

Decision \_\_\_\_\_

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

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations	Rulemaking 11-10-023 (Filed October 20, 2011)
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**INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK AND  
DECISION ON INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK**

<b>Claimant: The Utility Reform Network (TURN)</b>	<b>For contribution to Decision 13-06-024</b>
<b>Claimed: \$ 76,632.61</b>	<b>Awarded: \$</b>
<b>Assigned Commissioner: Mark J. Ferron</b>	<b>Assigned ALJ: David M. Gamson</b>
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/
<b>Date: 9-3-13</b>	<b>Printed Name: Thomas J. Long, Legal Director</b>

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

<b>A. Brief Description of Decision:</b>	Decision (D.)13-06-024 adopted an interim “flexible capacity” framework as an additional component of Resource Adequacy (“RA”) requirements, but found that there is no need to adopt a flexible capacity requirement for the 2014 RA year. In addition, the decision established local capacity procurement obligations for 2014 applicable to Commission-jurisdictional electric load serving entities.
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**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

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

1. Date of Prehearing Conference:	N/A	
2. Other Specified Date for NOI:	Nov. 28, 2011	
3. Date NOI Filed:	May 11, 2012 (see comment below)	
4. Was the NOI timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.11-11-008	
6. Date of ALJ ruling:	January 3, 2012	
7. Based on another CPUC determination (specify):	n/a	
8. Has the Claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.11-11-008	
10. Date of ALJ ruling:	January 3, 2012	
11. Based on another CPUC determination (specify):	n/a	
12. Has the Claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.13-06-024	
14. Date of Issuance of Final Order or Decision:	July 3, 2013	
15. File date of compensation request:	September 3, 2013	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
3	X		On August 31, 2012, ALJ Gamson issued a ruling accepting TURN's late-filed NOI and determining that TURN's eligibility for intervenor compensation would start on May 11, 2012, the date on which TURN filed its NOI. All of the hours claimed in this request were incurred after May 11, 2012.
15	X		The 60 <sup>th</sup> day after the issuance of D.13-06-024 fell on Sunday, September 1, 2013 and the following day was the Labor Day holiday when the Commission was closed. Pursuant to Rule 1.15 of the Commission's Rules of Practice and Procedure, this Request for Compensation is timely filed on the first business day thereafter.

**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.)**

<b>Contribution</b>	<b>Specific References to Claimant’s Presentations and to Decision</b>	<b>Showing Accepted by CPUC</b>
1. TURN contributed to the Commission’s determination that a flexible capacity requirement should not be adopted for the 2014 RA year because of the lack of a demonstrated need.	<ul style="list-style-type: none"> <li>• TURN Dec. 26, 2012 Comments, p. 5.</li> <li>• TURN April 5, 2013 Comments, pp. 5-7.</li> <li>• TURN April 15, 2013 Reply Comments, pp. 2-4.</li> <li>• D.13-06-024, pp. 38, 66 (Conclusion of Law (COL) 6)</li> </ul>	
2. TURN contributed to the Commission’s determination that load serving entities (LSEs) should be required to amend their RA filings to include information about their effective flexible capacity in their current RA portfolio.	<ul style="list-style-type: none"> <li>• TURN April 5, 2013 Comments at pp. 2, 9-10.</li> <li>• D.13-06-024, pp. 56 (citing TURN) and 70 (Ordering Paragraph (OP) 6).</li> </ul>	
3. TURN contributed to the Commission’s determination that there are unresolved issues relating to the ISO’s calculation of flexible capacity needs.	<ul style="list-style-type: none"> <li>• TURN April 5, 2013 Comments at pp. 6-9.</li> <li>• TURN June 17, 2013 Comments on the Proposed Decision (PD), p. 4.</li> <li>• D.13-06-024, pp. 39 (citing TURN), 55-56, 57 (item 5), 64 (Finding of Fact (FOF) 20).</li> </ul>	
4. TURN contributed to the Commission’s determination that one of the details that still needs to be determined is to define the error term in the methodology used to calculate the flexible capacity need.	<ul style="list-style-type: none"> <li>• TURN Dec. 26, 2012 Comments, p. 8.</li> <li>• TURN June 17, 2013 Comments on the Proposed Decision (PD), p. 9.</li> <li>• D.13-06-024, pp. 57, 64 (Finding of Fact (FOF) 20).</li> </ul>	
5. TURN contributed to the Commission’s determination that, although the Sierra Club/TURN	<ul style="list-style-type: none"> <li>• Sierra Club/TURN Amended Request for Evidentiary Hearings, March 28, 2013, pp. 4-</li> </ul>	

<p>motion for evidentiary hearings should be denied, the Commission would not make any Findings of Fact regarding any of the facts addressed in that motion.</p>	<p>5.</p> <ul style="list-style-type: none"> <li>• D.13-06-024, pp. 34, 62 (FOF 7).</li> </ul>	
<p>6. TURN contributed to the Commission’s determination that the proceeding schedule should be modified to allow a second workshop on flexible capacity issues.</p>	<ul style="list-style-type: none"> <li>• TURN Dec. 26, 2012 Comments, pp. 1-2.</li> <li>• February 11, 2013 e-mail from T. Long to ALJ Gamson (and the service list)</li> <li>• March 11, 2013 ALJ Ruling Resetting Schedule for Comments on Phase 2 Resource Adequacy Issues and Scheduling a Prehearing Conference, p. 2.</li> </ul>	
<p>7. The final decision adopts many revisions to Findings of Facts and Conclusions of Law recommended by TURN</p>	<ul style="list-style-type: none"> <li>• TURN June 17, 2013 Comments on the Proposed Decision (PD), Appendix A.</li> <li>• D.13-06-024, pp. 63-65 (FOFs 11, 16, 17, 20 and COL 5).</li> </ul>	

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

	<b>Claimant</b>	<b>CPUC Verified</b>
<p><b>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</b></p>	Yes	
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	Yes	
<p><b>c. If so, provide name of other parties:</b> TURN’s position that the Commission should not adopt a flexible capacity requirement for the 2014 RA year was shared by many parties. (See D.13-06-024, pp. 20-29).</p>		
<p><b>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b></p> <p>TURN and DRA represented similar interests in this proceeding. (While both represented ratepayer interests, TURN alone represented the interests of residential and small commercial customers.) TURN accordingly took steps to coordinate with DRA, as appropriate. On the critical issue of whether the ISO had demonstrated a need for a flexible capacity requirement in the 2014 RA year, TURN undertook its own assessment of the ISO data, which TURN submits benefitted the record by providing two independent and expert reviews of behalf of ratepayer interests. TURN and DRA emphasized different issues in their</p>		

participation. For example, more than DRA, TURN emphasized the importance of a complete and timely record, as evidenced by the Joint Sierra Club/TURN motion for evidentiary hearings.

Similarly, the fact that numerous parties shared TURN's perspective that a flexible capacity requirement was not justified for 2014 did not result in TURN's undue duplication with those parties. A rulemaking proceeding of this nature attracts a range of parties, and some degree of overlap in positions is inevitable. In the specific case of the flexible capacity requirement here, the range of interests represented by parties with positions overlapping with TURN's varied widely, from generators to marketers to environmental interests to consumer representatives. TURN's analysis was complementary to the offerings of others, yielding a full record upon which the Commission could base its determination that action was premature.

In addition, recognizing that several parties (e.g., Sierra Club, Vote Solar, CEERT, CalWEA) were likely to advocate for increased opportunities for preferred resources in the flexible capacity requirement, TURN avoided duplication of these parties' advocacy. TURN did join with the Sierra Club to request evidentiary hearings, but our partnership on those pleadings served to avoid duplication of effort.

For all of these reasons, TURN submits that the Commission should find no undue duplication between TURN's participation and that of DRA or other parties.

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

#	Claimant	CPUC	Comment

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

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

<p><b>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)</b></p> <p>TURN's advocacy reflected in D.13-06-024 addressed policy matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.13-06-024, given the nature of the issues presented. While it is difficult to place a dollar value on Resource Adequacy (RA) issues, TURN submits that our participation should result in reduced customer costs by deferring the adoption of a potentially costly flexible capacity requirement and thereby protecting ratepayers from assuming unnecessary costs. In this case as in prior RA proceedings, these</p>	<p><b>CPUC Verified</b></p>
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benefits far exceed the modest cost of TURN's participation. (*See, i.e.* D.12-06-014, issued in the last RA proceeding, R.09-10-032, as well as D.09-11-029, issued in R.08-01-025, and D.07-03-011, issued in R.05-12-013 (two earlier RA proceedings), which found that the benefits from TURN's participation on RA policy issues outweighed the costs of TURN's participation.)

For all of these reasons, the Commission should find that TURN's efforts here have been productive.

**b. Reasonableness of Hours Claimed.**

This Request for Compensation includes approximately 230 total hours for TURN's attorneys and consultants, or the equivalent of less than six weeks of full-time work by a single person (40 hours/week). TURN submits that this is a reasonable amount of time, given that Phase 2, resulting in D.13-06-024, spanned seven months, required careful analysis of two highly detailed flexible capacity proposals by the Joint Parties and by Energy Division, required careful scrutiny of the ISO data regarding flexible capacity need, involved several days of workshops and ISO stakeholder meetings, and involved six pleadings filed by TURN (excluding compensation-related pleadings).

TURN was efficient in staffing this proceeding and pursuing our objectives. As reflected in the attached timesheets, Hayley Goodson was TURN's attorney at the start of Phase 2 of this proceeding. In late January and early February of 2013, Ms. Goodson's other responsibilities, particularly her role as lead attorney in A.12-11-009 (PG&E's 2014 General Rate Case), required Thomas Long to take over the attorney responsibilities in this case. Upon the transfer of the case, Mr. Long assumed full attorney duties immediately so that he and Ms. Goodson did not overlap in the performance of any tasks. Throughout Phase 2, Ms. Goodson and Mr. Long were assisted by outside consultant Kevin Woodruff, of Woodruff Expert Services, the same expert TURN has extensively relied on in previous Resource Adequacy rulemaking proceedings. Once again, Mr. Long and Ms. Goodson relied heavily on Mr. Woodruff, resulting in Mr. Woodruff's incurring more than two-thirds of TURN's total hours (excluding intervenor compensation-related time). This reliance on Mr. Woodruff's extensive expertise significantly reduced TURN's attorney hours and thereby resulted in efficiencies in TURN's participation in this proceeding.

TURN claims 3.75 hours (less than 2% of TURN's total substantive hours, mostly incurred by Kevin Woodruff) for its work analyzing the ISO's Local Capacity Requirements (LCR) study. As D.13-06-024 reflects, LCR was a key issue in Phase 2, the first issue identified in the Phase 2 Scoping

Memo. The time incurred related to the LCR issue was devoted to understanding and analyzing the ISO study and its results. In contrast to prior years, upon concluding its analysis, TURN did not have concerns about the study methodology or its results and therefore did not see a reason to file any comments with the CPUC. Nevertheless, the fact that TURN undertook to scrutinize the CAISO study and found no problems worth commenting upon could give the Commission confidence that the ISO study and results were reliable. In this respect, TURN's analysis made a substantial contribution to the final decision adopting the ISO study results, and TURN did so efficiently by incurring a small number of hours and avoiding the filing of an unnecessary pleading with the Commission. Accordingly, TURN submits that these hours are reasonable and should be compensated.

TURN submits that all of the hours claimed in this request were reasonably necessary to the achievement of TURN's substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets.

TURN's request also includes 9.75 hours devoted to the preparation of this request for compensation by Mr. Long. This is a reasonable figure consistent with the scale of the proceeding and TURN's level of involvement in it. Mr. Long has prepared this request because of his extensive involvement in all but the preliminary stages of Phase 2 of this proceeding and his detailed knowledge of TURN's work effort.

**c. Allocation of Hours by Issue**

TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes:

Code	Description	Allocation of Time
Flex Cap (or FC)	Work specifically related to Flexible Capacity requirements ( <i>Phase 2 Scoping Memo</i> Issue 4)	90.9%
LCR	Work specifically related to Local Capacity Requirements for 2014 ( <i>Phase 2 Scoping Memo</i> Issue 1)	1.6%
GP	Work related to general participation in this proceeding, such as reviewing the scoping memo and other rulings, execution of nondisclosure agreements with utilities, and other procedural matters	3.4%
Comp	Work related to intervenor compensation.	4.1%

If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson	2012	4.5	\$325	D.13-08-022	1462.50			
H. Goodson	2013	7.25	\$340	Pending in A.11-06-007	2,465.00			
Thomas Long	2013	58.25	\$555	Pending in A.10-02-005 et al.	32,328.75			
Kevin Woodruff	2012	30.50	\$240	D.12-11-050	7,320.00			
K. Woodruff	2013	126.25	\$240	D.12-11-050	30,300.00			
<b>Subtotal: \$ 73,876.25</b>						<b>Subtotal: \$</b>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
[Person 1]								
[Person 2]								
<b>Subtotal: \$ 0</b>						<b>Subtotal: \$</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Thomas Long	2013	9.75	277.50	½ of 2013	2,705.63			
<b>Subtotal: \$ 2,705.63</b>						<b>Subtotal: \$</b>		
COSTS								
#	Item	Detail			Amount	Amount		
	Phone	Telephone expense related to R.11-10-023, Phase 2			\$12.15			
	Photocopying	Expenses associated with copying pleadings related to R.11-10-023, Phase 2			\$24.90			
	Postage	Expense associated with mailing pleadings related to R.11-10-023, Phase 2			\$13.68			
		<b>Subtotal</b>			\$50.73			

TOTAL REQUEST: \$ 76,632.61		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 are compensated at ½ of preparer's normal hourly rate.			
Attorney	Date Admitted to CA BAR <sup>1</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Thomas Long	December 11, 1986	124776	No
Hayley Goodson	December 5, 2003	228535	No

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

Attachment or Comment #	Description/Comment
1	<b>Certificate of Service</b>
2	<b>Daily Time Records for Attorneys and Experts with Coded Time Entries</b>
3	<b>Cost Detail</b>
4	<b>Allocation of Hours</b>
Comment 1	<p><b>Hourly Rates for TURN Attorneys:</b></p> <p>TURN seeks hourly rates for its staff attorneys at levels that the Commission has previously adopted for each individual's work in a given year, or at increased levels for 2013 consistent with Resolution ALJ-287. The following describes the basis for the requested rates that have not been previously awarded as of the date of this Request for Compensation.</p> <p><u>Hayley Goodson</u>: For Ms. Goodson's work in 2013, TURN seeks an hourly rate of \$340, an increase of 7.0% from the approved rate for 2012. The 2013 increase is the general 2.0% increase provided for in Res. ALJ-287, plus the second of two 5% step increases available with her move in 2010 to the 8-12 years experience tier. TURN has previously requested this 2013 rate for Ms. Goodson in A.11-06-007.</p> <p><u>Thomas Long</u>: For Mr. Long's work in 2013, TURN seeks an hourly rate of \$555. In D.13-05-007, the Commission approved an hourly rate of \$520 for Mr. Long's work in 2011 and \$530 for his work in 2012, based on the 2.2% cost of living adjustment in Resolution ALJ-281. Mr. Long's requested rate for 2013 is an increase of 7.0% from the requested rate for 2012. The 2013 increase is based on the general 2.0% increase provided for in Res. ALJ-287, plus the first of two 5% step increases available in the 13+ years experience tier. TURN has previously requested this 2013 rate for Mr. Long in A.10-02-005 et al.</p>

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

Item	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)

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Disposition

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?</b>	
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If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

1. Claimant [has/has not] made a substantial contribution to Decision (D.) \_\_\_\_\_.
2. The 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 non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of Claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

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

**Attachment 1:  
Certificate of Service**

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

**Attachment 2**  
**Daily Time Records for Attorneys and Experts with Coded Time Entries**

Date	Atty	Case	Task	Description	Time Spent
<u>Attorney: HG</u>					
10/31/2012	HG	R11-10-023	FlexCap	discuss strategy for flexible capacity market issues w/ K. Woodruff	0.25
12/18/2012	HG	R11-10-023	GP	discuss 12/20 cmts, schedule with K. Woodruff	0.25
12/19/2012	HG	R11-10-023	Flex Cap	begin review of, edits to K Woodruff draft cmts on Ph 2 Scoping Memo	1.75
12/20/2012	HG	R11-10-023	Flex Cap	edits to Ph2 Scoping Memo comments with K Woodruff's feedback	1.25
12/26/2012	HG	R11-10-023	Flex Cap	finalize Ph 2 Scoping Memo cmts with last round of additions from K. Woodruff	1.00
1/7/2013	HG	R11-10-023	FlexCap	discuss potential CAISO cmts, discovery issues w/ K. Woodruff	0.50
1/8/2013	HG	R11-10-023	FlexCap	review K. Woodruff draft DR re Joint Proposal & draft DR with further input from K. Woodruff	2.00
1/23/2013	HG	R11-10-023	Flex Cap	attend part of Flex Cap workshop	3.25
1/25/2013	HG	R11-10-023	Flex Cap	discovery -- flex cap	1.00
2/6/2013	HG	R11-10-023	Flex Cap	discovery -- flex cap	0.50
Total: HG					11.75

Attorney: K Woodruff

8/29/2012	K Woodruff	R11-10-023	LCR	Listened to CAISO call on 2013 LCR needs ""without SONGS""; reported to clients.	1.00
10/21/2012	K Woodruff	R11-10-023	Flex Cap	Communicated with client regarding status of flexible capacity issues in CPUC RA and CAISO stakeholder processes.	0.25
10/22/2012	K Woodruff	R11-10-023	Flex Cap	Discussed status of RA case with ED (Brooks) and DRA (Spencer).	0.50
10/30/2012	K Woodruff	R11-10-023	Flex Cap	Monitored CAISO conference call and materials on Flexible Ramping capacity product.	0.50
10/31/2012	K Woodruff	R11-10-023	Flex Cap	Communicated on status of RA case with CLECA (Barkovich) and client (Goodson).	0.25
11/8/2012	K Woodruff	R11-10-023	LCR	Listened to portion of CAISO call on 2014 LCR study.	0.50
11/15/2012	K Woodruff	R11-10-023	Flex Cap	Discussed status of RA proceeding and flexible capacity proposal with DRA (Spencer); reviewed Joint Parties' proposal; reported to client.	1.25
11/17/2012	K Woodruff	R11-10-023	Flex Cap	Began reviewing Joint Parties' proposal on flexible capacity.	0.50
11/29/2012	K Woodruff	R11-10-023	Flex Cap	Continued reviewing Joint Parties' proposal on flexible capacity.	0.75
12/9/2012	K Woodruff	R11-10-023	GP	Reviewed Assigned Commissioner's Ruling an Phase 2 Scoping Memo.	0.50

Date	Atty	Case	Task	Description	Time Spent
12/10/2012	K Woodruff	R11-10-023	GP	Provided summary of ACR policy issues and scheduling for client.	0.50
12/14/2012	K Woodruff	R11-10-023	GP	Communicated with client regarding preparation of comments on ACR.	0.25
12/17/2012	K Woodruff	R11-10-023	Flex Cap	Began preparing comments on Phase 2 Scoping Memo regarding Joint Parties' flexible capacity proposal.	5.50
12/18/2012	K Woodruff	R11-10-023	Flex Cap	Continued preparing comments on Phase 2 Scoping Memo.	4.75
12/19/2012	K Woodruff	R11-10-023	Flex Cap	Completed draft comments on Phase 2 Scoping Memo.	3.00
12/20/2012	K Woodruff	R11-10-023	Flex Cap	Revised draft comments; attended CAISO stakeholder meeting on flexible capacity procurement to complement CPUC RA Flex Cap policies.	7.75
12/21/2012	K Woodruff	R11-10-023	Flex Cap	Discussed draft comments with client; made further revisions; sent to client.	2.00
12/27/2012	K Woodruff	R11-10-023	Flex Cap	Reviewed parties' comments on Scoping Ruling; discussed issues with other parties (CLECA, Barkovich).	0.75
1/7/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed other parties' comments on Joint Parties' Flexible Capacity proposal; communicated with client regarding workshop schedule and possible data request.	2.50
1/8/2013	K Woodruff	R11-10-023	Flex Cap	Completed reviewing other parties' comments; prepared and edited data request for Joint Parties.	3.50
1/14/2013	K Woodruff	R11-10-023	GP	Reviewed ALJ's PD on RA filing schedule; reported to client.	0.25
1/15/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed draft workshop agenda; communicated with client.	0.25
1/22/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CMUA draft comments to FERC regarding CAISO draft forward procurement for flexible and local capacity; reviewed materials for 1/23 workshop; discussed flexible capacity issues with Sierra Club (M.Vespa).	4.75
1/23/2013	K Woodruff	R11-10-023	Flex Cap	Participated in workshop on RA program enhancements, particularly flexible capacity.	7.50
1/24/2013	K Woodruff	R11-10-023	Flex Cap	Began preparing follow-up data request to CAISO.	0.25
1/25/2013	K Woodruff	R11-10-023	Flex Cap	Completed follow-up data request to CAISO; sent to client.	1.25
1/30/2013	K Woodruff	R11-10-023	Flex Cap	Communicated with client regarding preparation of comments and reply comments.	0.25

Date	Atty	Case	Task	Description	Time Spent
2/4/2013	K Woodruff	R11-10-023	Flex Cap	Began preparing comments on Joint Parties' and ED's flexible capacity proposals.	2.25
2/5/2013	K Woodruff	R11-10-023	Flex Cap	Continued preparing comments.	1.50
2/6/2013	K Woodruff	R11-10-023	Flex Cap	Continued preparing comments.	1.00
2/7/2013	K Woodruff	R11-10-023	Flex Cap	Completed draft comments; sent to client; communicated with client regarding new procedural guidance from ALJ and ED.	3.50
2/8/2013	K Woodruff	R11-10-023	Flex Cap	Communicated with client regarding response to CAISO request on data request response.	0.25
2/11/2013	K Woodruff	R11-10-023	Flex Cap	Prepared informal comments for Energy Division on flexible capacity proposal.	1.50
2/12/2013	K Woodruff	R11-10-023	Flex Cap	Edited client's version of comments to ED.	0.25
2/13/2013	K Woodruff	R11-10-023	Flex Cap	Discussed status of flexible capacity issues with ED; communicated with client.	0.50
2/15/2013	K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO response to TURN and Sierra Club data requests.	1.75
3/1/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO responses to TURN's 2nd data requests; reported to client.	2.00
3/4/2013	K Woodruff	R11-10-023	Flex Cap	Communicated with Energy Division and client about process and status of flexible capacity issues in case.	0.25
3/4/2013	K Woodruff	R11-10-023	LCR	Began reviewing CAISO draft LCR study.	0.50
3/5/2013	K Woodruff	R11-10-023	Flex Cap	Discussed data requests and issues with other parties (Sierra Club/M.Vespa; DRA/A.Wecker; CalWEA/T.Beach).	0.75
3/6/2013	K Woodruff	R11-10-023	Flex Cap	Discussed motion for hearings with client; discussed data request follow-up with CAISO (K.Meeusen).	0.50
3/6/2013	K Woodruff	R11-10-023	LCR	Reviewed materials for CAISO LCR meeting and reported to client.	0.75
3/7/2013	K Woodruff	R11-10-023	LCR	Prepared for and attended CAISO stakeholder meeting on Local Capacity Requirements; reported to client.	0.25
3/7/2013	K Woodruff	R11-10-023	Flex Cap	Discussed data request with SDG&E staff (R.Anderson, R.Nicholson).	4.00
3/8/2013	K Woodruff	R11-10-023	Flex Cap	Discussed data request with SDG&E; signed PG&E NDC.	0.50
3/8/2013	K Woodruff	R11-10-023	LCR	Responded to client regarding questions on LCR costs.	0.25
3/11/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed ALJ's scheduling ruling; discussed data request with PG&E; signed SDG&E NDC.	0.75
3/12/2013	K Woodruff	R11-10-023	Flex Cap	Discussed Energy Division flexible capacity proposal with other party (CLECA,B.Barkovich) and Jack Ellis.	0.75

Date	Atty	Case	Task	Description	Time Spent
3/13/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO supplemental response to TURN data request; reported to client.	1.25
3/14/2013	K Woodruff	R11-10-023	Flex Cap	Prepared response to CAISO regarding latest response to data request.	1.00
3/15/2013	K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO presentation and workpapers for March 20 workshop.	0.50
3/16/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed ED flexible capacity proposal; continued reviewing CAISO presentation for March 20 workshop.	1.75
3/17/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO slides and workpapers; communicated with client.	2.00
3/18/2013	K Woodruff	R11-10-023	Flex Cap	Discussed possible settlement with PG&E; discussed data and case issues with Sierra Club (M.Vespa), CalWEA (T.Beach) and DRA (A.Wecker/P.Spencer); reviewed CAISO slides and workpapers further; communicated with client.	3.25
3/19/2013	K Woodruff	R11-10-023	Flex Cap	Prepared for PHC and workshop; prepared possible hearing schedule and changes to potential agreement with PG&E regarding flexible capacity implementation and hearings.	2.25
3/20/2013	K Woodruff	R11-10-023	Flex Cap	Attended Prehearing Conference and advised client; attended and participated in workshop on flexible capacity; discussed issues with other parties.	8.50
3/21/2013	K Woodruff	R11-10-023	Flex Cap	Discussed revising motion for hearings with client and Sierra Club (M.Vespa).	0.50
3/23/2013	K Woodruff	R11-10-023	Flex Cap	Prepared notes for client to prepare amended motion for hearings.	0.25
3/27/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed and commented on client's amended motion for hearings.	0.25
3/30/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed FERC order on CAISO FLRR proposal.	0.25
4/1/2013	K Woodruff	R11-10-023	Flex Cap	Discussed preparation of comments and other issues with client; communicated with other parties about data issues (Sierra Club/M.Vespa; CalWEA/T.Beach).	1.25
4/2/2013	K Woodruff	R11-10-023	Flex Cap	Prepared outline for comments; analyzed CAISO data regarding need.	4.00
4/3/2013	K Woodruff	R11-10-023	Flex Cap	Analyzed CAISO data; continued preparing comments.	3.50
4/4/2013	K Woodruff	R11-10-023	Flex Cap	Completed draft comments; sent to client.	5.50
4/5/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed client's edits; prepared workpaper.	4.25
4/6/2013	K Woodruff	R11-10-023	Flex Cap	Continued preparing workpaper and chart on IOU procurement of flexible capacity.	4.25

Date	Atty	Case	Task	Description	Time Spent
4/8/2013	K Woodruff	R11-10-023	Flex Cap	Continued preparing workpaper and chart on IOU procurement of flexible capacity; continued reviewing other parties' comments and outlining reply comments.	6.00
4/9/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO minute-level load data for anomalous values.	1.75
4/10/2013	K Woodruff	R11-10-023	Flex Cap	Began preparing reply comments; created attachments for comments, including new charts.	5.00
4/11/2013	K Woodruff	R11-10-023	Flex Cap	Completed editing draft comments; reviewed client's editorial comments; prepared additional charts.	5.00
4/12/2013	K Woodruff	R11-10-023	Flex Cap	Revised charts; provided to client.	2.00
4/15/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed other parties' reply comments; prepared workpaper for charts in reply comments.	1.25
4/16/2013	K Woodruff	R11-10-023	Flex Cap	Continued reviewing other parties' reply comments.	0.25
5/1/2013	K Woodruff	R11-10-023	LCR	Reviewed CAISO 2014 LCR study; forwarded notice to client with comments.	0.25
5/14/2013	K Woodruff	R11-10-023	Flex Cap	Communicated with client, ED and DRA regarding CAISO call on RA program issues.	0.25
5/16/2013	K Woodruff	R11-10-023	Flex Cap	Listened to CAISO resource adequacy implementation and issue call.	1.00
5/28/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed Proposed Decision; commented to client.	2.50
5/30/2013	K Woodruff	R11-10-023	Flex Cap	Provided additional comments to client on PD and schedule.	0.25
6/3/2013	K Woodruff	R11-10-023	Flex Cap	Communicated regarding PD with other party (CLECA, Barkovich).	0.25
6/10/2013	K Woodruff	R11-10-023	GP	Participated in CAISO monthly RA issues call.	1.00
6/13/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed PD and provided comments to client on potential comments.	1.00
6/14/2013	K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO straw proposal on FRAC-MOO.	0.25
6/17/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed and commented on client's draft comments; reviewed other parties' comments.	1.75
6/18/2013	K Woodruff	R11-10-023	Flex Cap	Prepared for CAISO stakeholder meeting.	0.25
6/19/2013	K Woodruff	R11-10-023	Flex Cap	Participated in CAISO stakeholder meeting on FRAC-MOO tariff.	6.00
6/21/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO comment template for FRAC-MOO proposal; began preparing comments.	0.50
6/22/2013	K Woodruff	R11-10-023	Flex Cap	Prepared draft comments to submit to CAISO regarding FRAC-MOO.	0.75

Date	Atty	Case	Task	Description	Time Spent
6/24/2013	K Woodruff	R11-10-023	Flex Cap	Reviewed other parties' reply comments.	0.25
Total: K Woodruff					156.75
<u>Attorney: TL</u>					
1/30/2013	TL	R11-10-023	GP	Discuss status of case/handoff w/ Hayley (0.5) and coordinate w/Kevin re 2/13 comments	0.75
2/5/2013	TL	R11-10-023	GP	Review OIR, Phase 2 scoping memo, and scan 1/23 workshop summary	1.25
2/7/2013	TL	R11-10-023	FC	Overview of Joint Parties flex cap proposal and review TURN 12/26/12 comments on it	1.00
2/7/2013	TL	R11-10-023	FC	Review and edit KW's draft post-workshop comments	2.25
2/7/2013	TL	R11-10-023	FC	E-mails w/KW re postponement of comment deadline and ED e-mail re informal comments	0.25
2/11/2013	TL	R11-10-023	FC	Finalize e-mail to ALJ re need for workshop	0.25
2/11/2013	TL	R11-10-023	FC	Respond to CAISO re requested DR extension and confer by e-mail w/ KW and HG	0.75
2/11/2013	TL	R11-10-023	FC	Strategize w/KW re schedule and edit draft e-mail to ALJ re need for another workshop	1.25
2/13/2013	TL	R11-10-023	FC	Finalize informal comments to ED and prep e-mail to Megha L (ED) transmitting same	0.25
2/28/2013	TL	R11-10-023	FC	Review KW e-mails re prel analysis of CAISO DR response	0.25
3/4/2013	TL	R11-10-023	FC	Review and send DRs PG&E-01, SDG&E-02, SCE-02 re IOUs forward procurement	0.50
3/4/2013	TL	R11-10-023	GP	Prep e-mails to csl for PG&E, SDG&E re NDAs	0.25
3/4/2013	TL	R11-10-023	FC	Prep e-mail to Kevin re potential need for evid hearings; follow-up call w/Kevin re same	0.50
3/5/2013	TL	R11-10-023	FC	Prep e-mail to M. Huffman confirming need for monthly data in DR	0.25
3/5/2013	TL	R11-10-023	FC	Ph/call w/M. Huffman (PG&E) re our DR and prep e-mail to Kevin re monthly data	0.25
3/5/2013	TL	R11-10-023	FC	Finalize e-mail to CAISO re incomplete response to DR #2	0.25
3/6/2013	TL	R11-10-023	FC	Review and edit SC draft of request for evid hearings and prep e-mails to Kevin, SC re same	1.25

Date	Atty	Case	Task	Description	Time Spent
3/7/2013	TL	R11-10-023	FC	Ph call w/ C. Lukens (DRA) re evid hrg request; edit request and recirculate to other parties; finalize doc (.25)	0.75
3/7/2013	TL	R11-10-023	LCR	Review Kevin's analysis of CAISO's draft LCR study and prep e-mail response	0.25
3/7/2013	TL	R11-10-023	GP	Rev and draft proposed edits to SDG&E NDA and prep e-mail to A. Pak re same	1.00
3/7/2013	TL	R11-10-023	GP	Rev draft PG&E NDA and forward to Kevin for signature	0.25
3/8/2013	TL	R11-10-023	GP	Rev A. Pak (SDG&E) response re NDA edits and prep e-mail responding to same	0.25
3/12/2013	TL	R11-10-023	GP	Initial review of new ALJ ruling re schedule	0.25
3/12/2013	TL	R11-10-023	GP	Final review and execution of NDAs for PG&E and SDG&E	0.50
3/12/2013	TL	R11-10-023	GP	Prep e-mail to SCE re potential need for NDA re TURN DR	0.25
3/13/2013	TL	R11-10-023	FC	Review ED revised flex cap proposal	1.00
3/14/2013	TL	R11-10-023	FC	Discuss stlmnt possibility w/KW and prep e-mail w/PG&E to schedule meeting	0.25
3/14/2013	TL	R11-10-023	FC	Ph call from M. Huffman (PG&E) re potential stlmnt and prep e-mail to KW re same	0.25
3/14/2013	TL	R11-10-023	FC	Discuss w/KW response to CAISO re incomplete DR response and edit KW's draft e-mail to CAISO	0.50
3/14/2013	TL	R11-10-023	FC	Rev CAISO supp DR response and KW e-mail re incompleteness of same; prep e-mail to KW re next steps	0.50
3/15/2013	TL	R11-10-023	GP	Rev and execute SCE NDA	0.50
3/15/2013	TL	R11-10-023	FC	Prep DR #3 to CAISO re new slides	0.25
3/17/2013	TL	R11-10-023	FC	Rev KW outline for TURN issues at 3/20 PHC	0.25
3/17/2013	TL	R11-10-023	FC	Rev CAISO slides in support of FC proposal	0.75
3/18/2013	TL	R11-10-023	FC	Rev KW e-mails re prep for PHC	0.25
3/18/2013	TL	R11-10-023	FC	Ph call w/Kevin re evid hearings and PG&E settlement proposal in light of conf call	0.25
3/18/2013	TL	R11-10-023	FC	Review TURN 12/26/12 comments, Jparties 10/12 proposal, and ED revised prop to prep for PHC	2.00
3/18/2013	TL	R11-10-023	FC	Prep e-mail to CAISO w/drawing DR #3 and identifying problems with 3/15/13 data	0.25
3/18/2013	TL	R11-10-023	FC	Settlement call w/PG&E and post-call discussion w/Kevin	0.75
3/18/2013	TL	R11-10-023	FC	Begin prep for PHC	0.25

Date	Atty	Case	Task	Description	Time Spent
3/18/2013	TL	R11-10-023	FC	Conf call w/DRA, SC re ISO's recent data and need for evid hearings	1.25
3/19/2013	TL	R11-10-023	FC	Ph call w/KW to discuss need for evid hrgs, response to PG&E settlement proposal	1.00
3/19/2013	TL	R11-10-023	FC	Prep remarks for PHC re evid hrgs	1.75
3/19/2013	TL	R11-10-023	FC	Conf call w/PG&E re their settlement proposal	0.25
3/19/2013	TL	R11-10-023	FC	Ph call w/M. Vespa (SC) re planned positions for PHC	0.25
3/19/2013	TL	R11-10-023	FC	Review and analyze KW ideas for evid hrgs and prep e-mail re same	0.50
3/20/2013	TL	R11-10-023	FC	Attend FC workshop	6.25
3/20/2013	TL	R11-10-023	FC	PHC re evid hrgs etc	1.25
3/22/2013	TL	R11-10-023	FC	Conf call w/ M. Vespa, Kevin re disputed facts	0.25
3/27/2013	TL	R11-10-023	FC	Edit draft amended motion for evid hrgs	1.25
3/27/2013	TL	R11-10-023	FC	Phone call w/B. Barkovich (CLECA) re potential positions/themes for 4/5 comments	0.50
3/27/2013	TL	R11-10-023	FC	Analysis of CAISO workshop presentation	0.25
3/27/2013	TL	R11-10-023	FC	Initial review of draft of amended m/evid hrgs and prre e-mails to M. Vespa, Kevin re same	0.50
3/28/2013	TL	R11-10-023	FC	Review edits from Kevin; final edits to amended motion	0.25
4/1/2013	TL	R11-10-023	FC	Prep for call with Kevin re 4/5 comments and call w/Kevin re same (0.75)	1.00
4/2/2013	TL	R11-10-023	FC	Review KW broad outline for 4/5 comments and prep e-mail to him re same; followup call (0.25)	0.50
4/5/2013	TL	R11-10-023	FC	Initial review of opening comments of other parties	0.25
4/5/2013	TL	R11-10-023	FC	Discuss my edits with Kevin and finalize comments	0.50
4/5/2013	TL	R11-10-023	FC	Rev and edit Kevin's draft comments	3.25
4/8/2013	TL	R11-10-023	FC	Exchange e-mails w/Kevin re plans for reply comments	0.25
4/9/2013	TL	R11-10-023	FC	Review KW draft graph re available FC and prep e-mail to KW re same	0.25
4/10/2013	TL	R11-10-023	FC	Review KW draft outline for reply comments and prep e-mail to KW re same	0.25
4/11/2013	TL	R11-10-023	FC	Rev and edit KW draft reply comments	1.50
4/11/2013	TL	R11-10-023	FC	Review KW draft reply cmts for general approach	0.25
4/11/2013	TL	R11-10-023	FC	Draft motion to file under seal	0.75
4/12/2013	TL	R11-10-023	FC	Review revised Att 4 to comments and discuss needed changes with KW	0.25

Date	Atty	Case	Task	Description	Time Spent
4/12/2013	TL	R11-10-023	FC	Discuss instructions for service of confid attachment w/ Jessica and prep e-mail with text for e-mail service	0.50
6/11/2013	TL	R11-10-023	FC	Review PD	2.00
6/11/2013	TL	R11-10-023	FC	Outline comments on PD	0.25
6/12/2013	TL	R11-10-023	FC	Prepare comments on PD	0.75
6/14/2013	TL	R11-10-023	FC	Draft comments on PD	3.25
6/14/2013	TL	R11-10-023	FC	Phone call w/Kevin re comments on PD	0.25
6/17/2013	TL	R11-10-023	FC	Draft recommended changes to FOFs, COLs and Ops	1.00
6/17/2013	TL	R11-10-023	FC	Draft comments on PD	1.50
6/17/2013	TL	R11-10-023	FC	Rev other parties' comments on PD	0.75
6/21/2013	TL	R11-10-023	FC	Rev KW analysis of ISO FRAC-MOO meeting	0.25
6/26/2013	TL	R11-10-023	FC	Edit KW draft comments to CAISO re FRAC-MOO re need to coordinate with R11-10-023	0.25
8/19/2013	TL	R11-10-023	Comp	Prep comp request	0.75
8/22/2013	TL	R11-10-023	Comp	Prep comp request	3.00
8/26/2013	TL	R11-10-023	Comp	Prep comp request	0.75
8/28/2013	TL	R11-10-023	Comp	Prep comp request	3.25
8/29/2013	TL	R11-10-023	Comp	Prep comp request	2.00
Total: TL					68.00
Grand Total					236.50

**Attachment 3**  
**Cost Detail**

Date	Atty	Case	Task	Description	Amount
<u>Activity: \$Copies</u>					
12/26/2012	rap	R11-10-023	\$Copies	Copies of comments sent to ALJ and Commissioner	\$10.00
3/1/2013	JG	R11-10-023	\$Copies	January and February 2013 copies (black) done at TURN Office.	\$1.00
3/1/2013	JG	R11-10-023	\$Copies	January and February 2013 scans (black) done at TURN Office.	\$1.20
3/7/2013	JG	R11-10-023	\$Copies	Copies for Request for Evidentiary Hearings of Sierra Club and The Utility Reform Network sent to ALJ and Commissioner.	\$1.20
3/28/2013	JG	R11-10-023	\$Copies	Copies for Amended Request For Evidentiary Hearings Of Sierra Club And TURN sent to ALJ and Commissioner.	\$1.40
4/5/2013	JG	R11-10-023	\$Copies	Copies of Comments of TURN sent to ALJ Gamson (not sent to Commissioner Ferron per his request).	\$1.30
4/15/2013	JG	R11-10-023	\$Copies	Copies for Motion Of TURN For Leave To File Under Seal Confidential Attachment 4 To Its Post-Workshop Reply Comments On Flexible Capacity Proposals sent to ALJ and Docket Office for filing.	\$1.50
4/15/2013	JG	R11-10-023	\$Copies	Copies for Post-Workshop Reply Comments Of The Utility Reform Network On Flexible Capacity Proposals sent to ALJ (not sent to Commissioner Ferron per his request of no hard copy mailings).	\$2.60
6/17/2013	JG	R11-10-023	\$Copies	Copies of comments of TURN on the proposed decision adopting a flexible capacity framework sent to ALJ only (not sent to Commissioner per his request of no hard copies).	\$1.10
7/17/2013	**	R11-10-023	\$Copies	TURN Office Scans associated with R.11-10-023 for the period March 2, 2013 to July 17, 2013	\$2.20
7/17/2013	**	R11-10-023	\$Copies	TURN Office Copies associated with R.11-10-023 for the period March 2, 2013 to July 17, 2013 (14 black & white copies)	\$1.40

Date	Atty	Case	Task	Description	Amount
<u>Total: \$Copies</u>					\$24.90
<u>Activity: \$Phone</u>					
2/15/2013	**	R11-10-023	\$Phone	Sprint Invoice 02/15/2013	\$1.09
3/15/2013	**	R11-10-023	\$Phone	Sprint Invoice 03/15/2013	\$2.12
4/15/2013	**	R11-10-023	\$Phone	Sprint Invoice 04/15/2013	\$6.15
5/15/2013	**	R11-10-023	\$Phone	Sprint Invoice 05/15/2013	\$2.79
<u>Total: \$Phone</u>					\$12.15
<u>Activity: \$Postage</u>					
12/26/2012	rap	R11-10-023	\$Postage	Postage for comments sent to ALJ and Commissioner	\$2.60
3/7/2013	JG	R11-10-023	\$Postage	Postage for Request for Evidentiary Hearings of Sierra Club and The Utility Reform Network sent to ALJ and Commissioner.	\$1.84
3/12/2013	JG	R11-10-023	\$Postage	Postage to send NDA to PG&E Law Department at the request of Tom Long.	\$1.32
3/28/2013	JG	R11-10-023	\$Postage	Postage for Amended Request For Evidentiary Hearings Of Sierra Club And TURN sent to ALJ and Commissioner.	\$2.24
4/5/2013	JG	R11-10-023	\$Postage	Postage of Comments of TURN sent to ALJ Gamson (not sent to Commissioner Ferron per his request).	\$1.12
4/15/2013	JG	R11-10-023	\$Postage	Postage for Post-Workshop Reply Comments Of The Utility Reform Network On Flexible Capacity Proposals sent to ALJ (not sent to Commissioner Ferron per his request of no hard copy mailings).	\$1.72
4/15/2013	JG	R11-10-023	\$Postage	Postage for Motion Of TURN For Leave To File Under Seal Confidential Attachment 4 To Its Post-Workshop Reply Comments On Flexible Capacity Proposals sent to ALJ and Docket Office for filing.	\$1.92

Date	Atty	Case	Task	Description	Amount
6/17/2013	JG	R11-10-023	\$Postage	Postage for comments of TURN on the proposed decision adopting a flexible capacity framework sent to ALJ only (not sent to Commissioner per his request of no hard copies).	\$0.92
Total: \$Postage					\$13.68
Grand Total					\$50.73

**Attachment 4**  
**Allocation of Hours**

## ALLOCATION OF HOURS

R.11-10-023

ATTORNEYS AND CONSULTANTS

	Billing Period	Hourly Rate				Total Substantive Hours	Total Compensation (non-travel, non-comp)
			Flex Cap	LCR	GP		
Hayley Goodson	2012	\$325.00	4.25		0.25	4.50	\$1,462.50
	2013	\$340.00	7.25			7.25	\$2,465.00
Kevin Woodruff	2012	\$240.00	27.75	1.50	1.25	30.50	\$7,320.00
	2013	\$240.00	123.00	2.00	1.25	126.25	\$30,300.00
Thomas Long (T. Long)	2013	\$555.00	52.75	0.25	5.25	58.25	\$32,328.75
<b>TOTAL</b>			215.00	3.75	8.00	226.75	<b>\$73,876.25</b>