
Subtotal:					\$221,386	Subtotal:			
EXPERT FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
William Marcus	2008	4.2	\$250	D.08-11-053 ¹ , p. 10.	\$ 1,050				
W. Marcus	2009	127.9	\$250	D.08-11-053	\$ 31,975				
W. Marcus	2010	.3	\$250	D.08-11-053	\$ 75				
Gayatri Schilberg	2008	3.4	\$200	D.09-04-027, p. 9.	\$ 680				
G. Schilberg	2009	151.5	\$200	D.09-04-027	\$ 30,300				

¹ D.08-11-053 and D.09-04-027 approved these rates for Mr. Marcus's and Ms. Schilberg's work performed in 2008; JBS Energy has not changed its rates since then.

Garrick Jones	2008	3.0	\$120	D.09-04-027, p. 9.	\$ 360				
G. Jones	2009	481.5	\$120	D.09-04-027	\$ 57,780				
G. Jones	2010	3.1	\$120	D.09-04-027	\$ 372				
Subtotal:					122,592	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 \$
W. Marcus Travel	2009	3.0	\$125	½ the approved hourly rate	\$ 475				
Subtotal:					\$ 475	Subtotal:			
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Robert Finkelstein	2009	1.25	\$235	50% of \$470	\$ 294				
Robert Finkelstein	2010	14.75	\$235	50% of \$470	\$ 3,466				
Subtotal:					\$ 3,760	Subtotal:			
COSTS									
#	Item	Detail	Amount	Amount					
1	Photocopies	TURN Pleadings	\$ 1,376						
2	Lexis/Nexis	Computerized research	\$ 89						
3	Phone and postage	Proceeding-related phone calls and TURN pleadings	\$ 145						
Subtotal:			\$ 1,610	Subtotal:					
TOTAL REQUEST (without multiplier) \$:					\$ 349,823				
25% Multiplier (on non-comp issues) (see Comment 5)					\$ 85,995	Multiplier:			
TOTAL REQUEST					\$ 435,818	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 ½ of preparer's normal hourly rate.									

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

Attachment or Comment #	Description/Comment
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Attachment 1	Detailed Time Reports for TURN's Attorneys and Consultants
Attachment 2	Detail of TURN's Expenses
Attachment 3	Certificate of Service
Comment 1	<p>Reasonableness of TURN Hours: PG&E's distribution reliability improvement proposal warranted a level of effort and resource commitment similar to that which TURN typically devotes to a full-fledged general rate case. The application focused on PG&E's electric distribution operations, both proposing changes to the utility's operation and reliability measurement standards, and seeking to implement those changed standards through very costly measures. Substantial time and effort was required to understand PG&E's proposals sufficiently to challenge them on a technical basis. Furthermore, throughout the proceeding PG&E steadfastly refused to present traditional or typical cost-effectiveness analysis of its proposals, thus requiring TURN to engage in extensive discovery and analysis in order to backfill this omission of material that (in TURN's experience) would typically be included in a utility's initial workpapers supporting such an application. As a result, in order to perform the broad and detailed analysis that a multi-billion dollar proposal warrants, TURN was required to devote substantial attorney and consultant resources to further fleshing out and reviewing the utility's proposal. As just one example, TURN's consultants and at least one of our attorneys made a very substantial effort in order to develop a sufficient grasp of interconnectivity issues and the importance of the number of zones on a feeder. The result is that both TURN's attorneys and consultants recorded a substantial amount of hours. As described below, the number of hours for each TURN representative was reasonable under the circumstances present here.</p> <p>Robert Finkelstein was the sole TURN attorney assigned to this proceeding from its start in mid-2008 through the service of PG&E's updated testimony in March 2009. Soon thereafter, Hayley Goodson and Nina Suetake both began working on the proceeding with Mr. Finkelstein, with Ms. Goodson taking on distribution capacity issues and Ms. Suetake focusing primarily on distribution automation issues, while Mr. Finkelstein continued to address the broad policy issues (including the purported need for the new program) and ratemaking issues, overseeing the work of TURN's other attorneys, and generally coordinating TURN's efforts.</p> <p>Mr. Finkelstein's hours are reasonable. In 2008, he recorded approximately 50 hours, almost entirely related to the very substantial and comprehensive Motion to Dismiss and the ensuing reply pleading. In 2009, he recorded approximately 265 hours associated with serving as the sole TURN attorney on the matter for the first portion of the year, and then TURN's lead attorney (coordinating discovery and review of PG&E's application and updated testimony, and TURN's development of testimony, ongoing coordination with DRA and other intervenors, handling of evidentiary hearings, and drafting of briefs) as well as maintaining primary responsibility for policy and related issues.</p> <p>The hours Ms. Goodson and Ms. Suetake recorded in 2009 (approximately 135 and 90, respectively) reflect a reasonable amount given the effort required to assist with later rounds of discovery, testimony development and review, preparation for cross examination on complex and highly technical issues, and briefing those issues. As noted earlier, the absence of any cost-effectiveness showing in PG&E's application and supporting testimony required a broader focus on technical issues, which in turn led to Ms. Goodson and Ms. Suetake devoting substantial effort to quickly getting up the learning curve on issues related to substation capacity and its effect on system reliability, and feeder lines and connectivity matters.</p> <p>JBS Energy, TURN's consultant for expert witness services in this proceeding, allocated its resources in a manner similar to the approach taken in the most recent SCE GRC (A.07-11-011).</p>

The vast majority of the hours billed to TURN for work in this matter were for the review and analysis performed by Garrick Jones, whose billing rate is substantially lower than those of the other firm members. By having Mr. Jones perform the most substantial share of the initial review and analysis of a wide array of issues raised in this application, as well as drafting large portions of the testimony ultimately sponsored by Mr. Marcus, JBS Energy was able to cover a wider array of the disputed issues in this proceeding while still controlling the amounts invoiced to TURN for the work in this proceeding. Furthermore, Mr. Jones took the lead for JBS Energy in terms of getting a handle on the non-cost-effectiveness issues PG&E relied on to support its application. Mr. Jones devoted many hours to reviewing and analyzing PG&E's claims about the purported benefits of adding to its emergency substation capacity and the utility's distribution automation proposal. The number of Mr. Jones's hours (approximately 475 in 2009) makes sense when the far lower figures for Gayatri Schilberg (approximately 150 hours) and Mr. Marcus (approximately 130 hours) are considered.

Ms. Schilberg's focus was primarily on PG&E's proposed changes to reliability measurement, monitoring and reporting, as well as the incentive mechanism PG&E proposed in its application, but then withdrew in the face of the opposition raised by TURN and other intervenors. She sponsored portions of TURN's testimony, and drafted a portion sponsored by Mr. Marcus.

In the SCE GRC, the Commission awarded intervenor compensation for approximately 2,000 hours for JBS Energy (the full amount of hours requested), of which approximately 60% were for Mr. Jones's work. Here, TURN seeks compensation for approximately 750 hours for JBS Energy. Mr. Jones's hours represent approximately 62% of the total sought for JBS Energy's work ($475/755 = 63\%$). TURN submits that the Commission should find the JBS Energy totals reasonable and award compensation for the full amount of hours requested, consistent with its treatment in D.09-10-051 (in A.07-11-011).

A very small number of hourly entries reflect meetings attended by two or more of TURN's attorneys and expert witnesses. In past compensation decisions the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. These meetings were essential to TURN developing and implementing its strategy for this proceeding. TURN's requested hours do not include any for any TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting's purpose. TURN notes that PG&E had three attorneys handling the proceeding, and those three attorneys worked with at least five PG&E staff or consultants sponsoring testimony. TURN suspects (but does not know for a fact) that those attorneys similarly met among themselves and with one or more of the expert witnesses in order to develop and implement the utility's strategy. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

There is also travel time associated with TURN's expert witness's attendance at the evidentiary hearings conducted in this matter. This travel was not "general commuting," as JBS Energy staff members only rarely come to the CPUC for business, and Mr. Marcus would not have traveled to San Francisco on this day but for his need to appear at the hearing.

Finally, TURN is requesting compensation for 16.0 hours devoted to compensation-related matters, primarily preparation of this request for compensation. Of this amount, approximately 2.0 hours were devoted to researching and preparing the request for a fee enhancement. While slightly higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the fact that TURN's NOI in this proceeding presented its

	<p>support for the annual finding of financial hardship (resulting in higher-than-normal hours devoted to this task), and given the size and complexity of the request for compensation itself. In D.10-07-012, the Commission awarded compensation for the full 13.0 hours requested for compensation-related work in a somewhat less complex proceeding.</p>
<p>Comment 2</p>	<p>Allocation of Hours: TURN has allocated its time entries by the following activity codes:</p> <p>MotDis – Motion to Dismiss: time devoted to preparing the TURN/DRA Motion to Dismiss and the Reply to the responses other parties filed to the Motion to Dismiss.</p> <p>GP - General Participation: time for activities necessary to participate in the docket that typically do not vary by the number of issues addressed, such as initial review of applications and updated applications, participation in prehearing conferences, and similar activities.</p> <p>GH – General Hearing: time spent preparing for and participating in the evidentiary hearings that is not easily allocated to a specific issue category. (Due to a coding error by TURN’s attorney, hours designated “HP” in the attachment also fall into this category.)</p> <p>Pol – Policy and Need for Program: TURN’s more generalized critique of PG&E’s proposal on policy grounds as well as the broader failure to demonstrate the need for the program.</p> <p>DistCap – Distribution Capacity: Analyzing and critiquing PG&E’s proposal for substation emergency transformer capacity and related issues, and developing TURN’s proposed alternative recommendation.</p> <p>DA – Distribution Automation: Analyzing and critiquing PG&E’s proposal for distribution automation and related issues, and developing TURN’s proposed alternative recommendation.</p> <p>RelMonitor – Reliability Monitoring and Incentive Mechanisms: Analyzing and critiquing PG&E’s proposals for reliability monitoring and incentive mechanisms, and developing TURN’s proposed alternative recommendation.</p> <p># - Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. The time entries coded # represent approximately 13% of the total hours TURN recorded for work allocated to substantive categories in this proceeding, which TURN believes is a reasonable amount given the simultaneous handling of all substantive categories throughout much of the proceeding. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries in equal 20% shares to the four issue-specific categories described above (Policy, DistCap, DA, and RelMonitor) and general participation (GP).</p> <p>Settle – Settlement-related matters, including discussions with other parties and development of TURN’s settlement position and strategy.</p> <p>PD – Proposed Decision: Time devoted to reviewing and analyzing the Proposed Decision and any modified versions thereof, developing and drafting TURN’s comments and reply comments, and reviewing comments and reply comments of other parties.</p> <p>Comp – Time devoted to compensation-related pleadings</p> <p>Travel – Time devoted to travel related exclusively to work in this proceeding.</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>

<p>Comment 3</p>	<p>Hourly Rate for TURN attorneys and consultants in 2009 and 2010:</p> <p>2009 Rates: With one exception, TURN’s request for compensation uses 2009 hourly rates for its attorneys and consultants at levels previously authorized in prior Commission decisions, as noted in the table above.</p> <p>TURN seeks an increase in the hourly rate for the work of staff attorney Nina Suetake in 2009. Ms. Suetake joined TURN’s staff as an attorney in late 2004. Since joining TURN’s staff, Ms. Suetake has participated in a wide array of technical and complex matters, including serving as TURN’s lead attorney on the array of AMI-related applications before the Commission in recent years. Based on her work at TURN in 2005-2008, she had four years experience on public utilities-related issues in California prior to the start of 2009, and was early in her fifth year as an attorney in this field when 2009 began. In Resolution ALJ-247, the Commission adopted a range of \$280-300 (the same as for 2008) for attorneys in their fifth through seventh year of experience. The requested rate of \$280 is at the low end of this range. It would also bring Ms. Suetake’s 2009 rate to the same level adopted for Ms. Goodson’s work in 2008 (in D.08-08-027, p. 5), consistent with Ms. Goodson having joined TURN’s staff as an attorney in late 2003.</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>2010 Rates: The Commission has not previously authorized an hourly rate for TURN’s attorneys or consultants where a substantial portion of the substantive work in the proceeding occurred in 2010. In this proceeding TURN requests compensation using the previously-approved 2009 hourly rates for each attorney’s and consultant’s 2010 work. TURN reserves the right to seek a higher hourly rate for work performed in 2010 in a future request for compensation.</p>
<p>Comment 4</p>	<p>Reasonableness of Expenses: The Commission should find TURN’s direct expenses reasonable. The expenses consist of photocopying expenses, including the costs of producing the hard copies of TURN’s testimony, expenses for legal research conducted via the Lexis/Nexis database in support of TURN’s advocacy in this proceeding, and phone and postage costs for TURN’s participation in this proceeding.</p>
<p>Comment 5</p>	<p>Request for Fee Enhancement:</p> <p>In past awards of intervenor compensation the Commission has recognized that under certain circumstances an enhancement of the base level of award is warranted. TURN submits that such circumstances are present here, in light of the exceptional results TURN’s participation achieved in this proceeding.</p> <p>In decisions addressing requests for enhancement of an intervenor compensation award, the Commission has described two categories of work that might warrant such an enhancement:</p> <p style="padding-left: 40px;">Commission decisions authorize two different kinds of multipliers, sometimes differentiated as either an “efficiency adder” or a “fee enhancement.” Both are applied to the authorized hourly rate. An “efficiency adder” has been approved where a customer’s participation involved skills or duties beyond those normally required.... A “fee enhancement” has been approved where the Commission determined the intervenor had achieved exceptional results.²</p>

² D.04-08-025 (I.02-04-026 -- PG&E Bankruptcy), p. 46.

As the Commission noted in D.04-08-025, a multiplier award is rare in all cases, and particularly rare as a “fee enhancement” for achieving exceptional results.³

TURN’s research suggests that the most recent award of a multiplier as a “fee enhancement” occurred in D.00-09-068, awarding intervenor compensation to TURN and other intervenors in PG&E’s test year 1999 GRC. In that decision the Commission first reviewed the factors set forth in D.88-02-056 for determining whether an upward adjustment to the base level of compensation is warranted. It went on to quote the earlier decision’s recognition that the factors “are not to be applied in a rigid manner.”⁴ The Commission then found that TURN’s request for a 25% enhancement for work performed on depreciation-related issues in that GRC was justified, noting that “TURN achieved a remarkable degree of success on these issues” particularly in light of the substantial dollars associated with the depreciation issues in that GRC.

TURN submits that the circumstances present here with regard to the entirety of PG&E’s distribution reliability incentive program similarly warrant a 25% enhancement. As described in the section on TURN’s substantial contribution, TURN achieved remarkable success in this proceeding from the outset through the conclusion of the proceeding. Throughout the decision, the Commission cited with favor TURN’s analysis, and generally adopted TURN’s recommended outcome on each of the disputed issues. As a result, the utility was authorized to spend approximately 18% of the requested amount on capital and 16% of the requested amount for expense. D.10-06-048, p. 2. Even at the final stage of the decision-making process, the Commission adopted the change TURN recommended to prevent the utility from spending on substation emergency transformer capacity amounts authorized for distribution automation or rural reliability improvements. In sum, the Commission should find that the outcomes TURN achieved in this proceeding represent the type of exception results that warrant a fee enhancement.

In D.04-08-025, the Commission described the fee enhancement as applying to the authorized hourly rate. In the table in Part III.B of the request for compensation, TURN used the regular hourly rates approved (or for which approval is sought) for each TURN staff member or expert witness, and made a single entry to reflect the 25% fee enhancement TURN is requesting. The table below makes the same calculation with the enhancement reflected in the hourly rate used for each staff member or expert witness. (Since TURN seeks a single hourly rate for each attorney’s or consultant’s work in this proceeding, the following figure shows the total hours for each attorney or consultant from 2008-2010.)

	Hours	Normal Rate	25% of Normal Rate (enhancement)	Requested Comp at Normal Rate	Requested enhancement	Total requested comp
R. Finkelstein	333	\$470	\$117.50	\$156,510	\$39,128	\$195,638
H. Goodson	140.7	\$280	\$70	\$39,396	\$9,849	\$ 49,245
N. Suetake	91	\$280	\$70	\$25,480	\$6,370	\$ 31,850
W. Marcus	132.4	\$250	\$62.50	\$33,100	\$8,463	\$ 42,313
G. Schilberg	154.9	\$200	\$50	\$30,980	\$7,745	\$ 38,725

³ *Id.*, and fn. 17, pp. 46-47.

⁴ D.00-09-068, pp. 27-28.

	G. Jones	487.6	\$120	\$30	\$58,512	\$14,628	\$ 73,140
	Total				\$343,978	\$85,995	\$429,973

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 1:

Detailed Time Reports for TURN's Attorneys in A.08-05-023

Date	Attorney	Activity	Description	Time Spent
Attorney: BF				
5/13/2008	BF	GP	Preview meeting w/ DRA and PG&E	1.25
5/15/2008	BF	GP	E-mail TURN re: summary of PG&E request	1.75
5/22/2008	BF	GP	Review application, testimony	2.75
5/24/2008	BF	MotDis	Draft Mtn Dismiss	1.50
5/25/2008	BF	MotDis	Research, draft mtn dismiss	6.25
5/26/2008	BF	MotDis	Research, draft mtn dismiss	1.25
5/28/2008	BF	MotDis	Draft mtn dismiss	1.75
5/31/2008	BF	MotDis	Draft mtn dismiss	3.25
6/1/2008	BF	MotDis	Draft mtn dismiss	6.25
6/2/2008	BF	MotDis	Draft mtn dismiss	2.75
6/14/2008	BF	MotDis	Draft and revise mtn to dismiss	3.75
7/15/2008	BF	MotDis	Review PG&E and CUE responses to MTD; contact DRA re: reply, review file	4.25
7/16/2008	BF	MotDis	Review file; outline reply	5.75
7/17/2008	BF	MotDis	Research and draft reply on MTD	3.25
7/18/2008	BF	MotDis	Draft and edit reply	6.00
Total: 2008				51.75
1/11/2009	BF	DistCap	Review draft DRs	0.50
1/12/2009	BF	GP	Review draft DRs; e-mail w/ other consumer reps; begin review of app, testimony	2.25
1/13/2009	BF	GP	Edit DRs, review case file, e-mail to consumer reps, BM	1.75
1/14/2009	BF	GP	Review PG&E PHC Stmt; e-mails to JBS re: disc'y, other consumer groups	1.25
1/14/2009	BF	DA	Review PG&E testimony; e-mail BM re: intersection w/ Smart Meters	2.25
1/15/2009	BF	DA	Review PG&E testimony, exchange e-mails w/ JBS re: DA and KEMA studies	2.75
1/20/2009	BF	DA	Background research for PHC statement	1.25
1/21/2009	BF	GP	Draft PHC statement	4.75
1/22/2009	BF	GP	Draft and edit PHC statement; e-mails w/ other consumer groups; p/cs w/ BM, GS	3.75
1/25/2009	BF	GP	prep for phc	0.75
1/26/2009	BF	GP	Prep for and participate in PHC; e-mail summarizing PHC	3.25
1/28/2009	BF	GP	Review proposed confy agmt, samples from MF	0.50
1/29/2009	BF	GP	Review materials, draft e-mail to PG&E on confy agmt	1.00
1/31/2009	BF	#	Begin review of 2d set of DRs	1.75
2/4/2009	BF	GP	Review DR responses	0.75
2/11/2009	BF	GP	e-mails w/ GJones re: discovery	0.50
2/12/2009	BF	RelMonitor	DR to PG&E	0.50
2/22/2009	BF	Comp	Draft NOI, including fin. hardship showing	1.25
2/23/2009	BF	GP	Review scoping ruling; e-mail to JBS	0.75
3/6/2009	BF	DistCap	review initial results re: tnsfrmr spending and reliability improvements; e-mail re: strategy discussion	1.25
3/17/2009	BF	#	Prep for and conduct DRIP strategy call	2.25
3/20/2009	BF	DistCap	Review drs; e-mails w/ JBS	2.25
4/2/2009	BF	RelMonitor	Develop strategy for standard issue; e-mail JBS	1.25
4/22/2009	BF	#	Draft case status and strategy memo	2.25
4/27/2009	BF	#	prep for and attend DRIP mtg w/ HG and NS	1.25
5/6/2009	BF	Pol	E-mail exchange w/ JN re: DRIP interaction w/ AMI	0.50
5/8/2009	BF	DistCap	p/c w/ BM re: metric for reasonableness, strategy	0.50
5/21/2009	BF	DistCap	E-mail BM and GJ re: strategy, status	1.50
5/28/2009	BF	#	Review and edit DRs	1.75
5/29/2009	BF	#	Review DRIP file, review and edit DRs	3.75
6/2/2009	BF	#	Review DRs, e-mails w/ G Jones; initial review DRA DR resps	2.75
6/4/2009	BF	GP	Prep for consumer meeting	2.25

Date	Attorney	Activity	Description	Time Spent
6/5/2009	BF	GP	Meeting w/ DRA, CCSF re: strategy; review files, testimony, wps	5.75
6/8/2009	BF	#	Review and edit DRs	0.75
6/9/2009	BF	#	Review and edit DRs; e-mail to JBS	3.75
6/10/2009	BF	RelMonitor	Review, edit and draft DRs	1.75
6/11/2009	BF	#	DR Resp review; e-mails w/ JBS; review and edit DRs	2.75
6/17/2009	BF	Pol	Review and draft stimulus funds DR; draft annotated outline	3.25
6/18/2009	BF	#	Draft and edit annot. Outline; draft cover e-mail	1.75
6/29/2009	BF	DA	Review and edit DR #11	0.75
6/30/2009	BF	GP	Review DR responses; e-mail PG&E re: missing DRs	1.25
6/30/2009	BF	GP	Review PG&E finl rpts; e-mail to JBS	2.75
7/1/2009	BF	Pol	Review discovery materials; E-mail JBS re: material in board and exec. Reports	2.25
7/2/2009	BF	GP	Draft and edit request for schedule extension	3.25
7/6/2009	BF	#	Review rough draft testimony	0.75
7/7/2009	BF	#	Review testimony annotated outline; e-mail JBS	2.00
7/8/2009	BF	Pol	Review testimony general econ analysis section	1.75
7/10/2009	BF	Pol	Review testimony on policy issues	3.75
7/11/2009	BF	DistCap	Review draft testimony -- substn tfmr	3.75
7/12/2009	BF	Pol	Review discy on finl rpts to Board, BusTrans; draft memo re: potential testimony or cross	4.25
7/13/2009	BF	Pol	Revise and edit memo; e-mails to JBS and TURN	1.25
7/14/2009	BF	#	conf call w/ JBS; prep for call	3.25
7/15/2009	BF	#	E-mail JBS, TURN re: work plan; review GS testimony	2.75
7/16/2009	BF	#	Review draft testimony; p/cs w/ JBS	2.75
7/17/2009	BF	#	Final draft and edit of testimony	4.25
7/27/2009	BF	GP	Respond to PG&E question re: confl attchs	0.25
7/28/2009	BF	HP	e-mail exchange re: cross of Edeson, scheduling	0.25
7/30/2009	BF	GP	review DRA ex parte notice	0.25
8/4/2009	BF	HP	E-mail Paul A.; e-mail JBS and TURN re: upcoming rebuttal, preparation for hearings	0.75
8/5/2009	BF	HP	Review CUE testimony; e-mail JBS and TURN re: same	0.75
8/5/2009	BF	RelMonitor	Research, exchange e-mails w/ GS re: momentary outage std under IEEE, impact on claims	1.25
8/7/2009	BF	HP	Review file, notes; prep materials for hearings	3.25
8/8/2009	BF	HP	Initial review rebuttal testimony CUE, PG&E; begin outline of issues	2.75
8/9/2009	BF	GP	Draft ex parte notice	0.50
8/10/2009	BF	Pol	Review Dasso rebuttal, draft DRs	2.00
8/11/2009	BF	HP	Review rebuttal; p/c w/ GJ, BM & GS; e-mails to HG and NS	3.25
8/12/2009	BF	#	Finish preparing review rebuttal notes and cover memo; circulate to JBS and HG and NS; draft and review rebuttal DRs	5.25
8/13/2009	BF	Pol	Draft and edit DR #13 on rebuttal testimony	1.25
8/14/2009	BF	HP	Meet w/ HG and NS; meet w/ HG, NS, and JBS re: rebuttal review, hearing strategy, coverage; hearing prep	3.75
8/15/2009	BF	HP	E-mails to PG&E and service list about Monday call, status of incentive mechanism and IEEE standrd testimony	0.50
8/17/2009	BF	HP	Review rebuttal testimony, record materials; participate in conf call with all parties; e-mail to JBS re: results	2.25
8/18/2009	BF	Pol	Hearing prep -- Dasso, Pearson; e-mails re hearings	4.25
8/19/2009	BF	HP	Hearing prep -- genl (x ests, etc.); prep for Dasso cross; review rebuttal DR responses	3.75
8/20/2009	BF	#	Hearing prep -- Pearson, Dasso; forward x notes to HG; review Carruthers cross notes	6.00
8/21/2009	BF	DistCap	Hearing prep - Pearson - further review of testimony, cross notes, memo to HG	5.00
8/21/2009	BF	DA	Hearing prep -- review notes, memo to NS	3.00
8/22/2009	BF	Pol	Prep for Dasso cross	2.25

Date	Attorney	Activity	Description	Time Spent
8/23/2009	BF	Pol	Prep for Dasso cross, other hearing prep	2.75
8/24/2009	BF	GH	Prep for and attend hearings -- Dasso, Pearson	6.75
8/25/2009	BF	GH	Prep for and attend hearings -- Pearson, Carruthers, Smith, DRA; prep for D. Marcus cross	5.75
8/26/2009	BF	GH	Prep for and attend hearing -- D. Marcus, B. Marcus	2.50
8/27/2009	BF	GH	Post hearing review, prepare exhibits for late filing	1.25
9/3/2009	BF	Sett	Settlement mtg w/ PG&E and DRA; e-mails w/ DRA and TURN/JBS	2.25
9/6/2009	BF	#	Review file, record, transcripts	3.75
9/11/2009	BF	Sett	Review TURN testimony; draft settlement counter-offer to PG&E	2.25
9/11/2009	BF	#	Review hearing tscpts, testimony, file	4.25
9/15/2009	BF	#	Develop brief outline; e-mail HG and NS	3.25
9/17/2009	BF	Pol	Review file, outline brief	4.25
9/18/2009	BF	Pol	Review file, transcripts	5.00
9/20/2009	BF	Pol	Draft background section	4.75
9/23/2009	BF	Pol	Review files, outline brief	3.75
9/24/2009	BF	Pol	Draft policy section; review dist capacity section	11.25
9/25/2009	BF	Pol	Draft and edit policy section; review and edit entire brief	7.50
10/2/2009	BF	GP	Review opening briefs, files	3.25
10/5/2009	BF	GP	Review opening briefs, files; begin outline of reply brief	4.75
10/6/2009	BF	#	Outline reply brief	2.75
10/7/2009	BF	Pol	Draft reply brief -- general sections	5.25
10/8/2009	BF	Pol	Draft reply brief -- general sections	6.75
10/9/2009	BF	#	Draft and edit reply brief	3.75
Total: 2009				265.75
5/25/2010	BF	PD	Review PD, draft e-mail to TURN and JBS	1.25
6/11/2010	BF	PD	Emails w/ TURN, JBS and CCSF re: cmmts	1.25
6/12/2010	BF	PD	Review PD; outline cmmts	2.25
6/13/2010	BF	PD	Draft and edit cmmts	2.75
6/14/2010	BF	PD	Draft and final edit cmmts; review PG&E cmmts; e-mails re: analysis of cmmts	3.00
6/19/2010	BF	PD	Draft and edit reply cmmts on PD	4.25
6/21/2010	BF	PD	Review PG&E, ORA reply cmmts	0.25
6/22/2010	BF	PD	Review revised PD; draft e-mail memo to TURN, JBS re: same	0.50
7/17/2010	BF	Comp	Review time records; e-mail GS and GJ re: same; begin compiling data for comp request	1.75
8/5/2010	BF	Comp	Research and draft multiplier issue	2.00
8/5/2010	BF	Comp	Review case file, begin drafting comp request	2.75
8/8/2010	BF	Comp	Draft substl cont section of request	2.25
8/11/2010	BF	Comp	Finish substl cont section; draft hourly rates, reasonableness sections	3.25
8/12/2010	BF	Comp	Finish drafting comp request	2.75
Total: 2010				30.25
Total: BF				347.75
Attorney: HG				
4/27/2009	HG	GP	read scoping memo; meeting w/ Nina, Bob about case	0.75
6/5/2009	HG	#	review PG&E testimony, BF memo, conf call w/ JBS	2.50
6/7/2009	HG	#	cont. reading PG&E's testimony, prep for tomorrow's meeting w/ DRA	3.00

Date	Attorney	Activity	Description	Time Spent
6/8/2009	HG	RelMonitor	discuss w/ Gayatri SAIDI / SAIFI underlying data	0.50
6/8/2009	HG	#	discuss strategy internally	1.00
6/8/2009	HG	#	meet with DRA to coordinate coverage and strategy	2.25
6/9/2009	HG	RelMonitor	review Gayatri DR re SAIDI / SAIFI, outage causes; discuss w/ Gayatri, BF	0.50
7/14/2009	HG	RelMonitor	review Gayatri's testimony, edit	5.75
7/14/2009	HG	#	conf call w/ JBS re: testimony finalization	0.75
7/15/2009	HG	RelMonitor	discuss Gayatri's testimony w/ Bob; coordinate next steps in document review (Bill's testimony) and finalization	0.50
8/6/2009	HG	GP	begin reading other intervenor testimony	2.75
8/11/2009	HG	HP	discuss PG&E rebuttal internally; begin reading PG&E rebuttal	1.50
8/12/2009	HG	HP	cont reading PG&E rebuttal; notes for DR, hearings	2.75
8/13/2009	HG	HP	cont. reading other intervenor testimony	3.00
8/14/2009	HG	HP	meeting w/ Bob, NS re hearings; conf call w/ JBS re cross prep, case strategy; coordinate w/ DRA	3.50
8/14/2009	HG	HP	cont reading intervenor testimony, notes for hearing	1.50
8/17/2009	HG	GP	discuss today's pre-hearing conf call internally; participate in conf call	1.00
8/20/2009	HG	DistCap	discuss cross w/ BF; rsch Pearson cross (dist capacity)	2.50
8/21/2009	HG	DistCap	(Capacity) rsch, prep for cross of Pearson, prep cross exhibits; discuss cross w/ Bob, Gayatri, Garrick	6.25
8/23/2009	HG	DistCap	review TURN testimony re issues addressed by PG&E witness Pearson; review Pearson rebuttal; rsch, draft cross questions; finalize cross exhibits	15.00
8/24/2009	HG	DistCap	cont prep for cross of Pearson; attend hearings, begin cross; discuss strategy for tomorrow w/ Bob	9.00
8/25/2009	HG	DistCap	more prep for Pearson cross; cont crossing Pearson	3.25
8/25/2009	HG	DistCap	attend hearings; limited cross of Carruthers (0.25); discuss hearings internally	4.50
8/26/2009	HG	DistCap	review transcript fm Pearson cross; email Gayatri re: DR	0.50
8/26/2009	HG	GH	attend hearings	2.00
8/27/2009	HG	DistCap	(Pearson / DR) review Gayatri's analysis of DR issue	0.25
8/28/2009	HG	GP	read PG&E ex parte notice; discuss response internally	0.25
9/10/2009	HG	Sett	discuss sett meeting, next steps w/ Bob, Nina	0.25
9/10/2009	HG	#	discuss brief w/ Bob, Nina	0.25
9/11/2009	HG	Sett	discuss response to PG&E's sett offer w/ Bob; read DRA's response	0.25
9/20/2009	HG	DistCap	review materials for brief (emergency substation capacity)	4.00
9/21/2009	HG	DistCap	review materials for brief (interconnectivity capacity); work on emergency capacity arguments	9.00
9/22/2009	HG	DistCap	draft brief (emergency substation capacity)	8.25
9/23/2009	HG	DistCap	draft brief (emergency substation capacity)	11.75
9/24/2009	HG	DistCap	draft brief (interconnectivity capacity)	14.00
9/24/2009	HG	DistCap	draft brief (inflated unit costs)	1.25
9/24/2009	HG	DistCap	discuss brief w/ Garrick at JBS, edit (emergency substation capacity)	1.50
9/25/2009	HG	DistCap	finish brief section on emergency capacity	2.24
9/25/2009	HG	DistCap	integrate brief sections for finalization	1.25
9/25/2009	HG	DistCap	draft brief (inflated unit costs - labor escalation)	0.50
10/8/2009	HG	DistCap	rsch, draft reply brief (dist. capacity)	4.00
10/9/2009	HG	GP	read other parties' reply briefs	1.00
10/9/2009	HG	DistCap	reply brief -- discuss w/ Bob, review, edit draft	0.75
Total: 2009				137.24
5/25/2010	HG	PD	read PD; discuss w/ BF	1.00
6/9/2010	HG	PD	coordinate cmts on PD w/ NS	0.25
6/11/2010	HG	PD	review substation capacity, interconnectivity sections of PD; review record; cmts for Bob	1.25

Date	Attorney	Activity	Description	Time Spent
6/13/2010	HG	PD	finish memo for Bob for cmts on PD	1.00
Total: 2010				3.50
Total: HG				140.74
Attorney: JBS--B Marcus				
5/13/2008	JBS--B Marcus	GP	get shareholder presentations together prior to PG&E meeting	0.33
5/15/2008	JBS--B Marcus	MotDis	TC Bob, draft memo	1.75
5/27/2008	JBS--B Marcus	MotDis	review shareholder conference material for discussion of DRIP, etc.	0.34
5/30/2008	JBS--B Marcus	MotDis	review 5/22 investor conference material re: DRIP	0.33
6/2/2008	JBS--B Marcus	MotDis	review and edit Bob's motion to dismiss	1.00
7/16/2008	JBS--B Marcus	MotDis	e-mail answer to question re DRIP motion	0.17
7/17/2008	JBS--B Marcus	MotDis	TC Bob F re motion to dismiss	0.25
Total: 2008				4.17
1/2/2009	JBS--B Marcus	DistCap	draft data request, review DPA demand forecasting methodology	6.25
1/13/2009	JBS--B Marcus	DistCap	edit data request	0.33
1/14/2009	JBS--B Marcus	DistCap	conference call, edit data responses	0.75
1/21/2009	JBS--B Marcus	DistCap	review Garrick's DRIP research and DRs	1.50
1/22/2009	JBS--B Marcus	GP	review and edit PHC statement	1.00
1/26/2009	JBS--B Marcus	DistCap	review and edit Garrick's DRs	0.67
2/5/2009	JBS--B Marcus	#	review data responses	0.50
2/20/2009	JBS--B Marcus	#	supervise Garrick in coordinating GRC and DRIP materials	0.25
3/5/2009	JBS--B Marcus	Pol	review DRs produce chart on SAIDI/.SAIFI/cust minutes by function, review PG&E investor presentation	0.75
3/16/2009	JBS--B Marcus	DistCap	discuss PG&E data responses with Garrick	0.33
3/18/2009	JBS--B Marcus	DistCap	review responses to DRs and PG&E's update testimony; draft more DRs	2.00
5/7/2009	JBS--B Marcus	Pol	TC Bob F re burden of proof	0.33
5/28/2009	JBS--B Marcus	#	work with Garrick on case strategy, DR preparation, TC BF	0.75
5/29/2009	JBS--B Marcus	#	work with Garrick on case strategy	0.75
6/5/2009	JBS--B Marcus	DistCap	conference call, look up CEMA materials on transformers for Garrick, discuss DRs	1.75
6/9/2009	JBS--B Marcus	Pol	send materials on reducing discretionary spending, review materials from Garrick	0.25
6/10/2009	JBS--B Marcus	DistCap	work on DRIP DRs	0.75
6/11/2009	JBS--B Marcus	DistCap	internet research substation capacity, reliability, and aging issues	1.75
6/29/2009	JBS--B Marcus	DistCap	work on substation VOS and outage data	4.50
6/30/2009	JBS--B Marcus	DistCap	work on substation calculatoins and testimony	5.25
7/1/2009	JBS--B Marcus	DistCap	Draft testimony on substation cap.	5.00
7/2/2009	JBS--B Marcus	DistCap	Draft & revise testimony	10.50
7/3/2009	JBS--B Marcus	DistCap	revise testimony - review relevant DRA DRs.	4.50
7/6/2009	JBS--B Marcus	DistCap	draft testimony	8.00
7/7/2009	JBS--B Marcus	DA	analyze costs of connectivity, edit material on substation transformers	5.50
7/8/2009	JBS--B Marcus	Pol	draft policy section and edit other material	7.75
7/9/2009	JBS--B Marcus	DA	edit material from Garrick	2.00
7/10/2009	JBS--B Marcus	DA	edit DA testimony work on connectivity	5.00
7/13/2009	JBS--B Marcus	DistCap	draft DRIP testimony	5.50

Date	Attorney	Activity	Description	Time Spent
7/14/2009	JBS--B Marcus	DA	edit and revise sections on cost estimation, connectivity, edit Garrick drafts on FLISR	6.75
7/15/2009	JBS--B Marcus	DistCap	work on testimony - connectivity mostly	7.75
7/16/2009	JBS--B Marcus	DistCap	work on attachments, testimony	7.25
7/17/2009	JBS--B Marcus	DistCap	complete last revisions to testimony and exhibits	5.75
7/20/2009	JBS--B Marcus	#	review DRA/CCUE testimony	2.00
8/13/2009	JBS--B Marcus	DistCap	work on DRIP cross-exam and analysis	1.75
8/14/2009	JBS--B Marcus	HP	conference call on cross exam	2.25
8/19/2009	JBS--B Marcus	DistCap	prepare testimony errata	2.00
8/20/2009	JBS--B Marcus	DistCap	work on testimony errata, cross-exam	1.25
8/21/2009	JBS--B Marcus	DistCap	last changes to testimony errata, work with Garrick on cross	1.25
8/24/2009	JBS--B Marcus	Pol	respond to questions from Bob re: cross	0.17
8/25/2009	JBS--B Marcus	#	prepare for hearing	1.50
8/26/2009	JBS--B Marcus	#	attend hearing face cross-examination, send Bob 2 attachments for late-filed exhibit	2.58
8/26/2009	JBS--B Marcus	Travel	Travel to and from evid'y hearing.	3.00
9/29/2009	JBS--B Marcus	#	read opening briefs, provide notes to attys.	1.50
Total: 2009				130.91
6/14/2010	JBS--B Marcus	PD	review PG&E opening comments, prepare brief comment for Bob F re item to include in reply - no transfer of money to transformer emergency capacity	0.25
Total: 2010				0.25
Total: JBS--B Marcus				135.33
Attorney: JBS--G Jones				
5/13/2008	JBS--G Jones	GP	DRIP Presentation by PG&E	3.00
Total: 2008				3.00
1/9/2009	JBS--G Jones	DA	Case Review (overall & Distribution Automation)	6.31
1/12/2009	JBS--G Jones	#	Case Review (overall & Distribution Automation)	6.87
1/13/2009	JBS--G Jones	DA	Case Review (Capacity and Distribution Automation)	4.00
1/13/2009	JBS--G Jones	DistCap	Case Review (Emergency Capacity)	1.39
1/14/2009	JBS--G Jones	DA	Review KEMA reports on Distribution Automation	4.15
1/14/2009	JBS--G Jones	DA	Case review; review KEMA reports on Distribution Automation)	3.91
1/15/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	8.00
1/16/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	8.33
1/20/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	8.00
1/21/2009	JBS--G Jones	#	Draft Stretegy Memo	6.75
1/22/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	8.00
1/23/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	7.25
1/26/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation and non-emergency capacity)	9.13
1/27/2009	JBS--G Jones	RelMonitor	Draft DRs (Reliabilty- IEEE v 1996 Exclusions definitions)	3.50
1/30/2009	JBS--G Jones	DA	Review DR responses (Distribution Automation)	0.73
1/30/2009	JBS--G Jones	RelMonitor	Draft DRs (Reliabilty- IEEE v 1996 Exclusions definitions)	0.34
2/2/2009	JBS--G Jones	Pol	Review PG&E investor conferences	7.00

Date	Attorney	Activity	Description	Time Spent
2/3/2009	JBS--G Jones	Pol	Review PG&E investor conferences	7.00
2/4/2009	JBS--G Jones	Pol	Review PG&E investor conferences	0.73
2/6/2009	JBS--G Jones	Pol	Draft DRs on investor conferences	0.37
2/11/2009	JBS--G Jones	DA	Review PG&E DR responses/testimony (Distribution Automation)	6.00
2/12/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation)	5.25
2/18/2009	JBS--G Jones	Pol	Review PG&E consultant report (KEMA on PG&E Automation)	4.90
2/19/2009	JBS--G Jones	DA	Draft DRs (Distribution Automation & non-emergency capacity)	8.25
2/20/2009	JBS--G Jones	Pol	Review PG&E consultant report (KEMA on Aging Infrastructure)	8.00
2/23/2009	JBS--G Jones	Pol	Review PG&E consultant report (KEMA on Aging Infrastructure)	0.83
2/25/2009	JBS--G Jones	Pol	Draft DRs (Aging Distribution)	0.23
3/6/2009	JBS--G Jones	RelMonitor	SAIDI Exclusion Definition Analysis (Reliability - IEEE vs 1996 plus choice of beta)	2.73
3/10/2009	JBS--G Jones	RelMonitor	SAIDI Exclusion Definition Analysis (Reliability - IEEE vs 1996 plus choice of beta)	8.00
3/11/2009	JBS--G Jones	RelMonitor	SAIDI Exclusion Definition Analysis (Reliability - IEEE vs 1996 plus choice of beta)	6.90
3/12/2009	JBS--G Jones	RelMonitor	SAIDI Exclusion Definition Analysis (Reliability - IEEE vs 1996 plus choice of beta)	5.00
3/17/2009	JBS--G Jones	DistCap	Review of Emergency Transformers Benefits	5.00
3/18/2009	JBS--G Jones	Pol	Value of Service research (including reading PG&E's last study)	1.70
3/19/2009	JBS--G Jones	DA	Draft DRs Distribution Automation	3.75
3/19/2009	JBS--G Jones	DistCap	Review of Emergency Transformers Benefits	0.87
3/20/2009	JBS--G Jones	DA	Review Distribution Automation DR Responses	0.12
3/20/2009	JBS--G Jones	DA/DistCap	Draft DRs Distribution Automation & Emergency Transformers	4.47
3/31/2009	JBS--G Jones	DistCap	DR Response Review & Response (Emergency Transformers)	0.58
3/31/2009	JBS--G Jones	DA	DR Response Review & Response (Distribution Automation)	2.88
4/1/2009	JBS--G Jones	RelMonitor	Reliability Calculation Issue re exclusion definition (reliability)	0.36
4/1/2009	JBS--G Jones	DistCap	Draft DRs regarding transcripts and customer names (load growth)	0.48
4/2/2009	JBS--G Jones	RelMonitor	Reliability Standards Issue (reliability)	0.33
4/2/2009	JBS--G Jones	DistCap	Draft Transformer Capacity DRs (emergency capacity)	0.85
4/3/2009	JBS--G Jones	DA	DR Response Review (Distribution Automation)	0.49
4/6/2009	JBS--G Jones	Pol	Earnings call transcripts & confidentiality issue	0.36
4/6/2009	JBS--G Jones	DA	DR Response Review (Distribution Automation)	1.19
4/21/2009	JBS--G Jones	DA	Review Outage Maps (automation and capacity)	0.38
4/21/2009	JBS--G Jones	DA	DR Review (Distribution Automation)	0.42
4/22/2009	JBS--G Jones	DA/DistCap	Followup DRs (emergency & non-emergency capacity)	5.32
4/22/2009	JBS--G Jones	DistCap	Review of Ch. 3 Workpapers	0.33
4/23/2009	JBS--G Jones	DA/DistCap	Followup DRs (emergency & non-emergency capacity)	0.50
4/27/2009	JBS--G Jones	Pol	Review Notes to Directors	1.92
4/27/2009	JBS--G Jones	Pol	Review Aging Infrastructure Report	0.50
4/28/2009	JBS--G Jones	Pol	Review Notes to Directors	1.02
4/30/2009	JBS--G Jones	Pol	Review Aging Dist Infrastru Report	2.34
5/6/2009	JBS--G Jones	DA	Compare proposed communication with AMI /PBR Benefits	0.68
5/18/2009	JBS--G Jones	DistCap	Draft DRs Emergency Transformers (emergency capacity)	0.40
5/18/2009	JBS--G Jones	Pol	Draft DRs (Aging Infrastructure)	1.77
5/18/2009	JBS--G Jones	DA	Cost Benefit Analysis (dist automation/non-emergency capacity)	0.49
5/19/2009	JBS--G Jones	Pol	Draft DRs (Aging Infrastructure)	0.41
5/19/2009	JBS--G Jones	DistCap	Review emergency planning criteria changes	4.30
5/19/2009	JBS--G Jones	DA	Review DR Responses, Draft DRs (Dist Automation, non-emerg)	1.80
5/20/2009	JBS--G Jones	DA	Review DR Responses, Draft DRs (Dist Automation, non-emerg)	1.50
5/21/2009	JBS--G Jones	#	Review 2007 GRC	1.12
5/21/2009	JBS--G Jones	DA	Review of Cap Ex WPs (DA/non-emergency capacity)	2.68
5/21/2009	JBS--G Jones	Pol	Review DR Responses; Averich-Johnson Research on capital incentives	4.04
5/22/2009	JBS--G Jones	DA	Rev DRs, draft DRs (Distribution Automation, non-emerg capacity)	4.07

Date	Attorney	Activity	Description	Time Spent
5/22/2009	JBS--G Jones	#	Rev 2007 GRC; disc'n w B. Finkelstein TURN; Rev Distribution operations	3.06
5/26/2009	JBS--G Jones	DistCap	Draft DRs Emergency Capacity	8.00
5/27/2009	JBS--G Jones	Pol	Rev Chngs to DPA Facilities Guides; Aging infrastu	4.16
5/27/2009	JBS--G Jones	DA	Draft Testimony on Cost-effectiveness (dist auto & non-emergency capacity)	2.08
5/28/2009	JBS--G Jones	DA	Draft DRs Distribution Automation	8.00
5/29/2009	JBS--G Jones	Pol	Review Board of Directors Materials	3.60
6/1/2009	JBS--G Jones	DA/DistCap	Review TURN DR Set #4 (dist automation, emergency & non-emergency capacity)	3.73
6/1/2009	JBS--G Jones	DA	Review of DRA DR questions (distribution automation)	1.39
6/2/2009	JBS--G Jones	Pol	Review of May 22 Investor Conference re DRIP; Rev Financial Perf and Bus Plans; draft testimony outline	2.50
6/2/2009	JBS--G Jones	DA	Review KEMA Reports; Draft DRs (distribution automation)	1.90
6/5/2009	JBS--G Jones	DA	phone call with TURN; Drafting testimony outline	6.77
6/5/2009	JBS--G Jones	#	Research & draft memo on PG&E's 2006 CEMA case	1.35
6/8/2009	JBS--G Jones	RelMonitor	IEEE Research (Reliability)	0.12
6/8/2009	JBS--G Jones	DistCap	Draft Line Transformer DRs (capacity)	0.64
6/8/2009	JBS--G Jones	#	Review PG&E Aging Infr; Prep for DRA meeting; Meeting with TURN and DRA (general case discussion)	3.70
6/9/2009	JBS--G Jones	Pol	Summary of Bus. Highlights, Bus Report, BT; Review internal PG&E memoranda on CapEx	3.40
6/10/2009	JBS--G Jones	DistCap	Draft DRs (emergency capacity-outright failures vs forced outages)	1.85
6/10/2009	JBS--G Jones	DA/DistCap	Draft DRs (dist automation, emergency & non-emergency capacity) IEEE Stadards Research (reliability)	3.67
6/11/2009	JBS--G Jones	DistCap	Transformer Research, prioritize emergency capacity DR questions; Rev DR Responses (emergency capacity); Disc with Bob; Dis with PGE re: DR about load growth data inquiry	2.90
6/12/2009	JBS--G Jones	DA	Drafting testimony on Distribution Automation restoration	1.00
6/15/2009	JBS--G Jones	RelMonitor	Compare 1996 exclusion definition to IEEE definition for Reliability measure; Review Centralized vs peer to peer proprietary	1.00
6/16/2009	JBS--G Jones	RelMonitor	Difference in reliability improvement btwn 2008 and 2009	0.20
6/24/2009	JBS--G Jones	DA	DRAFT DRs (Distribution Automation)	3.93
6/25/2009	JBS--G Jones	#	Escalation & cost reduction analysis (overall); strategy conversation with TURN	3.62
7/1/2009	JBS--G Jones	Pol	DRAFT Testimony (Policy & Thematic Section)	8.50
7/2/2009	JBS--G Jones	Pol	DRAFT Testimony (Policy & Thematic Section)	4.00
7/2/2009	JBS--G Jones	DistCap	Analysis (capacity expenses)	4.00
7/3/2009	JBS--G Jones	DistCap	Analysis (capacity expenses)	4.17
7/3/2009	JBS--G Jones	Pol	DRAFT Testimony (Policy & Thematic Section)	3.67
7/6/2009	JBS--G Jones	DA	DRAFT Testimony (Dist Automation, non-emergency capacity)	8.00
7/7/2009	JBS--G Jones	DA	DRAFT Testimony (Dist Automation, non-emergency capacity)	8.00
7/8/2009	JBS--G Jones	DA	DRAFT Test (Dist Autom); Analysis (dist aut)	8.00
7/9/2009	JBS--G Jones	DA	Analysis (dist analysis)	6.40
7/10/2009	JBS--G Jones	DA	Analysis (dist analysis); draft testimony (Dist Auto)	8.00
7/13/2009	JBS--G Jones	DA	Expense analysis, disallowance Calculation Dist Auto	4.20
7/14/2009	JBS--G Jones	DA	Draft and Edit Distribution Automation testimony	0.66
7/14/2009	JBS--G Jones	RelMonitor	Adjusting KEMA-stated SAIDI improvement	1.32
7/14/2009	JBS--G Jones	DA	Distribution Automation capex, conversation with TURN; drafting testimo	5.27
7/15/2009	JBS--G Jones	DA	Disallowance calculation distribution automation capex & opex; draft testimony Distribution Automation, non-emergency capacity	8.20
7/16/2009	JBS--G Jones	DA	Draft testimony (distribution automation & non-emergency capacity)	8.00
7/17/2009	JBS--G Jones	DA	Draft testimony; edits (distribution automation, non-emergency capacity)	10.00
7/20/2009	JBS--G Jones	DA	Workpapers (dist auto & non-emergency capacity)	3.29
7/20/2009	JBS--G Jones	DA	Review draft; Workpapers (distribution automation, non-emergency capacity)	4.17
7/21/2009	JBS--G Jones	DA	Workpapers (dist auto & non-emergency capacity)	2.86
7/31/2009	JBS--G Jones	DA	DRs and errata (distribution automation, non-emergency capacity)	4.60

Date	Attorney	Activity	Description	Time Spent
8/7/2009	JBS--G Jones	#	Review PG&E Rebuttal	0.36
8/11/2009	JBS--G Jones	#	Review PG&E Rebuttal	0.65
8/11/2009	JBS--G Jones	DA	Review PG&E Rebuttal, draft DRs (Distribution Automation, non-emergency capacity)	4.51
8/12/2009	JBS--G Jones	DA	Review PG&E Rebuttal, draft DRs (Distribution Automation, non-emergency capacity)	8.00
8/13/2009	JBS--G Jones	DA	Review PG&E Rebuttal; prepare for hearings (draft cross distribution automation, non-emergency capacity)	8.25
8/14/2009	JBS--G Jones	DA	Rebuttal review; draft cross and other prep; analysis of 400 worst circuits (dist automation, non-emergency capacity)	7.00
8/17/2009	JBS--G Jones	DA	Analysis of 400 worst circuits (dist automation, non-emergency capacity)	0.80
8/18/2009	JBS--G Jones	DA	Draft cross, non-emergency capacity, analysis of 400 worst circuits	3.80
8/19/2009	JBS--G Jones	DA	Draft cross, automation and non-emergency capacity	7.25
8/20/2009	JBS--G Jones	DA/DistCap	Draft cross, automation	8.70
8/21/2009	JBS--G Jones	DA/DistCap	Draft cross, emergency and non-emergency capacity, dist automation	7.80
8/24/2009	JBS--G Jones	DA/DistCap	draft cross, emergency, non-emergency capacity	3.33
8/24/2009	JBS--G Jones	DA	Hearings issues (dist automation and non-emergency capacity)	1.20
8/25/2009	JBS--G Jones	DA	Review PG&E Rebuttal, hearings issues (dist automation)	0.70
9/24/2009	JBS--G Jones	DA	Draft brief (distribution automation capacity)	5.33
9/30/2009	JBS--G Jones	GP	Review PG&E Brief	0.73
10/5/2009	JBS--G Jones	#	Review DRA Brief for inclusion in reply brief (distribution automation, capacity)	3.08
10/6/2009	JBS--G Jones	DistCap	Draft reply brief (response to CUE & PG&E)	0.98
10/7/2009	JBS--G Jones	DistCap	Draft Reply Brief (Capacity)	0.67
10/8/2009	JBS--G Jones	DistCap	Draft Reply Brief (Capacity)	2.16
10/9/2009	JBS--G Jones	#	Reply Brief Edits	1.03
Total: 2009				481.48
6/11/2010	JBS--G Jones	PD	Draft memo re DA issues & prop to include 4-kV circuits	0.52
6/14/2010	JBS--G Jones	PD	Draft PD Comments memo	0.68
6/14/2010	JBS--G Jones	PD	Draft PD Comments	1.86
Total: 2010				3.06
Total: JBS--G Jones				487.54
Attorney: JBS-G Schilberg				
5/13/2008	JBS-G Schilberg	GP	Prep for and meet with PG&E	3.00
7/23/2008	JBS-G Schilberg	RelMonitor	review of reliability mechanism	0.25
12/19/2008	JBS-G Schilberg	GP	review Ruling	0.15
Total: 2008				3.40
1/5/2009	JBS-G Schilberg	RelMonitor	review DR	0.11
1/16/2009	JBS-G Schilberg	#	Brainstorm ideas and issues	0.61
1/20/2009	JBS-G Schilberg	Pol	answer VOS question	0.45
1/21/2009	JBS-G Schilberg	RelMonitor	review reliability issues	3.35
1/22/2009	JBS-G Schilberg	RelMonitor	review filings and DRs -reliability monitoring	1.71

Date	Attorney	Activity	Description	Time Spent
1/23/2009	JBS-G Schilberg	RelMonitor	create DR -reliability monitoring	4.57
1/27/2009	JBS-G Schilberg	RelMonitor	create DR -reliability monitoring	0.60
1/29/2009	JBS-G Schilberg	GP	review PHC report	0.08
2/12/2009	JBS-G Schilberg	#	review developments	0.21
2/25/2009	JBS-G Schilberg	RelMonitor	review DR -- reliability monitoring	0.13
3/6/2009	JBS-G Schilberg	RelMonitor	review data responses -- reliability	2.56
3/12/2009	JBS-G Schilberg	RelMonitor	review reliability calculations	0.57
3/13/2009	JBS-G Schilberg	Pol	review documents and issues -- AMI overlap	1.21
3/16/2009	JBS-G Schilberg	Pol	review filing AMI overlap	1.33
3/17/2009	JBS-G Schilberg	GP	review update filing	1.08
3/18/2009	JBS-G Schilberg	Pol	research VOS	0.23
6/2/2009	JBS-G Schilberg	RelMonitor	review filing and DRs -overall	2.20
6/3/2009	JBS-G Schilberg	RelMonitor	review filing and DRs -overall	1.99
6/4/2009	JBS-G Schilberg	RelMonitor	conference call -- realibility definition	1.50
6/5/2009	JBS-G Schilberg	Pol	review filing and DRs -- outages in the news	4.91
6/8/2009	JBS-G Schilberg	RelMonitor	call with DRA	1.84
6/8/2009	JBS-G Schilberg	RelMonitor	review filing and DRs -- outages in the news	2.86
6/9/2009	JBS-G Schilberg	RelMonitor	create DR causes of outages	1.45
6/9/2009	JBS-G Schilberg	RelMonitor	review filing and issues causes of outages	1.33
6/10/2009	JBS-G Schilberg	RelMonitor	study issues -reliability	4.28
6/11/2009	JBS-G Schilberg	RelMonitor	review DRs - reliability	0.84
6/11/2009	JBS-G Schilberg	RelMonitor	review issues -reliability	2.68
6/12/2009	JBS-G Schilberg	RelMonitor	review filings and issues -IEEE definition	1.80
6/15/2009	JBS-G Schilberg	Pol	review issues -- federal stimulus funds	2.89
6/16/2009	JBS-G Schilberg	Pol	review issues, create DR 10 -federal stimulus funds	2.14
6/17/2009	JBS-G Schilberg	Pol	review KEMA	1.25
6/19/2009	JBS-G Schilberg	RelMonitor	reiev emails and testimony outline	0.52
6/24/2009	JBS-G Schilberg	RelMonitor	review outline;write testimony	2.90
6/25/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability comparisons	2.82
6/26/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability comparisons	4.44
6/28/2009	JBS-G Schilberg	RelMonitor	write testimony - causes of outages	1.30
6/29/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability monitoring statistics	3.68
6/30/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability monitoring statistics	4.14
7/1/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability monitoring statistics	6.48
7/2/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability monitoring statistics	3.72
7/6/2009	JBS-G Schilberg	Pol	review DRs - smart grid	0.74
7/6/2009	JBS-G Schilberg	Pol	read DRs; write testimony - smart grid	3.80
7/7/2009	JBS-G Schilberg	RelMonitor	write testimony - reliability monitoring statistics	4.71
7/8/2009	JBS-G Schilberg	RelMonitor	write testimony - incentive mechanism	5.54
7/9/2009	JBS-G Schilberg	RelMonitor	write testimony - finalize draft	4.13
7/9/2009	JBS-G Schilberg	Pol	write testimony - major outage news stories	0.96
7/15/2009	JBS-G Schilberg	RelMonitor	incorporate edits	4.38
7/16/2009	JBS-G Schilberg	RelMonitor	final draft	6.41
7/20/2009	JBS-G Schilberg	RelMonitor	review testimony	1.63
7/21/2009	JBS-G Schilberg	Pol	review Smart Grid issues	1.30
7/22/2009	JBS-G Schilberg	RelMonitor	finalize workpapers.	0.71
7/23/2009	JBS-G Schilberg	RelMonitor	review Bob's argument re: incentives	1.15
7/29/2009	JBS-G Schilberg	Pol	review Smart Grid developments	0.13
8/3/2009	JBS-G Schilberg	Pol	review AMI overlap	1.10
8/5/2009	JBS-G Schilberg	RelMonitor	respond to Bob's emails on outages	0.60
8/7/2009	JBS-G Schilberg	RelMonitor	review rebuttal - incentive mechanism	0.47
8/10/2009	JBS-G Schilberg	RelMonitor	review rebuttal - major outages	1.51
8/11/2009	JBS-G Schilberg	RelMonitor	review rebuttal - reliability monitoring	2.95
8/12/2009	JBS-G Schilberg	RelMonitor	review rebuttal - reliability monitoring	3.27

Date	Attorney	Activity	Description	Time Spent
8/13/2009	JBS-G Schilberg	HP	review rebuttal and cross strategy	3.39
8/14/2009	JBS-G Schilberg	HP	prepare for conference call & conf call	3.04
8/17/2009	JBS-G Schilberg	Pol	respond to Bob's questions on outages	0.64
8/18/2009	JBS-G Schilberg	Pol	cross prep - major outages	3.01
8/19/2009	JBS-G Schilberg	Pol	prepare cross	2.65
8/21/2009	JBS-G Schilberg	Pol	cross preparation for Bob	3.06
8/24/2009	JBS-G Schilberg	Pol	cross prep - Smart Grid	1.24
8/25/2009	JBS-G Schilberg	Pol	cross prep - reliability comparisons	3.33
8/27/2009	JBS-G Schilberg	RelMonitor	review transcript and Q from Hayley --demand response and load forecast	2.18
9/17/2009	JBS-G Schilberg	RelMonitor	answer DRIP question -- reliability metrics	0.68
Total: 2009				151.47
Total: JBS-G Schilberg				154.87

Attorney: NS

4/16/2009	NS	DA	Review DR reponse	0.50
4/22/2009	NS	GP	Read email from Bob re: background & prodoceudral history of DRIP	0.25
4/27/2009	NS	GP	Conference call w/ Bob and Hayley	0.50
4/30/2009	NS	DA	Review PG&E application and testimony	2.00
6/5/2009	NS	#	Conf. call w/ JBS re: issues and schedule	1.00
6/9/2009	NS	GP	Review PG&E testimony	2.00
6/25/2009	NS	GP	Review DRA draft testimony	2.50
7/1/2009	NS	RelMonitor	Read emails re: reliability measurement	0.25
7/13/2009	NS	Pol	Edit Gayatri's testimony	2.00
7/16/2009	NS	#	Edit Bill's testmony	3.50
7/17/2009	NS	#	Draft summary section	2.50
8/3/2009	NS	DA	Review PG&E testimony	4.00
8/12/2009	NS	DA	Review notes on rebuttal testimony	2.00
8/13/2009	NS	DA	Read rebuttal testimony	2.50
8/13/2009	NS	DA	Read/draft emails	0.25
8/14/2009	NS	DA	Review JBS rebuttal notes	1.00
8/14/2009	NS	HP	Meet w/ Bob and Hayley re: hearing prep	0.50
8/14/2009	NS	HP	Conference call w/ JBS re: hearing prep	1.00
8/17/2009	NS	HP	Conference call re: hearing prep	1.50
8/19/2009	NS	DA	Read emails re: DRs	0.25
8/19/2009	NS	HP	Read emails re: cross and cross prep	0.50
8/19/2009	NS	DA	Review TURN testimony and PG&E rebuttal	3.00
8/19/2009	NS	DA	Re-read Carruthers testimony	2.00
8/19/2009	NS	DA	Review cross notes for Carruthers	1.00
8/20/2009	NS	DA	Review testimony and notes, prep cross	3.00
8/21/2009	NS	HP	Hearing prep meeting	1.00
8/21/2009	NS	DA	Prep cross exhibits	2.00
8/24/2009	NS	DA	Prep additional cross for Carruthers	0.50
8/24/2009	NS	DA	Attend hearing (cross Carruthers)	5.00
9/3/2009	NS	Sett	Settlement conference	1.50
9/11/2009	NS	Sett	Emails re: settlement	0.25
9/15/2009	NS	GP	Review brief outline	0.50
9/22/2009	NS	GP	Emails re: testimony versions and pagination	0.50
9/22/2009	NS	DA	Draft brief	4.00
9/23/2009	NS	DA	Draft brief	8.00

Date	Attorney	Activity	Description	Time Spent
9/24/2009	NS	DA	Emails w/ Garrick re: DRAKE model and brief notes	0.50
9/24/2009	NS	DA	Talk w/ Bob re: brief	0.75
9/24/2009	NS	DA	Draft brief	9.00
9/25/2009	NS	DA	Emails w/ Bob and Hayley re: brief (check in questions, and draft sections)	0.50
9/25/2009	NS	DA	Draft brief	10.00
9/30/2009	NS	DA	Read opening briefs	1.00
10/8/2009	NS	DA	Review opening briefs and prep for reply brief	3.00
10/8/2009	NS	DA	Draft reply brief	2.00
Total: 2009				89.50
5/25/2010	NS	GP	Read PD	1.00
6/9/2010	NS	GP	Talk to Bob and Hayley re: PD	0.50
Total: 2010				1.50
Total: NS				91.00
Grand Total				1357.23

Attachment 2:

Detail of TURN's Expenses in A.08-05-023

Date	Activity	Description	Billed
<u>Activity: \$Cons Travel</u>			
5/15/2008	Cons. Travel	Automobile Travel BART	\$8.00
Total: \$Cons Travel			\$8.00
<u>Activity: \$Copies</u>			
6/17/2008	Photocopies	Motion and DRA to Dismiss the DRIP Application. 2cc x 41pp	\$16.40
6/25/2008	Photocopies	Motion for Party Status in the Proceeding. 2cc x 4pp	\$1.60
7/18/2008	Photocopies	Reply to Response to the Motion to Dismiss the DRIP Application. 2c x 17pp	\$6.80
1/22/2009	Photocopies	Prehearing Conference Statement. 2cc x 13pp	\$4.60
2/23/2009	Photocopies	Notice of Intent to Claim Intervenor Compensation. 2cc x 14pp	\$5.60
7/2/2009	Photocopies	Motion to Revise the Procedural Schedule. 2cc x 13pp	\$5.20
7/17/2009	Photocopies	Notice of Availability of Confidential and Non-Confidential Attachments to Testimony. 2cc x 3pp	\$1.20
8/10/2009	Photocopies	Late-Filed Notice of Ex Parte Communication. 2cc x 3pp	\$1.20
8/21/2009	Photocopies	Testimony. Colour Drop print job.	\$1,194.53
8/23/2009	Photocopies	Cross Exhibits Copies	\$64.06
8/24/2009	Photocopies	Cross Exhibits Copies	\$13.70
9/25/2009	Photocopies	Opening Brief on PG&E Company's Distribution Reliability Improvement Program (DRIP). 2cc x 114	\$45.60
10/9/2009	Photocopies	Reply Brief on PG&E's Company Distribution Reliability Improvement Program (DRIP). 2 x 22pp	\$8.80
6/14/2010	Photocopies	Opening Comments on the Proposed Decision of Administrative Law Judge Fukutome. 2cc x 10pp	\$4.00
6/21/2010	Photocopies	Reply Comments on the Proposed Decision of Administrative Law Judge Fukutome. 2cc x 6pp	\$2.40
Total: \$Copies			\$1,375.69
<u>Activity: \$Lexis Research</u>			
7/15/2008	Lexis Nexis	LexisNexis July Invoice	\$21.65
1/15/2009	Lexis Nexis	LexisNexis January Invoice.	\$47.04
7/15/2009	Lexis Nexis	LexisNexis July Invoice.	\$19.88
Total: \$Lexis Research			\$88.57
<u>Activity: \$Phone</u>			
2/15/2009	Phone/Fax	Sprint Invoice; \$0.02	\$0.02
4/27/2009	Phone/Fax	Conference Call	\$16.87
6/5/2009	Phone/Fax	Conference Call	\$43.68
7/14/2009	Phone/Fax	Conference Call	\$22.07
9/15/2009	Phone/Fax	Sprint Invoice; \$0.61	\$0.61
10/15/2009	Phone/Fax	Sprint Invoice; \$1.01	\$1.01
2/15/2010	Phone/Fax	Sprint Invoice; \$18.13	\$18.13
3/15/2010	Phone/Fax	Sprint Invoice; \$14.86	\$14.86
4/15/2010	Phone/Fax	Sprint Invoice; \$19.01	\$19.01
5/15/2010	Phone/Fax	Sprint Invoice; \$1.57	\$1.57
6/15/2010	Phone/Fax	Sprint Invoice; \$3.54	\$3.54
7/15/2010	Phone/Fax	Sprint Invoice; \$11.21	\$11.21

Date	Activity	Description	Billed
Total: \$Phone			\$152.58
<u>Activity: \$Postage</u>			
6/14/2010	Postage	Opening Comments on the Proposed Decision of Administrative Law Judge Fukutome. \$1.05 x 2cc	\$2.10
6/21/2010	Postage	Reply Comments on the Proposed Decision of Administrative Law Judge Fukutome. \$1.05 x 2cc	\$2.10
Total: \$Postage			\$4.20
Grand Total			<u>\$1,629.04</u>

Colour Drop

727 Van Ness Ave
San Francisco, CA 94102

Invoice

Date	Invoice #
8/25/2009	7433

Bill To
T.U.R.N 268 Bush Street #3933 San Francisco, CA 94104 Attn: Accounts Payable

Ship To
T.U.R.N 711 Van Ness Ave San Francisco, CA 94102

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
	Due on receipt		8/25/2009			

Quantity	Item Code	Description	Price Each	Amount
	Copying Services	Copy Work Inv# 16500	1,090.90	1,090.90T
		sales tax	9.50%	103.64

Total			\$1,194.54
--------------	--	--	------------

colour drop

Work Order Number: **16500**

727 Van Ness Avenue, San Francisco, CA 94102 • [t] 415.353.5720 • [f] 415.353.5730 • www.colourdrop.us • Federal Tax ID 30-0047642

CONTACT INFORMATION

Date In: **8/20/09** Due Date: **8/21/09** Intake By: **TIPU**
 Firm: **TURN**
 Contact: **Larry**
 Address: **268 Bush St # 3933**
 City: **San Francisco** State: **CA** Zip: **94104**
 Phone: _____ Fax: _____

SPECIAL INSTRUCTIONS

- 1st pg is red
 - double sided copies
 - Side tabs (numbers insert)
 - Bind original / add tabs

JOB INFORMATION

DESCRIPTION	ORIGINAL	SETS	SIDES	TOTAL	SIZE	RATE	COST
1. ONE COPY		6	1 ②	5646	11" 14" 17" 18"	.6	564.60
2. ONE ASAP;			1 2		11" 14" 17" 18"		
3. COPIES FOR			1 2		11" 14" 17" 18"		
4. MONDAY			1 2		11" 14" 17" 18"		
5.			1 2		11" 14" 17" 18"		
6.			1 2		11" 14" 17" 18"		
7.			1 2		11" 14" 17" 18"		
8.			1 2		11" 14" 17" 18"		
9.			1 2		11" 14" 17" 18"		
10.			1 2		11" 14" 17" 18"		

FINISHING / SERVICES

DESCRIPTION	QTY	RATE	COST
Staples			
Bindery	36	4	144-
Binders			
3 Hole Paper			
Labor		50	250-
Delivery			
TABS	294	.45	132.30
			526.30

BATES

COPY INFORMATION

OPERATOR

BALANCE

DO WE LABEL?

- Standard Language
- Redwells
- Binder F/B/S
- Manila Folder F/B/IF/IB
- Post-it Note
- Tab
- Slip Sheets
- CD/DVD
- Oversize Documents

POSITION

- Horizontal
 Bottom Left / Middle / Right
 Upper Left / Middle / Right
- Vertical
 Bottom Left / Middle / Right
 Upper Left / Middle / Right

PAPER SIZE/TYPE

- Size for Size
 - Reduce all to 8.5" x 11"
 - 3 Holes (Side)
 - 2 Holes (Top)
- ### COPY OPTIONS
- Same as Original
 - Convert 1 to 2 Sided
 - Convert 2 to 1 Sided
 - Slip Sheets
 - Only Flagged Docs
 - Color for Color
 - Color to B&W

COPY GRADE

A B C D E

© 2006 Form & Layout, All rights reserved. Colour Drop

DO WE COPY?

- Covers
- Spines
- File Folder Covers
- File Folder Tabs
- Index Tabs
- Post-it Notes
- Redwells
- Envelopes
- Standard Language

THE BOXES CONTAIN

- Mixed Original Sizes
- Two Sided Documents
- Post-it Notes
- Checks/Check Stubs
- NCR Documents
- Oversize Documents
- CDs
- Prints
- Small Documents

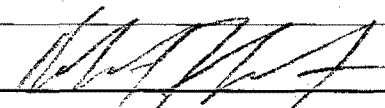
FINISHING

- Rebind Originals
- Restaple Originals
- Reclip Originals
- Bind Copies as Originals
- Staple Copies as Originals
- Clip Copies as Originals
- Do Not Staple Copies
- Do Not Clip Copies
- Rubber Band Copies

Name: **Ali/TIC/ST**
 Date/Time: _____
 Name: _____
 Date/Time: _____
 Supervisor: **Ali**
 QC: _____

Sub-total: **1090.90**
 Tax: **103.63**
TOTAL 1194.53

Your signature(s) below indicates authorization and approval of the project. All invoices are due net 15, after 30 days late fee of \$25.00, plus a surcharge of 1.5% (18%) will be applied to your balance. All accounts over 60 days will be sent to a collection agency.

Customer Authorization: _____
 Customer Approval: 

Customer Reference: **A08-65-023**

Attachment 3:

Certificate of Service by Customer

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

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

to the following persons appearing on the official Service List:

andre.devilbiss@recurrentenergy.com
atrowbridge@daycartermurphy.com
bcragg@goodinmacbride.com
bds@cpuc.ca.gov
bfinkelstein@turn.org
brbarkovich@earthlink.net
bruce.foster@sce.com
bts1@pge.com
case.admin@sce.com
cem@newsdata.com
CPUCCases@pge.com
crmd@pge.com
dkf@cpuc.ca.gov
dkl@cpuc.ca.gov
dmarcus2@sbcglobal.net
filings@a-klaw.com
garrick@jbsenergy.com
Jheckler@levincap.com
jim.howell@recurrentenergy.com
JSAd@pge.com
jsperry@ifpte20.org
julien.dumoulin-smith@ubs.com
jw2@cpuc.ca.gov
keith.mccrea@sutherland.com
kenneth.swain@navigantconsulting.com
kev@cpuc.ca.gov
kms@cpuc.ca.gov
ldri@pge.com
liddell@energyattorney.com
luke.dunnington@recurrentenergy.com

mcnultfa@sce.com
mdjoseph@adamsbroadwell.com
mdp5@pge.com
mflorio@turn.org
mjd@cpuc.ca.gov
mrw@mrwassoc.com
nes@a-klaw.com
norman.furuta@navy.mil
pfa@cpuc.ca.gov
pfoley@adamsbroadwell.com
PGG4@pge.com
ralphdennis@insightbb.com
regrelcpuccases@pge.com
RGiles@SempraUtilities.com
rkoss@adamsbroadwell.com
rliibert@cbbf.com
rschmidt@bartlewells.com
rschmidt@bartlewells.com
srovetti@sflower.org
swc@cpuc.ca.gov
tburke@sflower.org
theresa.mueller@sfgov.org
thomas.long@sfgov.org
txb@cpuc.ca.gov
wbooth@booth-law.com
wendy@econinsights.com
Yim@ZimmerLucas.com
zango@zimmerlucas.com

Executed this 24th day of August, 2010, at San Francisco,
California.

/S/

Larry Wong
The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104