

ATTACHMENT 4 – TO WEM INTERVENOR COMPENSATION CLAIM – R.1203014

STATEMENT OF JEAN MERRIGAN IN SUPPORT OF REQUESTED HOURLY RATE

1. My name is JEAN MERRIGAN. Since February 2013, I have worked with Women's Energy Matters, as a Ratepayer Advocate, primarily working on I.1210013, the SONGS Investigation.

2. My participation in I.1210013 has included researching the issues, indexing thousands of pages of testimony, and writing and filing WEM testimony, comments and briefs. I also participated in over two and a half weeks of Evidentiary Hearings in Phases 1, 1(a) and 2 of the SONGS OII, which included preparing WEM's exhibits and questions, and cross-examining utility witnesses. In January 2014, I participated in an All Party Meeting in I.1210013 called by Commissioner Sandoval. In preparation for that meeting I requested and attended ex parte meetings with Commissioner Peterson and her advisors, Commissioner Florio and his Chief of Staff, and with Amy Baker, advisor to Commissioner Sandoval.

3. I have worked in the legal profession since 1980, providing legal support services to trial attorneys.

4. I have a B.A. in history from U.C. Berkeley and an M.A. in Radio and Television from San Francisco State University. I have expertise related to mass media, which I have used effectively in the SONGS proceeding, bringing to light evidence of Southern California Edison's misuse of ratepayer funds for self-serving and misleading corporate public relations campaigns. In Phase 1 of I.1210013 I prepared a content analysis of SCE's SONGS-related Community Outreach and Emergency Preparedness Materials, and a cost analysis of SCE's spending related to Community Outreach and Emergency Preparedness, both of which are entered into the record. In Phase 2 of I.1210013, I brought to light the fact that SCE used ratepayer funds to pay for a 2013 corporate PR campaign regarding whether or not the CPUC should order ratepayer refunds as a result of the SONGS outages.

5. I have over 20 years experience working as an activist on issues related to Nuclear Policy. This included work with Women's International League for Peace & Freedom, and work providing web content for a bilingual Japanese/English website that originated after the March 11, 2011 Fukushima disaster.

6. In 2011 I audited Dan Hirsch's Nuclear Policy course at the University of California, Santa Cruz.

7. In February 2013 I began working with Barbara George at Women's Energy Matters, to assist her with the SONGS OII proceeding.

8. Prior to her death, Ms. George discussed the LTPP proceeding (R.1203014) with me, advising me which issues she believed were most important, which helped me when it came time to review the proceeding to prepare the compensation requests for D.1302015 and D.1212010. In the course of preparing this comp. request, I reviewed all of WEM's filings in the LTPP to support WEM's claim.

8. I believe that because of my education, skills and experience, an hourly rate of \$175 is reasonable.

Dated: March 1, 2014

/s/ Jean Merrigan \_\_\_\_\_  
JEAN MERRIGAN