

Agenda ID # \_\_\_\_\_

Decision \_\_\_\_\_

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

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2011.	Application 09-12-020 (Filed December 21, 2009)
Order Instituting Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Service and Facilities of Pacific Gas and Electric Company.	Investigation 10-07-027 (Filed July 29, 2010)

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

<b>Claimant:</b> The Utility Reform Network (TURN)	<b>For contribution to D.11-05-018</b>
<b>Claimed (\$):</b> \$909,859	<b>Awarded (\$):</b>
<b>Assigned Commissioner:</b> Michael R. Peevey	<b>Assigned ALJ:</b> David K. 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 1).	
<b>Signature:</b> /s/	

<b>Date:</b>	7/5/11	<b>Printed Name:</b>	Robert Finkelstein
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**PART I: PROCEDURAL ISSUES** (to be completed by Claimant except where indicated)

**A. Brief Description of Decision:**

Decision (D.) 11-05-018 resolves Pacific Gas & Electric Company's (PG&E) test year 2011 general rate case. The decision adopts (with modifications and clarifications) a settlement agreement addressing all but one of the disputed issues in this proceeding. It authorizes a GRC revenue requirement increase for 2011 amounting to \$450 million, or 8.1%, over the current authorized level of \$5,582 million. The authorized increase is comprised of \$237 million for electric distribution, \$47 million for gas distribution, and \$166 million for electric generation. The decision also authorizes additional post-test year attrition increases totaling \$180 million for 2012 and \$185 million for 2013. Additionally, D.11-05-018 resolves the sole litigated issue of the ratemaking treatment for the undepreciated plant balance associated with electric meters that are replaced by SmartMeters. The decision authorizes PG&E to amortize the remaining plant balance over a six-year period, but with a reduced rate of return of 6.3% to reflect the reduced regulatory risk for that plant.

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

	Claimant	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	2/19/2010	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	3/19/2010	
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:	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?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
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?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D.11-05-018	
14. Date of Issuance of Final Decision:	May 13, 2011	
15. File date of compensation request:	July 5, 2011	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
3,4	X		The Commission has yet to issue any ruling on the Notice of Intent filed by any party in this proceeding. Rather than re-state the basis for TURN's eligibility, we rely on the showing made in the still-pending NOL.

**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>This GRC proceeding covered an array of issues associated with PG&amp;E’s electric and gas distribution and electric generation utility functions. TURN submitted testimony from five witnesses on a wide variety of those issues, and addressed additional issues through our cross-examination of PG&amp;E witnesses during the evidentiary hearings. After the conclusion of the evidentiary hearings, TURN worked with the other active intervenors in the proceeding to achieve a settlement of all but one of the disputed issues. The Commission should find that the resulting settlement reflects TURN’s substantial contribution on each of the TURN-disputed issues covered by the settlement.</p> <p>The active parties submitted a Settlement Agreement that describes in some detail the agreed-upon outcomes and, in some cases, the parties’ pre-settlement positions, as well as a Motion for Adoption of Settlement Agreement that contained greater detail on some of the proposed outcomes and the process that produced each of those outcomes. However, the settlement did not address each and every adjustment any party had proposed in any particular issue area, and the proposed outcomes were generally “higher level” rather than issue-specific (that is, the adopted revenue requirement for A&amp;G spending addressed a relatively few components of that revenue requirement, but not the dozens of adjustments that TURN and other intervenors had proposed in their testimony or were likely to propose in their briefs).</p> <p>In D.11-05-018, the Commission described in very summary fashion each settling party’s litigation position, then broadly discussed the proposed settlement and its consistency with the standards the Commission employs to assess the reasonableness of a proposed settlement. As a result, the decision has less detail than does the Settlement Agreement and</p>		

<p>Settlement Motion about how the settlement outcomes reflect an individual party's position.</p> <p>Therefore, TURN's discussion of our substantial contribution to the Commission's decision relies more on the Settlement Agreement and Settlement Motion than it does the text of D.11-05-018 for those issues covered by the adopted settlement. TURN submits that this is a reasonable approach under the circumstances. However, should the Commission not agree and wish to see some other analysis of TURN's substantial contribution, TURN requests that we be so informed and provided an opportunity to provide such an alternative analysis.</p>		
<p>Overall outcome – At the end of hearings, PG&amp;E's litigation position would have resulted in a base revenue requirement increase of over \$1 billion in the 2011 test year, and \$260 million and \$334 million in the 2012 and 2013 attrition years respectively.</p> <p>The authorized GRC revenue requirement increase for 2011 is \$450 million, with attrition increases of \$180 million and \$185 million in 2012 and 2013, respectively.</p> <p>On the lone issue that was not included in the settlement, the Commission adopted an accelerated amortization period for the remaining investment in electric meters replaced by SmartMeters, with a reduced rate of return. The return on removed meters issue was raised in TURN's testimony, and TURN played the most substantial role among intervenors in pursuing the issue.</p>	<p>Settlement Motion, p. 6.</p> <p>D.11-05-018, p. 2.</p> <p>D.11-05-018, pp. 2, 35-74.</p> <p>TURN-10, pp. 9-10; TURN Opening Brief, pp. 3-18; TURN Reply Brief, pp. 3-20.</p>	
<p>A&amp;G --</p> <p>TURN made a number of recommendations in A&amp;G spending levels, including corporate communications, public affairs, regulatory relations, law department costs (including outside counsel and claims and settlement expenses), and other areas. In particular, TURN proposed a reduction to the gross premium costs for Directors and Officers' Liability Insurance, and continuation of the 50/50 cost sharing with shareholders. TURN-1, pp. 58-66.</p>	<p>Settlement Sec. 3.6.1 ("The test year revenue requirement increase set forth in Section 3.1 above reduces PG&amp;E's forecast for A&amp;G expense and capital by at least \$89 million and consists in part of the following... (2) a reduction of \$11.4 million to reflect parties' arguments with respect to the following departments and areas: (a) Public Affairs (includes \$2.5 million reduction); (b) Corporate Relations (includes \$2.5 million reduction); and (c) PG&amp;E Corporation (Corporate Services and holding company corporate items; includes \$6.4 million reduction); and (3) a reduction of \$1.9 million to reflect 50/50 sharing of Directors and Officers liability insurance.")</p>	

<p>A&amp;G – Short Term Incentive Plan (STIP)</p> <p>TURN proposed to have no ratepayer funding for STIP or, in the alternative, a further reduction to that proposed by DRA for STIP funding. TURN-1, pp. 19-28.</p>	<p>Settlement Sec. 3.6.1 ("The test year revenue requirement increase set forth in Section 3.1 above reduces PG&amp;E's forecast for A&amp;G expense and capital by at least \$89 million and consists in part of the following...(1) a reduction of \$45 million to reflect parties' arguments regarding the Short Term Incentive Plan (STIP) (including a reduction of \$2.8 million in PG&amp;E's STIP request for PG&amp;E Corporation).")</p>	
<p>Customer Care -- Customer Inquiry Costs –</p> <p>TURN recommended rejection of the requested "[Peak Day Pricing] carryover funds" because adequately funded elsewhere, forecast assumes unrealistic enrollment rate and unsupported by actual recorded 2009 costs (supplementing DRA's showing). TURN-6, p. 47.</p>	<p>Settlement Sec. 3.5.1(c) ("The test year revenue requirement set forth in Section 3.1 above reduces GRC revenue requirement by \$10 million for peak day pricing expenses. PG&amp;E shall not request rate recovery of the peak day pricing activities for which expenses were requested in this GRC in another proceeding.")</p>	
<p>Customer Care – Reconnection Fees – TURN recommended that PG&amp;E be prohibited from charging a fee for remote disconnections and reconnections performed via SmartMeter devices. TURN-10, pp. 12-13.</p>	<p>Settlement Sec. 3.5.2(f), p. 1-11; Settlement Motion, p. 60 ("The Agreement provides that reconnection fees shall not be revised and shall remain at existing levels. Given TURN's concerns about revising reconnection fees in times of declining costs associated with SmartMeter devices, the denial of PG&amp;E's proposal is supported by the record.")</p>	
<p>Customer Care – Non-tariffed Products and Services (NTP&amp;S) – TURN called for rejection of PG&amp;E's proposed "net" revenue sharing mechanism in favor of maintaining cost of service treatment or a "gross" revenue sharing mechanism as called for by DRA. TURN-10, pp. 19-23.</p>	<p>See Settlement Sec. 3.5.2(h) ("PG&amp;E's proposed expansion of Non-Tariffed Products and Services (NTP&amp;S) shall be adopted, and the costs and revenues associated with the expansion of services shall be treated on a cost of service basis. PG&amp;E's proposals concerning the 50/50 net revenue sharing mechanism and a sharing mechanism for shareholder capital shall not be adopted.")</p>	
<p>Customer Care – SmartMeter Issues --</p> <p>Meter Reading – TURN identified an inconsistency between SmartMeter Meter Reading Benefits and the TY 2011 forecast of meter reading costs (\$113 M). Benefits based on lower \$/meter reading cost and activated meters forecast than those contained in GRC. TURN recommended excluding the meter reading cost from GRC and eliminate \$/meter/month meter reading benefit in 2011-2013 and book recorded cost in subaccount of</p>	<p>Settlement Sec. 3.5.1(a) ("PG&amp;E shall remove \$113 million (Fully Burdened dollars) in forecast meter reading costs from requested GRC revenue requirements. PG&amp;E shall record actual meter reading costs in a new balancing account, up to an annual cap of \$76.2 million (Fully Burdened dollars), for recovery in annual revenue consolidation proceedings.") and Settlement Sec. 3.5.1(c) ("The SmartMeter Benefits Realization Mechanism adopted by the Commission in</p>	

<p>SmartMeter Balancing Account. TURN-6, pp. 26-33.</p>	<p>D.06-07-027 and D.09-03-026 shall be continued through the 2011 GRC cycle. For this period, the per-meter amounts shall be adjusted as proposed by PG&amp;E in Table 13-3 of Exhibit PG&amp;E-4, except that in conjunction with the removal of forecast meter reading costs from the GRC, PG&amp;E shall also remove the meter reading savings from the electric and gas SmartMeter crediting mechanism, effective January 1, 2011." Settlement Motion, p. 52 ("TURN's recommendation would remove from the GRC the entirety of PG&amp;E's \$113.6 million forecast in this area.")</p>	
<p>Customer Care – Smart Meter Issues – SmartMeter Audit – TURN called for an audit to ensure that all SmartMeter-related costs and benefits are being appropriately booked to the balancing account rather than recovered through GRC rates. TURN-6, pp. 26, 38, 41 and 42.</p>	<p>Settlement Section 3.5.2(b) ("At PG&amp;E's expense, the Commission's Energy Division shall oversee an independent audit of PG&amp;E SmartMeter-related costs to determine whether costs that should have been recorded in the SmartMeter balancing accounts were instead recorded in other accounts, for example, accounts related to the GRC, demand response, or dynamic pricing programs.... The purpose of the audit shall be to ensure proper booking and allocation of costs and benefits related to PG&amp;E's SmartMeter program, including the SmartMeter upgrade, and to evaluate whether PG&amp;E's internal cost management guidelines are adequate to ensure that all PG&amp;E labor and non-labor costs are properly booked to its SmartMeter balancing accounts.")</p>	
<p>Electric Distribution – Rev. Req. Issues – TURN presented a number of recommendations regarding the proposed spending on electric distribution expenses and capital expenditures, including distribution automation; distribution capacity; preventative maintenance and equipment repair; pole test and treat (intrusive inspections) costs; pole replacement; and patrols and inspections. TURN-3; TURN-8, pp. 21-26.</p>	<p>Settlement Sec. 3.2.1 – The Settlement adopts reduced Electric Distribution expense and capital-related revenue requirement by at least \$52 million. Settlement Motion, p. 30 ("The Settling Parties' agreement on the overall revenue requirement reduction for Electric Distribution represents a compromise from the litigation position of PG&amp;E, DRA and TURN.</p>	
<p>Electric Distribution – Streetlight Issues – TURN recommended assumed approval of the LED Project, and on that basis proposed to deny all funding (\$3.197 M) because of stranded costs (consistent with Cal-SLA recommendation). TURN also proposed to reduce the forecast to account for deferred</p>	<p>Settlement Sec. 3.2.1(c) ("LED Streetlight Replacement Program."); Settlement Motion, p. 32, Sec. VI.B.2.a.3 ("Hence, the agreement adopts TURN's and Cal-SLA's recommendations for funding and takes into consideration DRA's recommended adjustment.")</p>	



<p>maintenance by \$345k on a 5-yr cycle or \$1.771 M on a 10-yr cycle (10-yr cycle proposed by DRA, but without TURN's deferred maintenance adjustment of \$345k). Ex. TURN-8, pp. 29-31.</p>		
<p>Electric Distribution – Vegetation Management TURN proposed to reduce the budget for routine tree trimming to comport with TURN's more accurate forecasting method, and to remove environmental costs not required in 2011. TURN-3, pp. 25-26.</p>	<p>Settlement Sec. 3.2.1(b) ("A reduction of \$18.5 million in MWC HN for vegetation management.") Settlement Motion, p. 31, Sec. IV.B.2.a.(2) ("Specifically, this provision adopts TURN's recommendation.")</p>	
<p>Electric Distribution -- Cathodic Protection of Isolated Services – TURN supported DRA's recommended disallowance of \$4.6 million with a complementary showing that work on the supposed 10-yr program has been deferred since its inception, indicating that it has never been a high priority for PG&amp;E. Ex. TURN-1, pp. 40-42.</p>	<p>Settlement Sec. 3.3.1(b) ("A reduction of \$4.6 million in MWC DG to reflect DRA's and TURN's positions on cathodic protection of isolated services.")</p>	
<p>Gas Distribution-- DIMP Leak Surveys – TURN proposed rejection of PG&amp;E's 3-year cycle request as premature, pending the results of PG&amp;E's current effort to re-inspect gas mains for leaks in 2008-2010 -- reducing DRA's forecast [which TURN otherwise supports] by \$990k (for a total reduction to PG&amp;E's forecast of \$3.392 M). TURN-1, pp. 39-40.</p>	<p>Settlement Sec. 3.3.1(c) ("Maintaining currently mandated levels of gas leak inspection work.")</p>	
<p>Generation -- Fossil Decommissioning -- Reduce forecast by \$2.804 M at Humboldt Bay Powerplants 1 and 2 to reflect a variety of factors. TURN-1, pp. 57-58.</p>	<p>Settlement Sec. 3.8) (Depreciation); Settlement Motion, p. 74 ("The Settling Parties agree that the Settlement's adoption of a \$2.5 million annual reduction in decommissioning accruals represents a reasonable compromise of their respective litigation positions.")</p>	
<p>Generation – Fossil O&amp;M -- Reduce forecast by [amount covered by non-disclosure agreement] to remove the cost of one major maintenance event at the Gateway powerplant. TURN-1, p. 53.</p>	<p>Settlement Sec. 3.4.1(i) ("For PG&amp;E's new fossil generation plants, only one longterm service agreement (LTSA) payment shall be collected through normalized funding per plant. This results in a test year reduction of the O&amp;M revenue requirement for the Gateway Generating Station.")</p>	



<p>Generation -- Hydro Capital -- Adopt policies to limit capital spending to new hydro projects that are cost-effective; exclude the new small hydro projects because they are not cost-effective and won't be built in time anyway; remove Britton powerplant because will not be finished by test year 2011.</p> <p>TURN-1, pp. 46-50.</p>	<p>Settlement Sec. 3.4.1 (a) ("New small hydroelectric generation plants installed after test year 2011 are not approved in this proceeding but shall be reviewed in PG&amp;E's next GRC. Review shall include cost comparison with other renewable resource alternatives.")</p> <p>Settlement Sec. 3.4.1(c) ("Removal of the capital costs of Britton powerhouse from PG&amp;E's test year 2011 GRC cycle. This project will be reviewed in the next GRC.")</p>	
<p>Generation -- Nuclear O&amp;M -- Reduce forecast by \$413k to continue to disallow half the cost of the Nuclear Energy Institute (or \$512k with PG&amp;E's forecast for fees) TURN-1, pp. 51-52.</p>	<p>Settlement Sec. 3.4.1(h) ("A reduction in revenue requirement associated with the requirement that during the test year 2011 GRC cycle PG&amp;E shall record 50% of its forecasted costs for Nuclear Energy Institute (NEI) fees below-the-line. For the 2011 test year, PG&amp;E had forecast a total of \$930,000 in NEI fees.") Settlement Motion, p. 44 ("Specifically, this provision adopts TURN's recommendation.")</p>	
<p>Results of Operation -- AFUDC -- AFUDC -- Suspend accrual of AFUDC for 10 Business Transformation software projects resulting in a \$1.7 M write-off through the end of 2010. TURN-1, pp. 105-107; TURN-3, pp. 2-7.</p>	<p>Settlement Sec. 3.12(p) ("PG&amp;E shall suspend Allowance for Funds Used During Construction (AFUDC) accruals for ten Transform Operations projects identified by TURN. PG&amp;E shall ensure that future requests for capital recovery of the projects do not include AFUDC for the period starting with the dates (November 2008 for seven projects, and February 2009 for three projects) identified in TURN's testimony and continuing until spending on the projects resumes.")</p>	
<p>Results of Operation -- Depreciation -- Leave existing net salvage rates in place, reducing depreciation expense by approximately \$200 million as compared to the utility's request for 2011 test year.</p> <p>TURN-10, pp. 6-9.</p>	<p>Settlement Sec. 3.8 ("Depreciation"); Settlement Motion, p. 72 ("Section 3.8 is a reasonable compromise of the parties' respective litigation positions to adjust PG&amp;E's proposed net salvage rates to result in a revenue requirement reduction of nor more than \$105 million.")</p>	
<p>Results of Operation -- Rate Base - Bonus Depreciation affect on ADIT -- Reduce</p>	<p>Settlement Sec. 3.9 ("The test year revenue requirement increase set forth in Section 3.1 above consists in part of the following: (a) A</p>	

<p>rate base by \$88.150 M (\$33.854 M elec dist, \$18.077 M gas dist, \$36.219 M elec gen) for additional Accumulated Deferred Income Taxes due to more bonus depreciation from the 2009 stimulus act than forecast in the GRC. TURN-1, pp. 75-78 89.</p>	<p>reduction of \$35 million to reflect ... (2) recalculation of 2011 rate base set forth in the December 21, 2009 application using updated estimates of bonus depreciation-related deferred tax balances from 2008 and 2009 Federal stimulus legislation; and (3) resolution of issues raised by TURN regarding income taxes, customer deposits, and materials and supplies. (In addition to the \$35 million referenced above, the corresponding amount associated with PG&amp;E's 2011 gas transmission and storage rate case is \$3 million.)).</p>	
<p>Results of Operation – Rate Base – Reduce rate base for materials and supplies; customer deposits; , bonus depreciation; and income tax. TURN-1, pp. 86-105.</p>	<p>Settlement Sec. 3.9 ("The test year revenue requirement increase set forth in Section 3.1 above consists in part of the following: (a) A reduction of \$35 million to reflect ... (2) recalculation of 2011 rate base set forth in the December 21, 2009 application using updated estimates of bonus depreciation-related deferred tax balances from 2008 and 2009 Federal stimulus legislation; and (3) resolution of issues raised by TURN regarding income taxes, customer deposits, and materials and supplies. (In addition to the \$35 million referenced above, the corresponding amount associated with PG&amp;E's 2011 gas transmission and storage rate case is \$3 million.)).</p>	
<p>Shared Services – Corporate Real Estate – TURN made a number of proposed adjustments to the Shared Services forecast, particularly in Corporate Real Estate. TURN-6, pp. 2-25.</p>	<p>Settlement Sec. 3.7 (Shared Services); Settlement Motion, p. 70 ("In Section 3.7of the Agreement, the Settling Parties agree that the overall revenue requirement increase for 2011 reduces PG&amp;E's Shared Services forecast by at least \$55 million....")</p>	
<p>Shared Services – CRE -- 111 Almaden Building Sale -- reject funding for proposed projects because all costs/expenses necessary for sale should be considered in a Sec. 851 application, and selling building appears imprudent and ill-timed. TURN-6, pp. 18-20.</p>	<p>Settlement Sec. 3.7(b) ("A reduction of \$14.5 million (\$4.6 million in expense, which is included in the A&amp;G reduction above, and \$9.9 million in capital for 2011) relating to the costs of sale of 111 Almaden Blvd., San Jose, and associated relocation, severance and retraining costs. No such costs shall be approved in this GRC. If PG&amp;E sells 111 Almaden, PG&amp;E will file a Section 851 application and may request rate recovery of the costs in the Section 851 application."); Settlement Motion, p. 71 ("In addition, the \$14.5 million reduction for 111 Almaden fairly balances TURN's concerns about the</p>	

	timing and cost of the 111 Almaden relocation project....")	
Shared Services – Information Technology -- TURN made a number of proposed adjustments to the proposed forecast of IT costs, including a write-off of the plant associated with Business Transformation Foundational Project. TURN-3, pp. 3-5.	Settlement Sec. 3.7(a) ("A reduction of at least \$50 million, to resolve DRA and intervenor arguments regarding information technology (IT) costs, including TURN's arguments about Business Transformation "Foundational" programs.")	
TURN's general efforts toward achieving and supporting the settlement adopted in D.11-05-018 comprise a further substantial contribution. Working closely with DRA and Aglet Consumer Alliance, TURN achieved a tentative agreement on the revenue requirement issues that enabled further discussions to seek agreeable outcomes on the array of non-revenue requirement issues raised in the proceeding. TURN continued to work closely with the array of customer and other non-utility parties to achieve a settlement with the widest possible support among the active parties. In the end, no intervenor opposed the proposed settlement (although several chose not to join the settlement). The breadth of the settlement and the support among the active parties should be recognized as a distinct but critical substantial contribution that is in addition to the contributions on specific issues covered by the settlement.		
Ratemaking treatment of removed meters – TURN proposed that the remaining investment in meters removed from service for replacement by SmartMeters also be removed from rate base and provided a reduced rate of return, consistent with the Commission's past treatment of plant that is no longer "used and useful." TURN-10, pp. 9-10. This ended up being the lone issue that parties did not include in the settlement agreement.  -- PG&E argued that the ratemaking treatment for the removed meters had already been decided in the utility's AMI application (A.05-06-028) and SmartMeter Upgrade Application (A.07-12-009), and therefore TURN should not be allowed to relitigate the issue here. The Commission rejected this argument, and agreed with TURN that this recommendation is not a re-litigation of the ratemaking proposal adopted	D.11-05-018, pp. 36-41; FOF 21-24.	

<p>in the earlier decisions.</p> <p>-- The Commission adopted a reduced rate of return on equity of 6.55% for the electromechanical meters (for an overall return of 6.3% on those meters), higher than the 0% return TURN had recommended but below the current return on equity for PG&amp;E.</p> <p>-- PG&amp;E argued that its proposal to leave the remaining investment in rate base is consistent with the "group accounting" principles used for depreciation of such plant. The Commission rejected this position in favor of that put forth by TURN (following Aglet's lead on this point).</p> <p>-- In PG&amp;E's reply brief the utility contended that the controlling decision on this issue is D.83-08-031. TURN addressed this late-raised point in a letter to Commissioner Peevey's advisor, explaining that the decision is distinguishable and actually supported TURN's position. The Commission rejected PG&amp;E's argument, determining instead that the circumstances related to the earlier case are not the same as those here.</p>	<p>D.11-05-018, pp. 60-63; COL 11 and Ordering Paragraph 45.</p> <p>TURN Reply Brief, pp. 6-7; D.11-05-018, pp. 63-64.</p> <p>TURN Letter to Scott Murtishaw (12/17/10); D.11-05-018, pp. 64-66, FOF 31.</p>	
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y/N)	Yes	
b. Were there other parties to the proceeding? (Y/N)	Yes	
<p>c. <b>If so, provide name of other parties:</b> In addition to PG&amp;E and DRA, the Settling Parties included Aglet Consumer Alliance (Aglet), California City-County Street Light Association (CAL-SLA), California Farm Bureau Federation (CFBF), Coalition of California Utility Employees (CCUE); Consumer Federation of California (CFC), Direct Access Customer Coalition (DACC), Disability Rights Advocates (DisabRA), Energy Producers and Users Coalition (EPUC), Engineers and Scientists of California, Local 20 (ESC), The Greenlining Institute (Greenlining), Merced Irrigation District (Merced ID), Modesto Irrigation District (Modesto ID), South San Joaquin Irrigation District (SSJID), Western Power Trading Forum (WPTF), and Women's Energy Matters (WEM). In addition, the Greenlining Institute, City and County of San Francisco, and Southern California Edison Company (SCE) were active intervenors, but did not join the settlement.</p>		

**d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:**

TURN's work in a GRC is typically very closely and efficiently coordinated with other like-minded groups, and this case was no different. In light of the scope of the proceeding and the magnitude of the requested rate increase, TURN worked especially hard to achieve such coordination and, as a result, maximum coverage for ratepayers. Our time records include a number of entries (usually coded as "coord" or "GP") for efforts that were primarily devoted to communicating with the other intervenors about procedural strategies and issue area allocation.

As is our regular practice in such proceedings, TURN closely coordinated with Aglet Consumer Alliance and the Division of Ratepayer Advocates from the earliest stages of the GRC. With Aglet, such coordination enabled TURN to identify the issues Aglet was likely to address and thus limit duplication. With DRA, avoiding duplication is nearly impossible (since the staff seeks to address nearly all issue areas covered by the utility application). Therefore the coordination effort with DRA aims to minimize duplication and to ensure that where such duplication occurs TURN's witnesses are presenting recommendations that TURN provided unique arguments in support of that outcome. As a result, the Commission ended up with a more robust record upon which to evaluate the issue at hand. In most instances, however, TURN raised unique issues, thus broadening the overall presentation of DRA and other intervenors.

TURN also closely coordinated our efforts with those of other intervenors during the extended effort to achieve a proposed settlement of the issues in dispute. TURN worked very closely with DRA and Aglet to explore possibilities for an overall revenue requirement settlement (as the three intervenors that had addressed the broadest array of revenue requirement issues). As the discussions broadened to include the whole array of issues raised by intervenors, TURN devoted time and effort to continuing to coordinate with the other active intervenors.

In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor.

**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
<p>TURN's request for intervenor compensation seeks an award of close to \$1 million as the reasonable cost of our participation in the proceeding. While TURN recognizes that this is a substantial award request, the Commission should have little trouble concluding that it is reasonable in light of the benefits achieved through TURN's participation in the proceeding. As noted earlier, PG&amp;E's litigation position sought a revenue requirement increase of \$1 billion in the 2011 test year alone, plus a further increase of \$260 million and \$334 million in 2012 and 2013, respectively, for a total impact of \$3.8 billion of increased revenue requirement over the three-year GRC cycle. The adopted revenue requirement, based almost entirely on a broad settlement that TURN played an important role in helping to achieve, includes a \$450 million test year revenue requirement increase, plus attrition increases of \$180 million and \$185 million, for a total impact of \$1.9 billion over the GRC cycle. TURN's requested compensation amount is a tiny fraction of the savings achieved in the settlement.</p> <p>Furthermore, the requested compensation amount is a very small fraction of the savings directly attributable to TURN's work in the proceeding. For example, TURN's position on the treatment of meter investment caused recognition of the fact that PG&amp;E had inappropriately included costs of removal for SmartMeter. Correcting for this error reduced PG&amp;E's requested revenue requirement by approximately \$12.8 million. (Ex. PG&amp;E-28, p. ii). Similarly, the settlement's reduction of \$18.5 million for vegetation management expenses is attributed to TURN. (Settlement Motion, p. 31, Sec. IV.B.2.a.(2).) Even if TURN's substantial contribution had been limited to either one of these adjustments and nothing more, PG&amp;E's ratepayers would have seen a more than ten-fold return on TURN's requested amount of compensation – in the test year alone.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable in light of the substantial benefits to PG&amp;E ratepayers that were directly attributable to TURN's participation in the case.</p>	

**B. Specific Claim:**

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Robert Finkelstein	2009	9.25	\$470	Res. ALJ-235; D.09-10-051, p.	\$ 4,348				



				20.					
R. Finkelstein	2010	604.75	\$470	Res. ALJ-247	\$284,232				
R. Finkelstein	2011	69.75	\$470	Res. ALJ-267	\$ 32,783				
Hayley Goodson	2009	30.25	\$280	Res. ALJ-235; D.09-10-051, p. 20.	\$ 8,470				
H. Goodson	2010	436.75	\$295	Res. ALJ-267; First "step" increase in new rate range	\$ 128,841				
Nina Suetake	2010	149.5	\$280	D.10-11-032, p. 19	\$ 41,860				
Michel P. Florio	2010	11.5	\$535	D.10-05-012.	\$6153				
Marcel Hawiger	2010	75.75	\$350	See Comment 3 below.	\$26,513				
Matthew Freedman	2010	33.25	\$325	Res. ALJ-247	\$10,806				
<b>Subtotal:</b>					<b>\$544,006</b>	<b>Subtotal:</b>			
<b>EXPERT FEES</b>									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
William Marcus	2009	71.1	\$250	D.08-11-053 <sup>1</sup> , p. 10.	\$ 17,775				
W. Marcus	2010	232.1	\$250	D.08-11-053	\$ 58,025				
W. Marcus	2011	0.33	\$250	D.08-11-053	\$ 83				
Gayatri Schilberg	2009	40.1	\$200	D.09-04-027, p. 9.	\$ 8,020				
G. Schilberg	2010	340.1	\$200	D.09-04-027	\$ 68,020				
Jeff Nahigian	2009	71.75	\$190	D.11-05-044	\$13,633				
Jeff Nahigian	2010	440.0	\$190	D.10-07-040	\$83,600				
Garrick Jones	2009	143.75	\$130	D.10-11-032, p. 19.	\$ 18,688				
G. Jones	2010 (to 6/30)	533.24	\$130	D.10-11-032, p. 19.	\$ 69,321				
G. Jones	2010 (from	55.1	\$140	See Comment 3	\$ 7,754				

<sup>1</sup> 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.



	7/1)			below.					
Greg Ruzzovan	2010	51.5	\$195	See Comment 3 below.	\$10,042				
Jim Helmich	2010	16	\$195	See Comment 3 below.	\$3,120				
<b>Subtotal:</b>					<b>\$358,081</b>	<b>Subtotal:</b>			
<b>OTHER FEES</b>									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
W. Marcus Travel	2010	4.0	\$125	the approved hourly rate	\$ 500				
G. Jones Travel	2010	2.5	\$70	the requested hourly rate	\$175				
<b>Subtotal:</b>					<b>\$675</b>	<b>Subtotal:</b>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>									
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
R. Finkelstein	2010 -11	18.75	\$235	the approved hourly rate	\$4,406				
H. Goodson	2011	5.5	\$140	the approved hourly rate	\$ 770				
<b>Subtotal:</b>					<b>\$5,176</b>	<b>Subtotal:</b>			
<b>COSTS</b>									
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>			
1	Photocopies	TURN Testimony and Pleadings			\$ 893				
2	Lexis/Nexis	Computerized research			\$ 679				
3	Phone and postage	Proceeding-related phone calls and TURN pleadings			\$ 285				
4	Consultant travel expense	Travel from W. Sacramento office to CPUC to testify at hearing -- \$60 mileage, \$3.50 BART			\$ 64				
<b>Subtotal:</b>					<b>\$1,921</b>	<b>Subtotal:</b>			
<b>TOTAL REQUEST \$:</b>					<b>\$909,859</b>	<b>TOTAL AWARD \$:</b>			
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 75% 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
Attachment 1	<b>Detailed Time Reports for TURN's Attorneys and Consultants</b>
Attachment 2	<b>Detail of TURN's Expenses</b>
Attachment 3	<b>Certificate of Service</b>
Comment 1	<p><b>Reasonableness of TURN Hours:</b> TURN's attorneys and consultants recorded a substantial number of hours for their work on this GRC. However, this is true of any GRC, as TURN tends to address a very broad array of issues (typically second only to DRA in terms of breadth of coverage) and devotes substantial time to review of the utility's showing, preparation of discovery, and development of the testimony positions and arguments. As a point of comparison, TURN reviewed the request for compensation we submitted in the SCE 2009 GRC. There are approximately 100 fewer consultant hours, and approximately 400 more attorney hours in this request as compared to the request TURN presented in A.07-07-011 (and that the Commission addressed in D.09-10-051). As described below, the number of hours for each TURN representative was reasonable under the circumstances present here.</p> <p><u>TURN Attorneys:</u></p> <p>Hayley Goodson served as the lead and coordinating attorney, as well as covering several issue categories for purposes of testimony review, hearing room work (cross-examination and defending TURN's witness), and both briefing and providing input to the settlement discussions regarding the issues she covered. Ms. Goodson also played the lead role for TURN's early participation in the settlement discussions, and was an active participant for TURN throughout those discussions.</p> <p>Robert Finkelstein played a wide-ranging and labor-intensive role throughout this proceeding. TURN seeks compensation for approximately 680 of his hours here (as compared to 310 hours included in the SCE 2009 GRC compensation request). The difference is largely reflected in the fact that Mr. Finkelstein recorded substantial numbers of hours for the lengthy settlement discussions (including a brief period as TURN's sole representative in the discussions, and the remainder of the time working in coordination with Ms. Goodson), and on the meter-related issue that was not included in the settlement. In addition, Mr. Finkelstein was responsible for the cross-examination and briefing on issues related to PG&amp;E's claims of under-spending, another relatively labor-intensive endeavor. TURN submits that the attached time sheets amply demonstrate that Mr. Finkelstein's recorded hours were for work that was integral to TURN's substantial contribution to D.11-05-018, both as represented by the settlement and the litigated outcome on the meter issue. (In the final review of the time sheets, TURN identified two instances of duplicate entries – 4/30/11 (1.75 hours) and 10/13/10 (0.75 hours), a duplicate of the entry for 6/16/11). TURN has adjusted these hours out of our totals, but was not able to remove them from the time sheets due to summer vacation schedules.)</p> <p>Four other TURN staff attorneys worked on this PG&amp;E GRC. Nina Suetake and Marcel Hawiger each assumed responsibility for discrete issue areas (including customer care and electric distribution issue for Ms. Suetake, and rate base and tax issues for Mr. Hawiger). In</p>

addition, Matthew Freedman bore lead responsibility for a number of generation-related issues, as well as TURN's analysis of the rate impacts of PG&E's proposed revenue requirement increase. Finally, Mike Florio helped TURN develop and implement the strategy for the "double leverage" issue that arose during the proceeding. (In the final review of the time sheets, TURN identified an entry for Ms. Suetake for travel to Sacramento for a meeting for which TURN is not including travel time (4.0 hours on 6/17/10). TURN has adjusted these hours out of our totals, but was not able to remove them from the time sheets.)

Ms. Goodson and Mr. Finkelstein led TURN's settlement efforts, with each recording approximately 100 hours directly related to that work. Given the range of issues that TURN had raised in our testimony and the number of parties involved in the settlement discussion, it is no surprise that the discussions continued for several months, involved one to two TURN attorneys at all times, and required this number of hours from those attorneys (plus much smaller figures from TURN's other attorneys and expert witnesses). The Commission should find the hours devoted to settlement-related work reasonable under the circumstances.

TURN submits that the recorded hours are reasonable, both for each attorney and in the aggregate. While greater in number than TURN included in the SCE 2009 GRC request for compensation, the increase is reasonable given the different circumstances present here (particularly the meter issue and the rather unique course that issue followed in the proceeding). Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request.

JBS Energy:

The number of hours for which TURN is requesting for work performed by JBS Energy is approximately the same as TURN had included in the most recent SCE GRC compensation request. As has become our practice in GRCs, TURN asked JBS both to cover a broader array of issues than we had in the past, and to conduct a more in-depth review of past spending patterns.

TURN's consultant's review of the PG&E showing in this GRC began earlier in the process than it normally has in previous GRCs (but consistent with our work in the SCE 2009 GRC). When PG&E served its "Notice of Intent" in late summer 2009 and, in doing so, indicated that the magnitude of the PG&E request was in excess of \$1 billion, TURN determined to conduct a broad and in-depth review. This larger effort was a lynchpin of TURN's generally successful efforts in this GRC, both in terms of developing a general strategy and for identifying issues that TURN should focus on. The increased hours included in this request for compensation for the associated work of JBS Energy were a critical part of this approach and, ultimately, of TURN's success. In light of the breadth of TURN's substantial contribution and the dollar impact of many of the issues on which we prevailed (either in whole or in part), the increased amount of intervenor compensation is a very cost-effective investment for PG&E's ratepayers.

Four members of JBS Energy sponsored testimony on behalf of TURN. William Marcus's testimony covered policy issues and an array of different O&M and capital issues. Gayatri Schilberg's testimony covered information technology issues from two important angles – the Business Transformation program from the 2005 GRC and the current IT spending proposals – as well as several electric distribution issues (including vegetation management). Jeff Nahigian's testimony covered corporate real estate and SmartMeter costs and benefits, a newly-emerged issue area that proved to be less straightforward than the Commission may have hoped in its SmartMeter decisions. And Garrick Jones both performed much of the analysis supporting Mr. Marcus's testimony and sponsored testimony on a variety of electric distribution spending areas. In addition, Greg Ruszovan of JBS Energy recorded a relatively

	<p>small number of hours providing analysis in support of Mr. Nahigian’s SmartMeter testimony and Ms. Schilberg’s IT testimony, and Jim Helmich recorded a very small number of hours performing analysis that fed into Mr. Marcus’s testimony on generation subjects.</p> <p><u>Meetings or discussions involving more than one TURN attorney or expert witness:</u> A relatively 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. For the meetings that were among TURN’s attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN’s strategy for this proceeding. None of the attendees are there in a duplicative role – each is an active participant, bringing his or her particular knowledge and expertise to bear on the discussions. As a result, TURN is able to identify issues and angles that would almost certainly never come to mind but for the “group-think” achievable in such settings.</p> <p>There were also meetings with other parties (particularly in the settlement discussion setting) at which more than one attorney represented TURN on occasion. The Commission should understand that this is often essential in a case such as this one, with a wide range of issues that no single person is likely to master. 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 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.</p> <p>There is also travel time associated with TURN’s expert witnesses’ 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 neither Mr. Marcus nor Mr. Jones would have traveled to San Francisco on these days but for their need to appear at the hearing.</p> <p><u>Compensation Request Preparation Time:</u> TURN is requesting compensation for 24.25 hours devoted to compensation-related matters, primarily preparation of this request for compensation. 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 size and complexity of the request for compensation itself. In D.09-10-051, the Commission awarded compensation for the full 30.0 hours requested for compensation-related work in the SCE 2009 GRC. Mr. Finkelstein did most of the preparation work due to Ms. Goodson’s extended absence from the office. While Ms. Goodson returned at a time when she possibly could have prepared the request, it would have absorbed all of her available time and attention at a time when she was digging out of the work that had accumulated during her three-month leave. Therefore TURN determined that it would be reasonable under these circumstances to have Mr. Finkelstein prepare the request, with his extensive knowledge of all aspects of this proceeding.</p>				
Comment 2	<p><b>Allocation of Hours:</b> TURN has allocated its time entries set forth in the attachments by the following activity codes:</p> <table data-bbox="544 1552 1364 1657"> <tr> <td data-bbox="544 1552 673 1606">Code</td> <td data-bbox="690 1552 1364 1606">Stands for:</td> </tr> <tr> <td data-bbox="544 1617 673 1657">GP</td> <td data-bbox="690 1617 1364 1657">General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part</td> </tr> </table>	Code	Stands for:	GP	General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part
Code	Stands for:				
GP	General Participation -- work that would not vary with the number of issues that TURN addresses, for the most part				



GH	General Hearing -- Hearing-related (preparation and participation), but not issue-specific. Due to the nature of GRC hearings and witness scheduling, TURN attorneys spent time in the hearing room waiting for their witness to take the stand. To the extent possible, TURN's attorneys used the time in the hearing room to perform other substantive work (such as preparing for the NEXT witness in queue), with the time recorded to the related substantive issue.
PD	PD/AD -- work on analyzing, commenting on, lobbying on, strategizing on the PD/AD/revisions thereto
Proc	Procedural -- Procedural motions (recuse ALJ, change schedule, mtns to strike etc.)
Coord	Coordination with other parties -- meetings and e-mails w/ DRA, other intervenors about issue coverage, etc.
Settle	Work on Settlement related issues -- analysis of offers, negotiation, strategizing, etc.
Policy	Substantive work on policy issues (particularly developing and implementing the strategy for challenging PG&E's "over-spending" claims, etc.)
Gas Dist	Gas Distribution O&M and Capital
Elec Dist	Electric Distribution O&M and Capital
NTP&S	Non-Tariffed Products and Services (distinct from general OOR)
ORR	Other Operating Revenue -- revenues from fees and charges
Law	Law Department
A&G	Administrative and General (other than Law Department and STIP)
Gen	Fossil Decommissioning, Fossil O&M, Hydro Capital, Nuclear O&M
IT	Information Technology
RB	Rate base -- customer deposits, working cash, bonus depreciation
Dep	Depreciation (early in the proceeding the "meters" issue was included as part of TURN's depreciation work)
Tax	Payroll, income, and other tax issues
SmartMeter	SmartMeter costs, benefits, accounting and ratemaking
STIP	Short Term Incentive Plan
CustCare	Customer Care (other than SmartMeter)
Meters	Ratemaking treatment of removed meters
DL	Double leverage issues (related to holding company corporate structure)
CRE	Corporate Real Estate
Bus Trans	Business Transformation
<p># - Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a very small portion of the total hours. 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</p>	

	<p>broader issue-specific categories described above (Policy, Meters, and Elec Dist) and to two non-issue-specific categories (GP and Settle).</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><b>Hourly Rate for TURN attorneys and consultants in 2009 and 2010:</b></p> <p><b>2009 Rates:</b> 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><b>2010 Rates:</b> Except for the individuals discussed below, TURN’s request for compensation uses 2010 hourly rates for its attorneys and consultants at levels previously authorized in prior Commission decisions either for work performed in 2010 or for work performed in prior years, as noted in the table above.</p> <p><b>Hayley Goodson:</b> In D.08-08-027, the Commission recognized that Ms. Goodson’s experience warranted moving her to the next experience level for her work in 2008, and set her hourly rate at \$280, the lowest rate for the experience level of 5-7 years. TURN did not seek any increase to her rate for 2009. For 2010, TURN seeks a “step increase” of 5%, pursuant to Finding 2 of Res. ALJ-267. This brings her hourly rate for 2010 to \$295 (rounded to the nearest \$5 increment).</p> <p><b>Marcel Hawiger:</b> TURN seeks an increase in the hourly rate for the work of staff attorney Marcel Hawiger in 2010 from the \$325 rate authorized for work in 2009 to \$350 for his work in 2010. This increase would reflect his having moved from the 8-12 years experience range to the 13+ years experience range for purposes of establishing hourly rates for attorneys for intervenors. (TURN has also requested the same 2010 rate in the compensation request submitted June 17, 2011 in A.09-09-013, the PG&amp;E gas transmission and storage case.)</p> <p>Mr. Hawiger graduated New York University School of Law in 1993, and has also earned Bachelor’s and Master’s degrees in Geology and Environmental Engineering. After stints as a staff attorney for a legal services program in Washington, and as the Executive Director of a non-profit fair housing organization in Palo Alto, Mr. Hawiger joined TURN in August of 1998. Mr. Hawiger has served as TURN’s lead attorney in all major gas proceedings over the past decade, as well as playing an instrumental role in the energy utility general rate cases (including serving as the lead TURN attorney for both the SCE 2009 GRC and the Sempra Utilities’ 2008 GRCs) and in the multitude of demand response proceedings of recent years.</p> <p>In 2010 Mr. Hawiger was in his twelfth year on TURN’s staff. Even discounting his pre-TURN legal experience by 50% due to its non-energy regulatory nature (although still advocacy positions, thus making them relevant as a qualification for appearing before the Commission), in 2010 Mr. Hawiger’s experience would move him into the 13-plus year category in the Commission’s hourly rate structure, the highest range. Due to a quirk in the Commission’s rate structure, the lower end of the 13-plus year range is the same as the lower end of the 8-12 year experience range. However, even though the approved rate of \$325 for Mr. Hawiger’s work in 2009 is slightly above the low end of the 13-plus year range, the Commission should approve an hourly rate of \$350 to reflect the different range in which Mr. Hawiger now belongs.</p> <p>The \$325 hourly rate for 2009 is approximately mid-way in the \$300-355 range set for attorneys with 8-12 years of experience, but is only 10% above the floor of the \$300-535 range for attorneys with more than 13 years experience. An increase to \$350 would put Mr. Hawiger’s 2010 rate at approximately 20% above the floor of the higher range.</p> <p>The reasonableness of the \$350 rate is confirmed when compared to the rates the Commission has approved for other attorneys with comparable qualifications and experience. For example, Christine</p>

Mailloux on TURN's staff graduated from law school in the same year as Mr. Hawiger, and joined TURN's staff in 2001 (several years after Mr. Hawiger). However, her pre-TURN experience was more directly relevant to work before the Commission (work for a TET-funded consumer education program, and three years with a private firm representing clients in Commission matters). Her approved hourly rate was \$360 in 2007 and increased to \$390 in 2008 (where it has remained since). Similarly, the Commission has approved an hourly rate of \$420 for Melissa Kasnitz of Disability Rights Advocates for her work in 2008, 2009 and 2010. Ms. Kasnitz is a 1992 law school graduate who joined the staff of Disability Rights Advocates in 1997. Like Mr. Hawiger, her previous post-law school experience, while impressive, was not directly related to advocacy on regulated utility matters.

TURN submits that this information is more than sufficient for the Commission to grant the requested increase to Mr. Hawiger's hourly rate. However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be informed of the additional information that is necessary and given an opportunity to provide that information before a draft decision issues on this compensation request.

**Garrick Jones, JBS Energy:** For work performed in the latter half of 2010 by Garrick Jones of JBS Energy, TURN seeks an hourly rate of \$140. The Commission has previously adopted a \$130 rate for his work in 2009. JBS Energy increased the hourly rate the firm charges for work performed by Mr. Jones as of July 1, 2010.

Mr. Jones joined JBS Energy in June 2007, and at the time had three years' experience of analysis with a focus on environmental impact assessment and reporting. As of July 1, 2010, he had a full three years of experience with JBS, as well as the analytical skills developed during his previous experience.

The Commission retained the \$125-185 range for experts with 0-6 years of experience in 2010. Resolution ALJ-267. Even if his pre-JBS experience is discounted to zero, Mr. Jones's three years with the firm would justify a rate at the mid-point of that range (\$155). Including the pre-JBS experience would result in closer to six years of experience, and a figure near the top of the range. As is typical for the rates JBS Energy charges for each of its firm members, the \$140 rate for work performed in 2010 is below the figure one would expect using the scale the Commission last adjusted in 2008 (D.08-04-010).

The Commission should approve the \$140 rate for work performed after July 1, 2010 for several reasons. First and foremost, it is the market rate that JBS Energy charges each of its clients for work performed by Mr. Jones. If the Commission were to approve a lower rate for his work during that period, there would be a shortfall between the amount JBS invoiced for Mr. Jones's work and the amount awarded for that work. To the extent TURN shares that shortfall with JBS, it creates an incentive that the Commission should strive to avoid, that is, to indicate to JBS that in order to appear in Commission proceedings on behalf of TURN it must accept an hourly rate less than the rate that its other clients pay. At some point JBS Energy can reasonably be expected to respond to this incentive and devote less time to Commission proceedings in favor of more time devoted to work at its usual hourly rates.

To the extent TURN absorbs the shortfall, the Commission is signaling its expectation that TURN could obtain the same quality of expert witness services from another firm as it gets from JBS through the work Mr. Jones performs for TURN, and at an even lower rate than the \$140 JBS began charging on July 1, 2010. TURN submits that this is just not true. In a short three years Mr. Jones has attained a level of facility and comfort with energy utility analysis such that he sponsored substantial testimony on a variety of issues related to electric distribution (Ex. TURN-8). The Commission has long recognized that JBS Energy is a unique and valued resource because the firm consistently provides first-rate analysis at cut-rate prices. This is so for Mr. Jones's work even at a \$140 hourly rate. TURN submits that the likely outcome of switching to a different firm is that we could at best hope to obtain the same quality of service at a somewhat higher price. The irony is that TURN might have an easier time establishing the reasonableness of the higher rate for a new consultant than we would trying to obtain the same rate for an existing consultant with identical qualifications and experience.

A second reason why the Commission should approve the \$140 hourly rate starting July 1, 2010 is because the Commission set his 2008 hourly rate at \$120, a figure below the adopted range for that year (despite TURN's request for a rate of \$130). D.09-04-027, pp. 12, 15. Thus for all of Mr. Jones's work



in 2008 that was included in a compensation award from the Commission, there was a shortfall that should not have existed. Having once set an hourly rate at a level below both the rate invoiced by JBS Energy and the established range for consultants, the Commission should set Mr. Jones's hourly rate at \$140 starting July 1, 2010, the rate invoiced by JBS Energy and a level still in the lowest quartile of the range adopted for consultants with up to six years of experience.

**Greg Ruzzovan, JBS Energy:** For work performed in 2010 by Greg Ruzzovan of JBS Energy, TURN seeks an hourly rate of \$195. The Commission has previously adopted a \$180 rate for his work in 2008. However, in the compensation request that led to the adoption of that rate, TURN had requested a \$195 hourly rate for his work in 2008, as JBS Energy had increased the hourly rate the firm charges for work performed by Mr. Ruzzovan to \$195 as of 2008. TURN had requested the use of that rate starting in 2008. However, the Commission limited the increase to the 3% COLA increase plus a 5% step increase applied to the \$165 hourly rate that had been adopted for work in 2006 and 2007.

Mr. Ruzzovan is the firm's Senior Energy Analyst, with more than two decades of experience in energy conservation, advanced computer analysis, database programming and utility production simulation modeling. Since joining JBS Energy in 1989, Mr. Ruzzovan has performed energy-related computer analysis of utility operations, energy data analysis, and major utility customer data base design and development. He has designed and developed a multi-relational database, including a customized data entry program for each major utility, to process and analyze individual facility energy use data. He has built models to integrate analysis of hourly market pricing data and hourly load data for individual customers or customer classes. He has provided consulting services on computer systems, both in hardware design and software operation, for a variety of clients and for the internal operations of JBS.

The Commission retained the \$155-390 range for experts with more than 13 years of experience in 2010. Resolution ALJ-267. With approximately 20 years experience with JBS Energy, Mr. Ruzzovan would easily fall at least at the mid-point of that range (approximately \$275). Again, as is typical for the rates JBS Energy charges for each of its firm members, the \$195 rate for work performed in 2010 is substantially below the figure one would expect using the scale the Commission last adjusted in 2008 (D.08-04-010), and is within the bottom quartile for the ranges for experts with this level of experience. It is also only slightly higher than the rate produced if the Commission were to apply the "5% step increase" approach here (which would produce a \$190 hourly rate).

The Commission should approve the \$195 rate for work performed in 2010 not only because it is a reasonable rate, but also because it is the market rate that JBS Energy charges each of its clients for work performed by Mr. Ruzzovan. As TURN explained above in the discussion of Mr. Jones's rate, if the Commission were to approve a lower rate for his work during that period, at some point it can reasonably expect that either JBS Energy will devote less time to Commission proceedings (in favor of more time devoted to work at its usual hourly rates) or TURN will continue to bear a shortfall in cost recovery even as we continue to rely on a firm that charges hourly rates far below what the market would bear for individuals of similar talent and experience.

**Jim Helmich, JBS Energy:** For work performed in 2010 by Jim Helmich of JBS Energy, TURN seeks an hourly rate of \$195. The Commission has previously adopted a \$190 rate for his work in 2008. However, in the compensation request that led to the adoption of that rate, TURN had requested a \$195 hourly rate for his work in 2008, as JBS Energy had increased the hourly rate the firm charges for work performed by Mr. Helmich to \$195 as of 2008.

Mr. Helmich is one of the founders of JBS Energy and is the firm's Principal Engineer. A statement of Mr. Helmich's qualifications may be found at [http://jbsenergvy.com/Energy/Associates/Jim\\_Helmich/jim\\_helmich.htm](http://jbsenergvy.com/Energy/Associates/Jim_Helmich/jim_helmich.htm).

With 30 years of experience in energy economics, analysis and engineering, Mr. Helmich would easily fall within the upper levels of the hourly rate range the Commission has adopted for experts with more than thirteen years of experience. Again, as is typical for the rates JBS Energy charges for each of its firm members, the \$195 rate for work performed in 2010 is substantially below the figure one would expect using the scale the Commission last adjusted in 2008 (D.08-04-010), and is within the bottom quartile for the ranges for experts with this level of experience. It is also only slightly below the rate

	<p>produced if the Commission were to apply the “5% step increase” approach here (which would produce a \$200 hourly rate).</p> <p>Once again, the Commission should approve the \$195 rate for work performed in 2010 not only because it is a reasonable rate, but also because it is the market rate that JBS Energy charges each of its clients for work performed by Mr. Helmichs. As TURN explained above in the discussion of Mr. Jones’s rate, if the Commission were to approve a lower rate for his work during that period, at some point it can reasonably expect that either JBS Energy will devote less time to Commission proceedings (in favor of more time devoted to work at its usual hourly rates) or TURN will continue to bear a shortfall in cost recovery even as we continue to rely on a firm that charges hourly rates far below what the market would bear for individuals of similar talent and experience.</p> <p>TURN submits that this information is more than sufficient for the Commission to grant the requested increases to the hourly rates for these members of JBS Energy. However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be informed of the additional information that is necessary and given an opportunity to provide that information before a draft decision issues on this compensation request.</p> <p><b>2011 Rates:</b> 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 2011. In this proceeding TURN requests compensation using the previously-approved or requested 2010 hourly rates for each attorney’s and consultant’s 2011 work. TURN reserves the right to seek a higher hourly rate for work performed in 2011 in a future request for compensation.</p>
Comment 4	<p><b>Reasonableness of Expenses:</b> 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, phone and postage costs for TURN’s participation in this proceeding, and consultant travel expense to attend the evidentiary hearing. The legal research expense is slightly higher than in most requests, due to the more extensive research for the issues surrounding treatment of meter investment that is no longer “used and useful.” The phone costs include a cell phone expense due to the lengthy calls for settlement meetings among the parties and the fact that these calls caused one of TURN’s attorneys to incur charges due to exceeding his monthly allowance of call minutes. Finally, the travel expenses should be compensated because the person who traveled has his office in West Sacramento and only made the trip in question in order to appear at the evidentiary hearing conducted for this proceeding. The fact that he traveled less than 120 miles each way does not in any way change the nature of his trip.</p>

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

#	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

Within 30 days after service of this claim, Commission Staff  
or any other party may file a response to the claim (see § 1804(c))

(CPUC completes the remainder of this form)

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

If so:

Party	Reason for Opposition	CPUC Disposition

**B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(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 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:  
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:

akhan@visiumfunds.com, anders@opentopsightseeing.com,  
ASteinberg@SempraUtilities.com, atrowbridge@daycartermurphy.com,  
bcragg@goodinmacbride.com, beg@cpuc.ca.gov, BermanEconomics@gmail.com,  
bfinkelstein@turn.org, bkc7@pge.com, blaising@braunlegal.com,  
blake@consumercal.org, bpf2@pge.com, brbarkovich@earthlink.net,  
case.admin@sce.com, cem@newsdata.com, CentralFiles@SempraUtilities.com,  
ckt@cpuc.ca.gov, cleo.zagrean@macquarie.com, cmkehrlein@ems-ca.com,  
dao@cpuc.ca.gov, dbp@cpuc.ca.gov, dbyers@landuselaw.com, dfb@cpuc.ca.gov,  
dfdavy@well.com, dietrichlaw2@earthlink.net, dkf@cpuc.ca.gov, dlf@cpuc.ca.gov,  
dmarcus2@sbcglobal.net, douglass@energyattorney.com,  
DWTCPUCDOCKETS@dwt.com, ec2@cpuc.ca.gov, edwardoneill@dwt.com,  
enriqueg@greenlining.org, epoolc@adplaw.com,  
erasmussen@marinenergyauthority.org, filings@a-klaw.com, francis.mcNulty@sce.com,  
fsmith@sflower.org, garrick@jbsenergy.com, hayley@turn.org,  
HEmmrich@SempraUtilities.com, IErgovic@Jefferies.com, info@dcisc.org,  
janreid@coastecon.com, jdangelo@catapult-llc.com, jheckler@levincap.com,  
jimross@r-c-s-inc.com, john@clfp.com, joyw@mid.org, judypau@dwt.com,  
julien.dumoulin-smith@ubs.com, jweil@aglet.org, kerntax@kern taxpayers.org,  
kjsimonsen@ems-ca.com, kkm@cpuc.ca.gov, KMelville@SempraUtilities.com,  
kmills@cbbf.com, kris.vyas@sce.com, lauren.duke@db.com, lawcpucases@pge.com,  
ljt@cpuc.ca.gov, lmh@eslawfirm.com, martinhomec@gmail.com,  
mdjoseph@adamsbroadwell.com, michelle.d.grant@dynegy.com,  
mmattes@nossaman.com, mramirez@sflower.org, mrw@mrwassoc.com,  
naaz.khumawala@baml.com, nes@a-klaw.com, nms@cpuc.ca.gov, pgg4@pge.com,

pk@utilitycostmanagement.com, pucservice@dralegal.org, pucservice@dralegal.org,  
ram@cpuc.ca.gov, RegRelCPUCCases@pge.com, rkoss@adamsbroadwell.com,  
rmccann@umich.edu, rmp@cpuc.ca.gov, rnevis@daycartermurphy.com,  
rschmidt@bartlewells.com, salleyoo@dwt.com, samuelk@greenlining.org,  
scott.senchak@decade-llc.com, sean.beatty@genon.com, SGM@cpuc.ca.gov,  
srt@cpuc.ca.gov, stephaniec@greenlining.org, steven@iepa.com,  
sue.mara@RTOadvisors.com, thomas.long@sfgov.org, txb@cpuc.ca.gov,  
vidhyaprabhakaran@dwt.com, wem@igc.org, wendy@econinsights.com,  
will.mitchell@cpv.com, william.sanders@sfgov.org, Yim@ZimmerLucas.com,  
zango@zimmerlucas.com,

Executed this 5th day of July 2010, at San Francisco,  
California.

/s/

Richard A. Perez  
The Utility Reform Network  
115 Sansome Street, Suite 900  
San Francisco, CA 94104  
Tel: (415) 929-8876











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Case No.	Status	Description
10-000001	Open	Investigation of a security breach on a server.
10-000002	Open	Analysis of network traffic logs for anomalies.
10-000003	Open	Review of system logs for unauthorized access.
10-000004	Open	Identification of potential vulnerabilities in the database.
10-000005	Open	Implementation of security patches for the operating system.
10-000006	Open	Conducting a penetration test on the web application.
10-000007	Open	Configuration of firewalls to restrict incoming traffic.
10-000008	Open	Establishing an incident response plan for future breaches.
10-000009	Open	Regular updates of security software and antivirus definitions.
10-000010	Open	Training staff on security best practices and phishing awareness.
10-000011	Open	Monitoring system logs for suspicious activity.
10-000012	Open	Reviewing user access rights and removing unnecessary privileges.
10-000013	Open	Performing a security audit of the network infrastructure.
10-000014	Open	Implementing multi-factor authentication for sensitive systems.
10-000015	Open	Encrypting sensitive data stored in the database.
10-000016	Open	Establishing a secure communication channel for remote access.
10-000017	Open	Conducting a security awareness campaign for all employees.
10-000018	Open	Regular backups of critical data to off-site storage.
10-000019	Open	Reviewing and updating security policies and procedures.
10-000020	Open	Implementing a secure email gateway to filter spam and malware.















Figure 1

Figure 2

Figure 2

Figure 1





























10-1	10-2	10-3
10-1-1	10-2-1	10-3-1
10-1-2	10-2-2	10-3-2
10-1-3	10-2-3	10-3-3
10-1-4	10-2-4	10-3-4
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10-1-18	10-2-18	10-3-18
10-1-19	10-2-19	10-3-19
10-1-20	10-2-20	10-3-20

表 10-1

10-1	10-2	10-3
10-1-1	10-2-1	10-3-1
10-1-2	10-2-2	10-3-2
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Expenses.

Page 1

Date	Activity	Description	Billed
<u>Activity: \$Cons Travel</u>			
7/14/2010	Cons. Travel	Automobile Travel	\$60.00
7/14/2010	Cons. Travel	BART	\$3.50
Total: \$Cons Travel			\$63.50
<u>Activity: \$Copies</u>			
1/25/2010	Photocopies	Protest.7pp x 2cc	\$2.80
2/17/2010	Photocopies	Prehearing Conference Statement. 9pp x 2cc	\$3.60
3/19/2010	Photocopies	Notice of Intent to Claim Intervenor Compensation. 14pp x 2cc	\$5.60
5/21/2010	Photocopies	JBS prepared Testimony and Attachments. 1115pp x 2cc	\$446.00
6/11/2010	Photocopies	Motion to Strike PG&E Rebuttal Testimony. 7pp x 2cc	\$2.80
6/21/2010	Photocopies	Hearing Exhibits. 550pp	\$110.00
6/22/2010	Photocopies	PG&E 2011 GRC	\$2.81
6/23/2010	Photocopies	PG&E 2011 GRC	\$52.78
6/25/2010	Photocopies	PG&E 2011 GRC	\$20.70
7/2/2010	Photocopies	Motion to Strike Portion of the Rebuttal Testimony of Jack A. Battin on Behalf of PG&E. 13pp x 2cc	\$5.20
7/8/2010	Photocopies	Printing & Copying	\$98.22
7/9/2010	Photocopies	Cross Exhibit for hearing.	\$40.00
7/12/2010	Photocopies	Jones Tetimony Errata Attachments 65pp x 2cc	\$26.00
7/12/2010	Photocopies	Jones Tetimony Errata Redline 11pp x 2cc	\$4.40
7/12/2010	Photocopies	Jones Tetimony Errata Clean 65pp x 2cc	\$26.00
10/29/2010	Photocopies	Opening Brief. 22 pp x 2cc	\$8.80
11/15/2010	Photocopies	Reply Brief. 27pp x 2cc	\$10.80
12/9/2010	Photocopies	Notice of Ex Parte Communication. 3pp x 2cc	\$1.20
12/22/2010	Photocopies	Notice of Ex Parte Communication. 3pp x 2cc	\$1.20
1/26/2011	Photocopies	Motion of TURN and CFC for a Coordinated and Public Investigation of Factors Leading to the San Bruno and Similar Catastrophes and Appropriate Preventive and Remedial Measures. 15pp x 2cc	\$6.00
2/23/2011	Photocopies	Notice of Ex Parte Communication. 3pp x 2cc	\$1.20
3/14/2011	Photocopies	Opening Joins Comments on the Alternate Proposed Decision of Commissioner Peevey. 9pp x 2cc	\$3.60
3/14/2011	Photocopies	Opening Comments on the Proposed Decision of ALJ Fukutome.16pp x 2cc	\$6.40
3/21/2011	Photocopies	Reply Comments on the Proposed Decision of ALJ Fukutome and Alternate Decision of Commissioner Peevey. 8pp x 2cc	\$3.20
3/23/2011	Photocopies	Notice of Ex Parte Communication. 9pp x 2cc	\$3.60
Total: \$Copies			\$892.91
<u>Activity: \$Lexis Research</u>			
5/15/2010	Lexis Nexis	LexisNexis May Invoice.	\$89.46
6/15/2010	Lexis Nexis	LexisNexis June Invoice.	\$26.66
7/15/2010	Lexis Nexis	LexisNexis July Invoice.	\$8.13
7/15/2010	Lexis Nexis	LexisNexis July Invoice.	\$66.24
8/15/2010	Lexis Nexis	LexisNexis August Invoice.	\$9.15
10/15/2010	Lexis Nexis	LexisNexis October Invoice.	\$112.63
11/15/2010	Lexis Nexis	LexisNexis November Invoice.	\$113.49
12/15/2010	Lexis Nexis	LexisNexis December Invoice.	\$177.74
3/15/2011	Lexis Nexis	LexisNexis March Invoice.	\$75.15

6/30/2011  
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Expenses.

Page 2

Date	Activity	Description	Billed
Total: \$Lexis Research			\$678.65
<u>Activity: \$Phone</u>			
12/15/2009	Phone/Fax	Sprint Invoice; \$0.29	\$0.29
1/15/2010	Phone/Fax	Sprint Invoice; \$2.87	\$2.87
2/3/2010	Phone/Fax	Conference Call	\$47.60
2/15/2010	Phone/Fax	Sprint Invoice; \$0.98	\$0.98
3/15/2010	Phone/Fax	Sprint Invoice; \$2.75	\$2.75
4/15/2010	Phone/Fax	Sprint Invoice; \$3.35	\$3.35
5/15/2010	Phone/Fax	Sprint Invoice; \$1.41	\$1.41
6/7/2010	Phone/Fax	Conference Call	\$26.45
6/15/2010	Phone/Fax	Phone bill	\$13.50
6/15/2010	Phone/Fax	Sprint Invoice; \$3.92	\$3.92
7/15/2010	Phone/Fax	Sprint Invoice; \$5.37	\$5.37
8/17/2010	Phone/Fax	Conference Call	\$24.33
9/15/2010	Phone/Fax	Sprint Invoice; \$0.75	\$0.75
10/15/2010	Phone/Fax	Cell phone expense for PG&E GRC conference calls.	\$121.95
10/15/2010	Phone/Fax	Sprint Invoice; \$1.9	\$1.90
Total: \$Phone			\$257.42
<u>Activity: \$Postage</u>			
2/17/2010	Postage	Prehearing Conference Statement. 9pp x 2cc	\$2.10
3/19/2010	Postage	Notice of Intent to Claim Intervenor Compensation. 14pp x 2cc	\$2.10
6/11/2010	Postage	Motion to Strike PG&E Rebuttal Testimony. 7pp x 2cc	\$2.10
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