

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

[Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms.	Rulemaking 11-02-019 (Filed February 24, 2011)
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**INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK**

Claimant: The Utility Reform Network (TURN)	For contribution to Decision (D.) 13-12-053
Claimed: \$ 35,713.99	Awarded: \$
Assigned Commissioner: Florio	Assigned ALJ: Bushey
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: 2/24/14	Printed Name: Thomas J. Long

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

A. Brief Description of Decision:	Decision 13-12-053 finds that Pacific Gas and Electric Company (PG&E) violated Rule 1.1 of the Commission's Rules of Practice and Procedure by delaying by several months the correction of a material misstatement in pleadings to the Commission and by mischaracterizing the correction as routine and non-substantive "errata." The Decision fines PG&E \$14.35 million for these violations.
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B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Claimant	CPUC Verified
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Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	June 2, 2011	
2. Other Specified Date for NOI:	N/A	
3. Date NOI Filed:	June 22, 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.11-11-008	
6. Date of ALJ ruling:	1/3/12	
7. Based on another CPUC determination (specify):	n/a	
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:	P.10-08-016	
10. Date of ALJ ruling:	11/22/10	
11. Based on another CPUC determination (specify):	n/a	
12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.13-12-053	
14. Date of Issuance of Final Order or Decision:	12/24/13	
15. File date of compensation request:	2/24/14	
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.)

Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC

TURN recommended that the Commission find that PG&E violated Rule 1.1 by delaying in correcting the record regarding the Line 147 Maximum Allowable Operating Pressure (MAOP) for over seven months.	TURN Opening Brief (OB), filed 9/26/13, pp. 1, 5-8 D.13-12-053, pp. 14-15	
TURN recommended that the Commission find that PG&E violated Rule 1.1 by submitting the misleading “errata” document to disclose its recordkeeping and MAOP errors.	TURN OB, 9/26/13, pp. 1, 3-5 D.13-12-053, pp. 15-18	
TURN recommended that the Commission levy the maximum fine for PG&E’s Rule 1.1 violations.	TURN OB, 9/26/13, pp. 8-9 D.13-12-053, pp. 18-20	
TURN recommended that the Commission reject PG&E’s narrow reading of the scope of the Order to Show Cause	TURN Reply Comments on Alternate Proposed Decision, 12/2/13, p. 4 D.13-12-053, pp. 20-21	

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

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding? ¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: CPUC’s Safety and Enforcement Division (SED), and City of San Bruno (CSB)		
d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: Although TURN and the other parties named above shared an interest in ensuring that PG&E was appropriately sanctioned for its Rule 1.1 violations, each of the parties emphasized different points and made		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

different recommendations. In the initial briefs, only TURN recommended that PG&E face the maximum \$50,000 fine for its continuing (per day) violations. (ORA and CSB later endorsed TURN’s proposal in their Reply Brief.) TURN’s recommended total fine of \$12.7 million was the closest of all the parties to the Decision’s final \$14.35 million fine. In contrast, SED proposed much lower fines (\$75,000) based on a different statutory provision, ORA initially focused on structural remedies rather than fines, and CSB did not make a specific fine proposal.

In addition, as reflected in the entries in TURN’s timesheet marked with the “Coord” (for Coordination) code, TURN and the other parties actively coordinated their efforts to minimize duplication of effort. Consequently, other parties devoted much of their time to issues on which TURN did not focus, such as attorney-client privilege issues (a focus of CSB’s work), rebutting PG&E’s claim that SED staff was fully aware of PG&E’s errors (a focus of SED’s pleadings), structural problems evidenced by PG&E’s violations (a focus of ORA), and researching and rebutting PG&E’s arguments regarding intent as an essential element of a Rule 1.1 violation (a focus of ORA). The coordination among intervenors was particularly evident at the oral argument in which TURN alone focused on providing a factual chronology related to PG&E’s violations, allowing the other intervenors to address other issues.

For all of these reasons, TURN submits that the Commission should find that there was no undue duplication between TURN’s participation and that of the other intervenors.

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>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)</p> <p>Although the Decision did not have a direct impact on rates, TURN would submit that its participation had an important impact on promoting compliance with the Commission’s regulations and, in particular, ensuring timely, candid and complete disclosure of material utility errors that the Commission previously relied upon in its decisionmaking. The benefits of such compliance – in terms of enhanced safety and more effective and</p>	<p>CPUC Verified</p>
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efficient regulation – are sure to outweigh the relatively small amount of compensation that TURN claims here.

b. Reasonableness of Hours Claimed.

TURN was able to achieve its substantial contributions through the expenditure of a modest amount of time – less than 70 hours, which equates to less than two weeks of full-time work. TURN was able to be highly efficient because of Mr. Long’s considerable previous experience – in this docket and in the enforcement cases, I.11-02-016 and I.12-01-007 -- dealing with PG&E pipeline safety and recordkeeping issues. As a result, despite the technical complexity of the underlying issues related to MAOP and recordkeeping, TURN did not need to retain an expert consultant. The only other attorney to incur time, Mr. Finkelstein, spent less than one hour researching a legal issue (responding to a PG&E due process contention) concerning the “harmless error doctrine” that drew upon his considerable appellate expertise. TURN’s efficiency is further demonstrated by the fact that TURN’s pleadings focused on the issues of most interest to the Commission in its Decision and avoided discussions that ultimately proved extraneous to the Commission’s decisionmaking.

TURN here only claims hours that relate to its substantial contribution on the Rule 1.1 OSC and excludes hours that were devoted exclusively to the contemporaneously issued “Substantive OSC”. Some hours that were common to both OSCs, denoted as GP (for General Preparation) in the attached timesheet, are included here because they were necessarily incurred in order to make TURN’s substantial contributions to D.13-12-053.

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 timesheet.

TURN’s request also includes 5.50 hours devoted to the preparation of this request for compensation by Mr. Long. This is a modest and reasonable figure that reflects the minimum time necessary to prepare a quality claim for compensation addressing all of the Commission’s requirements. Mr. Long has prepared this request because of his role as TURN’s attorney in this matter 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
Rule 1.1	Work specifically related to the Rule 1.1 violations and fine amounts.	78%
Coord	Work specifically related to coordinating participation and avoiding duplication with other intervenors.	3%
GP	Work related to general participation in this matter, such as reviewing the OSC, and preparing for and participating in the September 6, 2013 OSC hearing.	10%
Comp	Work related to intervenor compensation.	8%

Because the August 19, 2013 OSC only identified one issue for this portion of the proceeding – whether PG&E should be sanctioned for violating Rule 1.1 – TURN did not subdivide its time devoted to the Rule 1.1 issue into other sub-issues. However, in the event the Commission would like a subdivision of this time, TURN estimates that its hours devoted to the Rule 1.1 issues break down as follows: 55% to the issue of delay in correcting the record, 35% to the issue of the misleading “errata” submission, and 10% to the size of and legal authority for the fine amounts. 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						CPUCA WARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Thomas Long	2013	60.75	\$555	Pending in A.10-02-005 et al. and R.11-10-023 (see Comment 1)	\$33,716.25			
Robert Finkelstein	2013	0.75	\$490	Pending in A.10-02-005 et al. and A.07-06-031 (see Comment 1)	\$367.50			
<i>Subtotal:</i> \$ 34,083.75						<i>Subtotal:</i> \$		
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 \$

Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Thomas Long	2014	5.5	\$277.50	½ of 2013	\$1,526.25			
Subtotal: \$1,526.25						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopying	Expenses associated with photocopying pleadings related to the Rule 1.1 OSC in R.11-02-019			\$9.20			
	Computerized Legal Research	Expenses associated with computerized legal research related to legal issues raised by the Rule 1.1 OSC			\$76.15			
	Telephone	Telephone expense related to the Rule 1.1 OSC			\$3.68			
	Postage	Expenses associated with mailing pleading related to the Rule 1.1 OSC			\$14.96			
TOTAL REQUEST: \$35,713.99						TOTAL AWARD: \$		
<p>When entering items, type over bracketed text; add additional rows as necessary.</p> <p>*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.</p> <p>**Travel and Reasonable Claim preparation time are compensated at ½ of preparer's normal hourly rate.</p>								
Attorney		Date Admitted to CA BAR ²		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Thomas Long		December 11, 1986		124776		No		
Robert Finkelstein		June 13, 1990		146391		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	Certificate of Service
2	Daily Time Records for Attorneys with Coded Time Entries
3	Cost Detail
Comment 1	Hourly Rates for TURN Attorneys:

² This information may be obtained at: <http://www.calbar.ca.gov/>.

	<p>TURN seeks hourly rates for its staff attorneys at levels that the Commission has previously adopted, increased for 2013 consistent with Resolution ALJ-287. The following describes the basis for the requested rates.</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, R.11-10-023 and A.07-06-031.</p> <p><u>Robert Finkelstein</u>: For Mr. Finkelstein's work in 2013, TURN seeks an hourly rate of \$490, an increase of 2% from the rate authorized in D.13-08-022 for his work in 2012. This is the general 2.0% increase provided for in Res. ALJ-287. TURN has previously requested this 2013 rate for Mr. Finkelstein in A.10-02-005 et al. and A.07-06-031.</p>
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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)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Disposition

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

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to 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 Pub. Util. 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 compound 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 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

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 with Coded Time Entries

Date	Atty	Case	Task	Description	Time Spent
<u>Attorney: BF</u>					
11/21/2013	BF	R11-02-019	Rule 1.1	Discuss Rule 1.1 PD reply cmts w/ TLong; review materials for citations to cases on prejudice from inadequate process	0.75
Total: BF					0.75
<u>Attorney: TL</u>					
8/19/2013	TL	R11-02-019	GP	Rev OSC and PG&E errata filing/Florio remarks re MAOP for peninsula lines	0.25
9/3/2013	TL	R11-02-019	GP	Review PG&E verified statement	0.75
9/5/2013	TL	R11-02-019	GP	Prep for OSC hearings	0.50
9/6/2013	TL	R11-02-019	Coord	Discuss strategy, next steps re OSC w/DRA, San Bruno, CPSD	0.75
9/6/2013	TL	R11-02-019	GP	Prep for OSC hearings	0.50
9/6/2013	TL	R11-02-019	GP	Attend, participate in OSC hearings	4.75
9/10/2013	TL	R11-02-019	Coord	E-mails w/T. Bone (DRA) re party to seek sanctions against for late ""errata"" submission	0.25
9/25/2013	TL	R11-02-019	Rule 1.1	Review record re OSC re Rule 1.1	3.25
9/25/2013	TL	R11-02-019	Rule 1.1	Draft open brief re OSC re Rule 1.1 violations	4.75
9/26/2013	TL	R11-02-019	Rule 1.1	Draft open brief re OSC re Rule 1.1 violations	2.50
9/26/2013	TL	R11-02-019	Rule 1.1	Initial review of PG&E, SB, DRA opening briefs	0.50
9/30/2013	TL	R11-02-019	Coord	Coordinate w/DRA (T. Bone) re reply brief issues	0.25
9/30/2013	TL	R11-02-019	Rule 1.1	Detailed review and analysis of PG&E opening brief	0.50
9/30/2013	TL	R11-02-019	Rule 1.1	Research re burden of proof	0.75
9/30/2013	TL	R11-02-019	Rule 1.1	Initial review of SED opening brief	0.25
10/1/2013	TL	R11-02-019	Rule 1.1	Draft reply brief re Rule 1.1 violations	4.75
10/2/2013	TL	R11-02-019	Rule 1.1	Ph call w/T. Foss (CPUC Legal) re penalty statute issues	0.25
10/30/2013	TL	R11-02-019	Rule 1.1	Initial review and analysis of PD re Rule 1.1 violations	0.75
11/4/2013	TL	R11-02-019	Rule 1.1	Initial review of Ferron Alternate	0.25
11/5/2013	TL	R11-02-019	Rule 1.1	Prep e-mail to Ferron advisors to clarify due date for comments	0.25
11/5/2013	TL	R11-02-019	Rule 1.1	Compare Ferron Alt to PD	0.75
11/13/2013	TL	R11-02-019	Rule 1.1	Prep cmts on Bushey PD	0.75
11/14/2013	TL	R11-02-019	Rule 1.1	Prep cmts on Bushey PD	2.25
11/19/2013	TL	R11-02-019	Rule 1.1	Prep cmts on Bushey PD	2.00
11/19/2013	TL	R11-02-019	Rule 1.1	Initial review of op cmts on Bushey PD	0.50
11/20/2013	TL	R11-02-019	Coord	Discuss w/ T. Bone (ORA), D.Gruen (SED) responses to PG&E arguments in op cmts	0.50
11/21/2013	TL	R11-02-019	Rule 1.1	Prep reply comments on Bushey PD	2.25
11/22/2013	TL	R11-02-019	Rule 1.1	Prep reply comments on Bushey PD	1.75
11/25/2013	TL	R11-02-019	Rule 1.1	Research re burden of proof cases	0.75
11/25/2013	TL	R11-02-019	Rule 1.1	Prep reply comments on Bushey PD	3.75
11/25/2013	TL	R11-02-019	Rule 1.1	Prep cmts on Ferron Alt	1.00
11/25/2013	TL	R11-02-019	Rule 1.1	Initial review of other parties' reply cmts on PD and opening cmts on APD	0.50
11/26/2013	TL	R11-02-019	Rule 1.1	Prep reply comments on APD	0.50
11/26/2013	TL	R11-02-019	Rule 1.1	Prep for oral argument	0.25
11/26/2013	TL	R11-02-019	Rule 1.1	Detailed review and analysis of PG&E cmts on Ferron Alt	0.75
11/26/2013	TL	R11-02-019	Coord	Coordinate re oral arg w/ ORA, CSB, SED, CCSF	0.50
11/27/2013	TL	R11-02-019	Rule 1.1	Prep reply comments on APD	3.50
11/27/2013	TL	R11-02-019	Rule 1.1	Prep for oral arg	0.50
11/30/2013	TL	R11-02-019	Rule 1.1	Prep for oral arg	3.75
12/2/2013	TL	R11-02-019	Rule 1.1	Finalize reply cmts re Ferron APD	0.25
12/2/2013	TL	R11-02-019	Rule 1.1	Take part in oral argument	2.25
12/2/2013	TL	R11-02-019	Rule 1.1	Prep chronology handout for oral argument	1.00
12/2/2013	TL	R11-02-019	Rule 1.1	Prep for oral argument	3.00
12/3/2013	TL	R11-02-019	Rule 1.1	Review reply cmts re Ferron Alt.	0.25
12/18/2013	TL	R11-02-019	Rule 1.1	Rev revised Ferron alternate re Rule 1.1	0.25
12/19/2013	TL	R11-02-019	Rule 1.1	Listen to CPUC agenda meeting re decision re Rule 1.1	0.50
Total: TL					60.75
2/11/2014	TL	R11-02-019	Comp	Prep Rule 1.1 comp request	1.50
2/20/2014	TL	R11-02-019	Comp	Prep Rule 1.1 comp request	1.50
2/21/2014	TL	R11-02-019	Comp	Prep Rule 1.1 comp request	2.50
Total: TL Comp					5.50
Grand Total					67.00

**Attachment 3:
Cost Detail**

Date	Atty	Case	Task	Description	Amount
<u>Activity: \$Copies</u>					
9/3/2013	JG	R11-02-019	\$Copies	Copies of Reply Comments sent to ALJ and Commissioner.	\$1.00
9/26/2013	JG	R11-02-019	\$Copies	Copies of Opening brief of TURN in regards to the order to show cause why Pacific Gas & Electric Company should not be sanctioned for violations of rule 1.1 sent to ALJ and Commissioner.	\$2.40
10/1/2013	JG	R11-02-019	\$Copies	Copies for Reply brief of TURN In response to the order to show cause why PG&E company should not be sanctioned for violations of rule 1.1 sent to ALJ and Commissioner	\$2.00
11/19/2013	JG	R11-02-019	\$Copies	Copies of Comments of The Utility Reform Network On The Proposed Decision Of Administrative Law Judge Bushey Imposing Sanctions For Violation Of Rule 1.1 Of The Commission's Rules Of Practice And Procedure sent to ALJ and Commissioner.	\$1.20
11/25/2013	JG	R11-02-019	\$Copies	Copies of Comments of TURN sent to ALJ and Commissioner.	\$0.80
11/25/2013	JG	R11-02-019	\$Copies	Copies of Reply Comments of TURN on Proposed Decision of ALJ Bushey Imposing Sanctions For Violation of Rule 1.1 sent to ALJ and Commissioner.	\$1.20
12/2/2013	JG	R11-02-019	\$Copies	Copies of Reply Comments Of TURN On The Alternative Proposed Decision Of Commissioner Ferron Imposing Sanctions For Violation Of Rule 1.1 Of Commission's Rules Of Practice And Procedure sent to ALJ (not sent to Commissioner per his request of no paper mailings.)	\$0.60
Total: \$Copies					\$9.20
<u>Activity: \$Lexis Research</u>					
10/31/2013	**	R11-02-019	\$Lexis Research	LexisNexis October 2013 Invoice	\$7.12
11/30/2013	**	R11-02-019	\$Lexis Research	LexisNexis November 2013 Invoice	\$69.03
Total: \$Lexis Research					\$76.15
<u>Activity: \$Phone</u>					
10/15/2013	**	R11-02-019	\$Phone	Sprint Invoice 10/15/2013	\$0.19

Date	Atty Case	Task	Description	Amount
10/31/2013 **	R11-02-019	\$Phone	Telepacific Invoice 10/31/2013	\$3.49
Total: \$Phone				\$3.68
<u>Activity: \$Postage</u>				
9/3/2013 JG	R11-02-019	\$Postage	Postage for Reply Comments sent to ALJ and Commissioner.	\$2.24
9/26/2013 JG	R11-02-019	\$Postage	Postage for Opening brief of TURN in regards to the order to show cause why Pacific Gas & Electric Company should not be sanctioned for violations of rule 1.1 sent to ALJ and Commissioner.	\$3.04
10/1/2013 JG	R11-02-019	\$Postage	Postage for Reply brief of TURN In response to the order to show cause why PG&E company should not be sanctioned for violations of rule 1.1 sent to ALJ and Commissioner	\$2.24
11/19/2013 JG	R11-02-019	\$Postage	Postage for Comments of The Utility Reform Network On The Proposed Decision Of Administrative Law Judge Bushey Imposing Sanctions For Violation Of Rule 1.1 Of The Commission's Rules Of Practice And Procedure sent to ALJ and Commissioner.	\$2.24
11/25/2013 JG	R11-02-019	\$Postage	Postage for Comments of TURN sent to ALJ and Commissioner.	\$1.84
11/25/2013 JG	R11-02-019	\$Postage	Postage for Reply Comments of TURN on Proposed Decision of ALJ Bushey Imposing Sanctions For Violation of Rule 1.1 sent to ALJ and Commissioner.	\$2.24
12/2/2013 JG	R11-02-019	\$Postage	Postage for Reply Comments Of TURN On The Alternative Proposed Decision Of Commissioner Ferron Imposing Sanctions For Violation Of Rule 1.1 Of Commission's Rules Of Practice And Procedure sent to ALJ (not sent to Commissioner per his request of no paper mailings.)	\$1.12
Total: \$Postage				\$14.96
Grand Total				\$103.99

invoice no:	invoice date
1311046539	30-nov-13

account number
112z08

billing period 01-nov-13 - 30-nov-13

invoice to:
 utility reform network
 san francisco ca 94102

**itemization of lexisnexis & related charges
 account summary by client**

client	contract use		transactional use		total before tax	tax	total charges	
	gross amount	adjustment	net amount	over the cap				outside contract
a12-03-001	\$ 41.00	(\$ 34.08)	\$ 6.92	-	-	\$ 6.92	-	\$ 6.92
a13-09-010	\$ 93.00	(\$ 77.30)	\$ 15.70	-	-	\$ 15.70	-	\$ 15.70
comp petition p1311001	\$ 164.00	(\$ 136.31)	\$ 27.69	-	-	\$ 27.69	-	\$ 27.69
general work	\$ 82.00	(\$ 68.16)	\$ 13.84	-	-	\$ 13.84	-	\$ 13.84
i.12-10-013	\$ 457.00	(\$ 379.86)	\$ 77.14	-	-	\$ 77.14	-	\$ 77.14
r09-06-019 ph2	\$ 77.00	(\$ 64.00)	\$ 13.00	-	-	\$ 13.00	-	\$ 13.00
r09-06-019 ph2 rate complaint	\$ 318.00	(\$ 264.32)	\$ 53.68	-	-	\$ 53.68	-	\$ 53.68
r11-02-019	\$ 409.00	(\$ 339.97)	\$ 69.03	-	-	\$ 69.03	-	\$ 69.03
account total:	\$ 1,641.00	(\$ 1,364.00)	\$ 277.00	\$ 0.00	\$ 0.00	\$ 277.00	\$ 0.00	\$ 277.00