Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Implementation and Administration of the California Renewables Portfolio Standard Program.	Rulemaking 11-05-005 (Filed May 5, 2011)

INTERVENOR COMPENSATION CLAIM OF Sustainable Conservation AND DECISION ON INTERVENOR COMPENSATION CLAIM OF Sustainable Conservation

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Claimant: Sustainable Conservation			**For contribution to D.** 12-05-035
Claimed ($): $58,893.50			**Awarded ($):**
Assigned Commissioner: Ferron			**Assigned ALJ: DeAngelis**
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).			
		Signature:	/s/
Date:	**7/31/2012**	**Printed Name:**	**Jody London**

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

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A. Brief Description of Decision:	D.12-05-035 implements various amendments to the Public Utilities Code. The decision adopts, among other things, the "Renewable Market Adjusting Tariff/ ("ReMAT"), a new pricing mechanism for the Commission's Feed-in Tariff program for renewable resources.

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

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	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	July 11, 2011	
2. Other Specified Date for NOI:	Order Instituting Rulemaking, p. 20: "We permit a party found eligible in R.08-	

	08-009 to remain eligible in this proceeding. The party should update its planned participation, potential compensation request, or other relevant information, however, if different than as stated in R.08-08-009."	
3. Date NOI Filed:	June 9, 2011	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.08-08-009	
6. Date of ALJ ruling:	November 10, 2010	
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.09-09-045, D.09-12-039, D.11-06-036	
12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.12-05-035	
14. Date of Issuance of Final Order or Decision:	May 31, 2012	
15. File date of compensation request:	July 30, 2012	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment

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

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

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Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
1. Prioritize Implementation of SB 32. When the Commission opened R.11-05-005, it asked parties to comment on the order in which it should address the many issues encompassed in the Rulemaking. Sustainable Conservation advocated for the Commission to implement SB 32 immediately. The Commission adopted several tracks for R.11-05-005, and put SB 32 implementation into the first track.	**Presentation** 5/31/2011 *Comments*, p. 2: "SB 32 became law in October 2009. The Commission, nevertheless, waited until March 2011, *18 months*, before it even requested briefs from stakeholders on how to best implement SB 32. The Commission has taken no further action since then. This is not only inexcusable; it disrespects the will of the Legislature. Because SB 32 has already been fully briefed, the Commission has a complete record from which it can move quickly. Signing of SB 2 (IX) on April 12, 2011 should not be an excuse to further delay implementation of SB 32. The Commission should focus in the next three months on implementing SB 32. 7/21/11 *Comments*, p. 11: "…in the context of the tariff, it is probably more efficient to address all issues concurrently." **Commission Action** An Administrative Law Judge Ruling, on June 27, 2011 set out a separate track for SB 32 implementation: "Today's ruling sets forth an initial proposal for implementing these amendments with the intention of moving forward expeditiously on this matter. Other issues identified in R.11-05-005 will proceed on a separate track." (p. 1)	
2. Environmental compliance costs. Sustainable Conservation has maintained that SB 32 requires the Commission to include environmental compliance costs in the feed-in tariff price. These costs will vary by renewable technology and perhaps business category. So will the value these different technologies provide. Sustainable Conservation provided references to published reports on environmental compliance costs for agricultural biogas projects.	**Presentation** 3/7/2011 *Brief*, p. 11: "The Federal Energy Regulatory Commission ("FERC") allows even broader discretion including (but not limited to) location benefits, environmental attributes, and base load power. The CPUC will need to develop a record on the costs associated with these items. The costs will vary by technology and perhaps business category (i.e., farm vs. municipal), as will the	

The Commission agreed in D.12-05-035 that it is required to include environmental compliance costs. The Commission agreed that the Renewable Auction Mechanism, the results of which provide the starting point for ReMAT, does not include specific environmental compliance costs. The Commission added language in the final decision to reflect that further study is needed to determine these costs.	value different technologies provide. In the case of biogas, value has more than one component including: the reduction in emissions of methane, a potent greenhouse gas, and the ability to operate these facilities in a baseload manner, thereby increasing system reliability." 3/22/2011 *Reply Brief*, p. 10: "Several parties join Sustainable Conservation in opening briefs in reminding the CPUC that SB 32 requires the market price to include all current and anticipated environmental compliance costs…" 11/2/2011 *Comments*, pp. 6-14 discuss pricing. Pp. 9-10 focus specifically on environmental compliance costs for biogas. 4/9/12 *Comments on Proposed Decision*, p. 7: "The Proposed Decision notes that specific environmental compliance costs may not be reflected in the prices that are bid to the RAM, which is the basis for the Re-MAT starting price. The specific example cited is costs for compliance in an air quality management district. This is dismissed, however, by saying no party presented data on those costs. This is disingenuous." **Commission Action** D.12-015-035, p. 43, acknowledges that the adopted mechanism does not include environmental compliance costs. The final decision was modified from the Proposed Decision to acknowledge this, as indicated below: "We seek to pay generators the price needed to build and operate ~~the~~ a renewable generation facility. We do not find, however, that specific costs, such as compliance costs in a particular air quality management district, are necessarily captured by the RAM methodology. ~~No party presented data on such costs.~~ More analysis is needed. We further discuss our proposal for compliance with § 399.20(d)(1) in a separate section." D.12-05-035, p. 54: "We are mindful of the importance of quantifying this cost and find it essential for the Commission's compliance with the statute. More analysis and data is required, however, to complete this task. We will prioritize this issue in this proceeding and will resolve this matter."	

3. Reservation for biomass within the baseload category. Sustainable Conservation has supported a reservation of capacity specifically for biogas technology. While the Commission did not designate a specific reservation for biogas, it did allocate capacity under ReMAT into three categories, one of which – baseload – is a category into which biogas projects could bid. Further, the Final Decision was modified to identify how ReMAT might benefit biogas.	**Presentation** 3/7/2011 *Brief*, p. 8: "The Commission should reserve within the SB 32 cap a recommended 150 MW of capacity for baseload renewable biomass resources. Within this baseload renewable resource set-aside, the Commission should ensure that various generator categories have the opportunity to participate. These should include agricultural feedstock facilities, municipal waste feedstock facilities, and food processing facilities." 3/22/11 *Reply Brief*, pp. 9-10: "As noted above, some parties ask the Commission to raise the eligibility under SB 32 to 5 MW. This request comes from parties representing solar technology. Were the Commission to adopt this recommendation, it would create a bias in favor of solar, to the disadvantage of other technologies that are not as widely deployed at this time. The larger sized projects would use up more of the capacity cap, so there would be less capacity available for other projects and technologies. And, as noted in opening briefs, the solar industry is already well-developed and financed. This is why Sustainable Conservation advocates that the Commission reserve within the SB 32 cap a recommended 150 MW of capacity for baseload renewable biomass resources. This concept is supported by other parties. Further, within this baseload renewable resource set-aside, the Commission should ensure that various generator categories, i.e., agricultural feedstock, municipal waste feedstock, food processing, have the opportunity to participate." **Commission Action** D.12-05-035, pp. 81-82 (as modified from the Proposed Decision): "However, as discussed previously, we seek to support the development of different renewable technologies, and, therefore, we adopt three product types ~~for the~~within today's expanded FiT Program ~~and require at least 3 MW in each type~~.…The ~~allocation will remain in the designated product type unless there is no subscription in that type for more than 12 months. Re-MAT also~~ Re-MAT pricing	

	mechanism could benefit bioenergy, biogas, forest biomass, and the other technologies because it allows renewable resources to compete against other similarly-valued renewable resources, rather than the entire renewable market."	
4. Recognize the value of baseload renewable technologies. Sustainable Conservation has been a constant advocate for the Commission to recognize the value of baseload renewable resources, and a diverse renewable resource portfolio. Throughout the proceeding, Sustainable Conservation has analyzed utility RPS compliance reports as they become available, and presented evidence that demonstrates that under current policies, by 2020 the utilities' RPS portfolios will include very little baseload power; the amount of biogas anticipated in the RPS portfolios hovers around 1% of all RPS power, according to these reports. D.12-05-035 directs that resources be procured in three buckets, one of which is baseload.	**Presentation** 3/7/2011 *Brief*, pp. 6-7: "The Commission needs to recognize the value baseload biomass generator benefits add, and encourage their deployment. They are not now specifically encouraged by the CPUC." 3/22/2011 *Reply Brief*, pp. 9-10. May 31, 2011 *Comments*, p. 4: "Data submitted by the utilities in their RPS compliance reports on March 1, 2011 should be a wake-up call for policy makers concerned about the diversity in the State's renewable resource portfolio." **Commission Action** The Final Decision added language not included in the initial Proposed Decision on the benefits of biogas, and specifically mentions Sustainable Conservation, p. 51: "In some instances, parties relied on § 399.20(d)(1) to support their position that the Commission adopt an environmental adder or, in some other manner, incorporate into the FiT price a component to reflect specific environmental benefits of different generation technologies. For example, parties representing the biogas industry, including CEERT, AECA, Sustainable Conservation and others discussed the value of the reduction in emission of methane. Similarly, parties, including Placer County and others, representing the forest biomass industry explained the value of reduced air emissions from wildfires, mitigated fire suppression costs, and public safety benefits. We support these renewable generation industries and their potential to contribute to the reduction of greenhouse gas emissions and improve air quality." D.12-05-035, Finding of Fact 10: "A separate price for each of the three product types (baseload, peaking as-available, non-peaking as-available) better captures the value provided by the different technology types."	

5. Interconnection. Sustainable Conservation has advocated throughout these proceedings on the importance of interconnection for small distributed generation projects, and the need for significant reform of the current process. To highlight the importance of this issue, Sustainable Conservation protested utility advice letters that proposed continuing to allow distribution level interconnection under tariffs governed by the Federal government. This advocacy was ultimately summarized in a Petition to Modify D.07-07-027 filed by Sustainable Conservation in July 2011. The Commission has responded by addressing some of the concerns in D.12-05-035 and by opening a new Rulemaking, R.11-09-011.	**Presentation** December 21, 2009 letter from Sustainable Conservation to Energy Division staff regarding Renewable Energy Distributed Energy Collaborative: "It typically takes six months to one year to complete the interconnection process. With a quicker process, a customer generator would have their small distributed renewable generation source on line…The delays in the current process can cost hundreds of thousands of dollars in lost revenue from electricity sales" (p.1) "…we have found that the FERC tariff continues to be a deterrent to customers with generation potential." (p. 3) 3/7/2011 *Brief*, pp. 12-16. See overall discussion. 3/22/2011 *Reply Brief*, pp. 2-9. See overall discussion. Sustainable Conservation and California Farm Bureau Protest to PG&E Advice Letter 3830, May 5, 2011: "This Advice Letter requests revisions to PG&E's Electric Rule 21 ("Advice Letter"). Concurrent with the Advice Letter, PG&E is proposing other modifications to Rule 21 through different Advice Letters and even CPUC and Federal jurisdictional venues. Additionally, the Commission itself has initiated a process to revise Rule 21 to better accommodate distributed generation. The Commission should withhold making any decision on Advice Letter 3508-E until there is a better understanding of the entire universe of proposed modifications to Rule 21 by PG&E, and others, and their impacts and benefits." **Commission Action** D.12-05-035, p. 107: "The issues framed by Sustainable Conservation's petition for modification are addressed in today's decision or will be addressed in the separate, ongoing rulemaking before the Commission, R.11-09-011. We expect that the first two issues raised by the petition will be addressed, to the extent necessary, in R.11-09-011. Today's decision addresses the third issue raised in the petition. Specifically, today's decision directs the utilities to give generators a choice of which interconnection procedures to use, either the	

	Tariff Rule 21 or the FERC interconnection tariffs." Finding of Fact 42: "Expedited interconnection is critical to the success of the § 399.20 FiT Program and is required by statute." Finding of Fact 46: "The issues framed by Sustainable Conservation's petition for modification are addressed in today's decision or will be addressed in the separate, ongoing rulemaking before the Commission, R.11-09-011."	
6. Pricing basis for renewable power. Sustainable Conservation has supported moving to a price that is based on renewable energy, and away from the Market Price Referent ("MPR"), which is based on the avoided cost of a natural gas power plant. D.12-05-035 adopts the Renewable Market Adjusting Tariff ("ReMAT"), a pricing mechanism that is based on the market for renewable energy, and not the MPR.	**Presentation** 7/21/11 *Comments*, p. 5: "In our opinion, there is no benefit in continuing to use the MPR as the basis for setting the tariff rate for the § 399.20 program." 7/21/11 *Comments*, p. 6: "Our definition of the market price of electricity explicitly recognizes that the marketplace is composed of a variety of types of products and services. Within this definition there is no doubt that technology-specific and/or product-specific tariffs are viable options that are consistent with the new § 399.20(d)" **Commission Action - MPR** D.12-05-035, Conclusion of Law 3: "Based on the *FERC Clarification Order*, the Commission can determine a different avoided cost, differentiated for particular sources of energy as long as state law has imposed an obligation on the utility to purchase energy from those sources of energy." Conclusion of Law 10: "Because the MPR does not reflect ongoing changes within the renewable market and, as a result, could potentially result in a price either too low or too high, using the MPR to set § 399.20 FiT Program price fails to achieve our first policy guideline: to "establish a feed-in tariff price based on quantifiable utility avoided costs that will stimulate market demand."" Conclusion of Law 11: "The renewable market is sufficiently robust to serve as a point of reference for establishing a market price for the § 399.20 FiT Program, and, therefore, we decline to adopt a pricing proposal	

Sustainable Conservation also advocated that prices be established for specific technologies. The Commission requested parties comment on this specific issue in the 7/21/2011 Comments. The Commission did not adopt Sustainable Conservation's recommendation, instead finding that setting prices by three technology types, rather than specific technologies, satisfies the intent of the Legislature. The language in the Decision leaves open the possibility that the Commission might, at some future time, examine this option. Sustainable Conservation has a different interpretation of various Sate and Federal laws and policies, and respectfully requests that it not be penalized because the Commission did not adopt in full its recommendation.	that relies upon the MPR." **Presentation – Technology Specific Price** 7/21/11 *Comments*, pp. 6-7. 11/2/11 *Comments*, p. 11. 12/19/11 *Joint Motion*, throughout. **Commission Action – Technology-Specific Price** In rejecting the proposal for technology-specific pricing, D.12-05-035 was modified from the Proposed Decision as follows: "We seek to create a pricing policy that supports a diversity of technologies. In doing so, we must balance a number of competing interests, and find that, at this time, unique prices for separate technologies is not consistent with state law or the best interest to ratepayers."	
7. Preserve excess sales option. Sustainable Conservation has long supported the ability of generators to use onsite the electricity they need, and sell any excess to the utility. D.12-05-035 preserves this option.	**Presentation** 2/4/2009 *Pre-Workshop Comments*, pp. 3. 4/10/2009 *Comments*, pp. 4-7. 3/7/2011 *Brief*, p.6. "It also is critical, as the Commission implements SB 32, that it retain the "excess sales" option in the current tariff…" 4/9/2012 *Comments on Proposed Decision*, p. 9: "Sustainable Conservation for years has championed the excess sales option. The Proposed Decision rightly maintains this as an option for the feed-in tariff. **Commission Action** D.12-05-035, COL 44: "the FiT Program should not exclude excess sales."	
8. Program Complexity. Sustainable Conservation expressed concern that the ReMAT as originally proposed provided opportunities for gaming by bidders. Sustainable Conservation also suggested that adjusting prices monthly made the program overly complex, and difficult for potential participants to track prices and determine whether they want to bid. D.12-05-035 allows the utilities to suspend the program if they suspect there has been gaming. The Final Decision also modified the price adjustment so that it occurs every other month,	**Presentation** 8/26/11 *Reply Comments*, p. 2: "The program should be easy to access, understand, and implement." 4/9/2012 *Comments on Proposed Decision*, p. 5: "Setting a price for different renewable technologies, even six or seven technologies, once a year means fewer prices to examine and a tariff that is intuitively simpler to understand than the elaborate pricing scenario proposed. Changing prices potentially every month does not make the tariff easy for small generators to know with certainty what the price will be. Generators will be tracking bids twelve times	

instead of every month.	per year, in some instances across three utilities, for a total of 36 different prices to track. From the perspective of a farmer for whom the opportunity to install a biogas digester is one of myriad business decisions, tracking an annual technology-based price is much easier – and much more likely to occur – than tracking a price that changes monthly." **Commission Action** D.12-05-035, Conclusion of Law 25: "A two-month price adjustment for each product type should be adopted. The price may increase or decrease from the prior two month's price by increasing or decreasing amounts, depending on the subscription results in each product type for each utility." Conclusion of Law 27: "Utilities should be permitted to file a motion to temporarily suspend the program if evidence of market manipulation or malfunction exists." Conclusion of Law 28 (as compared against the Proposed Decision): "Utilities should incrementally release a portion of their total program capacity allocation each ~~month~~ two months for a ~~12~~24-month period."	
9. Remove SGIP Restriction. Sustainable Conservation advocated for removing the restriction on obtaining incentives under the Self-Generation Incentive Program, net metering programs, California Solar Initiative, or other similar programs. D.12-05-035 allows generators that previously received incentives to participate in the FiT after a certain period of time has expired.	**Presentation** 2/4/2009 *Pre-Workshop Comments*, pp. 1-2. 3/7/2011 *Brief*, p. 16. "The Commission should establish a statute of limitations on the refund requirement for those who participated in the Self Generation Incentive Program." **Commission Action** D.12-05-035, p. 101: "A generator the previously received incentives under CSI or SGIP can participate in the § 399.20 FiT Program and will owe no refund it if has been online and operational for at least ten years from the date it first received the incentive." COL 50: "To implement § 399.2(k) requiring refund of CSI and SGIP incentives, a generator that previously received incentives under CSI or SGIP can participate in the § 399.20 FiT Program and will owe no refund it if has been online and operational for at least ten years from the date it first received the incentive."	

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

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	Yes.	
b. Were there other parties to the proceeding with positions similar to yours?	Yes.	
c. If so, provide name of other parties: Agricultural Energy Consumers Association, California Farm Bureau Federation, Green Power Institute, Center for Energy Efficiency and Renewable Technologies, Fuel Cell Energy, AgPower, Clean Coalition, California Solar Energy Industries Association (CalSEIA), California Wastewater Climate Change Group.		
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: Sustainable Conservation's advocacy has been from the perspective of the environmental benefits of biogas technology, particularly in agricultural and food processing applications. This is a different perspective from other parties that advocate on biogas issues. Sustainable Conservation took a leadership role in coordinating with other parties, particularly with similar positions. Sustainable Conservation organized conference calls, meetings, and joint pleadings among these parties. For joint pleadings, Sustainable Conservation is claiming only the time spent by its staff. Sustainable Conservation also participated in group meetings with CPUC staff and decision makers, to be efficient with the Commission's time and resources. There may have been situations in which the positions of Sustainable Conservation and other parties were similar. Sustainable Conservation attempted through conference calls and advance exchange of pleadings to avoid duplication. In a proceeding as lengthy and far-reaching as this, it is difficult to avoid overlap. In some instances, Sustainable Conservation collaborated with parties and interested entities that did not submit comments themselves, thereby broadening the scope of input the Commission received (i.e., coordination with Farm Bureau, California Bioenergy).		

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

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#	Claimant	CPUC	Comment
A.			Sustainable Conservation's work to implement SB 32 has extended over several years. The Commission first solicited comments from parties on a feed-in tariff in January 2009, in R.08-08-009. This claim includes work performed by Sustainable Conservation in good faith towards developing a revised feed-in tariff. Attachment 1 lists the many pleadings Sustainable Conservation has developed and/or contributed to in this and predecessor proceedings.
A.			In the area of interconnection, subsequent to Sustainable Conservation's Petition to Modify D.07-07-027 to address interconnection problems, the Commission opened R.11-09-011, which focuses specifically on interconnection for small renewables. Sustainable Conservation is reserving the majority of the claim it will make related to this OIR, including the time spent preparing the Petition to Modify, for a claim that will be filed in R.11-09-011 at the appropriate time. There is some time claimed

			here for interconnection because it was not clear until R.11-09-011 was opened how the Commission would resolve the issue. Additionally, even after the OIR was opened, the utilities continued to submit advice letters and Petitions to Modify prior decisions related to interconnection, and the Proposed and Final Decision made certain findings about interconnection, as indicated above. This claim therefore includes some time spent on interconnection issues.
A.			Sustainable Conservation participated in this and predecessor proceedings in good faith, recommending what the organization recommends as sound public policy. The Commission did not completely agree with Sustainable Conservation on the issues of establishing a technology-based price, instead of the adopted ReMAT mechanism, and creating a capacity reservation for biogas projects. Sustainable Conservation should not be penalized because the Commission did not adopt in full its recommendations on these issues. The standard for an award of intervenor compensation is whether Sustainable Conservation made a substantial contribution to the Commission's decision, not whether Sustainable Conservation prevailed on a particular issue. For example, the Commission recognized that it "may benefit from an intervenor's participation even where the Commission did not adopt any of the intervenor's positions or recommendations." (D.08-04-004, in A.06-11-007, pages 5-6). In that case The Utility Reform Network's ("TURN's") opposition focused on the need for Southern California Edison's contract with Long Beach Generation and the overall cost effectiveness of the resource. The Commission stated that "The opposition presented by TURN and other intervenors gave us important information regarding all issues that needed to be considered in deciding whether to approve SCE's application. As a result, we were able to fully consider the consequences of adopting or rejecting the LBG PPA. Our ability to thoroughly analyze and consider all aspects of the proposed PPA would not have been possible without TURN's participation." *Id.*, at 6. On this basis the Commission found that TURN had made a substantial contribution even though its positions had not been adopted, and awarded TURN intervenor compensation for all of the reasonable hours devoted to the proceeding. The Commission reached a similar conclusion in D.09-04-027, awarding intervenor compensation for TURN's efforts in the SCE AMI proceeding (A.07-07-026). There the Commission found TURN to have made a substantial contribution even on issues where TURN did not prevail, as TURN's efforts "contributed to the inclusion of these issues in the Commission's deliberation" and caused the Commission to "add more discussion on the issue, in part to address TURN's comments." (D.09-04-027, page 4). In the current proceeding, the Commission has stated that it does not choose to follow Sustainable Conservation's pricing proposal at this time. The Commission added language to the Final Decision not present in the Proposed Decision to acknowledge there may be more than one way to set prices for the Feed-in Tariff. D.12-05-035 states, pp. 33-34: "We seek to create a pricing policy that supports a diversity of technologies. In doing so, we must balance a number of competing interests, and find that, at this time, unique prices for separate technologies is not consistent with state law or the best interest to ratepayers." The Commission also anticipates that it may at a later time modify the pricing mechanism, and modified the Final Decision from the Proposed Decision to preserve flexibility in potential changes. D.12-05-035, p. 50: "To the extent that changes to the adjustment

			mechanism or other aspects of the program are needed to improve the program, the utilities may file a joint advice letter with the Commission seeking specific changes to the mechanism. Alternatively, Commission Staff may propose modifications to the adjustment mechanism through a draft resolution ~~on its own motion~~ for consideration by the Commission." Similarly, as described above, on the issue of a capacity reservation for biogas, the Final Decision was modified to reflect the Commission's intention for the three product types in the ReMAT to support the development of different renewable technologies. The Commission should find that Sustainable Conservation's participation provided significant value to the decision-making process such that a full award of intervenor compensation is warranted.

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

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

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a. 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**
Sustainable Conservation is the only non-profit environmental organization with a specific focus on the environmental benefits of biogas technology in the agricultural and food processing industries in these proceedings. Sustainable Conservation's focus on ensuring a diversity of renewable resources in California's electricity portfolio should provide numerous benefits to ratepayers. Biogas digesters provide baseload renewable power, which assists with peak demand and load management. Installing biogas digesters on farms and food processing facilities throughout California should relieve congestion on distribution lines and reduce the need to construct new transmission. Biogas digesters have the additional benefit of significantly reducing emissions of methane, a powerful greenhouse gas. While the policy and procedural contributions from Sustainable Conservation can be difficult to quantify in monetary terms, we submit that Sustainable Conservation contributed substantially to the adoption of D.12-05-035, over the course of several years as the Commission developed the feed-in tariff policy, as discussed above.	
b. Reasonableness of Hours Claimed. Sustainable Conservation has maintained a high level of participation over many years on the feed-in tariff with minimal staff: one in-house staff person (Allen Dusault through October 2011, Stacey Sullivan since October 2011), and a regulatory consultant (Jody London). Ms. London has taken the lead in reviewing and summarizing relevant documents and communications, developing written comments, coordinating and consulting with other parties as part of the organization's development of positions, and setting meetings with CPUC staff and decision makers. Mr. Dusault and then Mr. Sullivan have provided technical review, researched technical issues related to the feed-in tariff and biogas technology, and ensured consistency with Sustainable Conservation's mission. Mr. Dusault and Mr. Sullivan participated in key conference calls and meetings along with Ms. London to ensure the technical aspects and organizational priorities were fully represented.	

Sustainable Conservation also retained an attorney, Don Liddell, to advise on certain legal aspects of the proceeding in 2010 and 2011. Mr. Liddell began representing another party (AgPower) in the proceeding in August 2011; Sustainable Conservation is not claiming time for Mr. Liddell's services to Sustainable Conservation at this time. Sustainable Conservation continued to coordinate with Mr. Liddell in his new capacity.

Similarly, this claim does not include time spent by Sustainable Conservation's Executive Director (Ashley Boren) and Managing Director (Kathy Viatella), even though they have contributed to the development of the organization's strategy and approach on the complex topic of the feed-in tariff.

c. Allocation of Hours by Issue

ISSUE AREAS

- **A** Pricing for renewable energy
- **B** Preserve Excess Sales
- **C** Remove SGIP Restriction
- **D** Biogas Reservation
- **E** Value of baseload renewable power
- **F** Interconnection
- **G** Ensure periodic program review
- **H** Environmental Compliance Costs
- **I** Prioritize SB 32 Implementation
- **J** Program Complexity

	A	B	C	D	E	F	G	H	I	J	
London	54.7	5.05	7.7	14.1	26.8	40.55	2.4	11.7	4.6	8.1	175.7
Dusault	12.25	1.25	2.85	3.85	6	7.9	1.2	0.9	2.6	1.6	40.4
Sullivan	19.2	0.4	0.2	4.1	8.6	3.2	2.4	11.1	0	1.2	50.4
Total	86.15	6.7	10.75	22.05	41.4	51.65	6	23.7	7.2	10.9	266.5
%	32.33	2.51	4.03	8.27	15.53	19.38	2.25	8.89	2.70	4.09	

B. Specific Claim:

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CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Allen Dusault, Expert	2009, 2011	40.4	$230	D.11-06-036	$9,292.00			
Stacey Sullivan, Expert	2011, 2012	40.4	$230	Resolution ALJ-267	$11,592.00			
Jody London, Advocate	2009, 2010	10.8	$190	D.11-06-036, Resolution ALJ-267	$2,052.00			
Jody London, Advocate	2011, 2012	168.7	$200	D.12-06-017	$33,740.00			
				Subtotal:	$56,676.00		***Subtotal:***	

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OTHER FEES Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate	Basis for Rate*	Total $	Hours	Rate	Total $
N/A			$					
N/A								
				Subtotal:			*Subtotal:*	

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INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total $	Hours	Rate	Total $
Jody London	2011, 2012	12.4	$ 100	D.12-06-017	$1,240.00			
Allen Dusault	2011	.5	$ 115	D.11-06-036	$57.50			
Stacey Sullivan	2012	8	$ 115	Resolution ALJ-267	$920.00			
				Subtotal:	$2,217.50		*Subtotal:*	

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COSTS					
#	Item	Detail	Amount	Amount	

			Subtotal:		*Subtotal:*
			TOTAL REQUEST $:	$58,893.50	TOTAL AWARD $:

When entering items, type over bracketed text; add additional rows as necessary.

*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.

C. Attachments Documenting Specific Claim and Comments on Part III (Claimant completes; attachments not attached to final Decision):

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Attachment or Comment #	Description/Comment
1	**Attachment 1: List of Pleadings**
2	**Attachment 2: Time Records**
Comment 1	Sustainable Conservation is not claiming any costs in this request. This is due to the ability to file and serve comments and other documents electronically using the Commission's E-file system; postage costs were minimal and are not included in this claim. Sustainable Conservation has used electronic mail communication and conference calls to reduce the cost of meetings, and similarly is not including those costs in this claim. Sustainable Conservation has relied on Ms. London for much of the work usually performed by an attorney, further reducing costs. Sustainable Conservation has been fiscally prudent.
Comment 2	**Rationale for Jody London's hour rates.** Sustainable Conservation requests an hourly rate of $190 for Jody London for work performed in 2009 and 2010. This is the rate approved for her in D.11-06-036. Resolution ALJ-247 authorized rates ranging from $155 - $390 for experts with 13 or more years experience. In March of 2011, Resolution ALJ-267 continued this

	previously adopted policy. D.12-06-017 grants an hourly rate for Ms. London of $200. Ms. London has over 21 years experience in the energy industry. Her work in this proceeding has frequently been in lieu of work that would otherwise be performed by an attorney with equivalent experience, at a significantly higher rate ($300-$535). Therefore the requested rate for Ms. London is extremely reasonable.
Comment 3	**Rationale for Allen Dusault's hourly rates.** Sustainable Conservation requests an hourly rate of $ 230 for Mr. Dusault. This is the rate approved for him in D.11-06-036. During this proceeding, Dusault managed Sustainable Conservation's Sustainable Agriculture program. He has nearly 25 years' experience in water quality issues, waste management, transportation, agriculture and energy generation that spans the public, private and non-profit sectors.
Comment 4	**Rationale for Stacey Sullivan's hourly rates.** This is the first claim Sustainable Conservation has submitted for Mr. Sullivan. Sustainable Conservation requests an hourly rate of $230 for Mr. Sullivan. Sullivan directs Sustainable Conservation's public policy program, and has assumed the responsibilities for CPUC-related matters previously performed by Allen Dusault. Prior to joining Sustainable Conservation in 2009, Sullivan spent 12 years as a committee consultant to the California State Assembly. After stints as a consultant to the Natural Resources Committee and Budget Subcommittee #3 (Resources), he served for eight years as Chief Consultant to the Local Government Committee. His work while with the Assembly included in-depth involvement in significant legislation and policy initiatives concerning the California Environmental Quality Act, water policy, sustainable agriculture, housing and land use planning. Sullivan was educated at the University of California, Santa Cruz, University of Oxford, and King Hall School of Law at the University of California, Davis. Sullivan is an active member of the California State Bar, and, while not employed as an attorney by sustainable Conservation, he draws extensively on his legal training in this work before the CPUC. This rate requested for Mr. Sullivan is the same rate approved for his predecessor within the organization, as discussed above. The range of rates for lawyers with 13+ years experience approved in Resolution ALJ-267 is $300-$535; the approved range of rates for experts with 13+ years experience is $155 - $390. The rate requested for Mr. Sullivan is extremely reasonable.

D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):

#	Reason

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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?	

If so:

Party	Reason for Opposition	CPUC Disposition

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

If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.

2. The requested hourly rates for Claimant's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.

4. 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. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated."] Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 75th day after the filing of Claimant's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.

4. This decision is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT 1

PLEADINGS SUBMITTED BY SUSTAINABLE CONSERVATION REGARDING DEVELOPMENT OF A FEED-IN TARIFF

	Date	Document Title
1.	December 21, 2009	Letter to Jaclyn Marks, CPUC Energy Division, re Comments for Renewable Energy Distributed Energy Collaborative
2.	Match 7, 2011	Brief of Sustainable Conservation on Implementation of Senate Bill 32 (R.08-08-009)
3.	March 22, 2011	Reply Brief of Sustainable Conservation on Implementation of Senate Bill 32 (R.08-08-009)
4.	May 31, 2011	Comments of Sustainable Conservation (R.11-05-005)
5.	July 21, 2011	Sustainable Conservation and Green Power Institute Comments to Section 399.20 Ruling June 27, 2011 (R.11-05-005)
6.	August 26, 2011	Sustainable Conservation and California Farm Bureau Federation Reply Comments to Section 399.20 Ruling June 27, 2011 (R.11-05-005)
7.	November 2, 2011	Comments of Sustainable Conservation and the Green Power Institute on Revised Staff Proposal for a Feed-in Tariff (R.11-05-005)
8.	November 14, 2011	Reply Comments of Sustainable Conservation and the Green Power Institute on Revised Staff Proposal for a Feed-in Tariff (R.11-05-005)
9.	December 19, 2011	Joint Motion of the Center for Energy Efficiency and Renewable Technologies; AgPower Group, LLC; Sustainable Conservation; Agricultural Energy Consumers Association; Green Power Institute; California Wastewater Climate Change Group; California Farm Bureau Federation; Fuel Cell Energy; and FlexEnergy, Inc., for a Ruling Direction the Consideration of an Administratively Determined Avoided Cost Pricing Workshop That Would Be Part of the Record for the Decision on the Renewable FiT (R.11-05-005)
10.	January 17, 2012	Response of Sustainable Conservation to Southern California Edison Petition for Modification of Decision 10-12-048
11.	January 20, 2012	Joint Reply of the Center for Energy Efficiency and Renewable Technologies; AgPower Group, LLC; Sustainable Conservation; Agricultural Energy Consumers Association; Green Power Institute; California Wastewater Climate Change Group; California Farm Bureau Federation; Fuel Cell Energy; and FlexEnergy, Inc., to Responses to the Joint Motion Filed December 19, 2011 (R.11-05-005)
12.	April 9, 2012	Sustainable Conservation Comments on Proposed Decision Revising Feed-in Tariff and Related Issues (R.11-05-005)

ATTACHMENT 2

STAFF TIME RECORDS

CPUC Intervenor Compensation Program
Submitted by: Sustainable Conservation
Proceeding No.: R.10-05-005
Date of Submission: August 2, 2012
INSTRUCTIONS: Please complete & email to icompcoordinator@cpuc.ca.gov

ATTORNEY AND ADVOCATE FEES					
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total**
Jody London	2009, 2010	10.8	$190	Resolution ALJ -247, ALJ 267; D.11-06-036	$2,052.00
Jody London	2011, 2012	168.7	$200	D.12-07-016	$33,740.00
				Subtotal:	$35,792.00

EXPERT FEES					
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total**
Allen Dusault	2009, 2010, 2011	40.4	$230	D.12-07-016	$9,292.00
Stacey Sullivan	2011, 2012	50.4	$230	Resolution ALJ -247, ALJ 267	$11,592.00
				Subtotal:	$20,884.00

OTHER FEES (e.g., paralegal, travel, etc.)					
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total**
None					
				Subtotal:	

INTERVENOR COMPENSATION CLAIM PREPARATION**					
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total**
Jody London	2011, 2012	12.4	$100.00	D.12-07-016	$1,240.00
Allen Dusault	2011	0.5	$115.00	D.12-07-016	$57.50
Stacey Sullivan	2012	8	$115.00	Resolution ALJ -247, ALJ 267; D.11-06-036	$920.00
				Subtotal:	$2,217.50

COSTS		
Item	**Detail**	**Total**
None		
	Subtotal:	
	TOTAL REQUEST:	$58,893.50

ISSUE AREAS

- **A** Pricing for renewable energy
- **B** Preserve Excess Sales

C Remove SGIP Restriction
D Biogas Reservation
E Value of baseload renewable power
F Interconnection
G Ensure periodic program review
H Environmental Compliance Costs
I Prioritize SB 32 Implementation
J Program Complexity

JODY LONDON

Date	Description	A	B	C	D	E	F	G	H	I	J	Hours	
2009													
12/9/2009	Participate in CPUC workshop on Renewable Distributed Energy Group (R.08-08-009)					2	2					4	
12/20/2009	Research, develop comments for CPUC REDEC re interconnection (R.08-08-009)						1					1	
12/21/2009	Further research, edit, revise comments for CPUC ReDEC (R.08-08-009); Telephone calls with client (A. Dusault) re same						1					1	
	Total 2009	0	0	0	0	2	4	0	0	0	0	6	$ 1,140.00
2010													
4/14/2010	Conference call with client (A. Dusault), other parties re SB 32 implementation; Telephone call with K. Mills (Farm Bureau) re same.	0.3	0.2	0.3	0.2			0.2				1.2	
4/21/2010	Conference call with client (A. Dusault), other parties re SB 32 implementation.	0.2	0.2	0.2	0.1	0.1	0.1	0.1				1	
5/5/2010	Conference call with client (A. Dusault), other parties re SB 32 implmentation. Exchange email with client re same.	0.2	0.2	0.2	0.2		0.1	0.1				1	
8/21/2010	Telephone call with S. Kately (CalSEIA) re		0.1									0.1	

	feed-in tariffs.										
12/23/2010	Begine review of CEC Bioenergy Action Plan; Review slides for CEC 12-14 workshop re same.					0.5				0.5	
12/24/2010	Complete review of CEC Bioenergy Action Plan.		0.2	0.2	0.2		0.2	0.2		1	
	Total 2010	0.7	0.9	0.9	0.7	0.6	0.4	0.6		4.8	$ 912.00
2011											
2/7/2011	Conference call with client (A. Dusault), K. Mills (Farm Bureau) re SB 32 comments; Prepare for same.	0.6	0.6	0.4		0.4				2	
2/18/2011	Telephone call with S. Kately (CalSEIA) re SB 32 brief (R.08-08-009).	0.2	0.2	0.2						0.6	
2/20/2011	Develop outline for SB 32 brief (R.08-08-009).	0.3	0.4	0.3		0.3				1.3	
2/22/2011	Conference call with CalSEIA (S. Kately), Fuel Cell Energy (L. Haug), IEUA (m. Boccadoro), CalBioenergy (R. Buckenham, N. Black), client (A. Dusault) re SB 32 breifs (R.08-08-009).	0.25	0.3		0.25	0.25				1	
2/22/2011	Conference call with Fuel Cell Energy (L. Haug), IEUA (M. Boccadoro), CalBioenergy (R. Buckenham, N. Black), client (A. Dusault) re SB 32 briefs and issues specific to biogas.			0.3	0.25	0.2				0.7	
2/22/2011	Conference call with Farm Bureau (K. Mills), client (A. Dusault) re SB 32 briefs and issues specific to agriculture biogas projects (R.08-08-009).					0.3	0.4	0.3		1	
2/25/2011	Continue developing SB 32 brief (R.08-08-009); Telephone call with S. Kately (CalSEIA) re same.	0.2	0.2	0.2		0.4	0.4	0.1		1.5	
2/27/2011	Conference call with client (A. Dusault), Farm Bureau (K. Mills) re intereconnection, WDAT, and SB 32 briefs (R.08-08-009).			0.2	0.2	0.2		0.1		0.7	
3/1/2011	Review utility RPS compliance filings (R.08-08-009); Incorporate findings into SB 32 brief (R.08-			0.3	0.3					0.6	

	08-009).										
3/1/2011	Continue working on SB 32 brief (R.08-08-009) [interconnection, project size, reporting requirements]						1.5				1.5
3/2/2011	Telephone call with CWCCC (J. Kepke) re proceeding status (R.08-08-009).					0.3					0.3
3/3/2011	Conference call with other parties (CalBio, CalSEIA, Farm Bureau, Fuel Cell Energy) re SB 32 brief (R.08-08-009).	0.3		0.3	0.3	0.3	0.3				1.5
3/3/2011	Telephone call with client (A. Dusault) re conference call with CalBioenergy, et al	0.2				0.2					0.4
3/3/2011	Address comments from client (A. Dusault) on draft SB 32 brief; Develop charts on utility RPS procurement re same (R.08-08-009).					3					3
3/4/2011	Participate in CPUC ReDEC workshop (R.08-08-009).						7				7
3/7/3011	Rewrite SB 32 brief re interconnection, procedural recommendations, conclusion; Telephone calls with client (A. Dusault) re same. Edit, revise brief per client comments; Telephone calls with K. Mills, D. Liddell re same (R.08-08-009).	1	1	0.5	1	1	1	0.5			6
3/8/2011	Meeting with DRA Policy Advisor (C. Cox) re SB 32 implementation (R.08-08-009).					0.5					0.5
3/9/2011	Begin reviewing SB 32 briefs (R.08-08-009).	0.1	0.1	0.1	0.1						0.4
3/10/2011	Continue reviewing SB 32 briefs (R.08-08-				0.1	0.1	0.1	0.1	0.1		0.5

	009).										
3/11/2011	Continue reviewing SB 32 briefs (R.08-08-009).	0.1	0.1	0.1	0.1	0.1	0.1				0.6
3/14/2011	Continue reviewing SB 32 briefs (R.08-08-009).	0.2	0.3	0.3	0.3	0.3	0.3	0.1	0.2		2
3/14/2011	Continue reviewing SB 32 briefs (R.08-08-009).	0.3	0.3		0.4	0.3			0.2		1.5
3/17/2011	Telephone call with client (A. Dusault), Farm Bureau (K. Mills) re positions of other parties in opening briefs (R.08-08-009).	0.2			0.2	0.2					0.6
3/17/2011	Telephone call with CEERT (S. Myers, D. Mills) re SB 32 briefs.	0.3			0.2						0.5
3/18/2011	Telephone call with Wastewater Agencies (J. Kepke) re SB 32 briefs, reply briefs (R.08-08-009).	0.1				0.1	0.1				0.3
3/18/2011	Telephone call with CalSEIA (S. Kately) re SB 32 reply briefs. Agencies (J. Kepke) re SB 32 briefs, reply briefs (R.08-08-009).	0.1					0.1		0.2		0.4
3/20/2011	Begin developing SB 32 reply brief.			0.3	0.3		0.4				1
3/21/2011	Research interconnection issues - utility tariffs and proposals - for SB 32 reply brief (1 hour); Continue writing SB 32 reply brief; Telephone calls with client (A. Dusault), AECA (M. Boccadoro), Farm Bureau (K. Mills) re reply briefs.			0.5	1.5		2.5				4.5
3/22/2011	Incorporate legal analysis of interconnection issues into SB 32 reply brief; Edit, rewrite, cite check same.			0.5	0.5		2.5				3.5
3/22/2011	Begin reviewing SB 32 reply briefs (R.08-08-009).			0.1	0.2		0.2				0.5
3/23/2011	Meeting with clients (A. Dusault, K. Viatella, S. Sullivan, A. Boren) re SB 32 implementation (R.08-08-009).				0.2	0.3			0.2		0.7
3/24/2011	Continue reviewing SB 32	0.7									0.7

	reply briefs (R.08-08-009).										
3/25/2011	Complete review of SB 32 reply briefs (R.08-08-009).			0.1		0.2			0.2		0.5
5/4/2011	Develop draft protest to PG&E Advice Letter 3830 (Small Renewable Tariff).						0.5				0.5
5/5/2011	Write protest to PG&E Advice Letter 3830 (small renewable tariff); Incorporate comments from client (A. Dusault), Farm Bureau (K. Mills) re same.						2				2
5/19/2011	Prepare response to CPUC staff questions re PG&E Advice Letter 3830.						0.5				0.5
5/20/2011	Finalize response to CPUC staff questions re PG&E Advice Letter 3830; Telephone call with CPUC staff (J. Marks) re same; Exchange email with client (A. Dusault) re same.						0.5				0.5
5/24/2011	Review R.11-05-005: telephone call with client (A. Dusault), D. Liddell re RPS ruling, PHC statement (R.11-05-005).	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.2		1
5/27/2011	Develop draft comments on RPS OIR (R.11-05-005.					0.5	0.5		0.3	0.7	2
5/30/2011	Incorporate input from client (A. Dusault), D. Liddell re RPS comments (R.11-05-005).					0.2				0.3	0.5
5/31/2011	Edit, revise, proof RPS comments (R.11-05-005).									0.5	0.5
6/3/2011	Begin reviewing comments on RPS OIR (R.11-05-005).	0.2			0.1	0.2					0.5
6/3/2011	Meeting with Advisor to Commissioner Ferron (M. Colvin), client (A. Dusault) re SB 32 implementation; Meeting with client (A. Dusault) to prepare for same.									1	1
6/5/2011	Prepare ex parte notice for 6/3 meeting with M. Colvin.									0.2	0.2
6/8/2011	Telephone call with client (A. Dusault) re reply comments in RPS docket (R.11-05-	0.2			0.1		0.2				0.5

	005).								
6/10/2011	Telephone call with client (A. Dusault), CWCCC (J. Kepke), EBMUD (J. Hake), Clean Coalition (T. Ko) re Prehearing Conference (R.11-05-005).				0.25	0.5			0.75
6/12/2011	Review reply comments in RPS OIR (R.11-05-005).	0.1	0.1	0.1		0.1	0.1		0.5
6/13/2011	Review transcript of PHC in RPS OIR (R.11-05-005).				0.1	0.1	0.1		0.3
6/17/2011	Meeting with clients (A. Dusault, K. Viatella, S. Sullivan, A. Boren) re status of SB 32 implementation (R.11-05-005).							1	1
6/22/2011	Develop letter to SCE re proposed CREST modifications; Exchange email, telpheone call with client (A. Dusault), Clean Coalition (T. Ko) re same.					1			1
7/6/2011	Facilitate conference call with client (A. Dusault), Clean Coalition, Fuel Cell Energy, Green Power Institute, AECA, CASA re interconnection, 7-11 Prehearing Conference on SB 32 (R.11-05-005).	0.25				0.75			1
7/8/2011	Telephone call with Fuel Cell Energy (L. Haug) re SB 32 implementation; Meeting with Green Power Institute (G. Morris) re same.	0.5				0.5			1
7/11/2011	Meeting with Clean Coalition (T. Ko), Solar Alliance (S. Birmingham), Farm Bureau (K. Mills), AECA (A. Trowbridge) re interconnection and pricing under SB 32 (R.11-05-005).	0.5				0.5			1
7/11/2011	Participate in Prehearing Conference on SB 32 (R.11-05-005).	0.75				1			1.75
7/11/2011	Conversations with client (A. Dusault), other	0.5				0.25			0.75

	parties re next steps from Prehearing Conference (R.11-05-005).						
7/14/2011	Review email re schedule extension in R.11-05-005; Exchange email with client (A. Dusault) re same.					0.2	0.2
7/15/2011	Respond to email request for schedule extension in R.11-05-005.					0.2	0.2
7/18/2011	Telephone call with client (A. Dusault), CalBioenergy (N. Black, R. Buckenham) re SB 32 comments, pricing (R.11-05-005); Telephone call with K. Mills (Farm Bureau) re same.	0.8	0.2				1
7/18/2011	Research, develop draft comments on SB 32.	1.3			1	0.2	2.5
7/19/2011	Telephone calls with client (A. Dusault) and CalBio (N. Black, R. Buckenham), AECA (A. Trowbridge), GPI (G. Morris), Fuel Cell Energy (R. Liebert) re comments on SB 32 (R.11-05-005).	1	0.5				1.5
7/20/2011	Telephone call with client (A. Dusault), G. Morris (GPI), N. Black (CalBio) re comments on 399.20 price, other issues (R.11-05-005); Review Fuel Cell Energy advance draft comments re same; Telephone call with K. Mills (Farm Bureau) re same; Begin revising client comments re same.	1.5		0.5	0.5		2.5

7/21/2011	Review advance draft comments from AECA (R.11-05-005); Edit, revise, rework comments per input from client (A. Dusault), G. Morris (GPI).	0.5			0.2	0.3	0.3	0.4	0.3		2
7/21/2011	Begin reviewing comments on Section 399.20 (R.11-05-005).	0.6									0.6
8/2/2011	Telephone call with client (A. Dusault), D. Liddell re SB 32 reply comments, upcoming workshops (R.11-05-005).	0.1								0.2	0.3
8/9/2011	Continue reviewing SCE proposed SB 32 tariff (R.11-05-005); Conference call with other parties (AECA, Fuel Cell Energy, AgPower Partners, Farm Bureau, CalBioenergy) re joint reply comments, workshop preparation.		0.2	0.2	0.2	0.5				0.4	1.5
8/10/2011	Telephone call with D. Liddell re SB 32 tariffs, pricing strategy, reply comments (R.11-05-005).	0.3									0.3
8/15/2011	Telephone call with AgPower (B. Joblin) re reply comments on 399.20 (R.11-05-005); Complete review of utility proposed tariffs re same; Continue review of 7-21 Opening Comments; Prepare summary for client (A. Dusault) of proceeding status.	1	0.3	0.3		0.4					2
8/16/2011	Telephone call with client (A. Dusault) re proceeding status report, upcoming activities (R.11-05-005).			0.3		0.25					0.5
8/19/2011	Begin outlining reply comments re SB 32 tariffs (R.11-05-005).	0.3				0.3				0.4	1

8/19/2011	Review e-mail from other parties re SB 32 tariffs, workshops (R.11-05-005).	0.2				0.2
8/23/2011	Telephone call with client (A. Dusault), AgPower (D. Liddell) re reply comments (R.11-05-005); Telephone call with M. Boccadoro (AECA) re same; Research, write same.	2	0.5	2	1.5	6
8/24/2011	Incorporate comments from client to draft reply comments (R.11-05-005); Circulate same to other parties; Telephone call with D. Liddell (AgPower) re same.				0.5	0.5
8/25/2011	Telephone calls with client (A. Dusault), Farm Bureau (K. Mills), Fuel Cell Energy (L. Haug) re Reply Comments on SB 32 (R.11-05-005); Review advance drafts of reply comments from AgPower, FCE; Edit, revise SusCon-Farm Bureau Reply Comments.	0.5				0.5
8/26/2011	Proofread, revise Reply Comments (R.11-05-005).	0.1		0.2	0.2	0.5
8/26/2011	Review draft comments, proposed SB 32 tariff from AECA; Telephone call with A. Trowbridge re same; Exchange e-mail with A. Trowbridge re same.	0.5				0.5
9/10/2011	Meeting with SusCon renewable energy team re CPUC feed-in tariff process (R.11-05-005).		0.2		0.2	0.4
9/26/2011	Review staff report on SB 32 tariff (R.11-05-005); Send email	0.3	0.1		0.2	0.6

	with issues re same to client (A. Dusault), D. Liddell, M. Boccadoro, A. Trowbridge, K. Mills, G. Morris.								
9/27/2011	Telephone call with client (A. Dusault), D. Liddell (AgPower) re next steps from workshop (R.11-05-005); Telephone call with CPUC staff (J. Marks) re workshop, staff report; Telephone calls with M. Boccadoro, K. Mills re next steps for same	0.2		0.4	0.4		0.2	0.3	1.5
9/28/2011	Telephone call with client (A. Dusault) re next steps on SB 32 implementation.	0.1		0.1			0.1		0.3
9/30/2011	Telephone calls with client (A. Dusault) re strategy for SB 32 tariff; Telephone call with G. Morris (GPI) re same.		0.2			0.1		0.2	0.5
10/5/2011	Telephone call with M. Boccadoro re response to CPUC FiT workshop, next steps.			0.2					0.2
10/6/2011	Conference call with CEERT, other parties re FiT proposed price methodology, response to CPUC staff report (R.11-05-005); Telephone call with S. Geary (Flex Power) re same.	1							1
10/7/2011	Telephone call with AgPower (D. Liddell) re FiT pricing, options, next steps (R.11-05-005).	0.5							0.5
10/7/2011	Send email to biomass parties re	0.2							0.2

	collaboration with CEERT on FiT (R.11-05-005).			
10/13/2011	Conference call with clients (A. Dusault, S. Sullivan), AgPower (D. Liddell, B. Joblin) re pricing options for feed-in tariff.	1		1
10/17/2011	Conference call with client (A. Dusault), AgPower representatives re pricing proposal for feed-in tariff (R.11-05-005).	0.5		0.5
10/19/2011	Review draft pricing proposal from AgPower (R.11-05-005); Meeting with clients (A. Dusault, S. Sullivan) re same; Provide feedback, edits re same.	1		1
10/20/2011	Telephone call with AgPower (D. Liddell) re 10-21 meetings with CPUC Advisors to Commissioners (R.11-05-005); Edit, revise pricing proposal for same.	0.4		0.4
10/24/2011	Telephone call with N. Black (CalBioenergy) re FiT pricing proposal (R.11-05-005); Review draft proposal from Clean Coalition, and send response re same.	0.5		0.5
10/25/2011	Telephone call with client (S. Sullivan) re FiT pricing proposals, coordination with other parties (R.11-05-005); Conference call with parties (CEERT, Flex Energy, Fuel Cell Energy, AECA,	1.5		1.5

	CalBioenergy) re staff report on FiT pricing.							
10/30/2011	Develop draft comments on CPUC staff feed-in tariff proposal (R.11-05-005).	4	0.3	0.5	0.3	0.5	0.4	6
10/31/2011	Edit, revise, rework draft comments on FiT Proposal (R.11-05-005); Circulate same to other parties (CalBioenergy, AgPower, Green Power Institute, Fuel Energy, CWCCG) re same.	0.6		0.3		0.3	0.3	1.5
11/1/2011	Edit, rework, rewrite comments on revised staff proposal for Feed-in Tariff (R.11-05-005).	2				0.5	0.5	3
11/2/2011	Revise pricing section in comments on revised FiT proposal (R.11-05-005); Telephone call with client (S. Sullivan) re same); Edit, review, proof same.	2						2
11/7/2011	Telephone call with client (S. Sullivan), B. Joblin (AgPower) re FiT reply comments, strategy (R.11-05-005); Follow up call with client re same; Continue reviewing opening comments on FiT.	0.2		0.2	0.2	0.4	0.3	1.3
11/9/2011	Continue reviewing opening comments on revised FiT staff proposal (R.11-05-005); Telephone calls	0.4		0.4	0.4	0.4	0.4	2

	with L. Haug (Fuel Cell Energy), D. Liddell (AgPower), M. Hawiger (TURN) re same.									
11/10/2011	Develop outline for reply comments on Feed-in Tariff (R.11-05-005); Continue reviewing opening comments re same.	0.3			0.2	0.2		0.3		1
11/11/2011	Develop draft reply comments re staff proposal for Feed-in Tariff (R.11-05-005).	1			1	1				3
11/14/2011	Incorporate input from G. Morris (GPI), clients (S. Sullivan, K. Viatella) for reply comments on FiT proposal (R.11-05-005); Edit, revise, rework same.	0.7			0.6	0.7				2
11/15/2011	Conference call with client (S. Sullivan), CEERT (D. Mills, S. Myers) re strategy for CPUC advocacy on feed-in tariff (R.11-05-005).	0.5								0.5
11/20/2011	Review CPUC Decision 11-11-012 re SCE CREST program (R.11-05-005).	0.1					0.2			0.3
11/22/2011	Begin reviewing reply comments on revised FiT proposal (R.11-05-005).	0.2	0.2	0.3		0.3				1
11/25/2011	Continue reviewing reply comments on revised FiT proposal (R.11-05-005).				0.5			0.3	0.2	1
11/29/2011	Telephone call with client (S. Sullivan) re next steps, strategy on FiT development process (R.11-05-005).							0.2	0.2	0.4

11/30/2011	Telephone call with D. Mills (CEERT) re next steps, strategy on FiT development process (R.11-05-005).	0.2			0.2
12/5/2011	Conference call with CEERT, Ag Power, Fuel Cell Energy, AECA, client (S. Sullivan), Environment CA, Sierra Club re strategy for FiT advocacy, next steps (R.11-05-005); Follow-up call with client re same.	1.5			1.5
12/8/2011	Conference call with other parties (CEERT, Sierra Club, AgPower, AECA) re Feed-in tariff advocacy (R.11-05-005); Send e-mail to client (S. Sullivan) re same;	1	0.2		1.2
12/11/2011	Review draft motion for additional consideration re FiT pricing methodology (R.11-04-005); Review draft pricing proposal; Send email to client (S. Sullivan), other parties re same.	0.4			0.4
12/14/2011	Conference call with other parties (CEERT, GPI, AECA, CalSEIA, Fuel Cell) re motion for workshop (R.11-05-005).	0.7			0.7
12/16/2011	Review draft motion for additional consideration; Send cites to D. Mills (CEERT) re same; Review e-mail from other parties re same. (R.11-05-005).	0.4			0.4

12/19/2011	Exchange email with other parties re Motion for Ruling re avoided cost (R.11-05-005); Telephone call with K. Mills (Farm Bureau) re same.	1										1	
	Total 2011	43.5	4.3	6.9	11.6	15.2	31.9	1.7	5.4	4.6	6.4	131.35	$ 26,270.00
2012													
1/10/2012	Review responses to Motion for Workshop (R.11-05-005); Exchange email with CEERT (D. Mills) re same; Review ALJ ruling setting workshop (R.11-05-005).	1.25										1.25	
1/11/2012	Meeting with client (S. Sullivan) re status of SB 32 implementation (R.11-05-005).	0.2			0.1	0.2						0.5	
1/15/2012	Develop response to SCE Petition for Modification of D.10-12-048 (R.11-05-005).1						2					2	
1/17/2012	Edit, review, revise Response to Petition for Modification of D.10-12-048 (R.11-05-005); Coordinate with client (S. Sullivan), P. Muller re same.						1.5					1.5	
1/18/2012	Conference call with CEERT, AgPower, other parties re avoided cost pricing; Review, revise reply from joint parties re same; Review, revise letter from joint parties re same (R.11-05-005).	1										1	
2/2/2012	Review PG&E advice letter requesting RAM modifications (AL 4000-E, R.11-05-005).					0.2						0.2	
2/6/2012	Telephone call with AECA (M. Boccadoro) re feed-in tariff advocacy, strategy (R.11-05-	0.5			0.5				0.3			1.3	

	005); Telephone call with client (S. Sullivan), P. Muller re same.										
2/8/2012	Meeting with AgPower (D. Liddell, B. Joblin), CEERT (S. Myers), AECA (N. Black) to prepare for meetings with CPUC advisors on FiT pricing (R.11-05-005); Meetings with S. Murtishaw (Advisor to Cmr Peevey), C. Kersten (Advisor to Cmr. Sandoval), M. Tisdale (Advisor to Cmr. Florio) re same.	2									2
3/8/2012	Review SCE Advice Letter modifying RAM procurement categories; Send email to client re same.					0.2					0.2
3/23/2012	Begin review of Proposed Decision on FiT (R.11-05-005).									0.7	0.7
3/27/2012	Continue reviewing, analyzing Proposed Decision on feed-in tariff (R.11-05-005); Telephone call with M. Boccadoro (AECA) re same.	0.7	0.2	0.2	0.4	0.4	0.2	0.3	0.6		3
3/30/2012	Telephone call with client (S. Sullivan) re FiT proposed decision, response to same (R.11-05-005).	0.1				0.2			0.2		0.5
3/31/2012	Write memo for clients summarizing FiT Proposed Decision (R.11-05-005); Review utility advice letters re RAM results.	0.5		0.2	0.3	1			0.5	0.5	3
4/5/2012	Develop comments on FiT	0.4	0.2		0.3	2	0.3		0.5	0.3	4

	Proposed Decision (R.11-05-005).						
4/8/2012	Edit, revise comments on FiT PD (R.11-05-005) to incorporate input from client (S. Sullivan), P. Muller.	0.2		0.2	0.3	0.3	1
4/9/2012	Further research re comments on FiT Proposed Decision (R.11-05-005); Edit, revise, proof same.	0.3		0.4		0.3	1
4/10/2011	Begin reviewing opening comments on feed-in tariff Proposed Decision (R.11-05-005).					0.5	0.5
4/11/2012	Continue reviewing opening comments on feed-in tariff Proposed Decision (R.11-05-005).	1	0.5	0.5			2
4/15/2012	Exchange e-mail with client (S. Sullivan) re necessity for reply comments on feed-in tariff proposed decision (R.11-05-005).					0.2	0.2
4/17/2012	Begin reviewing reply comments on FiT PD (R.11-05-005).			0.2		0.3	0.5
4/18/2012	Review reply comments on Feed-in Tariff Proposed Decision (R.11-05-005); Review comments on Draft Resolution on PG&E RAM modifications; Exchange email with CEERT re same.	0.5					0.5
4/25/2012	Conference call with CEERT, AECA, AgPower re 5-1 all-party; Exchange email with client re same (R.11-05-005).	0.4		0.4		0.5	1.3

4/27/2012	Exchange email with CPUC staff (S. Kamins), other parties re all-party meeting on FiT PD (R.11-05-005); Outline draft talking points re same.	0.2				0.3			0.2			0.7	
4/29/2012	Exchange email with client (S. Sullivan), CEERT (S. Myers) re all-party meeting on FiT.	5-1				0.1						0.1	
4/30/2012	Develop talking points for 5-1 all-party meeting on feed-in tariff (R.11-05-005).	0.3				0.4			0.3			1	
5/1/2012	Meeting with client (S. Sullivan), AECA, CEERT, AgPower, CalBioenergy to prepare for All-Party Meeting on Feed-in Tariff Proposed Decision (R.11-05-005); Participate in All-Party Meeting; Debrief with client, other parties.	1.3				1.4			1.3			4	
5/2/2012	Develop ex parte notice for 5-1 all-party meeting (R.11-05-005).	0.2				0.1			0.2			0.5	
5/10/2012	Listen to CPUC meeting on feed-in tariff proposed decision (R.11-05-005); Exchange email with client, CEERT re same.					1						1	
5/17/2012	Telephone call with client (S. Sullivan) re next steps on Feed-in Tariff (R.11-05-005).					0.2						0.2	
5/31/2012	Review D.12-05-035	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1		0.2	1.7	
	Total 2012	11.3	0.6	0.6	2.3	9.6	4.5	0.5	6.3	0	1.7	37.35	$ 7,470.00
	Total	54.70	5.05	7.70	14.10	26.80	40.55	2.40	11.70	4.60	8.10	175.70	$ 35,792.00
INTERVENOR COMPENSATION													
11/4/2011	Develop draft notice of intent to claim intervenor compensation in PGC rulemaking (R.11-10-003).											1	

11/8/2011	Edit, proof intervenor compensation claim (R.11-10-003).	0.3	
7/5/2012	Compile time records for Intervenor Compensation Claim.	1	
7/7/2012	Research, write Intervenor Compensation Claim	1.5	
7/17/2012	Continue writing intervenor compensation claim for D.12-05-035 (R.11-05-005).	0.4	
7/18/2012	Continue compiling time records, compendium of pleadings re feed-in tariff compensation claim (R.11-05-005)	2	
7/20/2012	Continue researching, writing intervenor compensation claim for D.12-05-035 (R.11-05-005).	3	
7/23/2012	Continue research, writing, time records on intervenor compensation claim (spreadsheet and text) for D.12-05-035.	3	
7/26/2012	Telephone call with client (S. Sullivan) re time records for intervenor comp claim for D.12-05-035 (R.11-05-005).	0.2	
	Total	12.4	$ 1,240.00
TOTAL - London		188.1	$ 37,032.00

Note: above claim uses a requested hourly rate of $190 for 2009 and 2010, and $200 for 2011 and 2012.

ALLEN DUSAULT

Date	Description	A	B	C	D	E	F	G	H	I	J	Hours	
2009													
12/21/2009	Review comments for CPUC ReDEC (R.08-08-009); Telephone calls with J. London re same						1.5					1.5	
	Total 2009	0	0	0	0	0	1.5	0	0	0	0	1.5	$ 345.00
2010													
4/14/2010	Conference call with J. London, other parties re SB 32 implementation.	0.2	0.2	0.2	0.2			0.2				1	
4/21/2010	Conference call with J. London, other parties re SB 32 implementation.	0.2	0.2	0.2	0.1	0.1	0.1	0.1				1	

5/5/2010	Conference call with J. London, other parties re SB 32 implmentation. Exchange email with client re same.	0.2	0.2	0.2	0.2		0.1	0.1				1		
	Total 2010	0.6	0.6	0.6	0.5	0.1	0.2	0.4	0	0	0	3	$	690.00
2011														
2/7/2011	Conference call with J. London, K. Mills (Farm Bureau) re SB 32 comments.	0.3	0.3	0.2		0.2						1		
2/22/2011	Conference call with CalSEIA (S. Kately), Fuel Cell Energy (L. Haug), IEUA (m. Boccadoro), CalBioenergy (R. Buckenham, N. Black), J. London re SB 32 briefs (R.08-08-009).	0.25	0.25		0.25	0.25						1		
2/22/2011	Conference call with Fuel Cell Energy (L. Haug), IEUA (M. Boccadoro), CalBioenergy (R. Buckenham, N. Black), J. London re SB 32 briefs and issues specific to biogas.			0.25	0.25	0.2						0.7		
2/22/2011	Conference call with Farm Bureau (K. Mills), J. London re SB 32 briefs and issues specific to agriculture biogas projects (R.08-08-009).					0.3	0.4	0.3				1		
2/27/2011	Conference call with J. London, Farm Bureau (K. Mills) re intereconnection, WDAT, and SB 32 briefs (R.08-08-009).			0.2	0.2	0.2		0.1				0.7		
3/3/2011	Conference call with other parties (CalBio, CalSEIA, Farm Bureau, Fuel Cell Energy) re SB 32 brief (R.08-08-009).	0.3		0.3	0.3	0.3	0.3					1.5		
3/3/2011	Telephone call with client J. London re conference call with CalBioenergy, et al	0.2				0.2						0.4		
3/3/2011	Provide comments to J. London on draft SB 32 brief (R.08-08-009).					2						2		
3/7/3011	Telephone calls with J. London re SB 32.	0.25			0.25							0.5		
3/17/2011	Telephone call with client J. London, Farm Bureau (K. Mills) re positions of other parties in opening briefs (R.08-08-009).	0.2			0.2	0.2						0.6		
3/17/2011	Telephone call with CEERT (S. Myers, D. Mills) re SB 32 briefs.	0.3			0.2							0.5		
3/21/2011	Telephone calls with J. London re reply briefs.			0.25			0.25					0.5		
3/23/2011	Meeting with J. London re SB 32 implementation (R.08-08-009).				0.2	0.3			0.2			0.7		
5/5/2011	Provide comments to J. London re: protest to PG&E Advice Letter 3830 (small renewable tariff).						1					1		
5/20/2011	Exchange emails with J. London re: response to CPUC staff questions re PG&E Advice Letter 3830.						0.5					0.5		
5/24/2011	Review R.11-05-005: telephone call with client (A. Dusault), D. Liddell re RPS ruling, PHC statement (R.11-05-005).	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.2			1		
5/30/2011	Povide input to J. London re RPS comments (R.11-05-005).					0.2				0.3		0.5		
6/3/2011	Meeting with Advisor to Commissioner Ferron (M. Colvin), J. London re SB 32 implementation; Meeting with J. London to prepare for same.									1		1		
6/8/2011	Telephone call with J. London re reply comments in RPS docket (R.11-05-005).	0.2			0.1		0.2					0.5		
6/10/2011	Telephone call with J. London, CWCCC (J. Kepke), EBMUD (J. Hake), Clean Coalition (T. Ko) re Prehearing Conference (R.11-05-005).					0.25	0.5					0.75		
6/17/2011	Meeting with J. London re status of SB 32 implementation (R.11-05-005).									1		1		

6/22/2011	Revieew letter to SCE re proposed CREST modifications with J. London.					0.5					0.5	
7/6/2011	Conference call with J. London, Clean Coalition, Fuel Cell Energy, Green Power Institute, AECA, CASA re interconnection, 7-11 Prehearing Conference on SB 32 (R.11-05-005).	0.25				0.75					1	
7/11/2011	Conversations with J. London, other parties re: next steps from Prehearing Conference (R.11-05-005).	0.5				0.25					0.75	
7/14/2011	Exchange emails with J. London re: email request for schedule extension in R. 11-05-005.								0.2		0.2	
7/18/2011	Telephone call with J. London, CalBioenergy (N. Black, R. Buckenham) re SB 32 comments, pricing (R.11-05-005).	0.8		0.2							1	
7/19/2011	Telephone calls with J. London and CalBio (N. Black, R. Buckenham), AECA (A. Trowbridge), GPI (G. Morris), Fuel Cell Energy (R. Liebert) re comments on SB 32 (R.11-05-005).	1		0.5							1.5	
7/20/2011	Telephone call with J. London, G. Morris (GPI), N. Black (CalBio) re comments on 399.20 price, other issues (R.11-05-005); Review Fuel Cell Energy advance draft comments re same; Telephone call with K. Mills (Farm Bureau) re same; Begin revising client comments re same.	1.5			0.5	0.5					2.5	
7/21/2011	Provide input to J. London on advance draft comments from AECA (R.11-05-005).	0.2			0.1	0.2	0.2	0.2	0.1		1	
8/2/2011	Telephone call with J. London, D. Liddell re SB 32 reply comments, upcoming workshops (R.11-05-005).	0.1								0.2	0.3	
8/16/2011	Telephone call with J. London re proceeding status report, upcoming activities (R.11-05-005).			0.25		0.25					0.5	
8/23/2011	Telephone call with J. London, AgPower (D. Liddell) re reply comments (R.11-05-005); Review, provide input to J. London re same.	0.5		0.5		0.5				0.5	2	
8/25/2011	Telephone calls with J. London, Farm Bureau (K. Mills), Fuel Cell Energy (L. Haug) re Reply Comments on SB 32 (R.11-05-005).	0.5									0.5	
9/10/2011	Meeting with J. London re CPUC feed-in tariff process (R.11-05-005).				0.2					0.2	0.4	
9/26/2011	Review email on staff report on SB 32 tariff (R.11-05-005) from J. London.	0.3		0.1						0.2	0.6	
9/27/2011	Telephone call with J. London, D. Liddell (AgPower) re next steps from workshop (R.11-05-005).	0.2		0.4	0.4			0.2		0.3	1.5	
9/28/2011	Telephone call with J. London re next steps on SB 32 implementation.	0.1		0.1				0.1			0.3	
9/30/2011	Telephone calls with J. London re strategy for SB 32 tariff.			0.2			0.1			0.2	0.5	
10/6/2011	Conference call with CEERT, other parties re FiT proposed price methodology, response to CPUC staff report (R.11-05-005).	1									1	
10/13/2011	Conference call with J. London, AgPower (D. Liddell, B. Joblin) re pricing options for feed-in tariff.	1									1	
10/17/2011	Conference call with J. London, AgPower representatives re pricing proposal for feed-in tariff (R.11-05-005).	0.5									0.5	
10/19/2011	Meeting with J. London re draft pricing proposal from AgPower (R.11-05-005).	1									1	
	Total 2011	11.65	0.65	2.25	3.35	5.9	6.2	0.8	0.9	2.6	1.6	35.9	$ 8,257.00

Total	12.25	1.25	2.85	3.85	6.00	7.90	1.20	0.90	2.60	1.60	40.40	$ 9,292.00

INTERVENOR COMPENSATION

11/4/2011	Review draft notice of intent to claim intervenor compensation in PGC rulemaking (R.11-10-003).										0.5	
	Total										0.5	$ 57.50
TOTAL - Dusault											40.9	$ 9,349.50

Note: above claim uses a requested hourly rate of $230 for all years.

2011		A	B	C	D	E	F	G	H	I	J	
3/23/2011	Meeting with J. London re: SB 32 implementation							0.7				0.7
6/17/2011	Meeting with J. London re: SB 32 implementation							1				1
10/13/2011	Conference call with J. London and AgPower (D. Liddell, B. Joblin) re pricing options for feed-in tariff.	1										1
10/19/2011	Review draft pricing proposal from AgPower (R.11-05-005); Meeting with J. London re same.	1										1
10/25/2011	Telephone call with J. London re FiT pricing proposals, coordination with other parties (R.11-05-005); Conference call with parties (CEERT, Flex Energy, Fuel Cell Energy, AECA, CalBioenergy) re staff report on FiT pricing.	1.5										1.5
11/2/2011	Review pricing section in comments on revised FiT proposal (R.11-05-005); Telephone call with J. London re: same.	2										2
11/7/2011	Telephone call with J. London, B. Joblin (AgPower) re FiT reply comments, strategy (R.11-05-005); Follow up call with J. London re: same.	0.2			0.2	0.2			0.4		0.3	1.3
11/11/2011	Develop draft reply comments re staff proposal for Feed-in Tariff (R.11-05-005) and provide to J. London.	1			1	1						3
11/15/2011	Conference call with J. London, CEERT (D. Mills, S. Myers) re strategy for CPUC advocacy on feed-in tariff (R.11-05-005).	0.5										0.5
11/25/2011	Review reply comments on revised FiT proposal (R.11-05-005).				0.5				0.3		0.2	1
11/29/2011	Telephone call with J. London re: next steps, strategy on FiT development process (R.11-05-005).								0.2		0.2	0.4
12/5/2011	Conference call with CEERT, Ag Power, Fuel Cell Energy, AECA, J. London, Environment CA, Sierra Club re strategy for FiT advocacy, next steps (R.11-05-005); Follow-up call with client re same.	1.5										1.5
12/8/2011	Review e-mail from J. London re: conference call with other parties (CEERT, Sierra Club, AgPower, AECA) re Feed-in tariff advocacy (R.11-05-005).	1										1

12/11/2011	Review e-mail from J. London re: draft motion for additional consideration re FiT pricing methodology (R.11-04-005); draft pricing proposal.	0.2										0.2	
	Total 2011	9.9	0	0	1.7	1.2	0	1.7	0.9	0	0.7	16.1	$ 3,220.00
2012													
1/11/2012	Meeting with J. London re status of SB 32 implementation (R.11-05-005).	0.2			0.1	0.2						0.5	
1/17/2012	Edit, review, revise Response to Petition for Modification of D.10-12-048 (R.11-05-005); discuss with J. London.						1.5					1.5	
1/18/2012	Conference call with CEERT, AgPower, other parties re avoided cost pricing.	1										1	
2/6/2012	Telephone call with J. London and P. Muller re: feed-in tariff advocacy, strategy (R.11-05-005).	0.5			0.5				0.3			1.3	
3/23/2012	Begin review of Proposed Decision on FiT (R.11-05-005).								1			1	
3/27/2012	Continue reviewing, analyzing Proposed Decision on feed-in tariff (R.11-05-005).				0.5	0.5	0.5	0.5	1			3	
3/30/2012	Telephone call with J. London re FiT proposed decision, response to same (R.11-05-005).	0.1				0.2			0.2			0.5	
4/5/2012	Develop comments on FiT Proposed Decision (R.11-05-005).	0.4	0.2		0.3	2	0.3		0.5		0.3	4	
4/8/2012	Conclude draft comments on FiT PD (R.11-05-005) and provide input to J. London.	0.2				0.2	0.3		0.3			1	
4/10/2011	Begin reviewing opening comments on feed-in tariff Proposed Decision (R.11-05-005).								1			1	
4/11/2012	Continue reviewing opening comments on feed-in tariff Proposed Decision (R.11-05-005).	1			0.5	0.5						2	
4/15/2012	Exchange e-mail with J. London re necessity for reply comments on feed-in tariff proposed decision (R.11-05-005).								0.2			0.2	
4/17/2012	Begin reviewing reply comments on FiT PD (R.11-05-005).					0.2			0.3			0.5	
4/18/2012	Review reply comments on Feed-in Tariff Proposed Decision (R.11-05-005).	0.5										0.5	
4/25/2012	Conference call with CEERT, AECA, AgPower re 5-1 all-party (R.11-05-005).	0.4				0.4			0.5			1.3	
4/29/2012	Exchange email with J. London re 5-1 all-party meeting on FiT.					0.1						0.1	
5/1/2012	Meeting with J. London, AECA, CEERT, AgPower, CalBioenergy to prepare for All-Party Meeting on Feed-in Tariff Proposed Decision (R.11-05-005); Participate in All-Party Meeting; Debrief with other parties.	1.3				1.4			1.3			4	
5/10/2012	Listen to CPUC meeting on feed-in tariff proposed decision (R.11-05-005); Exchange email with J. London, CEERT re same.					1						1	
5/17/2012	Telephone call with J. London re: next steps on Feed-in Tariff (R.11-05-005).					0.2						0.2	
5/24/2012	Listen to CPUC meeting on feed-in tariff final decision	1							1			2	
5/25/2012	Begin review of D. 12-05-035	1.5							1.5			3	

5/29/2012	Continue review of D. 12-05-035	1			0.3	0.3	0.4		1		0.20	3	
5/31/2012	Conclude review of D.12-05-035	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1		0.50	1.7	
	Total 2012	9.3	0.4	0.2	2.4	7.4	3.2	0.7	10.2	0	1.20	34.3	$ 6,860.00
	Total	19.20	0.40	0.20	4.10	8.60	3.20	2.40	11.10	0.00		50.40	$11,592.0
INTERVENOR COMPENSATION													
7/25/2012	Edit and revise Intervenor Compensation Claim											3	
7/26/2012	Continue compiling time records.											2	
7/27/2012	Continue compliling time records											2	
7/28/2012	Finish time record spread sheets, editing and revision of Claim											1	
	Total											8	$ 920.00
TOTAL - Sullivan												58.4	$12,512.00

Note: above claim uses a requested hourly rate of $230.