

Decision \_\_\_\_\_

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

Order Instituting Rulemaking to Consider  
Revisions to the Planning Reserve Margin for  
Reliable and Cost-Effective Electric Service.

Rulemaking 08-04-012  
(Filed April 10, 2008)

**CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION**

<b>Claimant: The Utility Reform Network</b>		<b>For contribution to D.10-09-024</b>	
<b>Claimed (\$): \$76,840</b>		<b>Awarded (\$):</b>	
<b>Assigned Commissioner: Peevey</b>		<b>Assigned ALJ: Wetzell &amp; Gamson</b>	
<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>			
		<b>Signature:</b>	/s/
<b>Date:</b>	<b>November 23, 2010</b>	<b>Printed Name:</b>	<b>Michel Peter Florio, Senior Attorney</b>

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

**A. Brief Description of Decision:** D.10-09-024 closed R.08-04-012 with no change to the current Planning Reserve Margin (PRM), concluding that “there is more preliminary discussion needed regarding the recent CAISO study, as well as potentially other studies and methodological questions before the PRM issues are ripe for decision” (Decision, p.4).

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

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		

1. Date of Prehearing Conference:	June 2, 2008	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	July 2, 2008	
4. Was the notice of intent timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	Scoping Memo in this proceeding, R.08-04-012, p.18	
6. Date of ALJ ruling:	September 30, 2008	
7. Based on another CPUC determination (specify):		
8. Has the claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	Scoping Memo in this proceeding, R.08-04-012, p.18	
10. Date of ALJ ruling:	September 30, 2008	
11. Based on another CPUC determination (specify):		
12. Has the claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D.10-09-024	
14. Date of Issuance of Final Decision:	September 24, 2010	
15. File date of compensation request:	November 23, 2010	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
A	X		This case was somewhat unusual, in that concluded without the issuance of a substantive decision on the merits of the issues under consideration. However, TURN was an extremely active participant throughout the proceeding and its expert consultant Kevin Woodruff provided substantial assistance to the CAISO's and Energy Division's efforts to develop the input data and modeling conventions needed to run the CAISO's GE MARS model using California system data. Mr. Woodruff participated in all of the several working groups that were organized to assist and

		<p>monitor the data gathering and modeling process, and contributed his expertise to the effort to develop accurate generator forced outage rate data for use in the model. Ultimately Energy Division informed the ALJ that the funds for the GE MARS work were exhausted, and the ALJ suspended the procedural schedule for roughly an entire year, after which the Commission ultimately decided that the proceeding should simply be closed.</p> <p>In past situations where a proceeding has been terminated without a substantive decision on the merits, this Commission has routinely awarded intervenor compensation to active participants despite that unusual end result. Examples include: D.07-07-031 in A.99-09-053 (PG&amp;E Market Valuation of its Hydro System); D.04-03-031 in A.99-12-024 (SCE’s Market Valuation of its Hydro System); D.03-06-065 in A.99-03-013, <i>et al.</i> (Revenue Cycle Services/Direct Access Service Fees); D.02-08-061 in A.00-01-009 (SCE Post-Transition Rates); D.02-03-035 in A.00-05-024 (SCE Four Corners/Palo Verde Valuation); D. 03-05-029 in A.99-03-014 (PG&amp;E GRC Phase 2); and D.02-03-034 in A.00-05-026 (SCE SSID Valuation). As this Commission stated in D.04-04-031:</p> <p style="padding-left: 40px;">We also agree that denying compensation here would be inconsistent with the intent expressed in Pub. Util. Code § 1801.3(b) that the intervenor compensation statutes should “be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” As we stated in D.02-08-061, “we see no reason to increase the intervenor’s [financial] risk [of participation] by denying compensation in a proceeding that is prematurely terminated for reasons that are not reasonably foreseen and are beyond [the intervenor’s] control.” (<i>Mimeo.</i>, at 8.)</p> <p>Here the reasons for granting compensation to TURN are even more compelling than in those prior cases for at least two reasons: 1) the ultimate outcome of the proceeding here was to leave the existing PRM in place, a result that was consistent with TURN’s overall objective in the proceeding, and 2) TURN’s participation went well beyond normal “advocacy” and included its consultant’s efforts to assist Energy Division and the CAISO in data gathering and analysis, in attempt to help move the proceeding forward. Given all of these considerations, compensation is entirely justified in this case.</p>
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**PART II: SUBSTANTIAL CONTRIBUTION** (to be completed by Claimant except where indicated)

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

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
See Part I.C, above.		
The Commission’s decision left the existing PRM in place, consistent with TURN’s overall objective in the proceeding.	TURN’s 2/26/10 comments, pp.1-2; D.10-09-024, p.1	

The Scoping Memo consolidated Phases 1 and 2 as originally envisioned in the OIR itself in order to avoid the need for a “feedback loop” as described by TURN in its PHC statement.	TURN’s 4/25/08 PHC Statement, p.5; 9/30/08 Scoping Memo, pp.3-4.	
TURN took the initiative to help resolve vexing and difficult confidentiality and model access issues in this proceeding by submitting its July 25, 2008 Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4. The ALJ’s 10/20/08 ruling adopted the essential features of TURN’s proposal.	TURN’s 7/25/08 Motion; 10/20/08 ALJ ruling, p.2 and <i>passim</i> .	
The Commission closed the proceeding, consistent with TURN’s recommendation in its 2/26/10 comments.	TURN’s 2/26/10 comments, p.2; D.10-09-024, p.1.	

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

	Claimant	CPUC Verified
<b>a. Was DRA a party to the proceeding? (Y/N)</b>	Yes	
<b>b. Were there other parties to the proceeding? (Y/N)</b>	Yes, many	
<b>c. If so, provide name of other parties:</b> See service list for R.08-04-012 in attached certificate of service. DRA was the only other <i>active</i> party representing the interests of small consumers.		
<b>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:</b> TURN actively coordinated with DRA throughout the proceeding, but TURN – through its expert consultant Kevin Woodruff – took the most active role in the various technical working groups that conducted the vast majority of the work in this case. Due to the collaborative nature of the working group process, there was no duplication of effort among the parties.		

**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):**

<b>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)</b>	<b>CPUC Verified</b>
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TURN's work in this proceeding helped to contribute to the Commission's ultimate conclusion that this case could be closed without making any change to the adopted PRM. Any increase in the PRM, as advocated by certain other parties, would have resulted in increased procurement costs amounting to tens of millions of dollars for residential and other small consumers. TURN's costs of participation were quite modest relative to its degree of success in the proceeding and the magnitude of the issues at stake.

**B. Specific Claim:**

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
M.P. Florio	2007	0.50	\$520	D.10-10-014	\$ 260.00				
M.P. Florio	2008	52.50	\$535	D.10-10-014	\$ 28,087.50				
M. P. Florio	2009	1.50	\$535	Res. ALJ-235	\$ 802.50				
M.P. Florio	2010	5.75	\$535	Res. ALJ-247	\$ 3,076.25				
N. Suetake	2008	2.50	\$225	D.09-04-027	\$ 562.50				
<b>Subtotal:</b>					<b>\$ 32,788.75</b>	<b>Subtotal:</b>			
EXPERT FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Kevin Woodruff	2007	25.00	\$225	D.10-10-014	\$ 5,625.00				
Kevin Woodruff	2008	138.00	\$225	D.10-10-014	\$ 31,050.00				
Kevin Woodruff	2009	19.50	\$225	Res. ALJ-235	\$ 4,387.50				
Kevin Woodruff	2010	2.50	\$225	Res. ALJ-247	\$ 562.50				
Bill Marcus	2008	0.75	\$250	D.10-05-015	\$ 187.50				
<b>Subtotal:</b>					<b>\$ 41,812.50</b>	<b>Subtotal:</b>			
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 \$
<b>Subtotal:</b>						<b>Subtotal:</b>			
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
M.P. Florio	2008	0.50	\$267.50	50% of 2008 rate	\$ 133.75				
M. P. Florio	2010	5.00	\$267.50	50% of 2010 rate	\$ 1,337.50				

		<b>Subtotal:</b>	\$ 1,471.25	<b>Subtotal:</b>	
<b>COSTS</b>					
#	Item	Detail	Amount	Amount	
1	Photocopies	Copies of TURN's pleadings	\$ 21.40		
2	Postage	Mailing of TURN's pleadings	\$ 3.15		
3	Consultant Travel & Lodging	Mr. Woodruff's car trips to Folsom and San Francisco (twice) and hotel in SF solely for purposes of this proceeding.	\$ 742.98		
		<b>Subtotal:</b>	\$ 767.53	<b>Subtotal:</b>	
		<b>TOTAL REQUEST \$:</b>	\$ 76,840	<b>TOTAL AWARD \$:</b>	
<p>When entering items, type over bracketed text; add additional rows as necessary.</p> <p>*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.</p> <p>**Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>					

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

Attachment or Comment #	Description/Comment
Comment 1	In accordance with our typical practice, TURN attempted to allocate the time of its attorneys and expert consultants among the issues addressed in the proceeding. However, since this was in essence a single issue proceeding regarding the determination of the PRM, the vast majority of the hours shown in the attached timesheets are coded "PRM". TURN's representatives also recorded a modest amount of time as General Preparation ("GP"), reflecting work that was not allocable by issue, primarily time devoted to procedural matters, including attendance at the PHC and the issue of access to confidential information. Mr. Florio's work on compensation-related pleadings ("Comp") was separately recorded as well.
Comment 2	Michel Peter Florio was TURN's lead attorney in this proceeding, as reflected in the attached timesheets. Nina Suetake substituted for Mr. Florio at the PHC, as he was required to participate in a conflicting proceeding at that same time. The bulk of TURN's participation came via Kevin Woodruff of Woodruff Expert Services in Sacramento, who acted as TURN's expert consultant in the workshops and working group process. Mr. Woodruff brought his extensive past experience with system modeling and reliability metrics to this proceeding and reviewed data and modeling conventions for key aspects of the reliability modeling process. Mr. Woodruff also undertook significant efforts to assist the CAISO and Energy Division in their data collection process by making use of his extensive knowledge of California generation resources to review the study's proposed classification of such units for purposes of estimating their forced outage rates. Bill Marcus of JBS Energy, Inc. in West Sacramento, who typically serves as TURN's expert on load forecasting issues, devoted a small amount of time to consulting with Mr. Woodruff regarding the load forecasting issues involved in the modeling process. All of the hours claimed in this request were reasonable and necessary to the achievement of TURN's substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets.
Comment 3	The issue of the appropriate PRM was originally included in the scope of Phase 2, Track 2 of R.05-12-013, but was removed from that proceeding by ruling of President Peevey dated 11/19/07, which indicated that a new rulemaking would be instituted to address PRM issues. TURN's Request for Compensation filed August 4, 2010 in R.05-12-013 therefore excluded all of the hours that TURN's representatives devoted to the PRM issue after October of 2007 and indicated that compensation for such work would be requested in this docket instead (TURN Request, p.6). The attached timesheets therefore include 25.0 hours of Mr. Woodruff's time and 0.50 hours of Mr. Florio's time devoted to PRM issues

	during the latter part of 2007, work that was originally recorded to R.05-12-013 but subsequently transferred to this docket. That work primarily involved review of the initial stages of the CAISO's Planning Reserve Requirements Study (PRRS) process that was ultimately incorporated into this proceeding. While undertaken prior to the issuance of R.08-04-012, that work was directly related to the subject matter of this proceeding and should be included in TURN's compensation award.
Comment 3	TURN is seeking reimbursement for the actual travel expenses of \$742.98 incurred by its consultant, Mr. Woodruff, solely as a result of his participation in this proceeding. These expenses include car travel at standard IRS mileage rates for one roundtrip to Folsom to participate in a CAISO meeting on the subject of the PRM and two roundtrips to San Francisco to participate in CPUC workshops in this proceeding, along with associated tolls and parking expenses. In addition, Mr. Woodruff was required to spend three nights total at a hotel in San Francisco in order to participate in the workshops. None of these expenses constitute routine commuting costs under any reasonable definition, as Mr. Woodruff lives and works in Sacramento and only travels to Folsom or San Francisco when required to effectively participate in proceedings. While this Commission has sometimes disallowed such travel costs, and has recently announced a unilateral determination that travel of less than 120 miles one-way is "routine" commuting that will not be reimbursed, TURN respectfully submits that these expenses, which have already been reimbursed to Mr. Woodruff by TURN, represent reasonable and necessary costs of participation in this proceeding and should be compensated in full. TURN notes that the listing of expenses in Attachment 2 includes meal expenses and the cost of obtaining internet access while staying overnight in San Francisco which have also been reimbursed to Mr. Woodruff by TURN, but those costs are not requested for compensation in the claim set forth above. Mr. Woodruff's hotel and parking receipts are included as part of Attachment 2.
Comment 4	If the Commission has any questions regarding any of the time or expenses claimed for compensation in this docket, or any other concerns regarding the content of this request, TURN respectfully asks that it be given an opportunity to answer any such questions prior to the issuance of a decision on this request.
Attachment 1	<b>Detailed Time Reports for TURN's Attorneys and Expert Consultants</b>
Attachment 2	<b>Detail of TURN's Expenses and Receipts</b>
Attachment 3	<b>Certificate of Service</b>

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

#	Reason

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

(CPUC completes the remainder of this form)

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

If so:

Party	Reason for Opposition	CPUC Disposition


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

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If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

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

**CONCLUSION OF LAW**

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

**ORDER**

1. Claimant is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning \_\_\_\_\_, 200\_\_, the 75<sup>th</sup> day after the filing of claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. [This/these] proceeding[s] [is/are] closed.



5. This decision is effective today.

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

**Attachment 1:**

**Detailed Time Reports for TURN's Attorneys and Expert Consultants  
In Rulemaking 08-04-012**

Date	Attorney	Activity	Description	Time Spent
<u>Attorney: JBS--B Marcus</u>				
8/28/2008	JBS--B Marcus	PRM	TC Kevin Woodruff on PG&E proposals	0.75
Total: 2008				0.75
<hr/>				
Total: JBS--B Marcus				0.75
<hr/>				
<u>Attorney: K Woodruff</u>				
11/8/2007	K Woodruff	PRM	Reviewed CAISO PRRS study proposal; communicated with client, CPUC staff and other parties.	1.00
11/19/2007	K Woodruff	PRM	Communicated with client and other parties regarding CAISO PRRS study proposal.	0.50
11/20/2007	K Woodruff	PRM	Reviewed Assigned Commissioner's Ruling and communicated with client and other parties.	0.50
11/26/2007	K Woodruff	PRM	Reviewed agenda for CAISO reserve margin study; communicated with client, other parties, and vendor.	0.50
11/27/2007	K Woodruff	PRM	Reviewed materials for CAISO reserve margin study meeting; communicated with client and other parties regarding CAISO PRRS study proposal.	1.00
11/28/2007	K Woodruff	PRM	Participated in CAISO reserve margin study meeting.	8.00
11/29/2007	K Woodruff	PRM	Participated in CAISO reserve margin study meeting.	7.00
12/3/2007	K Woodruff	PRM	Communicated with client and other parties regarding CAISO PRM study.	0.50
12/6/2007	K Woodruff	PRM	Discussed CAISO PRM Study with other parties.	0.50
12/7/2007	K Woodruff	PRM	Discussed CAISO PRM comment template with Bilateral Trading Group.	1.00
12/14/2007	K Woodruff	PRM	Prepared draft comments on CAISO PRM study.	1.50
12/17/2007	K Woodruff	PRM	Completed and sent draft comments on CAISO PRM study to client and other parties.	0.50
12/18/2007	K Woodruff	PRM	Reviewed other parties' comments on CAISO PRM study.	0.50
12/19/2007	K Woodruff	PRM	Discussed comments on CAISO PRM study with other customer groups; edited comments.	2.00
Total: 2007				25.00
<hr/>				
4/17/2008	K Woodruff	PRM	Reviewed OIR.	0.50
4/18/2008	K Woodruff	PRM	Provided comments on OIR to client and other parties.	0.50
4/23/2008	K Woodruff	PRM	Provided comments on OIR to client and other parties.	0.50
5/27/2008	K Woodruff	PRM	Reviewed OIR and parties' PHC statements and provided client comments regarding PHC issues.	2.00
5/30/2008	K Woodruff	PRM	Prepared for June 2 PHC.	0.50
6/2/2008	K Woodruff	GP	Prepared for and attended PHC; discussed with client afterwards.	4.50
6/3/2008	K Woodruff	GP	Prepared alternate schedule and comments on schedule provided at PHC; sent to client.	2.00
6/5/2008	K Woodruff	PRM	Communicated with client and ED staff regarding PRM workshop schedule and content.	0.50
6/18/2008	K Woodruff	PRM	Reviewed draft workshop report.	0.50
6/19/2008	K Woodruff	PRM	Discussed workshop report with client and IOU staff.	0.50
6/23/2008	K Woodruff	PRM	Reviewed Workshop Report; commented to client and Energy Division.	4.00
6/24/2008	K Woodruff	PRM	Discussed comments with client and Energy Division; prepared for workshops.	2.00
6/25/2008	K Woodruff	PRM	Participated in workshop.	8.00
6/26/2008	K Woodruff	PRM	Participated in workshop; discussed with client.	7.00
6/30/2008	K Woodruff	PRM	Communicated with client regarding upcoming Working Group calls.	0.50

Date	Attorney	Activity	Description	Time Spent
7/1/2008	K Woodruff	PRM	Prepared for and participated in Working Group calls; provided data to CEC and IOUs; prepared analysis of confidentiality issues for client.	5.50
7/2/2008	K Woodruff	PRM	Prepared for and participated in Working Group call; provided additional comments on confidentiality issues for client; provided sample NDAs to client.	3.00
7/3/2008	K Woodruff	PRM	Prepared for and participated in Working Group call.	2.00
7/7/2008	K Woodruff	PRM	Discussed transmission issues with SDG&E transmission guy; reviewed ED and other parties' notes and comments on Working Groups.	0.50
7/9/2008	K Woodruff	PRM	Reviewed preliminary plant outage data provided by CAISO.	3.00
7/10/2008	K Woodruff	PRM	Continued reviewing plant outage data; reported to client; discussed confidentiality and plant outage data with ED.	2.00
7/15/2008	K Woodruff	PRM	Participated in Working Group conference call.	1.00
7/16/2008	K Woodruff	PRM	Participated in Working Group conference call; communicated with Energy Division and client regarding status of project.	1.50
7/17/2008	K Woodruff	GP	Reviewed Model Protective Order and potential use in PRM OIR; commented to client.	0.50
7/18/2008	K Woodruff	PRM	Discussed study and modeling issues with PG&E staff.	0.50
7/23/2008	K Woodruff	PRM	Prepared for and participated in combined Working Group 2/3 call; reported to client.	2.00
7/27/2008	K Woodruff	PRM	Communicated with various parties regarding issues and process.	0.50
8/6/2008	K Woodruff	GP	Discussed motion for adoption of protective order with client and CAISO; reviewed status of working group efforts.	1.00
8/7/2008	K Woodruff	PRM	Provided comments on load forecasting issues to Working Group 2 subcommittee.	1.00
8/8/2008	K Woodruff	PRM	Reviewed and discussed additional comments regarding Working Group 2 and 3 issues.	0.50
8/11/2008	K Woodruff	PRM	Reviewed Working Group 4 issues; began reviewing parties comments on petition regarding confidentiality.	1.00
8/12/2008	K Woodruff	PRM	Participated in Working Group 4 call; reviewed parties' responses to TURN motion and commented to client.	2.00
8/15/2008	K Woodruff	PRM	Reviewed proposals for 8/18 Working Group 2 call.	0.50
8/18/2008	K Woodruff	PRM	Participated in Working Group 2&3 combined call; began preparing reply comments on confidentiality motion.	2.00
8/19/2008	K Woodruff	PRM	Reviewed materials regarding Working Group 2&3 issues.	0.50
8/20/2008	K Woodruff	PRM	Reviewed PG&E load sampling and weighting proposal; helped prepare and edit reply comments.	3.50
8/21/2008	K Woodruff	PRM	Participated in Working Group 2&3 combined call.	1.50
8/28/2008	K Woodruff	PRM	Discussed load forecasting issues with Bill Marcus; reviewed working group draft documents.	1.50
8/29/2008	K Woodruff	PRM	Prepared for and participated in Working Group 2&3 combined call; distributed TURN comments to working group.	2.00
9/2/2008	K Woodruff	PRM	Reviewed technical materials related to computing planning reserve margins.	0.50
9/9/2008	K Woodruff	PRM	Reviewed materials related to planning reserve margins and working group analyses.	1.50
9/11/2008	K Woodruff	PRM	Reviewed status of various working group analyses to date.	0.50
9/12/2008	K Woodruff	PRM	Began analysis of generator classifications by CAISO.	2.50
9/16/2008	K Woodruff	PRM	Continued analysis of generator classifications by CAISO.	2.50
9/17/2008	K Woodruff	PRM	Completed analysis of generator classifications; provided to ED staff and CAISO staff.	2.00
9/23/2008	K Woodruff	PRM	Reviewed NERC website regarding generation classifications and benchmarking services; prepared for 9/24 working group conference call.	1.00
9/24/2008	K Woodruff	PRM	Prepared for and participated in Working Group 4 call; reported to client.	2.00
9/25/2008	K Woodruff	PRM	Reviewed materials regarding NERC benchmarking; communicated with client and ED about outage data.	1.00
9/26/2008	K Woodruff	PRM	Prepared for and participated in Working Group 2&3 call.	2.50



Date	Attorney	Activity	Description	Time Spent
9/29/2008	K Woodruff	PRM	Reported to client on 9/26 working group call.	0.50
9/30/2008	K Woodruff	PRM	Reviewed ACR and Scoping Memo; discussed with client.	0.50
10/1/2008	K Woodruff	PRM	Reviewed ED proposal for Working Group 1 issues and commented to ED and client; reviewed materials regarding definition of ""LOLE"" and similar terms.	3.50
10/2/2008	K Woodruff	PRM	Prepared for and participated in working group 2/3 call; reviewed materials regarding definition of ""LOLE"" and similar terms.	3.00
10/3/2008	K Woodruff	PRM	Prepared comments on various draft sections of Working Group report; provided to client, other party and ED.	4.00
10/7/2008	K Woodruff	PRM	Participated in Working Group call; prepared comments on various draft sections of Working Group report.	4.00
10/9/2008	K Woodruff	PRM	Discussed PRM study with ED staff.	0.50
10/13/2008	K Woodruff	PRM	Reviewed and commented on draft ""working group"" report.	2.50
10/14/2008	K Woodruff	PRM	Reviewed other parties' comments on draft working group report; provided information to ED staff.	1.00
10/17/2008	K Woodruff	PRM	Began reviewing GE Phase 1A draft report.	1.00
10/20/2008	K Woodruff	PRM	Continued reviewing GE Phase 1A draft report; prepared comments for ED on definitions of LOLE.	4.50
10/21/2008	K Woodruff	PRM	Completed review of GE Phase 1A draft report; prepared notes thereon; communicated with client.	3.00
10/22/2008	K Woodruff	PRM	Prepared for and participated in Workshops.	8.00
10/23/2008	K Woodruff	PRM	Prepared for and participated in Workshops.	8.00
12/8/2008	K Woodruff	PRM	Reviewed GE's updated study to prepare for 12/9 conference call.	1.50
12/9/2008	K Woodruff	PRM	Participated in conference call regarding GE's updated study.	3.00
12/17/2008	K Woodruff	PRM	Reviewed status of PRM study; discussed with ED staff and client.	1.00
<b>Total: 2008</b>				<b>138.00</b>
1/6/2009	K Woodruff	PRM	Reviewed ED staff classification of CAISO generating units; prepared proposal for completing analysis.	2.50
1/7/2009	K Woodruff	PRM	Completed analysis of ED classification of CAISO generating units; sent recommendations for next steps to other working group members.	0.75
1/8/2009	K Woodruff	PRM	Prepared draft ""data request"" regarding GE MARS inputs and outputs; sent to client.	0.75
1/14/2009	K Woodruff	PRM	Reviewed materials regarding classification of generators to prepare for conference call.	1.00
1/15/2009	K Woodruff	PRM	Prepared for conference call.	0.50
1/16/2009	K Woodruff	PRM	Discussed issues regarding generator outages and PRM study with IOU staff.	1.00
1/26/2009	K Woodruff	PRM	Prepared for and participated in conference call regarding generator outages; analyzed alternate approaches to imposing PRM.	3.00
1/27/2009	K Woodruff	PRM	Analyzed alternate approaches to imposing RA requirements (i.e., annual, seasonal, fixed MW).	2.50
1/29/2009	K Woodruff	PRM	Completed analysis of alternate RA methods; reported to client.	1.00
2/2/2009	K Woodruff	PRM	Reviewed ED staff classification of generators for LOLE study; prepared for 2/3 conference call.	2.50
2/3/2009	K Woodruff	PRM	Participated in conference call; completed review of generator classifications and provided to ED staff.	3.50
3/12/2009	K Woodruff	PRM	Discussed schedule for PRM studies with PG&E and reported to client.	0.50
<b>Total: 2009</b>				<b>19.50</b>
5/21/2010	K Woodruff	PRM	Reviewed CAISO Planning Reserve Margin study; commented to client.	0.50
5/27/2010	K Woodruff	PRM	Reviewed CAISO study further; reported to client; discussed with other party.	1.75

Date	Attorney	Activity	Description	Time Spent
9/13/2010	K Woodruff	PRM	Reviewed parties' comment on closing PRM OIR; reported to client.	0.25
Total: 2010				2.50
Total: K Woodruff				185.00
<u>Attorney: MF</u>				
11/11/2007	MF	PRM	Review CAISO LOLP study workplan	0.50
Total: 2007				0.50
4/16/2008	MF	PRM	Read OIR	0.50
4/22/2008	MF	PRM	Study OIR and draft PHC comments	3.00
4/23/2008	MF	PRM	Work on PHC comments	1.00
4/25/2008	MF	PRM	Review party PHC statements	1.00
5/27/2008	MF	PRM	Discuss PHC with consultant and staff	0.50
5/30/2008	MF	PRM	Prep for PHC	1.00
6/2/2008	MF	PRM	Discuss PHC w/ KW and review transcript	1.00
6/24/2008	MF	PRM	Review WG report and prep for WS	2.25
6/25/2008	MF	PRM	PRM workshop and discuss	8.00
6/26/2008	MF	PRM	PRM workshop and discuss	6.00
7/1/2008	MF	Comp	Prepare notice of intent	0.50
7/16/2008	MF	GP	TC- Energy Div re: confid, prep work	0.50
7/23/2008	MF	GP	Draft motion for protective order	2.00
7/25/2008	MF	GP	Finish motion for protective order	0.75
8/6/2008	MF	GP	TC w/ ISO re: confidentiality issues	0.75
8/7/2008	MF	PRM	Review and respond to emails on WG issues	0.50
8/20/2008	MF	GP	Draft response to confid motion	3.75
10/21/2008	MF	PRM	Prep for workshop	2.50
10/22/2008	MF	PRM	Attend workshop	7.00
10/23/2008	MF	PRM	Attend workshop and discuss	7.00
12/9/2008	MF	PRM	Web-Ex session with parties & GE	3.00
12/15/2008	MF	PRM	Discuss w/ Kevin	0.50
Total: 2008				53.00
2/3/2009	MF	PRM	Party conference call	1.50
Total: 2009				1.50
2/8/2010	MF	PRM	Review ruling and staff manual	1.00
2/25/2010	MF	PRM	Review and edit draft comments	1.25
2/26/2010	MF	PRM	Finish comments on ALJ ruling	0.75
3/1/2010	MF	PRM	Review party comments	1.25
5/27/2010	MF	PRM	Review CAISO PRM study	1.25
9/10/2010	MF	PRM	Review and edit joint comments	0.25
11/22/2010	MF	Comp	Draft and comp request	5.00

Date	Attorney	Activity	Description	Time Spent
Total: 2010				10.75
Total: MF				65.75
<u>Attorney: NS</u>				
6/2/2008	NS	GP	Attend PHC	1.50
6/2/2008	NS	GP	Talk to Kevin Woodruff to prep for PHC	0.50
6/2/2008	NS	GP	Talk to Mike to prep for PHC	0.50
Total: 2008				2.50
Total: NS				2.50
Grand Total				254.00

**Attachment 2:**

**Detail of TURN's Expenses and Receipts  
In Rulemaking 08-04-012**



Date	Activity	Description	Billed
<u>Activity: \$Auto/Park/Toll</u>			
6/26/2008	Parking/Tolls	Tolls on trip to CPUC.	\$8.00
6/26/2008	Parking/Tolls	Parking near CPUC	\$16.00
10/22/2008	Parking/Tolls	Parking near CPUC.	\$18.00
10/23/2008	Parking/Tolls	Parking near CPUC.	\$18.00
10/23/2008	Parking/Tolls	Bridge tolls on round trip to S.F.	\$8.00
Total: \$Auto/Park/Toll			\$68.00
<u>Activity: \$Cons Travel</u>			
11/29/2007	Cons. Travel	Round trip to Folsom for CAISO meeting (40 x \$0.485)	\$19.40
6/26/2008	Cons. Travel	Round trip milage to S.F. (180 x \$0.505)	\$90.90
10/23/2008	Cons. Travel	Round trip milage from Sacramento to S.F. (180 x \$0.505)	\$90.90
Total: \$Cons Travel			\$201.20
<u>Activity: \$Copies</u>			
4/28/2008	Photocopies	Prehearing Conference Statement. 2cc x 8pp	\$3.20
7/2/2008	Photocopies	NOI to Claim Compensation. 2cc x 8pp	\$3.20
7/25/2008	Photocopies	Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4. 2cc x 19pp	\$7.60
8/21/2008	Photocopies	Reply Regarding the Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4. 2cc x 8pp	\$3.20
2/26/2010	Photocopies	Comments in Response to Administrative Law Judge Ruling. 7pp x 3cc	\$4.20
Total: \$Copies			\$21.40
<u>Activity: \$Lodging</u>			
6/26/2008	Hotel	Lodging in S.F., (inc. parking) - 2 nights.	\$339.72
10/23/2008	Hotel	Lodging in S.F. (inc. parking)	\$134.06
Total: \$Lodging			\$473.78
<u>Activity: \$Meals</u>			
6/25/2008	Working Meals	Working Meals (breakfasts at hotel)	\$32.28
6/25/2008	Working Meals	Dinner in S.F.	\$15.38
6/25/2008	Working Meals	Lunch in S.F.	\$5.94
10/22/2008	Working Meals	Lunch near CPUC.	\$7.87
10/22/2008	Working Meals	Dinner in S.F.	\$25.70
10/23/2008	Working Meals	Breakfast in S.F. (per AmEx)	\$16.14
10/23/2008	Working Meals	Dinner in S.F.	\$17.93
Total: \$Meals			\$121.24
<u>Activity: \$Miscellaneous</u>			
10/22/2008	Misc. Expenses	Internet access while traveling	\$8.00
Total: \$Miscellaneous			\$8.00

Date	Activity	Description	Billed
<u>Activity: \$Postage</u> 2/26/2010	Postage	Comments in Response to Administrative Law Judge Ruling. \$1.05 x 3cc	\$3.15
Total: \$Postage			\$3.15
<b>Grand Total</b>			<b>\$896.77</b>

# CATHEDRAL HILL HOTEL

1101 Van Ness Avenue • San Francisco, CA 94109  
Tel. (415) 776-8200 • FAX (415) 441-2841

KEVIN WOODRUFF  
AAA DISCOUNT  
2741 COLEMAN WAY  
SAC CA- 95818

Statement Date

06-26-08

Account Number

6FBIP  
CO:775

PAGE 1  
ANN


Date	Reference	Description	Charges	Credits
	RP775	ROOM: DISCOUNT/PROMOTION	129.00	
06-24-08	HT775	TAX: HOTEL OCCUPANCY	18.06	
06-24-08	PK775	PARKING	20.00	
06-24-08	PT775	TAX: PARKING TAX	2.80	
06-25-08	FD2006	RESTAURANT	16.14	
06-25-08	RP775	ROOM: DISCOUNT/PROMOTION	129.00	
06-25-08	HT775	TAX: HOTEL OCCUPANCY	18.06	
06-25-08	PK775	PARKING	20.00	
06-25-08	PT775	TAX: PARKING TAX	2.80	
06-26-08	FD2003	RESTAURANT	16.14	
06-26-08	AX0813	XXXXXXXXXXXX1004 EXP 11/08		372.00

THANK YOU FOR STAYING WITH US, WE LOOK FORWARD TO WELCOMING YOU BACK

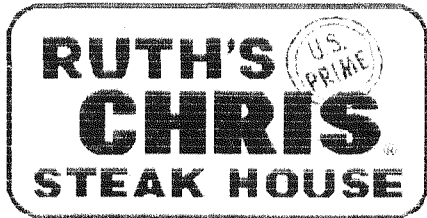
BALANCE DUE

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

.00



GUEST SIGNATURE \_\_\_\_\_



1601 Van Ness Avenue  
San Francisco, CA 94109  
415-673-0547

Date: Jun25'08 08:08PM  
Card Type: Amex  
Acct #: XXXXXXXXXXXX1004  
Trans Key: AFE000814555215  
Exp Date: XX/XX  
Auth Code: 505048  
Check: 5738  
Check ID: 75  
Server: 402 RUTHS L

Subtotal: 30.38  
Gratuuity: 5-  
Total: 35.38

Guest's Copy  
Perfection is in the details  
and we cover them all for you.  
Ask us about our Private Dining  
Accommodations today!  
Reservations & Gift Cards  
Available at RuthsChris.com.

Parking Receipt



420 Taylor Street, Suite 200  
San Francisco, CA 94102  
Tel: (415) 351-4450  
Fax: (415) 351-4499

License#119543

Opera Plaza  
601 Van Ness Avenue  
San Francisco, CA 94102

YOUR RECEIPT  
THANK YOU  
CALL AGAIN

REG 06-25-2008 11:05  
002299

DEPT01 \$4.19  
DEPT01 \$1.75  
TOTAL \$5.94  
CASH \$11.00  
CHANGE \$5.06



  
**CATHEDRAL HILL**  
**HOTEL**

1101 Van Ness Avenue • San Francisco, CA 94109  
 Tel. (415) 776-8200 • FAX (415) 441-2841

MR KEVIN WOODRUFF  
 2741 COLEMAN WAY  
 SACRAMENTO CA 95818

Statement Date

10-23-08

Account Number

184P5  
 00:609

PAGE 1  
 ANN

Date	Reference	Description	Charges	Credits
10-22-08	RP609	PARKING PACKAGE	119.00	
10-22-08	HT609	TAX: HOTEL OCCUPANCY	15.06	
10-23-08	AX0813	XXXXXXXXXXXX1004 EXP 11/08		134.06

THANK YOU FOR STAYING WITH US, WE LOOK FORWARD TO WELCOMING YOU BACK

**BALANCE DUE**

.00

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or requests for copies of charges must be made within five days after my departure.

GUEST SIGNATURE \_\_\_\_\_



OSAKAYA RESTAURANT  
1737 POST ST  
SAN FRANCISCO, CA

TERMINAL I.D.: 096400  
MERCHANT # : 04704616

10/22/08 6:47 PM

AMEX SRV: 2  
\*\*\*\*\*1004  
SWIPED

SALE  
BATCH: 002217  
INU:000033

AUTH: 585067  
RRN: 22170033

BASE \$21.70

TIP \$ 4

TOTAL \$ 25.70

TIP GUIDE

15% = \$3.25 18% = \$3.90 20% = \$4.34

KEVIN D WOODRUFF

CUSTOMER COPY

001 0098  
02-37  
7.8971

10/22/08  
22-08

Parking Receipt

RECEIPT 17:41 22OCT08

\$18.00 B26 2901 OPERA PLAZA



420 Taylor Street, Suite 400  
San Francisco, CA 94102  
Tel: (415) 351-4450  
Fax: (415) 351-4499

Opera Plaza  
601 Van Ness Avenue  
San Francisco, CA 94102

License#119543

Parking Receipt

RECEIPT 19:14 23OCT08

\$18.00 B26 3083 OPERA PLAZA



420 Taylor Street, Suite 400  
San Francisco, CA 94102  
Tel: (415) 351-4450  
Fax: (415) 351-4499

Opera Plaza  
601 Van Ness Avenue  
San Francisco, CA 94102

License#119543

THANK YOU FOR DINING AT  
MAY'S at the OPERA CAFE  
601 Van Ness Ave.  
San Francisco, CA 94102  
415 771-7300

Server: Bar Michael 10/23/2008  
Peer/1 6:42 PM  
Guests: 1 #30034

2 Items

PEAR SALAD 12.99  
SODA 2.75

Subtotal 15.74  
Tax 1.34

SF BENEFITS OFFSET 0.85

Total 17.93

Balance Due 17.93

PLEASE PAY YOUR SERVER!  
GRATUITY IS NOT INCLUDED

**Attachment 3:**

**Certificate of Service by Customer**

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

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

to the following persons appearing on the official Service List for A.08-04-012:

R0804012	P	jnelson@psrec.coop	JESSICA	NELSON
R0804012	P	tdarton@pilotpowergroup.com	THOMAS R.	DARTON
R0804012	P	martinhomec@gmail.com	MARTIN	HOME C
R0804012	P	ron.cerniglia@directenergy.com	RONALD M.	CERNIGLIA
R0804012	P	keith.mccrea@sutherland.com	KEITH	MCCREA
R0804012	P	joe.paul@dynegy.com	JOSEPH M.	PAUL
R0804012	P	doug.lars@pacificorp.com	DOUGLAS	LARSON
R0804012	P	jordan.white@pacificorp.com	JORDAN A.	WHITE
R0804012	P	jims@vea.coop	JIM	SUEUGA
R0804012	P	mmazur@3PhasesRenewables.com	MICHAEL	MAZUR
R0804012	P	ej_wright@oxy.com	E. J.	WRIGHT
R0804012	P	allwazeready@aol.com	FRANK	ANNUNZIATO
R0804012	P	akbar.jazayeri@sce.com	AKBAR	JAZAYEIRI
R0804012	P	annette.gilliam@sce.com	ANNETTE	GILLIAM
R0804012	P	rkmoore@gswater.com	RONALD	MOORE
R0804012	P	david.lloyd@nrgenergy.com	DAVID	LLOYD
R0804012	P	JPacheco@SempraUtilities.com	JOHN A.	PACHECO
R0804012	P	marcie.milner@shell.com	MARCIE A.	MILNER
R0804012	P	SRahon@SempraUtilities.com	STEVE	RAHON
R0804012	P	GloriaB@anzaelectric.org	GLORIA	BRITTON
R0804012	P	igoodman@commerceenergy.com	INGER	GOODMAN
R0804012	P	dorth@krcd.org	DAVID	ORTH
R0804012	P	chh@cpuc.ca.gov	Charlyn A.	Hook
R0804012	P	mflorio@turn.org	MICHEL PETER	FLORIO
R0804012	P	cmmw@pge.com	CORY M.	MASON
R0804012	P	bcragg@goodinmacbride.com	BRIAN T.	CRAGG
R0804012	P	bkc7@pge.com	BRIAN K.	CHERRY
R0804012	P	wbooth@booth-law.com	WILLIAM H.	BOOTH
R0804012	P	rick_noger@praxair.com	RICK C.	NOGER



R0804012	P	michaelboyd@sbcglobal.net	MICHAEL E.	BOYD
R0804012	P	sford@caiso.com	STACIE L.	FORD, ESQ.
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R0804012	I	jleslie@luce.com	JOHN W.	LESLIE, ESQ.
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R0804012	I	cpuc@certichron.com		
R0804012	I	mrw@mrwassoc.com		
R0804012	I	sue.mara@rtoadvisors.com	SUE	MARA
R0804012	I	steven.huhman@morganstanley.com	STEVEN	HUHMANN
R0804012	I	gary.jordan@ge.com	GARY A.	JORDAN
R0804012	I	glenn.haringa@ge.com	GLENN E.	HARINGA
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R0804012	I	case.admin@sce.com	CASE	ADMINISTRATION
R0804012	I	paul.nelson@sce.com	PAUL	NELSON
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R0804012	I	TRoberts@SempraUtilities.com	THEODORE	ROBERTS
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R0804012	I	Diane.Fellman@nrgenergy.com	DIANE I.	FELLMAN



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R0804012	S	clu@cpuc.ca.gov	Chloe	Lukins
R0804012	S	dmg@cpuc.ca.gov	David M.	Gamson
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R0804012	S	fxg@cpuc.ca.gov	Farzad	Ghazzagh
R0804012	S	kkm@cpuc.ca.gov	Karl	Meeusen
R0804012	S	litt@cpuc.ca.gov	Lana	Tran

R0804012	S	msw@cpuc.ca.gov	Mark S.	Wetzell
R0804012	S	ska@cpuc.ca.gov	Peter	Skala
R0804012	S	seb@cpuc.ca.gov	Simon	Baker
R0804012	S	vjb@cpuc.ca.gov	Valerie	Beck
R0804012	S	dbrown@energy.state.ca.us	DENNY	BROWN
R0804012	S	mjaske@energy.state.ca.us	MICHAEL	JASKE

Executed this 23rd day of November, 2010, at San Francisco, California.

/s/

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