

Decision 13-02-015

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 12-03-014 (Filed March 22, 2012)
---	--

**INTERVENOR COMPENSATION CLAIM OF
Alliance for Nuclear Responsibility (“A4NR”)
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
Alliance for Nuclear Responsibility**

2

Claimant: Rochelle Becker, Executive Director, Alliance for Nuclear Responsibility	For contribution to D.13-02-015
Claimed (\$):	Awarded (\$):
Assigned Commissioner: Michel Peter Florio	Assigned ALJ: David M. Gamson
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/ Rochelle Becker
Date: 04/11/13	Printed Name: Rochelle Becker

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

3

A. Brief Description of Decision:	Decision directs SCE to procure 1400 – 1800 MW in West Los Angeles sub-area and 215 – 290 MW in Moorpark sub-area to meet LCR needs by 2021, plus 1,000 MW adjustment for Loading Order resources.
--	--

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

	Claimant	CPUC Verified
--	-----------------	----------------------

Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
4	1. Date of Prehearing Conference:	04/18/12 and 07/09/12
	2. Other Specified Date for NOI:	At 07/09/13 PHC, the ALJ granted A4NR's Motion to Late File NOI
	3. Date NOI Filed:	07/02/12
	4. Was the NOI timely filed?	
Showing of customer or customer-related status (§ 1802(b)):		
5	5. Based on ALJ ruling issued in proceeding number:	
	6. Date of ALJ ruling:	
	7. Based on another CPUC determination (specify):	D.13-03-023
	8. Has the Claimant demonstrated customer or customer-related status?	
Showing of "significant financial hardship" (§ 1802(g)):		
6	9. Based on ALJ ruling issued in proceeding number:	A.12-11-009
	10. Date of ALJ ruling:	03/29/13
	11. Based on another CPUC determination (specify):	
	12. Has the Claimant demonstrated significant financial hardship?	
Timely request for compensation (§ 1804(c)):		
7	13. Identify Final Decision:	D.13-02-015
	14. Date of Issuance of Final Order or Decision:	02/13/13
	15. File date of compensation request:	04/10/13
	16. Was the request for compensation timely?	

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

8	#	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.)

9

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
1. Emphasizing LCR gap created by SONGS, A4NR urges procurement of ISO Trajectory Scenario (with Loading Order applied) of 2,370 – 3,741 MW for West LA Basin. Only ISO, AES and the three utilities support this level of procurement.	Opening Brief (9/23/12) at 9, 19. Commission adopts West LA range of 1,400 – 1,800 MW, plus 800 MW efficiency/CHP and 200 MW demand response adjustments, for total of 2,400 – 2,800 MW. OP 1, COL 6 and 7, FOF 29 and 31.	
2. A4NR premises its aggressive procurement recommendations on requirement that Loading Order be strictly enforced, and is confident that it can be.	Opening Brief at 9, Reply Brief at 3, PD Comments (1/13/13) at 1. Commission makes Loading Order the cornerstone of its LCR procurement. OP 1, 4g, 5, 6, 11b, 11e, COL 2, 4, 8 and 15.	
3. Based on SONGS linkage, A4NR is only party to endorse ISO recommendation for Moorpark sub-area, which even SCE declines to do.	Opening Brief at 4, 20, 22, Reply Brief (10/12/12) at 4. Commission orders 215 – 290 MW procurement for Moorpark sub-area contemporaneous with West LA. OP 2, COL 11, FOF 41 and 42.	
4. A4NR emphasizes importance of diligent CPUC oversight to assure SCE compliance with Commission LCR priorities.	Opening Brief at 1, 10, 12. Commission directs close Energy Division scrutiny & approval of SCE Procurement Plan. OP 5, 6, 7, 8, 11, COL 12, 13.	
5. A4NR argues that SWRCB’s OTC policy should be considered legally binding, with compliance schedule left intact for LCR planning purposes.	Opening Brief at 14 – 15. Commission agrees. COL 20, FOF 10.	
6. A4NR recommends inclusion of cost-of-service contracts as part of SCE’s procurement authority.	Opening Brief at 24. Commission agrees. OP 9, COL 16, 17.	
7. A4NR acknowledges unprecedented nature and difficulty of trying to apply 10-year planning horizon on LCR procurement	Opening Brief at 1 – 2. Commission agrees. FOF 6.	

8. A4NR identifies greater urgency to magnitude and timing of LCR procurement than any other party except ISO, and possibly SCE.	Opening Brief at 1, 4, 6, 7, 27, Reply Brief at 1-2, 5. Commission orders SCE to file plan promptly, allows acceleration of gas-fired portion. OP 5, 8, 11, COL19, FOF 25, 27.	
--	--	--

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

10

	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.	
<p>c. If so, provide name of other parties: The ISO, though significantly less concerned about adherence to Loading Order priorities, had a similar position regarding the magnitude of LCR need and the heightened urgency of LCR procurement caused by uncertainty about SONGS availability. SCE grudgingly agreed with the ISO's Trajectory Scenario for need in the LA Basin, but with a relaxed timeline for follow-up and strong resistance to being directed what to do.</p>		
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: A4NR's positions regarding both magnitude of LCR need and urgency of LCR procurement significantly diverged from DRA, TURN, and the environmental parties, each of which tended to question the advisability of authorizing significant procurement. A4NR regularly conversed with these parties about a shared commitment to Loading Order priorities, but did not agree with their belief that major LTPP authorization was antithetical to Loading Order success.</p> <p>A4NR was drawn to the significance of the LTPP process in late 2011, noting the reiteration in the CEC's pending IEPR that it, the ISO and the CPUC should collaborate to expand LTPP to provide a Plan B to address potential long-term unavailability of California's nuclear plants. A4NR made a concerted effort to reinforce this priority throughout the proceeding, including participation as a panelist in the CEC's Los Angeles Workshop on Southern California reliability concerns (CPUC Commissioners Florio and Sandoval, ISO CEO Steve Berberich, and CEC Commissioners Peterman and Weisenmiller at the dais) as well as making several presentations to the ISO Board.</p> <p>Despite embracing the ISO Trajectory Scenario, A4NR pointed out significant weaknesses in the ISO analysis (e.g., poorly supported optimism about a load transfer between distribution substations which ISO credited with a 2 - 3,000MW impact on need). Similarly, A4NR advocated a rigorous CPUC enforcement role in the LTPP order in sharp contrast to the passive authorization sought by SCE. A4NR's contributions supplemented the views of these somewhat aligned parties rather than simply echo them.</p>		

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

11

#	Claimant	CPUC	Comment

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

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

12

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
<p>A4NR’s participation assisted the Commission in ordering SCE to initiate the largest Southern California procurement in the history of the LTPP, and enabled it to do so with greater fidelity to Loading Order priorities than ever previously attempted. Failure to adequately replace LCR assets is a tangible risk – the Legislative Analyst determined that SONGS unavailability could prompt rolling blackouts and economic losses in the tens of billions of dollars annually (A4NR Opening Brief, p. 2). Similar results would logically flow from unaddressed OTC retirements. The Commission’s firm step toward mitigating this risk, while aggressively applying Loading Order policies that many parties believed incompatible with any LCR procurement, creates benefits greatly in excess of the cost of A4NR’s participation.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>A4NR relied on ISO and SCE witnesses rather than sponsor its own, confident that its briefing and highly focused cross examination would present a Loading-Order-centric case for aggressive LCR procurement more compelling to the Commission than the ISO/SCE efforts alone. Its unique perspective avoided duplication of others’ work and centered on the pivotal issues in the proceeding without sacrificing depth of coverage. It brought a high productivity discipline to each hour expended.</p>	
<p>c. Allocation of Hours by Issue</p> <p>1) Whether additional capacity is required to meet local reliability needs in the Los Angeles Basin and Big Creek/Ventura area between 2014 and 2021, and, if so, how much: 38.0%</p> <p>4) What assumptions concerning retirements of OTC plants should be made for the purpose of determining future local reliability needs: 6.6%</p> <p>5) Whether the ISO’s local capacity requirements and OTC studies should be adopted by the Commission as the basis for procurement of additional local capacity, and, if not, what should form the basis of a Commission decision: 25.2%</p>	

6) How resources aside from conventional generation, such as uncommitted energy efficiency, demand response, energy storage and distributed generation resources should be considered in determining future local reliability needs: 26.0%

General: 4.1%

B. Specific Claim:

13

CLAIMED						CPUC AWARD		
---------	--	--	--	--	--	------------	--	--

ATTORNEY, EXPERT, AND ADVOCATE FEES

Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
John Geesman	2011	1.25	\$535	Res. ALJ – 267	668.75			
	2012	214.66	\$545	Res. ALJ – 281	116,989.70			
	2013	33.58	\$545	Res. ALJ – 281	18,301.10			
[Attorney 2]								
[Expert 1]								
[Expert 2]								
Rochelle Becker	2012	15.45	\$135	D.13-03-023 & ALJ - 281	2,085.75			
David Weisman	2012	8.25	\$80	D.13-03-023 & ALJ - 281	660.00			
Subtotal:					138,705.30	Subtotal:		

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 \$
John Geesman	2012	6.00	\$272.50	Travel @ 50%	1,635.00			
Rochelle Becker	2012	10.00	\$67.50	Travel @ 50%	675.00			
David Weisman	2012	8.00	\$40.00	Travel @ 50%	320.00			
Subtotal:					2,630.00	Subtotal:		

INTERVENOR COMPENSATION CLAIM PREPARATION **

Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
John Geesman	2013	11.00	\$272.50	Claim Prep. @ 50%	2,997.50			

14

15

16

David Weisman	2013	1.25	\$42.50	Claim Prep. @ 50%	53.13			
					Subtotal:	3,050.63	Subtotal:	
COSTS								
17	#	Item	Detail	Amount	Amount			
		airfare		384.70				
		hotels	(includes 1/3 of 6-21-12 thru 6-24-12 stay)	252.77				
		personal vehicle	IRS mileage rate of 55.5 cents per mile (Morro Bay – Los Angeles roundtrip)	223.22				
		airport shuttle		30.00				
					Subtotal:	890.69	Subtotal:	
					TOTAL REQUEST \$:	145,276.62	TOTAL AWARD \$:	
<p>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.</p>								

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

18	Attachment or Comment #	Description/Comment
	1	Certificate of Service
	2	Time Records of John Geesman
	3	Time Records of Rochelle Becker
	4	Time Records of David Weisman
	5	Justification of ALJ – 267 and ALJ – 281 Rates for John Geesman
	6	Justification of ALJ – 281 Rates for Rochelle Becker
	7	Justification of ALJ – 281 Rates for David Weisman
	8	A4NR receipts

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

19	#	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?	
---	--

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 2

**Time Records of John Geesman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

DATE	TASK DESCRIPTION	ISSUE 1	ISSUE 4	ISSUE 5	ISSUE 6	GENERAL	TOTAL
04/08/13	Claim preparation					2.50	2.50*
04/06/13	Claim preparation					3.50	3.50*
04/05/13	Claim preparation					5.00	5.00*
02/13/13	Review adopted D.12003-014	0.35	0.05	0.35	0.25		1.00
02/13/13	Email w. clients re: CPUC/ISO longterm RA summit; CEC IEPR adoption draft	0.05		0.05	0.05		0.15
02/06/13	Email w. clients re: ISO Transmission Plan w/o nukes	0.05		0.05			0.10
02/06/13	Review ISO Transmission Plan w/o nukes	1.21		1.21			2.42
01/23/13	Review various parties' Reply Comments & ex parte notices	0.44	0.07	0.44	0.32		1.27
01/16/13	Read & evaluate other parties' Comments on PD	1.09	0.14	1.09	0.78		3.10
01/14/13	Draft FOF & COL, finalize Comments on PD	1.96		1.96			3.92
01/13/13	Email w. clients re: PD Comments	0.14		0.14			0.28
01/12/13	Email w. clients re: PD Comments	0.01		0.01			0.02
01/12/13	Draft Comments on Track 1PD	0.93		0.92			1.85
01/11/13	Draft Comments on Track 1PD	3.50		3.50			7.00
01/10/13	Draft Comments on Track 1PD	1.75		1.75			3.50
01/09/13	Draft Comments on Track 1PD	4.48		4.47			8.95
01/09/13	Email w. ISO re: longterm RA workshop	0.01		0.01			0.02
12/26/12	Review Track 1 PD	0.52	0.09	0.52	0.37		1.50
12/16/12	Email w. CEC re: SONGS planning horizon, ISO analysis	0.10	0.03	0.10	0.07		0.30
12/16/12	Email w. clients re: ISO SONGS analysis, CEC letter	0.07	0.03	0.07	0.05		0.20
12/14/12	Attend ISO mtg. on nuclear shutdown scenarios	1.71		1.71			3.42
12/11/12	Email w. clients re: TURN comments	0.04		0.03			0.07
12/10/12	Email w. clients re: TURN comments on SONGS Unit 2	0.04		0.04			0.08
12/10/12	Read various parties' comments on PD	0.46	0.06	0.46	0.33		1.33
12/07/12	Email w. ISO re: IEPR Update comments	0.02	0.01	0.02			0.05
12/04/12	Email w. clients re: IEPR	0.02	0.02	0.02			0.06

ATTACHMENT 2

**Time Records of John Geesman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

	Update, comments on PD						
12/04/12	Draft comments on Track 2PD	2.92		2.91			5.83
12/04/12	Email w. Clean Coalition re: Grid Bonus proposal				0.08		0.08
12/03/12	Draft comments on Track 2PD	1.75		1.75			3.50
12/03/12	Research PD, ISO, SCE, PG&E, DRA comments	0.87	0.14	0.87	0.62		2.50
12/02/12	Email w. clients re: IEPR Update comments	0.04	0.04				0.08
11/30/12	Draft comments for IEPR Update	0.75	0.75				1.50
11/30/12	Research CEC Draft IEPR Update	0.54	0.54				1.08
11/28/12	Read SDG&E Procurement PD and Alternate	0.35	0.05	0.35	0.25		1.00
11/16/12	Email w. clients re: CEC IEPR Update infrastructure chapter	0.05	0.05				0.10
11/16/12	Read CEC IEPR Update infrastructure chapter	0.25	0.25		0.25		0.75
10/31/12	Email w. clients re: EIX quarterly earnings call	0.05					0.05
10/19/12	Email w. clients re: Track 2 Reply Comments, CPUC scenarios				0.04		0.04
10/19/12	Email w. ISO, CEC re: Track 2 Reply Comments				0.02		0.02
10/19/12	Draft Track 2 Reply Comments				2.65		2.65
10/18/12	Draft Track 2 Reply Comments				2.98		2.98
10/18/12	Read initial Track 2 comments on scenarios from all parties				1.30		1.30
10/12/12	Email w. ISO, CEC re: Track 1 Reply Brief	0.01		0.01			0.02
10/12/12	Email w. clients re: Track 1 Reply Brief	0.02		0.02			0.04
10/12/12	Revise & edit Track 1 Reply Brief	0.42		0.41			0.83
10/12/12	Draft Track 1 Reply Brief	1.29		1.29			2.58
10/12/12	Draft Track 1 Reply Brief	2.17		2.17			4.34
10/07/12	Read other parties' Opening Briefs	0.89	0.14	0.89	0.63		2.55
10/04/12	Email w. clients re: Comments on Track 2 scenarios				0.02		0.02
10/04/12	Email w. ISO & CEC re:				0.04		0.04

ATTACHMENT 2

**Time Records of John Geesman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

	Comments on Track 2 scenarios						
10/04/12	Revise & edit Comments on Track 2 scenarios				1.25		1.25
10/03/12	Draft Comments on Track 2 scenarios				4.34		4.34
10/02/12	Draft Comments on Track 2 scenarios				4.08		4.08
10/02/12	Review ACR and ED staff proposed scenarios				2.17		2.17
09/28/12	Email w. Env. Council & Clean Coalition re: proposal				0.10		0.10
09/23/12	Email w. client re: Track 1 Opening Brief	0.08	0.02	0.08	0.05		0.23
09/23/12	Revise & edit Track 1 Opening Brief	1.62	0.25	1.62	1.16		4.65
09/22/12	Revise & edit Track 1 Opening Brief	1.61	0.25	1.61	1.15		4.62
09/19/12	Draft Track 1 Opening Brief	1.13	0.18	1.13	0.81		3.25
09/18/12	Draft Track 1 Opening Brief	1.58	0.24	1.58	1.13		4.53
09/17/12	Draft Track 1 Opening Brief	0.93	0.19	0.93	0.62		2.67
09/16/12	Draft Track 1 Opening Brief	1.41	0.22	1.41	1.01		4.05
09/14/12	Email w. clients re: ISO presentation	0.04		0.03			0.07
09/13/12	Draft Track 1 Opening Brief	1.80	0.28	1.80	1.29		5.17
09/13/12	Presentation to ISO	0.13		0.12			0.25
09/12/12	Draft Track 1 Opening Brief	2.63	0.39	2.63	1.88		7.53
09/11/12	Draft Track 1 Opening Brief	2.68	0.40	2.68	1.92		7.68
09/10/12	Draft Track 1 Opening Brief	1.80	0.28	1.80	1.29		5.17
09/09/12	Read transcripts	2.59	0.39	2.59	1.85		7.42
09/08/12	Read transcripts	2.12	0.32	2.12	1.52		6.08
09/05/12	Email w. CPUC re: missing transcripts					0.02	0.02
08/21/12	Email w. ISO re: LCR data	0.01		0.01			0.02
08/13/12	Attend LTPP hearing & cross examine	2.27	0.34	2.27	1.62		6.50
08/09/12	Attend LTPP hearing for cross examination	0.70	0.10	0.70	0.50		2.00
08/08/12	LTPP evidentiary hearing	2.36	0.35	2.36	1.68		6.75
08/07/12	LTPP evidentiary hearing	2.10	0.30	2.10	1.50		6.00
08/06/12	Review CEC energy efficiency, ISO web site as prep. for cross	0.50			0.50		1.00
08/06/12	Review cross examination	0.25		0.25			0.50
08/03/12	Read testimony and prepare	1.90	0.28	1.90	1.35		5.43

ATTACHMENT 2

**Time Records of John Geesman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

	cross						
08/02/12	Read testimony	1.86	0.28	1.86	1.33		5.33
07/22/12	Email w. CEC re: SONGS 2013 and beyond	0.05					0.05
07/18/12	Review Florio/Gamson ruling on Motion to Strike	0.13		0.12			0.25
07/17/12	Phone call w. Env. Council & Clean Coalition re: LTPP collaboration				0.58		0.58
07/17/12	Email w. Env. Council re: LTPP collaboration				0.05		0.05
07/17/12	Email w. clients re: IEPR comments & LTPP	0.03		0.02			0.05
07/16/12	Review WEM testimony & SCE Motion to Strike	0.70	0.10	0.70	0.50		2.00
07/15/12	Email w. clients re: Plan B coverage, impact on LTPP	0.06		0.06			0.12
07/09/12	Attend & participate in PHC	0.70	0.10	0.70	0.50		2.00
07/09/12	Discussion w. WEM re: SCE Motion to Strike their testimony				0.17		0.17
07/08/12	Prepare for PHC motions	0.87	0.14	0.87	0.62		2.50
07/07/12	Email w. clients re: SCE responses	0.03					0.03
07/06/12	Email w. clients re: SCE responses	0.12					0.12
07/03/12	Redraft motions per CPUC Dockets instructions	0.35	0.05	0.35	0.25		1.00
07/02/12	Email w. Env. Council re: LTPP collaboration				0.15		0.15
07/02/12	Draft Motion Seeking Party Status	0.35	0.05	0.35	0.25		1.00
06/28/12	Email w. clients re: NOI, financial hardship status					0.07	0.07
06/28/12	Prepare NOI	0.35	0.05	0.35	0.25		1.00
06/24/12	Email w. clients re: LTPP strategy	0.09	0.08		0.08		0.25
06/24/12	Review assorted LTPP documents	0.61	0.10	0.61	0.43		1.75
06/22/12	Attend & participate in CEC workshop on Southern Calif. reliability issues (Oakland-LA-Oakland) roundtrip	5.40	2.70		5.40		7.50 (travel 6.00*)
06/21/12	Draft testimony for CEC workshop	1.20	0.60		1.20		3.00
06/16/12	Email w. clients re: CEC	0.02	0.01		0.02		0.05

ATTACHMENT 2

**Time Records of John Geesman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

	workshop						
06/15/12	Email w. clients re: CEC workshop	0.01	0.01		0.01		0.03
06/15/12	Prepare for CEC workshop	1.33	0.67		1.33		3.33
06/13/12	Prepare for CEC workshop	1.13	0.57		1.13		2.83
06/10/12	Email w. clients re: grid issues at CEC workshop	0.02					0.02
06/08/12	Email w. CEC re: SONGS need	0.05					0.05
05/17/12	Emil w. clients re: CEC June 22nd workshop in LA	0.03					0.03
04/19/12	Phone call w. ISO re: SONGS grid impact issues	1.08					1.08
04/10/12	Email w. clients re: LTPP	0.01	0.01		0.01		0.03
03/22/12	Presentation at ISO Board Mtg. on SONGS grid impact	2.00					2.00
03/22/12	Email w. clients re: ISO Board	0.06					0.06
03/20/12	Review ISO planning, CPUC LTPP documents	2.65	0.40	2.65	1.89		7.59
03/18/12	Review ISO planning documents	2.27	0.34	2.27	1.62		6.50
03/16/12	Email w. clients re: WEM, Plan B presentation at CPUC	0.08			0.07		0.15
03/01/12	Meeting w. ISO staff re: SONGS grid impact issues	1.00					1.00
02/29/12	Email w. ISO re: meeting on SONGS grid impact issues	0.03					0.03
02/27/12	Review ISO draft 2012 Transmission Plan	1.31	0.20	1.31	0.93		3.75
02/26/12	Review ISO 2012-2016 Strategic Plan	2.10	0.30	2.10	1.50		6.00
02/25/12	Review docs. received from Ben Davis & advise client	0.17			0.17		0.34
02/08/12	Attend CEC meeting, testify on Plan B issues	4.25					4.25
02/07/12	Read IEPR electricity & nuclear chapters	0.70	0.10	0.70	0.50		2.00
01/19/12	Email w. Ind. Energy Producers re: Plan B	0.03					0.03
01/14/12	Email w. CEC re: transmission issues	0.12					0.12
12/27/11	Email w. clients re: debrief from meeting w. ISO	0.01	0.01		0.01		0.03
12/27/11	Prepare materials for client meeting w. ISO	0.08	0.07		0.07		0.22
11/26/11	Review transcript of 7/26/11 CEC workshop for	0.35	0.05	0.35	0.25		1.00

ATTACHMENT 2

Time Records of John Geesman
(hours allocated by Scoping Memo Issues)

* indicates activity eligible for compensation at 50% of ordinary hourly rate

	ramifications on LTPP & ISO work on Plan B issues						
--	--	--	--	--	--	--	--

ATTACHMENT 3

Time Records of Rochelle Becker (hours allocated by Scoping Memo Issues)

* indicates activity eligible for compensation at 50% of ordinary hourly rate

DATE	TASK DESCRIPTION	ISSUE 1	ISSUE 4	ISSUE 5	ISSUE 6	GENERAL	TOTAL
1/13/13	Review Comments on Track 1 PD	0.13		0.12			0.25
12/04/12	Review Comments on Track 2 PD	0.13		0.12			0.25
10/19/12	Review Reply Comments on Track 2 Scenarios				0.10		0.10
10/12/12	Review Track 1 Reply Brief	0.13		0.12			0.25
10/04/12	Review Comments on Track 2 Scenarios				0.10		0.10
09/23/12	Review Track 1 Opening Brief	0.26	0.04	0.26	0.19		0.75
06/24/12	Return travel to San Luis Obispo from Los Angeles (50% hourly rate)	1.60	0.80		1.60		4.00*
06/22/12	Attend & participate in CEC workshop on Southern Calif. reliability issues	3.00	1.50		3.00		7.50
06/21/12	Travel from Sacramento to Los Angeles for CEC workshop (50% hourly rate)	0.80	0.40		0.80		2.00*
03/22/12	Presentation on SONGS to ISO Bd. Mtg.	2.00					2.00
02/08/12	Return travel to San Diego from Sacramento (50% hourly rate)	2.00					2.00*
02/08/12	Attend & testify at CEC mtg. on lack of LTPP nuclear backup plan	4.25					4.25
02/07/12	Travel from San Diego to Sacramento for CEC mtg. (50% hourly rate)	2.00					2.00*

ATTACHMENT 4

**Time Records of David Weisman
(hours allocated by Scoping Memo Issues)**

* indicates activity eligible for compensation at 50% of ordinary hourly rate

DATE	TASK DESCRIPTION	ISSUE 1	ISSUE 4	ISSUE 5	ISSUE 6	GENERAL	TOTAL
04/08/13	Claim preparation (50% hourly rate)					0.50	0.50*
04/07/13	Claim preparation (50% hourly rate)					0.75	0.75*
09/23/12	Review Track 1 Opening Brief	0.26	0.04	0.26	0.19		0.75
06/24/12	Return travel to San Luis Obispo from Los Angeles (50% hourly rate)	1.60	0.80		1.60		4.00*
06/22/12	Attend CEC workshop on Southern Calif. reliability issues	3.00	1.50		3.00		7.50
06/21/12	Travel from San Luis Obispo to Los Angeles for CEC workshop (50% hourly rate)	1.60	0.80		1.60		4.00*

ATTACHMENT 5

JUSTIFICATION OF ALJ-267 and ALJ-281 RATES FOR JOHN GEESMAN Attorney for the Alliance for Nuclear Responsibility

John Geesman is an experienced practitioner in California energy matters, having been a member of the California State Bar for 35 years and first appearing in CPUC proceedings on solar energy, energy efficiency, and LNG in 1977 and 1978 on behalf of the California Citizen Action Group. He is a graduate of Yale College and the UC Berkeley School of Law.

He served in state government during two distinct periods: as Executive Director of the California Energy Commission from 1979 to 1983; and later as the attorney member of the California Energy Commission from 2002 to 2008. During this latter assignment, Mr. Geesman presided over the CEC's Facilities Siting Committee, its Electricity Committee, and its Renewables Committee. He also served as Chair of the Board of Governors of the California Power Exchange from 1998 to 2002, and briefly on the Board of the California ISO in 2002.

Mr. Geesman chaired the California Managed Risk Medical Insurance Board from 1999 to 2002, overseeing the expansion of the State Children's Health Insurance Program from 50,000 to 632,000 enrollees.

From 1983 to 2002, Mr. Geesman was an investment banker and, among other assignments, served as a financial advisor or bond underwriter for various construction financings by all of the state's largest municipal electric utilities and joint powers authorities. His firm was retained as a special adviser to the San Diego County Water Authority for evaluation of the attempted takeover of SDG&E by SCE. He was a member of the TURN Board of Directors for most of the 1990s, including six years as its President.

He was the Co-Chair of the Board of Directors of the American Council on Renewable Energy (ACORE) from 2006 to 2011, a position which involved considerable international and national speaking engagements as an explainer of California's energy policies.

Mr. Geesman's past experience qualifies him for the upper step of the \$300-535 range established by ALJ-267 for attorneys with 13+ years' experience for work performed in 2011, as well as the \$305-545 range established by ALJ-281 for work performed in 2012 and 2013.

ATTACHMENT 6

**JUSTIFICATION OF ALJ-281 RATES for ROCHELLE BECKER
Executive Director, Alliance for Nuclear Responsibility**

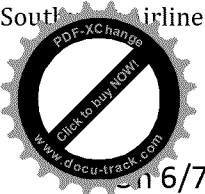
D.13-03-023, issued March 26, 2013, adopted a \$125 hourly rate for Rochelle Becker for work performed in 2010 and 2011. Pursuant to ALJ-281 Ordering Paragraphs 1 and 2, she respectfully seeks the 2.2% COLA authorized for work performed in 2012 as well as her first 5% step increase. Calculated as specified in D.08-04-010, her hourly rate for work performed in 2012 should be \$135.

ATTACHMENT 7

**JUSTIFICATION OF ALJ-281 RATES for DAVID WEISMAN
Outreach Director, Alliance for Nuclear Responsibility**

D.13-03-023, issued March 26, 2013, adopted a \$75 hourly rate for David Weisman for work performed in 2010 and 2011. Pursuant to ALJ-281 Ordering Paragraphs 1 and 2, he respectfully seeks the 2.2% COLA authorized for work performed in 2012 as well as his first 5% step increase. Calculated as specified in D.08-04-010, his hourly rate for work performed in 2012 should be \$80. Applying his second 5% step increase, but no COLA, his hourly rate for work performed in 2013 should be \$85.

ATTACHMENT 8



on 6/7/2012 10:36 AM, Southwest Airlines wrote:

You're all set for your trip!



[My Account](#) | [View My Itinerary Online](#)

[Check In Online](#)

[Check Flight Status](#)

[Change Flight](#)

[Special Offers](#)

[Hotel Deals](#)

[Car Deals](#)

Ready for takeoff!



Thanks for choosing Southwest for your trip! You'll find everything you need to know about your reservation below. Happy travels!

Upcoming Trip: 06/22/12 - Burbank



[AIR Itinerary](#)

AIR Confirmation: 4BMBXC

Confirmation Date: 06/7/2012

Passenger(s)	Rapid Rewards #	Ticket#	Expiration	Est. Points Earned
GEESMAN/JOHNLE ONARD		5262445807021	May 31, 2013	604

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Fri Jun 22	508	Depart OAKLANDCA (OAK) at 07:00 AM Arrive in BURBANKCA (BUR) at 08:05 AM Travel Time 1 hrs 5 mins Wanna Get Away
Fri Jun 22	325	Depart BURBANKCA (BUR) at 8:45 PM Arrive in OAKLANDCA (OAK) at 9:50 PM Travel Time 1 hrs 5 mins Wanna Get Away

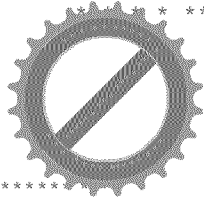
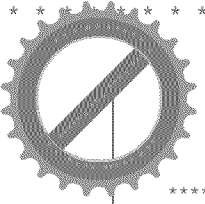


Find a Hotel
See ratings, photos and rates for over 40,000 hotels.

[Book a Hotel](#) ✈



Air Cost: 122.10



CLICK 'N SAVE

Get the best travel deals
straight to your inbox.



Sign Up Now



*** * *****

***** * * * * *

***** * * * * *

***** * * * * *

***** * * * * *

***** * * * * *

***** * * * * *

***** * * * * *

ALL-NEW RAPID REWARDS




NEW MEMBERS GET
250 BONUS POINTS TODAY!




DING

ACCOUNT ACTIVITY (CONTINUED)

06/24	EMBASSY SUITES LOS ANGELE GLENDALE CA	514.92
-------	---------------------------------------	--------

ROCHELLE M BECKER

(v) = Variable Rate

30 Days in Billing Period

Please see Information About Your Account section for the Calculation of Balance Subject to Interest Rate, Annual Renewal Notice, How to Avoid Interest on Purchases, and other important information, as applicable.

IMPORTANT NEWS

Luv points? Get even more with Rapid Rewards Shopping. Simply log in with your Rapid Rewards number and earn points for purchases made at retailers like Target.com. And that's in addition to the points earned on your card. Go online to rrshopping.southwest.com to learn more.

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
---------------------	--	-----------

DAVID WEISMAN

01/29	SOUTHWESTAIR5262417901994 DALLAS TX	262.60
	020712 1 R SAN SMF	
	2 T SMF SAN	
02/08	SUPERSHUTTLE EXECUCARSAC 8002583826 CA	30.00
02/08	CLARION SACRAMENTO SACRAMENTO CA	81.13

ROCHELLE M BECKER