

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans	Rulemaking 12-03-014 (Filed March 22, 2012)
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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	For contribution to Decisions (D.) 12-12-010, 13-02-015, 14-02-040, 14-03-004
Claimed: \$ 297,973.29	Awarded: \$
Assigned Commissioner: Michel Peter Florio	Assigned ALJ: David 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/
Date: 5/13/2014	Printed Name: Matthew Freedman

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

A. Brief Description of Decision:	<p><u>Decision 13-02-015 (Track 1)</u></p> <p>Authorizes Southern California Edison Company (SCE) to procure between 1400 and 1800 Megawatts (MW) of electrical capacity in the West Los Angeles sub-area of the Los Angeles (LA) basin local reliability area and 215-290 MW of the Moorpark sub-area of the Big Creek/Ventura local reliability area. Requires that at least 1000 MW, but not more than 1200 MW, of the LA basin capacity be procured from conventional gas fired resources, 50 MW from energy storage, and at least 150 MW from preferred resources. Authorizes SCE to procure an additional 600 MW of capacity from preferred and/or energy storage resources. Directs SCE to begin a solicitation process and to actively</p>
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	<p>pursue locally-targeted and cost-effective preferred resources.</p> <p><u>Decision 12-12-010 (Track 2)</u></p> <p>Adopts final Standardized Planning Assumptions and Scenarios for Track 2 of the 2012 Long-Term Procurement Plans. These assumptions will be used for forecasting system reliability needs for California’s electricity grid and to determine specific procurement system and bundled need authorizations or requirements for California investor-owned utilities. The California Independent System Operator should use the Standardized Planning Assumptions and Scenarios in this decision to conduct operational flexibility modeling related to renewable integration.</p> <p><u>Decision 14-02-040 (Track 3)</u></p> <p>Adopts changes to long-term procurement planning rules relating to estimating reasonable levels of expected direct access and community choice aggregation departing loads, the definition of incremental capacity eligible to bid into a new generation request for offers, the method for calculating capacity costs for facilities subject to the Cost Allocation Mechanism, and protocols for the selection of Independent Evaluators.</p> <p><u>Decision 14-03-004 (Track 4)</u></p> <p>Authorizes Southern California Edison Company (SCE) to procure between 500 and 700 Megawatts (MW) and San Diego Gas & Electric Company (SDG&E) to procure between 500 and 800 MW by 2022 to meet local capacity needs stemming from the retired San Onofre Nuclear Generation Station (SONGS). Authorizes specific “buckets” of procurement for preferred resources, energy storage and gas-fired resources.</p>
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B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	April 18, 2012	

2. Other Specified Date for NOI:		
3. Date NOI Filed:	May 17, 2012	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.12-11-009	
6. Date of ALJ ruling:	January 3, 2012	
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009	
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?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-03-004	
14. Date of Issuance of Final Order or Decision:	March 14, 2014	
15. File date of compensation request:	May 13, 2014	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment
1	TURN		Regarding lines 5-7 -- The Commission did not issue a formal ruling on TURN’s customer status in R.12-03-014 in response to TURN’s Notice of Intent to claim compensation.

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
<p><u>(1) RENEWABLE INTEGRATION</u></p> <p>Consistent with TURN’s recommendations, the Commission ruled that Renewable Integration needs would not be considered in this proceeding for the purposes of authorizing new procurement by SCE or SDG&E. Any consideration of renewable integration will occur in a future proceeding.</p> <p>SEE COMMENT #1</p>	<p><u>TURN Opening Brief, September 24, 2012, pp. 19-20.</u></p> <p><u>TURN Reply Brief, October 12, 2012, pp. pp. 4-6.</u></p> <p><u>Reply Comments of the Utility Reform Network regarding Post-Workshop Questions, October 23, 2012, pp. 1-2.</u></p> <p><u>Woodruff Direct Testimony, June 25, 2012, pp. 17-20.</u></p> <p>TURN argued against relying upon renewable integration models to require SCE to meet any particular resource flexibility requirement in its procurement.</p> <p><u>Comments of The Utility Reform Network, September 10, 2013</u></p> <p>TURN supported delays in considering Renewable Integration System Needs and urged the Commission not to authorize any new procurement specifically to satisfy claimed unmet system integration needs. (page 4)</p> <p><u>Decision 13-02-015, pages 96-97</u></p> <p>The Commission rejected proposals to rely on the CAISO studies of renewable integration to justify any specific requirements for SCE procurement. The Decision explains that results from the CAISO modeling include a wide range of potential needs (between 0 MW and 4600 MW) and fail to demonstrate</p>	

	<p>“what exact attributes and blend of flexible versus baseload resources are needed.” (page 97) Based on this analysis, the Commission decided not to require SCE to “take into account any particular flexible attributes in its procurement process”.</p> <p><u>Assigned Commissioner and Administrative Law Judge’s Ruling Regarding Track 2 and Track 4 Schedules, September 16, 2013, pages 1, 6-7</u></p> <p>Cancelled Track 2 of proceeding until 2014 LTPP stating “[t]here has been some indication that system flexibility needs may be low or non-existent depending on the level of local capacity procurement authorized in Track 4”. (page 6)</p>	
<p><u>(2) SCE LIVING PILOT</u></p> <p>The Commission directed SCE to take all possible actions to obtain cost-effective demand-side and preferred resources to satisfy local capacity needs. After SCE submitted its “Living Pilot” proposal in response to D.13-02-015, TURN worked with SCE and the Assigned Commissioner to advance the concept. TURN helped to organize, plan and develop the scope of the November 6, 2013 CPUC symposium on SCE’s Living Pilot proposal which was explicitly deemed eligible for intervenor compensation in the symposium notice.</p> <p>SEE COMMENT #2</p>	<p>TURN Track 4 opening brief, November 25, 2013, page 4.</p> <p>TURN urged the Commission not to authorize “all the needs the utilities and CAISO have postulated in their various testimonies” based on various strategies for procuring preferred resources that can meet local needs including SCE’s Living Pilot.</p> <p><u>D.14-03-004</u></p> <p>The Commission found that “SCE’s Living Pilot is a promising concept” (Finding of Fact 56), referenced the November 6, 2013 symposium held to discuss this concept (footnote 149), and noted that it would be “unreasonable to assume” that no resources related to the Living Pilot and other preferred resource initiatives would be able to meet local reliability needs relating to SONGS by 2022. (page 70)</p>	

	<p><u>D.13-02-015</u></p> <p>The Commission directed SCE to take all possible actions “to obtain cost-effective demand-side resources which can reduce the LCR need, and cost-effective preferred resources and energy storage resources to meet LCR needs.” (page 78). SCE subsequently proposed a Living Pilot to implement this requirement.</p>	
<p><u>(3) TRACK 1 / LOCAL CAPACITY REQUIREMENT NEEDS</u></p> <p>The Commission authorized SCE to procure between 50-75% of the quantities the utility proposed. While SCE asked for authority to procure up to 2370 MW (or 3741 MW depending upon the specific location), the Commission approved a need of between 1,400 and 1,800 Megawatts (MW) of electrical capacity in the West Los Angeles sub-area of the Los Angeles (LA) basin local reliability area to meet long-term local capacity requirements. This outcome is consistent with TURN’s recommendation that the Commission authorize procurement sufficient to satisfy 2/3 of the CAISO targets.</p>	<p><u>TURN Opening Brief, September 24, 2012, pp. 1, 4-10, 13</u></p> <p><u>TURN Reply Brief, October 12, 2012, pp. 2-3.</u></p> <p><u>TURN Reply Comments on PD, January 22, 2013, pp. 1-4</u></p> <p>TURN recommended that the Commission authorize, in Track 1, procurement sufficient to satisfy 2/3 of the Local Capacity Requirement (LCR) amounts sought by the CAISO, after adjusting the CAISO analyses to include 50 percent of long-term target or program goal for preferred resources.</p> <p><u>D.13-02-015, pages 1, 62-68, 82, 118, Conclusion of Law 1.</u></p> <p>The Commission authorized Southern California Edison Company (SCE) to procure between 1,400 and 1,800 Megawatts (MW) of electrical capacity in the West Los Angeles sub-area of the Los Angeles (LA) basin local reliability area to meet long-term local capacity requirements (LCRs) by 2021.</p>	
<p><u>(4) TRACK 1 / PROCUREMENT PROCESS</u></p> <p>TURN urged the Commission to ensure that any preferred</p>	<p><u>TURN Comments on PD, January 14, 2013, page 2</u></p> <p>TURN agreed that preferred resources should have ability to compete to meet local need.</p>	

<p>resource procurement will meet the technical requirements to count towards Local Capacity Requirements. The Commission directed SCE to work with the CAISO to develop requirements and performance characteristics in advance of any procurement.</p>	<p><u>TURN Track 1 opening brief, September 24, 2012</u></p> <p>TURN urged the Commission to ensure that there are clear criteria for determining the ability of preferred resources to comply with, and count towards, Resource Adequacy (RA) requirements. TURN also urged the Commission to require that any RFO used to satisfy identified procurement needs should identify the performance characteristics needed to be eligible to count as local RA.</p> <p><u>D.13-02-015</u></p> <p>The Commission agreed that the ISO may not recognize the LCR value of preferred resources unless the SCE and ISO develop requirements and performance characteristics in advance of any procurement process. The Decision directs SCE to consult with the ISO on these issues and document how any upcoming procurement process takes into account these concerns. (pages 74-75) The Decision explicitly directs SCE to “undertake technical studies to integrate certain preferred resources (including energy storage resources) so that they meet local reliability needs, and to work with the ISO to assess the impacts of such resources to meet or reduce LCR needs.” (Finding of Fact 43)</p>	
<p><u>(5) TRACK 1 / PROCUREMENT PROCESS</u></p> <p>The Commission agreed with TURN that SCE should submit a plan for Commission review prior to commencing any</p>	<p><u>TURN Opening Brief, September 24, 2012, pages 16-19.</u></p> <p><u>Woodruff Direct Testimony, June 25, 2012, pages 2, 21-22.</u></p> <p><u>Woodruff Reply Testimony, July 23, 2012, page 16</u></p> <p>TURN urged the Commission to</p>	

<p>authorized procurement and file all executed contracts together in an application.</p>	<p>recognize that SCE is the only entity capable of conducting the needed procurement, that SCE should be directed to report to the Commission on its framework to evaluate options for meeting LCR needs, that the Commission should approve any plan prior to SCE commencing procurement, and that SCE should then solicit and assemble a portfolio of resources to be submitted for approval through an application.</p> <p><u>D.13-02-015, pages 89-92</u></p> <p>Directed SCE to submit its procurement plan for all required and authorized resources in the LA Basin and Big Creek/Ventura areas for review by Commission staff. Prohibits SCE from beginning any solicitation process until Energy Division determines in writing that SCE has complied with the provisions of this Decision. Also states that separate Energy Division approvals are needed for the procurement plan and any request for offers.</p>	
<p>(6) TRACK 1 / PROCUREMENT PROCESS</p> <p>The Commission agreed with TURN that SCE should include a “circuit breaker” in the event that any the procurement of energy storage would result in unreasonable and excessive costs.</p>	<p><u>TURN Opening Brief, September 24, 2012, pages 17-18.</u></p> <p><u>Woodruff Direct Testimony, June 25, 2012, pages 3, 22</u></p> <p><u>TURN Comments on PD, January 14, 2013, pages 3-4</u></p> <p>TURN suggested a “circuit breaker” be included in SCE procurement process to allow procurement of smaller amounts of MW in case of price bids and specifically urged the Commission to include a circuit breaker for storage resources.</p> <p><u>D.13-02-015, pages 88-89</u></p> <p>“TURN recommends allowing SCE to</p>	

	<p>“invoke a price circuit-breaker for storage procurement if storage providers cannot provide resources that help meet local reliability at a reasonable price.” We agree.”</p>	
<p><u>(7) TRACK 1 / PROCUREMENT PROCESS</u></p> <p>The Commission agreed with TURN and SCE that it is reasonable to use both competitive solicitations and cost-of-service contracts authorized under §454.6. The Commission directed SCE to retain cost-of-service contracts as an option where there is significant market power that would be detrimental to ratepayers.</p>	<p><u>TURN Opening Brief, September 24, 2012, pages 16-19.</u></p> <p><u>Woodruff Direct Testimony, June 25, 2012, pages 3, 22</u></p> <p><u>Woodruff Reply Testimony, July 23, 2012, pages 16-17</u></p> <p>TURN suggested SCE should be rely on competitive solicitations unless the presence of extreme market power in certain sub-areas makes it difficult to conduct a competitive solicitation. In such situations, TURN urged SCE to consider offering cost-of-service contracts pursuant to §454.6 to uniquely situated resources especially for the purpose of repowering existing OTC units.</p> <p><u>D.13-02-015, page 86</u></p> <p>“It is reasonable to authorize SCE to use either or both RFOs and cost-of-service contracts in its LCR procurement process. Both methods are intended to fill the LCR needs identified in this order, and to do so consistent with the Loading Order and cost minimization. We agree with SCE and other parties that cost-of-service contracts (also called bilateral contracts) are allowed under § 454.6 under specified circumstances which are likely to result in a procurement process as a result of this decision. Therefore, § 454.6 cost-of-service contracts are an option that SCE will be able to use in situations where there is significant market power that would be detrimental to ratepayers.”</p>	
<p><u>(8) TRACK 1 / COST</u></p>	<p><u>TURN Opening Brief, September 24,</u></p>	

<p><u>ALLOCATION MECHANISM</u></p> <p>The Commission agreed with TURN in declining to revisit the Cost Allocation Mechanism (CAM), rejecting the proposals to allow other Load Serving Entities to “opt-out”, and holding that the costs of resources procured to satisfy the authorizations in the Track 1 decision would be allocated pursuant to the CAM.</p>	<p><u>2012, pages 20-24.</u></p> <p><u>TURN Reply Brief, October 12, 2012, pages 6-8.</u></p> <p><u>Woodruff Direct Testimony, June 25, 2012, pages 2-3, 23-24.</u></p> <p><u>Woodruff Reply Testimony, July 23, 2012, pages 3-6, 8-13</u></p> <p>TURN strongly opposed efforts to make significant changes to CAM including proposals by Direct Access (DA) providers and CCAs to cap CAM costs, to levelize the CAM charge, or to allow an opt-out for any Load-Serving Entity on the terms suggested in this rulemaking.</p> <p>TURN argued that since the new resources that may be authorized in this proceeding are explicitly intended to meet local area reliability needs on behalf of all customers, the Commission should presume that the costs of any new LCR resource commitments satisfy the statutory test and should be allocated to the customers of any load-serving entity operating in the service territory of the incumbent IOU.</p> <p><u>D.13-02-015</u></p> <p>The Decision finds that the costs of new procurement to meet local reliability should be allocated pursuant to the CAM (pages 106-107), rejects all proposals that would modify the CAM (pages 107-110), and declines to authorize the opt-out proposal (page 112).</p>	
<p><u>(9) TRACK 1</u></p> <p>The Commission agreed with TURN and rejected SCE’s request to file a separate</p>	<p><u>TURN Opening Brief, September 24, 2012, pages 26-27.</u></p> <p><u>TURN Reply Brief, October 12, 2012, pages 8-9.</u></p>	

<p>application to adjust its capital structure to take into account debt equivalence issues arising from additional PPAs.</p>	<p>TURN opposed SCE’s request to allow it to file an application to adjust its capital structure to reflect the impact of debt equivalence created by new long-term contracts. TURN urged the Commission to reaffirm the policy in D.09-06-018 rejecting explicit and automatic capital structure adjustments tied to debt equivalence.</p> <p><u>D.13-02-015</u></p> <p>“We will not change our policy from D.09-06-018 and previous decisions. SCE should use its next COC application, or other venue for consideration of COC, to seek any changes it considers appropriate due to debt equivalence for the contracts foreseen from today’s decision.” (page 116)</p>	
<p><u>(10) TRACK 2 / PLANNING ASSUMPTION</u></p> <p>The Commission agreed with TURN and rejected the CAISO proposal to discount Energy Efficiency and Demand Response resources in scenarios and adopt more conservative planning assumptions in general.</p>	<p><u>Reply Comments of The Utility Reform Network in Response to the Assigned Commissioner Ruling Setting forth Standardized Planning Scenarios, October 10, 2012</u></p> <p>TURN recommended the Commission not afford any “high need” scenario “more equal” status by giving it a presumptive label such as “operational reference case” and that uncommitted EE and DR resources should be considered for planning purposes. (page 1)</p> <p><u>Reply Comments of The Utility Reform Network on the Proposed Decision of ALJ Gamson Adopting Track 2 Standardized Planning Assumptions and Scenarios, December 17, 2012</u></p> <p>TURN recommended the Commission maintain traditional planning assumptions and not, as the CAISO</p>	

	<p>seemed to want, “shift to resource planning based on a scenario featuring multiple conservative assumptions”. (pages 1-2)</p> <p><u>D.12-12-010 (Track 2 Assumptions)</u></p> <p>D.12-12-010 did not agree with the CAISO’s request to change its construction and labeling of the planning assumptions listed in the PD or ACR to a more conservative basis.</p>	
<p>(11) TRACK 2 / PLANNING ASSUMPTIONS</p> <p>The Commission agreed with TURN and did not accept PG&E’s request to reduce the amount of imports to be assumed for purposes of modeling need.</p>	<p><u>Reply Comments of The Utility Reform Network on the Proposed Decision of ALJ Gamson Adopting Track 2 Standardized Planning Assumptions and Scenarios, December 17, 2012</u></p> <p>TURN recommended the Commission maintain its original assumption, noting that any concerns over out-of-state resource availability would be addressed in modeling. (page 3)</p> <p><u>D.12-12-010 (Track 2 Assumptions)</u></p> <p>“Imports shall be based on the CAISO Available Import Capability for loads in their control area. This is equal to the CAISO Maximum Imports minus Existing Transmission Contracts (ETCs) outside their control area.” (Attachment A, page 27).</p>	
<p>(12) TRACK 3</p> <p>The Commission agreed with TURN that greater public release of aggregated IOU procurement data would benefit the public, the market and the ability of the CAISO to assess the risk of retirement for existing generating units.</p>	<p><u>TURN’s Opening Comments on Track III Rules Issues, April 26, 2013, pages 3-4.</u></p> <p><u>TURN’s Reply Comments on Track III Rules Issues, May 10, 2013, pages 3-4.</u></p> <p><u>TURN’s Opening Comments on Track III PD, February 18, 2014, pages 2-3.</u></p> <p><u>TURN’s Reply Comments on Track III PD, February 24, 2014, pages 1-2.</u></p> <p>TURN urged the Commission to provide greater public release of</p>	

	<p>aggregated procurement data for the IOUs and other Load-Serving Entities to help inform public assessments of market conditions and to assist the CAISO in determining the extent of intermediate-term contracts with existing resources.</p> <p><u>D.14-02-040, pages 23-24</u> The Commission agreed that “The market will benefit from greater reporting of procurement activity, particularly in the forward time frame where it is currently less open to the public.” The Commission noted that “the CAISO will also benefit from greater reporting of procurement information” in order to “plan around which generating resources will be available to them and how those resources might operate.” To effectuate this goal, the Decision explains “we intend to promote greater reporting of the information that the Commission regularly collects from the utilities, either as aggregate or in specific when advisable.”</p>	
<p>(13) TRACK 3</p> <p>The Commission declined to establish new minimum or maximum procurement levels for the IOUs.</p>	<p><u>TURN’s Opening Comments on Track III Rules Issues, April 26, 2013, pages 2-3.</u></p> <p><u>TURN’s Opening Comments on Track III PD, February 18, 2014, page 4.</u></p> <p>TURN opposed making any changes at this time to IOUs’ minimum or maximum procurement levels because any such limits could increase IOU costs for serving bundled customers.</p> <p><u>D.14-02-040, pages 10-13</u> The Commission declined to establish new minimum or maximum procurement levels for bundled procurement plans. The Decision states</p>	

	<p>that “we agree with TURN that additional minimum procurement requirements for any particular electric product or service could increase ratepayer costs. At this time, we see no corresponding or overriding benefit to further minimum procurement requirements.” (page 13)</p>	
<p>(14) TRACK 3</p> <p>The Commission clarified that upgraded and repowered plants should be allowed to bid into long-term RFOs for new generating capacity.</p>	<p><u>TURN’s Opening Comments on Track III Rules Issues, April 26, 2013, page 5.</u></p> <p><u>TURN’s Reply Comments on Track III Rules Issues, May 10, 2013, page 5.</u></p> <p><u>TURN’s Opening Comments on Track III PD, February 18, 2014, page 5.</u></p> <p>TURN supported allowing incremental capacity from plant upgrades to bid into solicitations as new capacity.</p> <p><u>D.14-02-040</u></p> <p>“We hereby clarify that upgraded and repowered plants are allowed to bid in new generation RFOs” (pages 28-29).</p>	
<p>(15) TRACK 3 / APPLICATION FOR REHEARING OF D.14-02-040</p> <p>TURN opposed the application for rehearing of D.14-02-040 filed by Sierra Club California.</p>	<p><u>TURN response to Sierra Club California Application for rehearing of D.14-02-040, April 18, 2014</u></p> <p>TURN argued that the Bagley-Keene act does not apply to the Procurement Review Groups of the three IOUs. TURN noted that the each PRG does not operate as a “state body”, that PRG meetings do not result in any “actions taken” that can be subject to legal challenge, and that the Commission has not delegated any authority to these advisory groups.</p> <p>At the time of the filing of this request, the Commission had not issued a decision on the Application for Rehearing. TURN expects a decision on the application for rehearing to be issued prior to the issuance of a decision on</p>	

	<p>this compensation request. Rather than submitting a separate compensation request for the very small number of hours associated with this issue, TURN believes that it is more efficient to consolidate these hours into this request.</p>	
<p>(16) TRACK 4 / LOCAL CAPACITY REQUIREMENT NEEDS</p> <p>Consistent with TURN’s overall recommendations, the Commission authorized SCE and SDG&E to procure 500 to 700 (for SCE) or 800 (for SDG&E) MW of new resources to meet local reliability needs.</p>	<p><u>Woodruff Prepared Testimony, September 30, 2013, pages 8-9.</u></p> <p><u>TURN Opening Brief, November 25, 2013, pages 1-2 and 4-5.</u></p> <p><u>TURN Reply Brief, December 16, 2013, pages 1-2.</u></p> <p><u>TURN Comments on Proposed Decision, March 3, 2014, pp. 1-2.</u></p> <p>TURN supported SCE’s and SDG&E’s requests to procure 500 MW of capacity based on the need to take some actions to meet local needs while avoiding rash actions that could lead to over-procurement, but endorsed Proposed Decision’s findings as reasonable. TURN noted that a “large procurement effort could overwhelm future need analyses and other transmission or resource development efforts; the result could be that SCE and SDG&E meet a need figure that is too high and/or meet such needs with only gas-fired generation.” (Reply brief, page 2).</p> <p><u>D.14-04-003, pages 83-85</u></p> <p>The Commission authorized SCE to procure between 500 and 700 MW and SDG&E to procure between 500 and 800 MW. The Commission relied upon TURN’s recommendation (along with those of other parties) in finding that “this range is consistent with the recommendations of many parties and is near the center of the overall zone of reasonableness.” The Commission noted that this authorization was less than “the full amounts needed to meet the LCR</p>	

	<p>needs” with a significant amount of additional procurement to come from alternative resources. In keeping with TURN’s concerns over excessive procurement, the Commission explained that “This range provides greater ratepayer protection against over procurement and simultaneously reduces the likelihood of any reliability impacts from under procurement.”</p>	
<p>(17) TRACK 4 / LOCAL CAPACITY REQUIREMENT NEED DETERMINATIONS</p> <p>The Commission explicitly decided not to authorize procurement based on a need to mitigate the ‘N-1-1’ contingency advocated by the CAISO.</p>	<p><u>Woodruff Prepared Testimony, September 30, 2013, pages 2-3 and 12-27.</u></p> <p><u>TURN Opening Brief, November 25, 2013, pages 2-3 and 5-17.</u></p> <p><u>TURN Reply Brief, December 16, 2013, pages 3-9.</u></p> <p><u>TURN Reply Comments on Proposed Decision, March 10, 2014, p. 1.</u></p> <p>TURN argued Commission should not authorize procurement needed to comply with ‘N-1-1’ contingency at this time due to unknown cost-effectiveness of such investments. TURN provided analysis showing range of potential benefits, costs and probability of occurrence of N-1-1 contingency.</p> <p><u>D.14-04-003, pages 45, 68</u></p> <p>The Commission agreed that authorizing procurement based on a need to mitigate the ‘N-1-1’ contingency would not be cost effective. The Commission found that “it is not reasonable at this time to authorize utilities to procure – and ratepayers to pay the cost of -- the additional resources required to fully mitigate the identified N-1-1 contingency without an SPS.” (page 45) The Decision notes that this determination means that “it is reasonable at this time to authorize procurement of at least 588 MW fewer</p>	

	<p>resources than would be necessary to achieve the ISO’s current reliability objective, with the understanding that actual load shedding would be a very remote possibility and that the ISO has the authority to continue the current SPS in the San Diego area.” (page 68)</p>	
<p>(18) TRACK 4 / COST ALLOCATION MECHANISM</p> <p>The Commission determined that the benefits and costs of new resources will be allocated pursuant to the Cost Allocation Mechanism.</p>	<p><u>Woodruff Rebuttal Testimony, October 14, 2013, pages 1-17.</u></p> <p><u>TURN Opening Brief, November 25, 2013, pages 18-21.</u></p> <p><u>TURN Reply Brief, December 16, 2013, pages 9-11.</u></p> <p><u>TURN Reply Comments on Proposed Decision, March 10, 2014, pp. 1-3.</u></p> <p>TURN argued that, as a matter of law and policy, the benefits and costs of the resources SCE and SDG&E will procure pursuant to the decision’s authorization should be allocated to all customers via the Cost Allocation Mechanism.</p> <p><u>D.14-04-003, pages 4, 120</u></p> <p>The Commission agreed that the costs of all resources authorized in the Track 4 decision should be included in the Cost Allocation Mechanism (CAM). The Decision rejects arguments by AReM/DACC and finds that “the procurement authorized in this decision is for the purpose of ensuring local reliability in the SONGS service area, for the benefit of all utility distribution customers in that area. We conclude that such procurement meets the criteria of Section 365.1(c)(2)(A)-(B). Therefore, SCE and SDG&E shall allocate costs incurred as a result of procurement authorized in this decision, and approved by the Commission.” (page 120)</p>	

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: Natural Resources Defense Council, Sierra Club, Protect Our Communities, Vote Solar, Clean Coalition, California Environmental Justice Alliance, Women’s Energy Matters		
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: TURN coordinated with other intervenors throughout the proceeding as appropriate. To the extent that certain issues were the primary focus of work by other intervenors, such as the role of energy efficiency and preferred resources in the determination of LCR needs, TURN relied upon the work by these other intervenors and devoted substantially fewer hours to those topics than would have been the case <u>but for</u> the participation of these other parties. TURN made significant unique investments of time in renewable integration, preparation for the living pilot symposium, review of LCR needs, procurement practices and rules, and opposition to changes in the Cost Allocation Mechanism. In each of these areas, TURN presented a unique (and in some cases the only) viewpoint and did not duplicate the work performed by other parties. For renewable integration work, other intervenors indicated that they would rely upon TURN’s involvement since the technical modeling issues were extremely complex. As a result, the record of the proceeding reveals little direct duplication between the work of TURN and other intervenors. To the extent that duplication occurred, it was unavoidable due to the large number of parties in the case and a need to ensure that TURN presented a comprehensive position on each of the issues it addressed.		

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

#	Claimant	CPUC	Comment
1	TURN		RENEWABLE INTEGRATION TURN devoted substantial time to reviewing the renewable integration modeling developed by the CAISO, SCE and PG&E. These models were

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.

		<p>to be used in developing estimates of capacity needs that could be satisfied through new procurement. The May 17, 2012 scoping ruling explicitly identified this general issue as a key focus of work for all parties (page 5).</p> <p>For several years, the Commission and other key parties have devoted considerable effort to developing methods for assessing potential additional resources and other system changes needed to integrate renewable generation. Those efforts began well before R.12-03-014 was issued and are continuing in R.13-12-010. TURN expert Woodruff participated in the efforts made during the pendency of R.12-03-014. Much of this effort involved preparing for and participating in the following workshops, meetings and conference calls on the topic with ED and modeling sponsors. All the events listed below prior to September 16, 2013, were reasonably expected to relate consideration of renewable integration issues in Track 2. As to the other meetings:</p> <ul style="list-style-type: none"> • The September 18, 2013 workshop sponsored by Energy Division had been scheduled before September 16, 2013. • The CAISO scheduled the December 9, 2013 call to review their Track 2 efforts. • The meetings PG&E sponsored in January 2014 developed the renewable integration modeling report that has been admitted to the record in R.13-12-010. <table border="1" data-bbox="565 1101 1502 1916"> <thead> <tr> <th data-bbox="565 1101 1081 1177">Sponsor / Type of Meeting / Number</th> <th data-bbox="1081 1101 1502 1177">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="565 1177 1081 1511">CAISO Conference Call (9)</td> <td data-bbox="1081 1177 1502 1511">5/9/12 9/10/12 12/13/12 2/21/13 4/1/13 5/22/13 (with E3) 6/18/13 7/24/13 12/9/13 (with E3)</td> </tr> <tr> <td data-bbox="565 1511 1081 1806">Energy Division Workshop (7)</td> <td data-bbox="1081 1511 1502 1806">5/23/12 (call to prepare for 6/4/12) 6/4/12 9/19/12 4/24/13 5/10/13 8/26/13 9/18/13</td> </tr> <tr> <td data-bbox="565 1806 1081 1916">SCE Conference Call (3)</td> <td data-bbox="1081 1806 1502 1916">3/8/13 5/8/13 9/12/13</td> </tr> </tbody> </table>	Sponsor / Type of Meeting / Number	Date	CAISO Conference Call (9)	5/9/12 9/10/12 12/13/12 2/21/13 4/1/13 5/22/13 (with E3) 6/18/13 7/24/13 12/9/13 (with E3)	Energy Division Workshop (7)	5/23/12 (call to prepare for 6/4/12) 6/4/12 9/19/12 4/24/13 5/10/13 8/26/13 9/18/13	SCE Conference Call (3)	3/8/13 5/8/13 9/12/13
Sponsor / Type of Meeting / Number	Date									
CAISO Conference Call (9)	5/9/12 9/10/12 12/13/12 2/21/13 4/1/13 5/22/13 (with E3) 6/18/13 7/24/13 12/9/13 (with E3)									
Energy Division Workshop (7)	5/23/12 (call to prepare for 6/4/12) 6/4/12 9/19/12 4/24/13 5/10/13 8/26/13 9/18/13									
SCE Conference Call (3)	3/8/13 5/8/13 9/12/13									

		PG&E (2)	1/9/14 (meeting) 1/29/14 (conference call)												
		California Energy Commission Workshop (1)	6/11/12												
<p>Mr. Woodruff also provided written comments to various parties, including several in relation to some of the above meetings, including:</p>															
<table border="1"> <thead> <tr> <th data-bbox="560 528 1039 571">Sponsor</th> <th data-bbox="1039 528 1521 571">Date (in response to date)</th> </tr> </thead> <tbody> <tr> <td data-bbox="560 571 1039 646">CAISO</td> <td data-bbox="1039 571 1521 646">2/22/13 (2/21/13) 3/6/13 (in response to request)</td> </tr> <tr> <td data-bbox="560 646 1039 679">E3</td> <td data-bbox="1039 646 1521 679">5/23/13 (5/22/13)</td> </tr> <tr> <td data-bbox="560 679 1039 797">Energy Division</td> <td data-bbox="1039 679 1521 797">5/21/12 (for 5/23/12 call & 6/4/12 meeting) 12/16/12</td> </tr> <tr> <td data-bbox="560 797 1039 830">SCE</td> <td data-bbox="1039 797 1521 830">3/17/13 (3/8/13)</td> </tr> <tr> <td data-bbox="560 830 1039 873">PG&E</td> <td data-bbox="1039 830 1521 873">1/24/14 (1/9/14)</td> </tr> </tbody> </table>				Sponsor	Date (in response to date)	CAISO	2/22/13 (2/21/13) 3/6/13 (in response to request)	E3	5/23/13 (5/22/13)	Energy Division	5/21/12 (for 5/23/12 call & 6/4/12 meeting) 12/16/12	SCE	3/17/13 (3/8/13)	PG&E	1/24/14 (1/9/14)
Sponsor	Date (in response to date)														
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SCE	3/17/13 (3/8/13)														
PG&E	1/24/14 (1/9/14)														
<p>Mr. Woodruff also discussed renewable integration issues with staff from the above parties and a CAISO modeling vendor (E3).</p>															
<p>In a September 16, 2013 ruling, the Assigned Commissioner canceled further consideration of renewable integration in Track 2 and determined that any future decision addressing system needs related to renewable integration would occur in the next LTPP. As a result, the Commission did not issue a Track 2 formal decision addressing the reasonableness of renewable integration modeling by the CAISO, PG&E and SCE.</p>															
<p>The Commission has previously awarded TURN compensation for work performed in a proceeding where there is no final resolution of some or all of the issues on which TURN participated. In D.13-08-021 (R.10-05-006), the Commission awarded TURN full compensation for 367.75 hours of work on renewable integration in the 2010 LTPP despite the fact that there was no explicit resolution of renewable integration modeling issues in that proceeding. In that case, as is true in this proceeding, TURN's involvement included extensive participation in CAISO and CPUC workshops and detailed review of the modeling assumptions and inputs used by the CAISO and PG&E.</p>															
<p>Given the duration of time associated with the consideration of renewable integration modeling, the Commission should grant compensation for TURN's work on this subject during the course of R.12-03-014 rather than waiting until the conclusion of the next LTPP case. TURN participated in good faith based on the reasonable expectation that these models would be subject to extensive litigation in R.12-03-014. TURN has been the leading consumer representative involved in renewable integration modeling issues for many years and</p>															

		<p>devoted the appropriate amount of effort to this task.</p> <p>The fact that the Commission decided not to complete its consideration of this issue in this proceeding should not serve as the basis for denying TURN any compensation for work on this topic. Nor should the Commission delay compensating TURN for its substantial efforts relating to renewable integration modeling.</p>
2	TURN	<p>SCE LIVING PILOT SYMPOSIUM</p> <p>The Commission should find that TURN’s participation in activities leading up to, and immediately following, the Living Pilot Symposium constitutes a substantial contribution. In D.13-02-015, the Commission explicitly directed SCE to pursue cost-effective demand-side resources, preferred resources and energy storage resources to reduce LCR needs. In response to this requirement, SCE proposed a “living pilot” program that was the subject of a November 6, 2013 Commission symposium (http://www.cpuc.ca.gov/PUC/131106_DefiningTheLivingProject.htm).</p> <p>TURN was contacted by the Assigned Commissioner’s office to participate in the development of the November 6 symposium. TURN consultant Cynthia Mitchell worked closely with the Assigned Commissioner’s office and with SCE to provide ongoing support, guidance and advice to the Commissioner’s office regarding the appropriate scope of work for the symposium. Ms. Mitchell’s engagement involved the shaping of the agenda, the execution of the event itself, and significant follow-up activities.</p> <p>The Commission notice announcing the November 6 Symposium explicitly stated that “intervenor compensation is available for participation.” The Commission subsequently found that the Symposium made a valuable contribution to its understanding of the opportunity to rely on preferred resources to meet LCR needs. In D.14-03-004, the Commission found that “SCE’s Living Pilot is a promising concept” (Finding of Fact 56), referenced the November 6, 2013 symposium held to discuss this concept (footnote 149), and noted that it would be “unreasonable to assume” that no resources related to the Living Pilot and other preferred resource initiatives would be able to meet local reliability needs relating to SONGS by 2022. (page 70)</p> <p>The Commission has routinely awarded compensation for work of this type by intervenors. In D.11-06-012, the Commission awarded compensation for post-decision implementation work on energy efficiency program design including participation in workshops. In D.12-02-012, the Commission awarded compensation to TURN for informal work relating to implementation plans and the development of a pilot program. The Commission also awarded compensation in D.12-07-019 for implementation work that was not reflected in a subsequent Commission decision.</p>

		<p>TURN submits that the work performed by Ms. Mitchell to assist the Commission in the preparation of this symposium (including post-Symposium follow-up) is fully eligible for compensation. Given the fact that the symposium itself was deemed eligible for intervenor compensation, the central role played by Mr. Mitchell in the development of the symposium, and the endorsement in D.14-03-004 as to the usefulness of the symposium, this work should be found to make a substantial contribution.</p>
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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>As demonstrated in the substantial contribution section, TURN’s participation had a very sizable impact on the outcome of each individual decision and the entire proceeding. Although the exact benefits can be difficult to quantify in a policy proceeding, the sum total of these contributions resulted in significant savings to ratepayers as a whole, and to the ratepayers taking bundled service from the three IOUs.</p> <p>There are several contributions that should yield tangible savings for ratepayers. They include:</p> <ul style="list-style-type: none"> • Contributions to the SCE Living Pilot proposal intended to allow cost-effective preferred resources to meet Local Capacity needs at lower cost than conventional alternatives. • Limiting the procurement authorization in Track 1 to ensure that SCE does not overprocure and burden its customers with unreasonable and unnecessary costs. • Successfully proposing the adoption of a ‘circuit breaker’ in the event that the procurement of energy storage would result in unreasonable and excessive costs for ratepayers. • Defeating efforts to weaken the Cost Allocation Mechanism and ensuring that the cost of all local resources procured pursuant to Tracks 1 and 4 will be allocated to all customers rather than just bundled service customers. • Preventing SCE from being authorized to seek specific adjustments to its capital structure based on the procurement authorized in Track 1. Such adjustments would have the effect of raising SCE’s overall cost of capital. 	<p>CPUC Verified</p>
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<ul style="list-style-type: none"> • Promoting reasonable planning and scenario assumptions that will minimize the cost of potential overprocurement by the utilities. • Successfully arguing against the need to mitigate the N-1-1 contingency in determining local resource need, thereby reducing the amount of resources authorized for procurement and lowering total customer costs. <p>Taken together, TURN’s contributions led to substantial ratepayer savings through the avoidance of expenditures that may otherwise have been authorized and promoted strategies for meeting customer needs at least cost.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>Given the breadth and depth of TURN’s contributions to the four Decisions and one Resolution, the amount of time devoted by staff and consultants is fully reasonable. In considering the reasonableness of the request, the Commission should be mindful of the large number of workshops, ALJ rulings requesting specific comments, and complicated analysis sought by the Commission itself. Moreover, this proceeding involved two sets of evidentiary hearings (Track 1 and 4) and review of substantial amounts of materials from the CAISO. In order to effectively participate, TURN was obligated to devote substantial resources to the proceeding. The time devoted to each task was reasonable in light of the complexity of the issues presented.</p> <p><u>Reasonableness of Staffing</u></p> <p>TURN’s attorneys each focused on unique issues and engaged in a minimum of duplication. Matthew Freedman was the lead attorney handling the bulk of the work in the proceeding. Nina Suetake provided backup assistance to Mr. Freedman in 2012 during Track 1 including serving as the lead attorney at a Prehearing Conference when Mr. Freedman was unavailable. Hayley Goodson provided a few hours of assistance on energy efficiency issues. Tom Long, TURN’s legal director, provided oversight as needed throughout the proceeding, participated in Prehearing Conferences and status conferences when Mr. Freedman was unavailable, and took a leading role in overseeing the Track 4 briefing in lieu of Mr. Freedman. Marcel Hawiger took primary responsibility for TURN’s legal work on Track 3 issues.</p> <p>TURN’s consultants each addressed unique issues with Kevin Woodruff handling the bulk of the factual and policy arguments. Kevin Woodruff devoted a large number of hours to monitoring the CAISO renewable integration modeling effort, prepared written testimony in Tracks 1 and 4, provided initial drafts of comments in Tracks 2 and 3, drafted a large</p>	

<p>number of informal comments on renewable integration issues, presented at a CPUC-sponsored workshop in Los Angeles, and was TURN's witness in evidentiary hearings. Mr. Woodruff served as the primary reviewer for the pleadings, testimony, briefs, and comments submitted by other active parties. Given the large number of active parties, the wide range of issues, and the sheer number of activities required to effectively participate over the course of this multi-year proceeding, Mr. Woodruff's work was fully reasonable. Moreover, his efforts significantly reduced the number of hours required by TURN's attorneys (all of whom have higher approved hourly rates) and thereby minimized the overall compensation requested by TURN.</p> <p>Cynthia Mitchell was retained solely to evaluate energy efficiency assumptions and to provide assistance with the SCE Living Pilot symposium. Ms. Mitchell has previously provided TURN with expert advice and testimony in an array of Energy Efficiency proceedings. Bill Marcus provided a few hours of work to assist Kevin Woodruff with cost allocation issues.</p> <p>The Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's relative success on the merits.</p> <p><u>Costs not requested</u></p> <p>Consistent with the guidance provided by the Commission, TURN has omitted a significant number of hours and expenses associated with travel by Kevin Woodruff from Sacramento to San Francisco to attend CPUC workshops and evidentiary hearings. Mr. Woodruff devoted over 40 hours to travel for these activities, none of which are included in this request.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 25 hours devoted to the preparation of this request for compensation. This figure is somewhat higher than the number of hours we customarily devote to requests for compensation. However, preparing this request was particularly time consuming as it covers work over three calendar years, four Commission decisions, numerous formal pleadings filed by TURN, several rounds of testimony in two different tracks, and the review of copious time-keeping records detailing nearly 1100 hours of work by five TURN attorneys and three expert consultants. TURN has previously been awarded a comparable number of hours for compensation requests in cases of this magnitude (for example, see D.14-02-037 in R.12-01-005).</p>	
<p>c. Allocation of Hours by Issue</p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN</p>	

also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.

GP – 29.75 hours – 3% of total

General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This can include reading the initial application, Commission rulings, attendance at all-party meetings, review of Non Disclosure Agreements, reviewing responses to data requests submitted by other parties, participation in hearings that are not specific to one topic, and reviewing pleadings submitted by other parties.

EH – 182.75 hours – 17% of total

All tasks related to participation in Evidentiary Hearings and Prehearing Conferences including preparing cross-examination, attending hearings, and reviewing transcripts. Since these hours do not vary significantly based on the number of issues addressed, they are shown as a separate category.

RenInt – 100.25 hours – 9% of total

Work relating to Renewable Integration modeling as described in Section II(C), Comment #1.

LivPilot – 151.25 hours – 14% of total

Work relating to the Living Pilot Symposium described in Section II(C), Comment #2.

TR1/LCR – 85.7 hours – 8% of total

Work in Track 1 on Local Capacity Requirements including overall need determinations and any related procurement authorizations.

TR1/CAM – 58.45 hours – 5% of total

Work in Track 1 on the issues related to the Cost Allocation Mechanism including a determination that all authorized Track 1 procurement would be subject to this treatment.

TR1/EE – 14.65 hours – 1% of total

Work in Track 1 on the treatment of planning assumptions related to energy efficiency and demand response in the establishment of new local resource needs.

TR1/PROC – 29.55 hours – 3% of total

Work in Track 1 on procurement processes including the need to submit executed contracts via application, ensuring that any preferred resources meets the technical requirements needed to satisfy LCR need, the establishment of a “circuit breaker” for energy storage procurement, and the appropriate use of cost-of-service contracts.

TR1/MISC – 8.4 hours – 1% of total

Work in Track 1 on other miscellaneous issues including SCE's proposal to seek adjustments to its capital structure based on debt equivalence impacts tied to new procurement.

TR2 – 35.25 hours – 3% of total

Work in Track 2 related to standardized planning assumptions and scenarios including assumptions related to imports and the treatment of energy efficiency and demand response resources.

TR3 – 67 hours – 6% of total

Work in Track 3 on long-term procurement planning rules including minimum/maximum procurement levels, public access to utility data, and the eligibility of upgraded and repowered plants to bid into long-term RFOs for new generating capacity.

TR3/AFR – 4.75 hours – <1% of total

Work responding to the Sierra Club Application for Rehearing of Decision 14-02-040.

TR4/LCR – 179.4 hours – 16% of total

Work in Track 4 on Local Capacity Requirements including overall need determinations, the relevance of the N-1-1 contingency, and procurement authorizations.

TR4/CAM – 74.75 hours – 7% of total

Work in Track 4 on the application of the Cost Allocation Mechanism (CAM) to new local resource procurement and proposed changes to the CAM methodology.

TR4/MISC – 44.85 hours – 4% of total

Work in Track 4 not related to specific issues but necessary for effective participation including the review of filings submitted by other parties, responses to motions, internal coordination activities, preparation for prehearing conferences, and review of Commission rulings and proposed decisions.

COMP – 25.75 hours – 2% of total

Work preparing TURN's notice of intent to claim compensation the final request for compensation.

Multi-issue allocators

For hours coded "TR4", TURN allocates 60% to TR4/LCR, 25% to TR4/CAM, and 15% to TR4/MISC

For hours coded "TR1", TURN allocates 30% to TR1/LCR, 30% to TR1/CAM, 10% to TR1/EE, 20% to TR1/PROC and 10% to TR1/MISC.

TURN submits that under the circumstances this information should

suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.	
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B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman	2012	99.25	375	See Comment #1	37,219			
Matthew Freedman	2013	65.25	400	See Comment #1	26,100			
Matthew Freedman	2014	11.5	400	See Comment #1	4,600			
Marcel Hawiger	2012	0.75	375	D.13-08-022	281			
Marcel Hawiger	2013	0.75	400	D.14-05-015	300			
Marcel Hawiger	2014	4.75	400	See Comment #2	1,900			
Nina Suetake	2012	7	315	D.13-08-022	2,205			
Tom Long	2013	39.25	555	D.14-05-015	21,784			
Tom Long	2014	0.5	555	D.14-05-015	416			
Hayley Goodson	2012	5.5	325	D.13-08-022	1,788			
Kevin Woodruff	2012	217	240	D.12-11-050	52,080			
Kevin Woodruff	2013	393.25	240	D.12-11-050	94,380			
Kevin Woodruff	2014	76.75	240	D.12-11-050	18,420			
Cynthia Mitchell	2013	144.25	200	See Comment #3	28,850			
William Marcus	2012	0.75	260	D.13-08-022	195			
Subtotal: \$ 290,518						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Matthew Freedman	2012	0.75	\$187.5	@50% of 2012 rate (See Comment #1)	141			

Matthew Freedman	2014	25	\$200	@50% of 2014 rate (See comment #1)	5,000			
Subtotal: \$5,141						Subtotal: \$		
COSTS								
#	Item	Detail	Amount	Amount				
1	Consultant Travel	Travel for Cynthia Mitchell (Reno to SF) for Living Pilot Symposium, Travel for Kevin Woodruff from Sacramento to Los Angeles. See Comment #4	688.80					
2	Consultant Lodging	Lodging for Cynthia Mitchell for Living Pilot Symposium, Lodging for Kevin Woodruff in Los Angeles to attend CPUC workshop, Lodging for Kevin Woodruff during Track 1 evidentiary hearings. See Comment #4	1,214.11					
3	Copies	Copies for evidentiary hearings and pleadings	346.87					
4	Postage	Costs of mailing copies of pleadings and testimony	65.38					
Subtotal: \$2,315.16						Subtotal: \$		
TOTAL REQUEST: \$297,973.29						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 ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matthew Freedman	March 29, 2001	214812	No
Hayley Goodson	December 5, 2003	228535	No
Marcel Hawiger	January 23, 1998	194244	No
Tom Long	December 1986	124776	No
Nina Suetake	December 2004	234769	No

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

Attachment or Comment #	Description/Comment
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² This information may be obtained at: <http://www.calbar.ca.gov/>.

Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details
Comment 1	<p>2012 Hourly Rate for Matthew Freedman</p> <p>For Mr. Freedman’s work in 2012, TURN seeks an hourly rate of \$375, an increase of 7.2% from the previously awarded rate of \$350 for 2011. This increase is consistent with the general 2.2% cost-of-living increase provided for in Res. ALJ-281, plus the first of two 5% step increases available with his move to the 13+ years experience tier.</p> <p>TURN previously received a rate of between \$350 and \$360 for Mr. Freedman’s 2012 hours. The Commission awarded \$350 in D.12-07-019, \$358 in D.13-09-020, and \$360 in D.13-02-032 and D.13-05-008. TURN currently has three pending requests for compensation that include 2012 hours for Mr. Freedman at either the 2011 rate (in A.10-11-002) or at the \$375 rate (in A.11-06-007, filed June 3, 2013 and A.11-10-002, filed March 24, 2014). TURN is not seeking to change the hourly rate for Mr. Freedman’s work in 2012 for any of the pending or awarded requests that include his 2012 work.</p> <p>However, TURN is seeking a \$375 rate for 2012 work in A.11-06-007, in A.11-10-002, in this proceeding, and in all future compensation requests that include 2012 hours for Mr. Freedman, consistent with the Commission’s prior decisions and resolutions providing for step increases.</p> <p>2013 Hourly Rate for Matthew Freedman</p> <p>For Mr. Freedman’s work in 2013, TURN seeks an hourly rate of \$400, an increase of 7.2% from TURN’s requested rate of \$375 for 2012. This increase is consistent with the general 2% cost-of-living increase provided for in Res. ALJ-287, plus the second of two 5% step increases available with his move to the 13+ years experience tier.</p> <p>2014 Hourly Rate for Matthew Freedman</p> <p>For Mr. Freedman’s work in 2014, TURN seeks the same hourly rate as for his work in 2013. At the time of the submission of this request for compensation, the Commission had not adopted a general COLA for 2014. When the Commission adopts a COLA for 2014, TURN would request that Mr. Freedman’s hourly rate for 2014 be adjusted accordingly.</p>
Comment 2	<p>2013 Hourly Rate for Marcel Hawiger</p> <p>The Commission has adopted an hourly rate of \$375 for Mr. Hawiger for 2012, in D.13-08-022 and an hourly rate of \$400 in D.14-05-015 (Sempra 2012 GRC). For Mr. Hawiger’s work in 2014, TURN seeks the same hourly rate as for his work in 2013. At the time of the submission of this request for compensation, the Commission had not adopted a general COLA for 2014. When the Commission adopts a COLA for 2014, TURN would request that Mr. Hawiger’s hourly rate for 2014 be adjusted accordingly.</p>
Comment 3	<p>2013 Hourly rate for Cynthia Mitchell</p> <p>TURN seeks an hourly rate of \$200 for Ms. Mitchell’s work in 2013. The Commission last approved a rate of \$180 for her work during 2009 in D.11-06-012 (in A.08-07-021). Ms. Mitchell increased her actual billing rate for 2013 to \$200, and TURN requests that the Commission authorize \$200 as the reasonable billing rate for Ms. Mitchell in this proceeding based on her extensive experience and the criteria adopted by the Commission for setting appropriate market rates for expert witnesses. TURN has also requested a \$200 rate for 2013 work by Ms. Mitchell in a pending request in R.12-01-005 (filed November 12, 2013).</p>

	<p>Ms. Mitchell's prior 2011 billing rate of \$180 was based on her experience as an expert in utility demand-side management activities. Ms. Mitchell has worked for over 35 years in the energy and utility industry. She has held positions in government and consulting. Ms. Mitchell was the energy specialist for Utah Community Action Association on utility rate issues for seniors and low income, and the chief economist for the Nevada Attorney General's Bureau of Consumer Protection. As a consultant Ms. Mitchell has served as the expert witness to state public utility commissions and consumer advocate offices in twelve states and the District of Columbia. Ms. Mitchell's experience includes analysis on traditional utility rate making and regulatory matters with emphasis on cost allocation and rate design; integrated resource planning (IRP), and demand-side management activities. She has consulted for NASUCA and the DOE on integrated resource planning practices.</p> <p>It is reasonable to authorize a rate of \$200 for Ms. Mitchell services for 2013. Ms. Mitchell has not increased her billing rate of \$180 since 2009. If her rate were simply escalated based on the COLA adjustments for 2012 and 2013 authorized in Resolutions ALJ-281 and ALJ-287, her 2013 rate should be \$187 ($180 \times 1.022 \times 1.02$), which results in a rate of \$190 when rounded up. TURN also requests that the Commission authorize a 5% step increase for Ms. Mitchell, as allowed under both Resolution ALJ-281 and 287, which would then result in an hourly rate of \$199.50 ($190 \times 1.05$), or \$200 when rounded. TURN has not requested a 5% step increase previously for Ms. Mitchell. The same rate would result if TURN had requested a 5% step in 2012 ($180 \times 1.022 \times 1.05 \times 1.02 = 197$).</p> <p>Ms. Mitchell has consistently maintained her billing rate for non-profits such as TURN near the lowest endpoint of the range of rates for experts with over 13 years of experience. For example, Table 1 of Res. ALJ-281 shows that the lowest billing rate for an expert with 13+ years of experience is \$155, while the highest rates are at about \$390. Based on her experience of more than 30 years, Ms. Mitchell's billing rate should be closer to the upper end of the range; however, Ms. Mitchell has consistently maintained her rates at an affordable level. The Commission should, however, recognize that Ms. Mitchell's services justify a rate of \$200 based on the factors considered in setting expert hourly rates.</p>
<p>Comment 4</p>	<p>Travel and Lodging Expenses</p> <p>TURN seeks compensation for three instances of travel and lodging by Kevin Woodruff and Cynthia Mitchell:</p> <ol style="list-style-type: none"> (1) Ms. Mitchell traveled from Reno, NV (where she lives and works) to San Francisco to prepare for, and attend, the November 6 CPUC Living Pilot Symposium. (2) Mr. Woodruff traveled from Sacramento to Los Angeles to participate as a panelist in a Joint CPUC/CEC workshop on July 15, 2013 (http://www.energy.ca.gov/2013_energypolicy/documents/2013-07-15_workshop/2013-07-15_Agenda.pdf). (3) Mr. Woodruff required lodging in San Francisco during the Track 1 evidentiary hearings. In order to prepare for cross-examination, review transcripts and be available for hearings each day, it was necessary to have Mr. Woodruff stay in San Francisco. Had Mr. Woodruff not remained in San Francisco, it would not have been possible for TURN to be as effective during the Track 1 hearings due to the amount of additional time consumed for daily travel by Mr. Woodruff. <p>Although TURN consultants engaged in significant amounts of necessary travel (over 40 hours) to participate effectively in this proceeding, TURN is not claiming compensation for any travel time (apart from (1) and (2) discussed above) consistent with guidance provided by</p>

	the Commission.
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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))ff

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

Attachment 2

Daily Time Records For Attorneys and Experts

R.12-03-014 HOURS

Date	Atty	Task	Description	Time Spent
<u>Consultant: C Mitchell</u>				
6/20/13	C Mitchell	LivPilot	begin concept piece for EE/DR solicitations as specific offsets to regional demand and energy requirements, particularly generation retirements SONGS and OTC, and CASIO constrained regions	1.00
6/25/13	C Mitchell	LivPilot	continue concept piece for EE/DR solicitations as specific offsets to regional demand and energy requirements, particularly generation retirements SONGS and OTC, and CASIO constrained regions	2.00
6/26/13	C Mitchell	LivPilot	first draft concept piece for EE/DR solicitations as specific offsets to regional demand and energy requirements, particularly generation retirements SONGS and OTC, and CASIO constrained regions	2.00
6/27/13	C Mitchell	LivPilot	second draft concept piece for EE/DR solicitations as specific offsets to regional demand and energy requirements, particularly generation retirements SONGS and OTC, and CASIO constrained regions	1.00
7/3/13	C Mitchell	LivPilot	work on summary document for next cycle discussion on EE-DR competitive procurement for TURN internal review and consideration	2.50
7/5/13	C Mitchell	LivPilot	continued work on document for next cycle EE-DR competitive procurement with location specific resource offsets related to SONGS, OTC, and CAISO location constrained regions	3.00
7/9/13	C Mitchell	LivPilot	review PG&E EPIC demonstration funding project re. R Alsln suggestion that this could provide suport for developing EE PPA concept further	1.25
7/26/13	C Mitchell	LivPilot	discussion SCE re TURN-NRDC work with SCE on RFP design and protocols for EE and DR bidding	0.25
7/28/13	C Mitchell	LivPilot	review SCE 7-15-13 Track 1 procurement plan filing, begin analysis of SCE proposal to solicit preferred resources EE and DR	2.25
7/29/13	C Mitchell	LivPilot	continue review of SCE filing with focus on SCE's proposed EE and DR ""LIVING Wise"" pilot program	1.50
7/30/13	C Mitchell	LivPilot	continue review and analysis of SCE proposal to solicit preferred resources EE and DR, begin development of summary file on possible issues and concerns for TURN	3.75
7/31/13	C Mitchell	LivPilot	discussion M Freedman re same	0.25
9/3/13	C Mitchell	LivPilot	per request of K WoodruffTURN consultant SCE procurement, review specific section of SCE Track 4 filing on proposed EE and DR activities	1.00
9/10/13	C Mitchell	LivPilot	Respond affirmatively to Comr. Florio's verbal request that I assist him and his staff to develop the symposium. Begin to frame the matter of how to procure 50% of the reliability and load needs from SONGS-out and OTC retirements through preferred resources DR, EE, storage, DG, on a bundled and location-specific basis.	2.00
9/11/13	C Mitchell	LivPilot	continue work begun previous day on Florio Symposium, consider SCE Track 1 specification of the Living Pilot.	2.00
9/12/13	C Mitchell	LivPilot	communications with Comr Florio re. my preliminary framing of the location-specific preferred resources (PR), relationship to Living Pilot; discuss matters re. valuation and metrics relative to CAISO and PRs.	1.00
9/13/13	C Mitchell	LivPilot	respond affirmatively to Gene Rodrigues, SCE verbal request that I assist him with re. Living Pilot, formation of Edison ""Tiger Team"", and Florio Symposium; discussion of matters and next steps	1.00
9/16/13	C Mitchell	LivPilot	additional development and writing re. Florio Symposium	1.00
9/17/13	C Mitchell	LivPilot	begin vision, concept, and approach for Edison Tiger Team	1.00
9/18/13	C Mitchell	LivPilot	begin research, review, and analyses various documents and reports on reliability and load requirements re. SONGS-out and OTC retirements: Assembly Committee on Utilities& Commerce Oversight Hearing on Local Electric Reliability and OTC, June 17th; Jt Agencies Wkshp on Preliminary Reliability Plan for LA Basin and San Diego, Staff Preliminary Plan September 9th; CEC and CPUC Jt Workshp on Electricity Infrastructure Issues Resulting from SONGS Closure, July 15th; CAISO Flexible Resource Adequacy Criteria and Must-Offer Obligation, Market and Infrastructure Policy Revised Straw Proposal, June 13th; CAISO DR and EE Roadmap: Making the Most of Green Grid Resources, Draft June 12th; CPUC Energy Division & Policy and Planning Division Briefing Paper: A Review of Current Issues with LT Resource Adequacy, February 20th.	2.00
9/22/13	C Mitchell	LivPilot	Follow-up conversation Gene Rodrigues re. Edison engagement Florio Symposium, need for Edison Tiger Team engineering of substations, circuits, and loads for location-specific preferred resources	1.00
9/22/13	C Mitchell	LivPilot	Conversation Comr. Florio re. progress on Symposium, how to work more closely with his staff and Policy and Planning Divison, next steps	1.00
9/23/13	C Mitchell	LivPilot	Review Marzia Zafar, Policy and Planning Division (PPD) draft notice for Florio Symposium; offer constructive comments to redirect away from Track 1 ""targeted mass market widgets"", with CAISO current resource adequacy and dispatchability requirements, to bundled preferred resources that are tangible and identifiable at the substation, circuit, and load levels	1.00
9/26/13	C Mitchell	LivPilot	Organize discussion with M. Zafar, S. Khosrovjah, S. St. Marie, to discuss the draft notice, invite Comr. Florio; prepare 5 bullet points for Comr. Florio and staff ""what we want from the symposium""; participate in call with Florio and Staff	2.00
9/29/13	C Mitchell	LivPilot	Conversation with Comr. Florio, de-brief from Thursday staff discussion, next steps	1.00

Date	Atty	Task	Description	Time Spent
9/30/13	C Mitchell	LivPilot	Follow-up conversation w Comr Florio on Les Starck contact and matters, next steps including Comr. Florio direction to me to work more closely with Steve St. Marie, PPD; notes to self post-call re. task and such	1.00
9/30/13	C Mitchell	LivPilot	several emails with Comr. Florio re. substance and logistics of my assistance to his office and Edison on Symposium	1.00
9/30/13	C Mitchell	LivPilot	call from Gene Rodrigues on status of Comr. Florio contact with SF Edison office Sr VP Les Starck re. Florio's desire to have Edison use the living pilot for location-specific PRs at the substation, circuit, and load, level. Florio request that Edison form tiger team to develop mapping and use for Symposium Ideas; agree to provide Gene with talking points for his post-Florio discussion with Les Starck	1.00
9/30/13	C Mitchell	LivPilot	call from Steve St Marie, PPD, re. week's activities Symposium. Discussion re. the 3 service lists not including many energy efficiency providers, how to go about developing file of contact and contacting re. Symposium intention for new and innovative approaches at bundled location-specific PR. Discussed his contributions and some of the key issues and matters in PPD's Feb 20th Briefing Paper: A Review of Current Issues with LT Resource Adequacy	1.00
10/1/13	C Mitchell	LivPilot	Develop talking points for Gene Rodrigues, Edison discussion with Les Starck, Edison re. Symposium VISION and APPROACH and role and purpose of proposed Edison Tiger Team. Develop 2-page piece and provide to Rodrigues. Provide separate copy to Comr Florio as useful document to help reposition him re. his intention and expectations for the Symposium	3.00
10/2/13	C Mitchell	LivPilot	discussion Steve St. Marie PPD re. status of developing EE firms and businesses contacts file, and opportunity to provide suggested text to help shape the docket office Notice Florio Symposium, and PPD staff next-day field trip to ""STEM"" in Millbrae -- energy storage. Prepare paragraph suggested text for docket NOTICE, send to St. Marie w cc to Comr Florio; receive message back from Comr. Florio that he has directed Steve to incorporate my proposed language into the NOTICE	1.00
10/2/13	C Mitchell	LivPilot	call from Richard Aslin PG&E re. confusion and lack of clarity in Florio Symposium of Ideas email blast. Discussed repositioning Symposium to focus on bundled location-specific PRs and Edison tiger team. Rick shared thoughts about PG&'s increasing interest in utility direct investments in EE for location-specific PR being ""doable"" per internal finance and capital folks as similar to PG&E leased blds now. Discussed some of the capabilities of larger energy efficiency firms and businesses to provide bundled PR in large commercial bldgs, how PG&E would like to experiment with such as a procurement EE PPA of RFP.	1.00
10/4/13	C Mitchell	LivPilot	email Steve St Marie re. NOTICE on weekly calendar, review, call Steve and discuss repositioning of intent and expectations and next steps needed to begin tiger team and what sorts of information (per the Notice) the CPUC will be posting, agreed to Monday morning call to develop specific tasks. Developed 1-p file of some questions and comments about how location-specific resources about types, counting towards LCR, performance guarantees, ownership/contract arrangements, bids/options valuation, regulatory flexibility forward-looking, taking smart risks, changes to valuation	2.00
10/4/13	C Mitchell	LivPilot	communications Gene Rodrigues re. Notice, tiger team, establish Sunday check-in call	0.50
10/5/13	C Mitchell	LivPilot	prepare document for Cynthia and Gene discussion re. Symposium events and agenda, propose ways for Edison to be more engaged in Symposium, develop concepts around location-specific engineering and market analyses	1.50
10/6/13	C Mitchell	LivPilot	discussion Cmr Florio strategies and logistics	0.25
10/6/13	C Mitchell	LivPilot	discussion G Rodrigues SCE re. Symposium events and agenda	1.00
10/6/13	C Mitchell	LivPilot	begin research, review, and analyze various documents and reports on reliability and load requirements re. SONGS-out and OTC retirements: Assembly Committee on Utilities& Commerce Oversight Hearing on Local Electric Reliability and OTC, June 17th; Jt Agencies Wkshp on Preliminary Reliability Plan for LA Basin and San Diego, Staff Preliminary Plan September 9th; CEC and CPUC Jt Workshp on Electricity Infrastructure Issues Resulting from SONGS Closure, July 15th; CAISO Flexible Resource Adequacy Criteria and Must-Offer Obligation, Market and Infrastructure Policy Revised Straw Proposal, June 13th; CAISO DR and EE Roadmap: Making the Most of Green Grid Resources, Draft June 12th; CPUC Energy Division & Policy and Planning Division Briefing Paper: A Review of Current Issues with LT Resource Adequacy, February 20th.	3.00
10/7/13	C Mitchell	LivPilot	continue research, review, and analyze various documents and reports on reliability and load requirements re. SONGS-out and OTC retirements: Assembly Committee on Utilities& Commerce Oversight Hearing on Local Electric Reliability and OTC, June 17th; Jt Agencies Wkshp on Preliminary Reliability Plan for LA Basin and San Diego, Staff Preliminary Plan September 9th; CEC and CPUC Jt Workshp on Electricity Infrastructure Issues Resulting from SONGS Closure, July 15th; CAISO Flexible Resource Adequacy Criteria and Must-Offer Obligation, Market and Infrastructure Policy Revised Straw Proposal, June 13th; CAISO DR and EE Roadmap: Making the Most of Green Grid Resources, Draft June 12th; CPUC Energy Division & Policy and Planning Division Briefing Paper: A Review of Current Issues with LT Resource Adequacy, February 20th.	3.00
10/7/13	C Mitchell	LivPilot	provide document to S St Marie, PPD, re. ways to more fully engage Edison in symposium, inclusion of engineering and market analyses; discuss w Steve	0.75
10/7/13	C Mitchell	LivPilot	Brief Matt FreedmanTURN re. my communications and work with Florio Office and Edison	0.50
10/8/13	C Mitchell	LivPilot	begin detailed review and analysis of SCE Track 4 testimony and related documents with focus on preferred resources (PR) and Living Pilot	1.75
10/9/13	C Mitchell	LivPilot	complete review and analysis of SCE Track 4 re. PRs and Living Pilot and create summary file	2.25
10/10/13	C Mitchell	LivPilot	review draft events and agenda as developed by PPD as forwarded from Cmr Florio, provide initial comments to Cmr. Florio	0.50

Date	Atty	Task	Description	Time Spent
10/13/13	C Mitchell	LivPilot	discussion G Rodrigues SCE re. PPD draft Symposium events and agenda	0.75
10/13/13	C Mitchell	LivPilot	additional communications Cmr. Florio re. PPD draft Symposium events and agenda	0.25
10/15/13	C Mitchell	LivPilot	review G Rodrigues communication re. SCE Living Pilot team position Edison role and engagement in Living Pilot with myself	0.25
10/16/13	C Mitchell	LivPilot	discussion R Peterson, advisor Cmr Florio re. PPD proposed agenda and events. Respond to Cmr Florio request (10/13) and R Peterson request (10/16) to prepare suggested modifications to PPD draft agenda and events, prepare said document and provide to Cmr Florio and Staff for Monday October 21st conf call	2.25
10/23/13	C Mitchell	LivPilot	emails from Cmr Florio re. symposium event and agenda, concerns re too conventional, too RFO, respond to request for assist, begin assist	1.50
10/24/13	C Mitchell	LivPilot	similar discussion G Rodrigues Edison; begin draft proposed alternative symposium event and agenda	2.00
10/25/13	C Mitchell	LivPilot	continue work on symposium event and agenda; complete and separate communications Florio and Gene re. same; review PPD draft and summary of IDEAS	3.00
10/26/13	C Mitchell	LivPilot	more prep re Symposium ; weekend discussions Florio and Gene, draft modifications to PPD draft agenda	2.00
10/28/13	C Mitchell	LivPilot	Advance discussion R Peterson, Advisor Florio re. PPD agenda (0.5); per Florio invitation, attend meeting with Cmr Florio, R Peterson, PPD M Zafair and S St Marie re. draft agenda and day event, work through revisions to event to make more interactive, engaging, and productive (1.0)	1.50
11/1/13	C Mitchell	LivPilot	respond to call from C. McAndrews, Living Pilot Project Mgr. SCE, to discuss shared perspectives scope, design, and outcomes for Living Pilot (1.0); develop 1-page summary concept piece per common understanding myself and McAndrews on reasonableness of existing preferred resources (PR) to demonstrate reliability in current form; how could be modified to meet CAISO-result-oriented reliability criteria, send to McAndrews (1.5); additional writing and analysis re. same (2.0)	4.50
11/3/13	C Mitchell	LivPilot	begin review of IDEAS (3 pg living pilot preferred resources proposals, 55 in total) submitted to PPD in advance of Florio symposium	2.50
11/3/13	C Mitchell	LivPilot	discussion G Rodrigues SCE re. Edison role in upcoming Symposium, discussion and 1-page document McAndrews	1.25
11/4/13	C Mitchell	LivPilot	continued discussion C McAndrews SCE re. Symposium and my concept of an open architecture market strategy for demonstrating reliability of preferred resources (1.0); respond to H Sanders CAISO request re. Symposium, develop 1-pg document on how to demonstrate CAISO reliability (1.25)	2.25
11/4/13	C Mitchell	LivPilot	continue review of IDEAS (3 pg living pilot preferred resources proposals, 55 in total) submitted to PPD in advance of Florio symposium	3.25
11/5/13	C Mitchell	LivPilot	respond to H Sanders request to more fully explain concept of open architecture market strategy in prior day document, develop and provide (1.50); pre-meeting with Florio, Peterson; Edison C. McAndrews, M Hoover and others re. common terms, understandings, expectations re. Symposium (2.0)	3.50
11/6/13	C Mitchell	LivPilot	Assist R Peterson with room logistics and organization (0.5), participate in Symposium (9:30 - 4:30; 6.0); discussion C Hackney SCE lunch re. Living Pilot (0.5); post-meeting de-brief Edison offices with Florio and self (1.0)	8.00
11/7/13	C Mitchell	LivPilot	respond to request from R Peterson to have post-meeting discussion	1.00
11/7/13	C Mitchell	LivPilot	SUBTOTAL TRAVEL HOURS Drive Reno - SF Tuesday Nov 5th - return Thursday Nov 7th 10.0 hours total, good weather / no traffic	5.00
11/8/13	C Mitchell	LivPilot	prepare written and typed notes from Symposium to help with next steps of working with R Peterson, Florio Advisor in role of advisors with Edison on engineering and market analyses, pilot designs, for living pilot going forward	3.50
11/11/13	C Mitchell	LivPilot	develop outline for G Rodrigues Edison briefing of Symposium and next steps	1.00
11/12/13	C Mitchell	LivPilot	discussion R Peterson re. our roles on behalf of Florio with Edison on living pilot	0.50
11/15/13	C Mitchell	LivPilot	preparation of notes and talking points for post-symposium de-brief and call with C McAndrews (1.0); call with C McAndrews (1.0); post-call additional notes, particularly C McAndrews request to provide document of my view of my role going forward (0.75)	2.75
11/16/13	C Mitchell	LivPilot	begin draft document responsive to Edison invitation for ongoing role in PRP and C McAndrews request for more specific detail related to her identified to date (shared with me verbally two calls) engineering, marketing, and integration strategies and tactics	3.50
11/18/13	C Mitchell	LivPilot	continue work on responsive document, begin building piece on economic, market, contract, regulatory matters re PRP and future to scale system resource, required review of related documents and files such as EEI's Disruptive Challenges and Peter-Fox Penners' SmartGrid.	4.50
11/19/13	C Mitchell	LivPilot	continue work same document, first, second and third revisions/drafts. Provide to TURN COB	3.25
11/20/13	C Mitchell	LivPilot	correspondance with Cmr Florio re. C Mitchell continued role in Edison PRP work with C McAndrews and role with his office; correspondance TURN re. same	1.25
11/21/13	C Mitchell	LivPilot	respond to request from J Hirsch, consultant to Energy Division, to discuss SCE Track 1 RFOs for preferred resources (0.75); pull additional documents and files per my earlier writing and analysis on same topic for J Hirsch (0.5)	1.25
11/22/13	C Mitchell	LivPilot	additional review and revisions C Mitchell Responsive document to Edison; send to C McAndrews	1.00
11/25/13	C Mitchell	LivPilot	conversation C McAndrews re. C Mitchell 6-pg document responsive to my possible role in working collaboratively with C McAndrews and other Edison PRP team on design and implementation of PRP (1.0); notes for file after call (0.5); modification to 6-pg document per discussion and return to C McAndrews (0.50); update and progress re. all to TURN T Long and M Freedman (0.5)	2.50

Date	Atty	Task	Description	Time Spent
11/26/13	C Mitchell	LivPilot	discussion R Peterson various aspects post-symposium, PRP developments, Track 1 solicitation (1.0); notes prior to discussion to R Peterson, adjust notes after call for file (1.0); email to T Long re. status of work, my proposed role and responsibilities as being collaboratively developed with C McAndrews (0.75); follow-up from Monday call w C Andrews various email exchanges (0.75)	3.50
11/27/13	C Mitchell	LivPilot	follow-up email R. Peterson re. protocols and procedures regulatory engagement PRP, upcoming events; respond to call from R Peterson re same with updates per regulatory discussions her end (1.0); review J Hirsch comments re. SCE Track 1 early retirement commercial HVAC, respond with additional analytical comments (0.5)	1.50
12/5/13	C Mitchell	LivPilot	discussion C McAndrews SCE re. PRP status and pressing issues, including need for ability to tap internal uncommitted funds and need for outside help with integration work; communicate to Cmr Florio's office	1.50
12/6/13	C Mitchell	LivPilot	respond to call from R Peterson, Cmr Florio's office to discuss matters above	0.50
12/9/13	C Mitchell	LivPilot	review Track 1 solicitation rules and requirements upcoming proposals	0.75
12/11/13	C Mitchell	LivPilot	draft for Cmr Florio's office possible C Mitchell more formalized role with PRP for 2014	1.50
12/16/13	C Mitchell	LivPilot	discussion C McAndrews SCE re. my ongoing role in PRP; share parts of communication with R Peterson, follow-up email to Cmr. Florio and R Peterson	1.00
12/30/13	C Mitchell	LivPilot	email R Peterson re. Jan meeting ED LTPP division and Edison re. PRP and LTPP Track 1 solicitation	0.50
Total: C Mitchell				144.25
<u>Attorney: HG</u>				
7/31/12	Hayley Goodson	TR1/EE	review rsch materials from Cynthia re use of uncommitted EE in LTPP and digest for Matt	1.00
8/6/12	Hayley Goodson	TR1/EE	rsch, prepare memo for Matt for cross exam re EE issues	4.50
Total: HG				5.50
<u>Consultant: JBS--B Marcus</u>				
7/11/12	JBS--B Marcus	TR1/CAM	TC Kevin Woodruff to answer questions on cost allocation for local reliability to DA and CCA	0.25
7/25/12	JBS--B Marcus	TR1/CAM	work with Kevin Woodruff on issues related to cross cost allocation on local reliability	0.50
Total: JBS--B Marcus				0.75
<u>Consultant: K Woodruff</u>				
3/29/12	K Woodruff	GP	Reviewed OIR (1.0); communicated with client about contents (0.25).	1.25
4/10/12	K Woodruff	TR2	Reviewed agenda and background material for April 11-12 workshop.	0.25
4/11/12	K Woodruff	TR2	Participated in portions of Energy Division workshop regarding scenario planning by phone.	2.50
4/12/12	K Woodruff	TR2	Participated in portions of Energy Division workshop regarding scenario planning by phone.	2.00
4/13/12	K Woodruff	TR2	Reported on Energy Division workshop to client.	0.50
4/17/12	K Woodruff	GP	Communicated with client regarding issues to raise at Prehearing Conference.	0.25
4/18/12	K Woodruff	GP	Communicated with client regarding issues being discussed at Prehearing Conference and potential schedule.	1.00
4/25/12	K Woodruff	TR1/LCR	Reviewed agenda and background material for May 3 workshop; communicated with Energy Division (N.Skinner) about scope.	0.25
4/26/12	K Woodruff	TR1/LCR	Communicated with client and parties about scope and issues of May 3 workshop (DRA, C.Morey/Y.Schmidt).	0.75
5/1/12	K Woodruff	TR1/LCR	Began reviewing materials regarding CAISO OTC analysis for May 3 workshop.	0.75
5/2/12	K Woodruff	TR1/LCR	Continued reviewing materials regarding CAISO OTC analysis for May 3 workshop.	0.25
5/3/12	K Woodruff	TR1/LCR	Participated in workshop regarding long-term local capacity needs; discussed case with other parties (DRA/ Spencer,Fagan,Parillo,new atty, new analyst; CEJA/Behles,Lazerow;Sierra Club,Rostov) (1.0).	6.50
5/4/12	K Woodruff	TR1/LCR	Reported to client regarding LCR workshop.	0.25
5/7/12	K Woodruff	TR1/LCR	Discussed LCR workshop with CLECA (B.Barkovich).	0.25
5/9/12	K Woodruff	RenInt	Prepared for CAISO call on renewable integration modeling (0.25); participated in CAISO renewable integration call (2); reported to client (0.25).	2.50
5/12/12	K Woodruff	TR2	Reviewed ED proposal on long-term planning scenarios.	1.25
5/14/12	K Woodruff	TR2	Communicated with client regarding May 17 workshop.	0.25
5/17/12	K Woodruff	TR2	Participated in portion of workshop regarding planning assumptions.	3.00
5/21/12	K Woodruff	RenInt	Provided Energy Division comments on May 23 call and June 4 renewable integration workshop.	1.00
5/23/12	K Woodruff	RenInt	Participated in Energy Division-sponsored call to plan for June 4 workshop.	0.75
5/26/12	K Woodruff	TR1/LCR	Began reviewing CAISO testimony.	1.00
5/27/12	K Woodruff	TR1/LCR	Continued reviewing CAISO testimony.	0.25
5/31/12	K Woodruff	TR2	Reviewed parties' comments on scenarios and assumptions.	0.25
6/1/12	K Woodruff	TR1/LCR	Discussed LCR issues in Phase 1 with SCE (C.Silsbee).	0.50
6/1/12	K Woodruff	RenInt	Discussed renewable transmission and integration issues with municipal utility consultants (1.25); prepared for June 4 workshop on renewable integration (.25).	2.00
6/2/12	K Woodruff	TR1/LCR	Prepared data request for CAISO.	2.00
6/2/12	K Woodruff	RenInt	Prepared data request for CAISO.	0.75
6/2/13	K Woodruff	TR1/LCR	Completed data request for CAISO.	1.00
6/3/12	K Woodruff	RenInt	Completed data request for CAISO.	0.50
6/4/12	K Woodruff	RenInt	Participated in workshop on renewable integration studies.	6.25
6/5/12	K Woodruff	TR1/LCR	Discussed potential testimony on LCR issues with other consumer advocate (B.Barkovich).	0.25

Date	Atty	Task	Description	Time Spent
6/8/12	K Woodruff	RenInt	Reviewed materials for Energy Commission June 11 workshop on renewable integration.	0.25
6/11/12	K Woodruff	RenInt	Attended portion of CEC workshop on renewable integration.	4.00
6/18/12	K Woodruff	TR1/LCR	Reviewed CAISO's responses to TURN and other parties' data requests.	0.75
6/28/12	K Woodruff	RenInt		0.25
6/19/12	K Woodruff	TR1/LCR	Prepared outline for testimony; reviewed CAISO additional responses to DRA and CAISO supplemental testimony.	1.25
6/19/12	K Woodruff	RenInt	Prepared outline for testimony; reviewed CAISO additional responses to DRA and CAISO supplemental testimony.	0.25
6/20/12	K Woodruff	TR1/LCR	Finished editing outline; provided to client; communicated with client regarding outline and schedule.	0.25
6/21/12	K Woodruff	TR1/LCR	Began writing testimony.	1.50
6/21/12	K Woodruff	RenInt	Began writing testimony.	0.25
6/22/12	K Woodruff	TR1/LCR	Completed draft testimony; sent to client.	3.00
6/22/12	K Woodruff	RenInt	Completed draft testimony; sent to client.	0.75
6/24/12	K Woodruff	TR1/LCR	Revised testimony; sent to client	6.25
6/24/12	K Woodruff	RenInt	Revised testimony; sent to client	1.00
6/25/12	K Woodruff	TR1/LCR	Completed testimony; sent to client for service; reviewed CAISO responses to data requests; began reviewing other parties' testimony.	5.00
6/25/12	K Woodruff	RenInt	Completed testimony; sent to client for service; reviewed CAISO responses to data requests; began reviewing other parties' testimony.	1.50
6/26/12	K Woodruff	TR1/LCR	Continued reviewing other parties' testimony.	0.25
7/3/12	K Woodruff	TR1/LCR	Reviewed other parties' LTPP testimony on LCR needs.	3.50
7/8/12	K Woodruff	TR1	Communicated with client regarding issues for PHC.	1.00
7/9/12	K Woodruff	TR1/LCR	Prepared draft responses to PG&E and SCE data requests and sent to client (0.5); discussed case with client; provided cross-examination estimates for use in PHC (0.25); discussed case with CLECA (B.Barkovich) (0.25).	3.25
7/10/12	K Woodruff	TR1/CAM	Reviewed cost allocation issues.	2.00
7/10/12	K Woodruff	TR1/LCR	Edited draft responses to PG&E and SCE data requests.	1.00
7/11/12	K Woodruff	TR1/CAM	Reviewed AReM, et al, testimony.	2.75
7/11/12	K Woodruff	TR1/LCR	Finished responses to PG&E and SCE data requests (.75).	0.75
7/12/12	K Woodruff	TR1/CAM	Reviewed AReM, et al, testimony; discussed with SDG&E (R.Anderson) (0.5), SCE (C.Cushnie) (0.5), DRA (Radu) (0.25) and IOU's conference call (0.5).	2.50
7/13/12	K Woodruff	GP	Reviewed Assigned Commissioner Ruling.	0.25
7/14/12	K Woodruff	TR1/CAM	Outlined reply testimony.	1.25
7/15/12	K Woodruff	TR1/CAM	Began writing reply testimony.	2.75
7/16/12	K Woodruff	TR1/CAM	Continued writing testimony.	3.75
7/17/12	K Woodruff	TR1/CAM	Continued writing testimony.	3.50
7/18/12	K Woodruff	TR1/CAM	Continued writing testimony.	3.50
7/19/12	K Woodruff	TR1/CAM	Completed draft testimony; provided to client.	2.00
7/19/12	K Woodruff	TR1/LCR	Discussed opening testimony with another party (K.Foley, VoteSolar) (.25).	0.25
7/20/12	K Woodruff	TR1/CAM	Began reviewing client's comments on draft testimony.	0.25
7/21/12	K Woodruff	TR1/CAM	Began preparing revised draft.	1.00
7/22/12	K Woodruff	TR1/CAM	Completed revised draft testimony; sent to client.	0.50
7/23/12	K Woodruff	TR1/CAM	Completed testimony.	1.50
7/23/12	K Woodruff	TR1	Began reviewing other parties' reply testimony	1.00
7/24/12	K Woodruff	TR1	Continued reviewing other parties' testimony; reported to client.	2.75
7/25/12	K Woodruff	TR1/CAM	Discussed issues with CLECA (B.Barkovich) and TURN consultant (B.Marcus).	1.00
7/25/12	K Woodruff	TR1	Completed reviewing parties' testimony; reported to client.	2.50
7/26/12	K Woodruff	TR1/LCR	Reviewed CAISO responses to additional parties' data requests.	1.00
7/27/12	K Woodruff	TR1/LCR	Discussed CAISO testimony with Jack Ellis.	0.25
7/29/12	K Woodruff	TR1/LCR	Began preparing cross-examination scripts.	0.25
7/31/12	K Woodruff	TR1/LCR	Prepared cross-examination estimates (0.5); communicated with client regarding cross topics (0.25); began preparing cross-examination topic research (1.25).	2.00
8/3/12	K Woodruff	GP	Reviewed schedule with client.	0.25
8/5/12	K Woodruff	EH	Wrote cross-examination script for CAISO witness Sparks.	2.25
8/6/12	K Woodruff	EH	Wrote cross-examination script for CAISO witness Rothleder (1.5); communicated with client about issues and schedule.	2.00
8/7/12	K Woodruff	EH	Prepared for hearings.	1.25
8/7/12	K Woodruff	EH	Wrote cross-examination script for CAISO witness Millar (1.0).	1.00
8/8/12	K Woodruff	EH	Prepared for hearings (2.25); participated in hearings (7.0).	9.25
8/9/12	K Woodruff	EH	Prepared for hearings (3.5); participated in hearings (7.0).	10.50
8/10/12	K Woodruff	EH	Prepared for hearings (0.5); participated in hearings (6.5).	7.00
8/13/12	K Woodruff	EH	Reviewed AReM and SDG&E testimony and suggested cross-examination to client.	1.25
8/14/12	K Woodruff	EH	Provided additional ideas for crossing SDG&E on LCR issues.	0.25
8/16/12	K Woodruff	EH	Reviewed parties' cross-examination exhibits.	0.25
8/23/12	K Woodruff	TR2	Reviewed materials regarding scenarios to be used in 2013 Phase II analyses.	0.25
8/24/12	K Woodruff	TR2	Participated in workshop on scenarios for use in system planning in Phase II in 2013.	5.50
8/26/12	K Woodruff	EH	Reviewed transcript for possible corrections; reported to client on 8/24 scenarios workshop.	0.75
9/4/12	K Woodruff	TR1/PROC	Reviewed materials for 9/7 workshop on RFOs for LCRs.	1.00
9/5/12	K Woodruff	TR1/PROC	Prepared comments for 9/7 workshop.	1.75
9/6/12	K Woodruff	TR1/PROC	Completed comments for 9/7 workshop.	2.50
9/7/12	K Woodruff	TR1/PROC	Participated in 9/7 workshop.	7.50
9/9/12	K Woodruff	RenInt	Reviewed materials for 9/10 CAISO call on renewable integration.	0.50

Date	Atty	Task	Description	Time Spent
9/10/12	K Woodruff	RenInt	Prepared for (0.75) and participated in CAISO all on renewable integration (1.0); reported to client.	2.00
9/12/12	K Woodruff	RenInt	Communicated with other party (J.Ellis) regarding renewable integration studies.	0.25
9/13/12	K Woodruff	TR1/LCR	Discussed briefing of LCR issues and provided information on state-federal jurisdictional questions to CLECA consultant (B.Barkovich).	0.25
9/14/12	K Woodruff	TR1/LCR	Discussed briefing of LCR issues with client.	0.25
9/17/12	K Woodruff	TR1/CAM	Reviewed AREM interrogatories (to provided in exchange for waiving cross).	0.50
9/18/12	K Woodruff	TR1/CAM	Prepared responses to AREM questions.	1.00
9/18/12	K Woodruff	TR1	Prepared proposed outline for brief.	0.75
9/19/12	K Woodruff	RenInt	Attended workshop on renewable integration issues.	6.50
9/20/12	K Woodruff	TR1/CAM	Completed responses to AREM, et al. regarding CAM issues.	0.50
9/23/12	K Woodruff	TR1	Reviewed portions of draft brief and commented to client.	0.50
9/24/12	K Woodruff	TR1	Edited brief for client.	4.25
9/25/12	K Woodruff	RenInt	Discussed renewable integration workshop with party and outside consultant (J.Ellis, CLECA (Barkovich)).	1.00
9/28/12	K Woodruff	TR1	Communicated with client regarding reply brief and comments on scenarios.	0.25
9/30/12	K Woodruff	TR2	Began reviewing AC Ruling on scenarios.	0.50
10/1/12	K Woodruff	TR2	Reviewed ACR on scenarios.	0.75
10/2/12	K Woodruff	TR1/LCR	Reviewed 9/14 ACR regarding IOU procurement issues.	0.25
10/3/12	K Woodruff	RenInt	Reviewed CEJA/Sierra Club draft motion; provided comments to client.	0.50
10/4/12	K Woodruff	TR1/LCR	Began reviewing parties' opening briefs	1.00
10/4/12	K Woodruff	TR2	Prepared comments regarding Revised Scenarios	2.00
10/8/12	K Woodruff	TR1/LCR	Continued reviewing parties' opening briefs; provided client comments for reply brief.	4.50
10/9/12	K Woodruff	TR1/LCR	Completed comments for client on reply brief.	1.50
10/15/12	K Woodruff	TR2	Reviewed parties' comments on scenarios.	1.25
10/16/12	K Woodruff	TR1/LCR	Reviewed parties' comments on procurement.	1.50
10/17/12	K Woodruff	TR1/LCR	Prepared reply comments regarding procurement; discussed issues with DRA (Weckam).	2.50
10/17/12	K Woodruff	TR2	Prepared reply comments regarding scenarios; discussed issues with CCSF (Wagle).	1.75
10/18/12	K Woodruff	RenInt	Edited reply comments on procurement.	0.25
10/24/12	K Woodruff	RenInt	Discussed status of renewable integration studies with Energy Division (K.White).	0.25
11/15/12	K Woodruff	RenInt	Discussed status of Track II modeling with DRA (Spencer) and Energy Division (Skinner); communicated with client.	0.50
11/20/12	K Woodruff	TR2	Reviewed Proposed Decision regarding Track 2 modeling assumptions.	0.25
12/4/12	K Woodruff	TR2	Reviewed scenarios Proposed Decision; suggested draft comments to client.	0.75
12/7/12	K Woodruff	TR2	Prepared draft comments on scenarios PD.	1.00
12/10/12	K Woodruff	TR2	Discussed draft comments with client.	0.25
12/13/12	K Woodruff	RenInt	Reviewed comments on scenarios PD; participated in CAISO call regarding renewable integration modeling; communicated with client.	1.50
12/13/12	K Woodruff	TR2	Reviewed comments on scenarios PD; participated in CAISO call regarding renewable integration modeling; communicated with client.	1.50
12/14/12	K Woodruff	TR2	Completed draft reply comments on scenarios PD; sent to client.	1.75
12/16/12	K Woodruff	RenInt	Prepared draft comments for Energy Division on scheduling and process issues regarding CAISO renewable integration studies.	0.50
12/17/12	K Woodruff	TR2	Reviewed parties reply comments on scenarios PD.	0.50
12/27/12	K Woodruff	TR1	Reviewed PD on Phase 1 (LCR).	2.00
12/28/12	K Woodruff	TR1	Communicated with client regarding PD.	0.25
1/8/13	K Woodruff	TR1	Began outlining comments on Proposed Decision.	0.75
1/9/13	K Woodruff	TR1	Continued preparing comments on Proposed Decision.	3.00
1/10/13	K Woodruff	TR1	Continued preparing comments on Proposed Decision.	3.75
1/11/13	K Woodruff	TR1	Completed comments on Proposed Decision; sent to client.	1.50
1/14/13	K Woodruff	TR1	Began reviewing parties' comments on the PD.	2.25
1/15/13	K Woodruff	TR1	Finished reviewing parties' comments on PD; communicated with client.	1.50
1/16/13	K Woodruff	TR1	Began preparing reply comments on PD.	0.25
1/17/13	K Woodruff	TR1	Completed draft reply comments on PD.	3.75
1/22/13	K Woodruff	TR1	Reviewed client's final draft of reply comments on PD.	0.50
1/23/13	K Woodruff	RenInt	Reviewed DRA's comments to CAISO on renewable integration modeling.	0.50
2/1/13	K Woodruff	RenInt	Communicated with several parties regarding CAISO renewable integration modeling (CalWEA, SCE, CLECA).	0.50
2/4/13	K Woodruff	TR1/LCR	Reviewed CAISO Transmission Plan for LCR impacts; reported to client.	1.00
2/8/13	K Woodruff	TR1	Began reviewing revised Proposed Decision.	0.50
2/9/13	K Woodruff	TR1	Finished reviewing revised Proposed Decision.	0.75
2/11/13	K Woodruff	TR1/LCR	Participated in CAISO call regarding impact of nuclear retirements on local capacity; reported to client.	3.25
2/13/13	K Woodruff	TR1	Reviewed final LTPP Track 1 decision; reported to client on potential issue.	0.25
2/21/13	K Woodruff	RenInt	Participated in CAISO call regarding status of renewable integration modeling; reported to client; began preparing comments and questions for CAISO on presentation.	3.00
2/22/13	K Woodruff	RenInt	Completed comments on CAISO renewable integration modeling presentation and sent to CAISO.	0.25
3/5/13	K Woodruff	RenInt	Reviewed CAISO email request for feedback on integration modeling; discussed integration modeling with E3 (A.Olsen).	0.75
3/6/13	K Woodruff	RenInt	Responded to CAISO (S.Liu) questions regarding renewable integration modeling.	0.25
3/7/13	K Woodruff	RenInt	Communicated with SCE and other parties and client regarding renewable integration modeling meeting.	0.25
3/8/13	K Woodruff	RenInt	Participated in conference call with SCE to review renewable integration modeling efforts.	1.25

Date	Atty	Task	Description	Time Spent
3/16/13	K Woodruff	RenInt	Reviewed SCE proposal for analyzing renewable integration needs.	0.50
3/17/13	K Woodruff	RenInt	Provided comments to SCE regarding its proposal for renewable integration modeling.	0.75
4/1/13	K Woodruff	RenInt	Listened to CAISO call on modeling of Energy Imbalance Market for issues related to renewable integration.	1.75
4/19/13	K Woodruff	TR3	Began preparing potential comments on Bundled Procurement Plans (Phase 3).	0.75
4/19/13	K Woodruff	RenInt	Reviewed CAISO materials for 4/24 workshop; commented to client.	0.50
4/23/13	K Woodruff	TR3	Developed additional comment on Phase 3.	0.25
4/24/13	K Woodruff	RenInt	Participated in workshop on renewable integration modeling.	6.00
4/25/13	K Woodruff	TR3	Prepared comments on Phase 3; sent to client.	2.75
4/26/13	K Woodruff	TR3	Began reviewing parties' comments on Phase 3 issues; reviewed client's final version of comments.	1.00
4/30/13	K Woodruff	TR3	Continued reviewing parties' comments on Phase 3 issues.	1.25
5/1/13	K Woodruff	TR3	Discussed case, issues and schedule with client.	0.50
5/3/13	K Woodruff	TR3	Began preparing reply comments.	3.50
5/5/13	K Woodruff	TR3	Continued preparing reply comments.	0.50
5/6/13	K Woodruff	TR3	Continued preparing reply comments.	2.25
5/6/13	K Woodruff	RenInt	Reviewed materials for 5/10 workshop and PHC.	2.25
5/7/13	K Woodruff	TR3	Continued preparing reply comments.	1.50
5/7/13	K Woodruff	RenInt	Reviewed materials for 5/10 workshop and PHC; provided comments to client and SCE.	1.25
5/8/13	K Woodruff	TR3	Completed reply comments; sent to client.	0.50
5/8/13	K Woodruff	RenInt	Held conference call with SCE to discuss modeling (P. Nelson).	1.00
5/9/13	K Woodruff	TR3	Completed review of reply comments.	1.25
5/9/12	K Woodruff	RenInt	Communicated with SCE again regarding presentation (P.Nelson).	1.25
5/10/13	K Woodruff	RenInt	Attended workshop on SCE renewable integration modeling; attended Prehearing Conference on scheduling Phases 2 and 4.	5.25
5/13/13	K Woodruff	TR3	Reviewed parties' reply comments on Phase 3.	0.75
5/13/13	K Woodruff	RenInt	Reviewed parties' informal comments on CAISO renewable integration modeling in Phase 2.	0.50
5/21/13	K Woodruff	RenInt	Began reviewing Scoping Ruling.	0.25
5/22/13	K Woodruff	TR4	Participated in conference call with CAISO/E3 to review stochastic modeling for renewable integration needs.	3.00
5/22/13	K Woodruff	RenInt	Reviewed and commented on Scoping Ruling.	0.50
5/23/13	K Woodruff	TR4	Reviewed Scoping Ruling and commented to client.	0.25
5/23/13	K Woodruff	RenInt	Reviewed E3 renewable integration modeling presentation and provided comments to E3; discussed E3 and other models with Jack Ellis.	1.00
5/30/13	K Woodruff	RenInt	Discussed renewable integration modeling with E3 (A.Olsen); reviewed CAISO load and renewable generation data.	1.00
6/3/13	K Woodruff	RenInt	Reviewed CAISO load and variable resource data; reviewed Energy Division memo on changes to ""Replicating TPP"" scenario.	0.75
6/18/13	K Woodruff	RenInt	Participated in CAISO call on renewable integration modeling project status.	2.25
6/22/13	K Woodruff	RenInt	Reported to client regarding CAISO renewable integration call.	0.25
6/25/13	K Woodruff	TR4	Communicated with client regarding SONGS impacts on capacity needs.	0.50
6/26/13	K Woodruff	TR4	Communicated with client regarding SONGS impacts on capacity needs.	0.25
7/1/13	K Woodruff	TR4	Reviewed agenda for July 15 meeting on impact of SONGS retirement on system planning; communicated with client.	0.25
7/3/13	K Woodruff	TR4	Reviewed DRA motion in Track 4; communicated with DRA thereon.	0.25
7/9/13	K Woodruff	TR4	Participated in CEC (M.Jaske) conference call with other July 15 panelists; discussed SONGS modeling issues with DRA (N.Rogers, Radu)	1.25
7/10/13	K Woodruff	TR4	Reviewed materials for 7/15 meeting on SONGS alternatives.	0.25
7/12/13	K Woodruff	TR4	Prepared text for motion in support of 6/28 DRA, et al, motion regarding modeling of reactive power in SONGS proceeding; reviewed presentations for 7/15 meeting on SONGS alternatives; prepared outline of comments and sent to client.	4.00
7/13/13	K Woodruff	TR4	Reviewed additional presentations for 7/15 meeting.	0.50
7/14/13	K Woodruff	TR4	Reviewed additional presentations for 7/15 meeting.	0.25
7/15/13	K Woodruff	TR4	Participated (as panelist) in CEC / CPUC joint workshop on planning without SONGS	8.50
7/15/13	K Woodruff	TR4	Round trip air and ground travel from Sacramento to UCLA for CEC/CPUC planning meeting (6 hours @ 50%)	3.00
7/16/13	K Woodruff	TR4	Communicated with client and Sierra Club (W.Rostov) regarding 7/15 workshop.	0.75
7/24/13	K Woodruff	RenInt	Prepared for and participated in CAISO conference call on renewable integration modeling; reported to client.	2.25
8/5/13	K Woodruff	TR4	Began reviewing CAISO Track IV testimony.	0.25
8/7/13	K Woodruff	TR4	Continued reviewing CAISO Track 4 testimony; began preparing data request.	2.75
8/8/13	K Woodruff	TR4	Continued reviewing CAISO Track 4 testimony and preparing data request; discussed case with other parties (DRA/D.Lee,A.Wecker; NRDC/S.Martinez; CBE/S.Lazerow; CEERT/S.Myers; others).	2.25
8/9/13	K Woodruff	TR4	Completed data request for CAISO; sent to client; discussed local reliability criteria with other parties (NRG,B.Theaker; CLECA/B.Barkovich; Jack Ellis).	3.75
8/21/13	K Woodruff	TR4	Reviewed CAISO renewable integration modeling results.	1.50
8/22/13	K Woodruff	TR4	Reviewed CAISO renewable integration modeling results further.	1.75
8/23/13	K Woodruff	RenInt	Prepared for 8/26 workshop.	0.25
8/26/13	K Woodruff	RenInt	Prepared for and participated in workshop regarding renewable integration studies; discussed issues with parties and ED staff after workshop.	7.00
8/27/13	K Woodruff	TR4	Reported to client regarding 8/26 workshop; began reviewing SCE, SDG&E and Redondo Beach testimony.	3.25
8/28/13	K Woodruff	TR4	Began preparing data requests for SCE and SDG&E.	4.50

Date	Atty	Task	Description	Time Spent
8/29/13	K Woodruff	TR4	Continued preparing data requests for SCE and SDG&E; discussed utility testimony with various parties (SDG&E/Anderson; CLECA/Barkovich; DRA & Enviro/D.Lee,S.Martinez, etc.).	6.25
8/30/13	K Woodruff	TR4	Continued preparing data requests for SCE and SDG&E; discussed with SCE (C.Silsbee).	4.75
9/1/13	K Woodruff	TR4	Completed Track 4 Data Request; sent to client.	1.25
9/3/13	K Woodruff	TR4	Reported to client on issues for 9/4 PHC; reviewed report for joint CPUC/CEC 9/9 hearing on SONGS replacement; reviewed SCE's workpapers..	3.50
9/4/13	K Woodruff	TR4	Reviewed and commented on client's notes of PHC; discussed PHC with client; communicated with client during PHC; began reviewing CAISO proposal on preferred resources and LCR.	1.50
9/5/13	K Woodruff	TR4	Reviewed PHC transcript; discussed case and issues with SCE (C.Silsbee,K.Duggan) and CLECA (B.Barkovich); reviewed CAISO scheduling proposal; prepared own scheduling proposals.	6.25
9/6/13	K Woodruff	TR4	Analyzed and discussed schedules for Track 2 and Track 4 with other parties (NRDC,Sierra Club,CEJA, etc.), with CLECA (B.Barkovich) and client; made recommendation for client.	1.25
9/6/14	K Woodruff	RenInt	Analyzed and discussed schedules for Track 2 and Track 4 with other parties (NRDC,Sierra Club,CEJA, etc.), with CLECA (B.Barkovich) and client; made recommendation for client.	1.00
9/9/13	K Woodruff	TR4	Attended CEC workshop on Governor's Task Force on SONGS issues; reported to client; discussed comments on Task 2 and 4 schedule with client.	5.25
9/10/13	K Woodruff	TR4	Reviewed other parties' comments on Track 2 and 4 schedule.	0.75
9/10/13	K Woodruff	RenInt	Reviewed other parties' comments on Track 2 and 4 schedule.	0.50
9/11/13	K Woodruff	TR4	Completed reviewing other parties' scheduling comments; made recommendation to client.	0.25
9/12/13	K Woodruff	RenInt	Participated in SCE web review of its renewable integration modeling methods and results; communicated with client.	1.75
9/13/13	K Woodruff	TR4	Reviewed parties' comment on Track 2 & 4 schedule; communicated with client.	0.75
9/13/13	K Woodruff	RenInt	Reviewed parties' comment on Track 2 & 4 schedule; communicated with client.	0.50
9/16/13	K Woodruff	TR4	Reviewed revised Scoping Ruling; communicated with client; reviewed CAISO and IOU's testimony and began preparing outline for testimony.	1.75
9/17/13	K Woodruff	TR4	Reviewed SCE and SDG&E responses to TURN data requests; commented to client regarding follow-up.	3.25
9/18/13	K Woodruff	RenInt	Participated in workshop reviewing SCE renewable integration modeling; participated in CAISO conference call regarding criteria for preferred resources to provide local reliability.	4.75
9/19/13	K Woodruff	TR4	Reviewed additional responses to other parties' data requests; communicated with SDG&E about follow-up questions; outlined testimony.	3.00
9/20/13	K Woodruff	TR4	Prepared outline of testimony for client review; reviewed additional responses to other parties' data requests.	1.25
9/22/13	K Woodruff	TR4	Reviewed materials regarding NERC, WECC and CAISO grid planning and local reliability standards.	1.00
9/23/13	K Woodruff	TR4	Reviewed additional data requests; began writing testimony.	5.25
9/24/13	K Woodruff	TR4	Continued preparing testimony.	5.75
9/25/13	K Woodruff	TR4	Continued preparing testimony; listened to portion of CAISO call on 2013-2014 Transmission Plan.	7.25
9/26/13	K Woodruff	TR4	Continued preparing testimony; listened to portion of CAISO call on 2013-2014 Transmission Plan.	8.00
9/27/13	K Woodruff	TR4	Continued preparing testimony.	5.75
9/28/13	K Woodruff	TR4	Continued preparing testimony; sent draft to client.	6.50
9/29/13	K Woodruff	TR4	Continued editing testimony.	1.50
9/30/13	K Woodruff	TR4	Continued editing testimony; discussed with client; completed testimony; began reviewing other parties' testimony.	5.50
10/1/13	K Woodruff	TR4	Began reviewing parties' testimony; summarized for client; prepared data request for AREM/DACC.	3.00
10/2/13	K Woodruff	TR4	Continued reviewing parties' testimony.	0.25
10/3/13	K Woodruff	TR4	Continued reviewing parties' testimony.	0.75
10/4/13	K Woodruff	TR4	Continued reviewing parties' testimony; made recommendations to client regarding rebuttal.	0.75
10/7/13	K Woodruff	TR4	Continued reviewing parties' testimony.	1.25
10/8/13	K Woodruff	TR4	Began preparing rebuttal testimony.	2.25
10/9/13	K Woodruff	TR4	Continued preparing rebuttal testimony.	1.50
10/10/13	K Woodruff	TR4	Continued preparing rebuttal testimony.	7.00
10/11/13	K Woodruff	TR4	Continued preparing rebuttal testimony; provided first draft to client.	5.25
10/13/13	K Woodruff	TR4	Continued editing rebuttal testimony.	2.25
10/14/13	K Woodruff	TR4	Completed rebuttal testimony; began reviewing other parties' rebuttal testimony; reported to client; prepared data request for CAISO.	5.25
10/15/13	K Woodruff	TR4	Continued reviewing parties' rebuttal testimony; reviewed PHC transcript.	1.25
10/18/13	K Woodruff	TR4	Participated in call to coordinate efforts among DRA and environmental parties; reported to client.	1.50
10/21/13	K Woodruff	TR4	Prepared cross-examination estimates; began preparing need recommendation matrix per ALJ request; prepared notes regarding CAISO motion to limit scope of cross-examination.	3.50
10/22/13	K Woodruff	TR4	Provided client other preparation for PHC; listened to and communicated with client during PHC; commented to SCE on draft matrix of parties' need recommendations.	3.00
10/23/13	K Woodruff	TR4	Reviewed testimony for possible errata.	1.00
10/24/13	K Woodruff	EH	Began preparing cross-examination scripts and exhibits; communicated with client regarding errata.	4.00
10/25/13	K Woodruff	EH	Continued preparing cross-examination scripts and exhibits.	6.75
10/26/13	K Woodruff	EH	Continued preparing cross-examination scripts and exhibits.	5.50

Date	Atty	Task	Description	Time Spent
10/27/13	K Woodruff	EH	Continued preparing cross-examination scripts and exhibits.	3.25
10/28/13	K Woodruff	EH	Participated in hearings; prepared for next day's hearings.	10.00
10/29/13	K Woodruff	EH	Participated in hearings; prepared for next day's hearings.	9.25
10/30/13	K Woodruff	EH	Participated in hearings; prepared for next day's hearings.	9.25
10/31/13	K Woodruff	EH	Participated in hearings; prepared for next day's hearings.	10.50
11/1/13	K Woodruff	EH	Participated in hearings.	7.25
11/4/13	K Woodruff	EH	Reviewed transcripts.	0.75
11/5/13	K Woodruff	EH	Reviewed transcript and provided corrections to client.	0.50
11/6/13	K Woodruff	TR4	Began preparing outline for brief, including arguments and citations to record.	4.25
11/7/13	K Woodruff	TR4	Reviewed parties' transcript corrections; commented to client.	0.25
11/12/13	K Woodruff	TR4	Discussed briefing schedule and assignments with client.	0.25
11/18/13	K Woodruff	TR4	Completed annotated outline of brief; sent to client.	3.00
11/19/13	K Woodruff	TR4	Began writing brief; discussed with client.	5.50
11/20/13	K Woodruff	TR4	Continued writing brief.	3.75
11/21/13	K Woodruff	TR4	Continued writing brief.	6.75
11/22/13	K Woodruff	TR4	Completed first draft of brief; discussed with client.	5.75
11/24/13	K Woodruff	TR4	Revised draft brief based on client comments; resent to client.	2.50
11/25/13	K Woodruff	TR4	Completed review of client's final draft of brief; began reviewing other parties' briefs.	0.75
12/2/13	K Woodruff	TR4	Continued reviewing opening briefs.	0.25
12/6/13	K Woodruff	TR4	Continued reviewed opening briefs; discussed briefing issues and preparation with client.	1.00
12/9/13	K Woodruff	TR4	Discussed reply brief with client.	0.75
12/9/13	K Woodruff	RenInt	Participated in portions of CAISO-sponsored conference call regarding E3's renewable integration study results.	2.00
12/10/13	K Woodruff	TR4	Began preparing outline of brief.	1.75
12/11/13	K Woodruff	TR4	Began writing reply brief.	5.00
12/12/13	K Woodruff	TR4	Continued writing reply brief.	5.75
12/13/13	K Woodruff	TR4	Completed draft reply brief; discussed with client; began revising brief.	5.50
12/14/13	K Woodruff	TR4	Wrote addition paragraph for reply brief; sent to client.	0.50
12/15/13	K Woodruff	TR4	Completed editing reply brief; reviewed client's final edits.	2.50
12/16/13	K Woodruff	TR4	Reviewed additional issue regarding use of DR and PV to meet second contingency; reported to client.	0.75
12/18/13	K Woodruff	TR3	Prepared for and participated in workshop on LTPP assumptions.	5.00
12/19/13	K Woodruff	TR3	Reviewed ALJ Ruling; reported to client on workshop and Ruling; provided information to SCE (M.Mao) regarding 1-in-5 year load data.	1.00
1/6/14	K Woodruff	TR3	Began preparing comments on scenario assumptions.	2.25
1/7/14	K Woodruff	RenInt	discussed renewable integration issues with ED staff (K.White).	0.50
1/7/14	K Woodruff	TR3	Completed draft comments and sent to client.	4.00
1/8/14	K Woodruff	TR3	Reviewed parties' comments on scenarios.	1.75
1/9/14	K Woodruff	RenInt	Prepared for and attended PG&E-sponsored meeting regarding renewable integration modeling; discussed LTPP issues with client and ED staff.	6.00
1/10/14	K Woodruff	TR3	Began preparing reply comments on scenario assumptions.	3.00
1/13/14	K Woodruff	TR3	Continued preparing reply comments; discussed with CLECA (B.Barkovich).	5.25
1/15/14	K Woodruff	TR3	Continued preparing reply comments; provided draft to client.	4.25
1/15/14	K Woodruff	TR3	Completed reply comments; reviewed other parties' reply comments.	1.00
1/16/14	K Woodruff	TR3	Completed reviewing other parties' reply comments.	0.25
1/19/14	K Woodruff	RenInt	Reported to client on PG&E workshop.	0.50
1/23/14	K Woodruff	RenInt	Reviewed PG&E's introduction to renewable integration modeling report.	0.25
1/24/14	K Woodruff	RenInt	Reviewed and provided comments to PG&E's introduction and summary of renewable integration modeling report.	0.75
1/27/14	K Woodruff	RenInt	Reviewed E3's proposed editorial changes to Introduction of renewable integration report.	0.25
1/29/14	K Woodruff	RenInt	Prepared for and participated in PG&E-sponsored call regarding renewable integration modeling; communicated with ORA (R.Ciapagea) and E3 (A.Olsen) afterwards.	1.75
2/3/14	K Woodruff	TR4	Reviewed CAISO draft Transmission Plan for impact on Phase 4 need determinations.	1.75
2/5/14	K Woodruff	TR4	Continued reviewing CAISO draft Transmission Plan for impact on Phase 4 need determinations; reported to client.	1.50
2/6/14	K Woodruff	TR3	Began reviewing Proposed Decision in Track 3.	4.00
2/10/14	K Woodruff	TR3	Prepared comments on Track 3 PD.	3.75
2/11/14	K Woodruff	TR3	Completed comments on Track 3 PD.	3.25
2/12/14	K Woodruff	TR4	Reviewed Track 4 PD; listened to portions of CAISO Transmission Plan stakeholder call regarding Track 4 issues, including local needs in Southern California and ability of preferred resources to meet such needs.	5.25
2/13/14	K Woodruff	TR4	Reviewed Track 4 PD; reviewed CAISO TPP assessment of value of preferred resources at meeting local reliability criteria.	2.75
2/14/14	K Woodruff	TR4	Continued reviewing Track 4 PD.	0.50
2/17/14	K Woodruff	TR3	Began reviewing parties' comments on Track 3 PD; reported to client.	0.75
2/19/14	K Woodruff	TR4	Continued reviewing Track 4 PD.	1.25
2/21/14	K Woodruff	TR3	Prepared reply comments on Track 3 PD; sent to client.	2.00
2/27/14	K Woodruff	TR4	Began outlining comments on Track 4 PD.	1.00
2/28/14	K Woodruff	TR4	Proposed outline of Track 4 PD comments to client; responded to client inquiry regarding SDG&E procurement options.	0.50
3/1/14	K Woodruff	TR4	Prepared draft comments on Track 4 PD.	1.75
3/2/14	K Woodruff	TR4	Continued preparing draft comments on Track 4 PD.	2.00
3/3/14	K Woodruff	TR4	Completed draft comments on Track 4 PD; discussed with client.	2.25
3/6/14	K Woodruff	TR4	Began reviewing parties' comments on the PD.	0.50

Date	Atty	Task	Description	Time Spent
3/7/14	K Woodruff	TR4	Completed reviewing parties' comments on the PD; discussed with client; began preparing reply comments.	3.50
3/8/14	K Woodruff	TR4	Continued preparing draft reply comments on Track 4 PD.	3.00
3/9/14	K Woodruff	TR4	Continued preparing draft reply comments on Track 4 PD.	1.00
3/10/14	K Woodruff	TR4	Completed draft reply comments; discussed with client; reviewed parties' reply comments.	2.50
3/12/14	K Woodruff	TR4	Reviewed revised PD; commented to client.	0.25
Total: K Woodruff				687.00
<u>Attorney: Matt</u>				
3/27/12	Matt Freedman	GP	Review of OIR	0.50
4/5/12	Matt Freedman	GP	Review of OIR and scoping memo	1.00
4/6/12	Matt Freedman	GP	Drafting TURN comments on OIR and scoping memo	2.50
4/18/12	Matt Freedman	GP	Review of case materials in preparation for PHC	0.50
4/18/12	Matt Freedman	GP	Attendance at PHC	3.50
5/16/12	Matt Freedman	GP	Review of scoping ruling	0.50
5/16/12	Matt Freedman	Comp	Preparation of Notice of Intent to Claim Compensation	0.75
6/3/12	Matt Freedman	TR1	Edits to TURN data request #1 to CAISO	0.50
6/21/12	Matt Freedman	TR1	Review and edits to Woodruff testimony	1.50
6/23/12	Matt Freedman	TR1	Final review and edits to Woodruff testimony	1.00
6/26/12	Matt Freedman	TR1	Review PG&E DR to TURN, communicate with Kevin Woodruff	0.25
7/6/12	Matt Freedman	TR1	Review of Kevin Woodruff rebuttal testimony ideas, email to Woodruff providing guidance for rebuttal	0.50
7/6/12	Matt Freedman	TR1	Review of scoping memo and email to Nina providing guidance for PHC	0.25
7/9/12	Matt Freedman	TR1	Discussion with Kevin Woodruff re: case issues and strategy	0.50
7/9/12	Matt Freedman	TR1	Review of Scoping Ruling and discussion with Nina Suetake re: PHC	0.25
7/9/12	Matt Freedman	TR1	Review of Nina's notes from PHC	0.25
7/10/12	Matt Freedman	TR1	Edits to Woodruff responses to PG&E and SCE data requests	0.50
7/11/12	Matt Freedman	TR1	Review of Woodruff revised responses to PG&E and SCE data requests	0.25
7/19/12	Matt Freedman	TR1	Review of, and edits to, Kevin Woodruff rebuttal testimony	0.50
7/20/12	Matt Freedman	TR1	Review of, and edits to, Kevin Woodruff rebuttal testimony	2.50
7/23/12	Matt Freedman	TR1	Final review of Woodruff rebuttal testimony, discussion with Woodruff re: case issues	1.50
7/23/12	Matt Freedman	TR1	Initial review of rebuttal testimony submitted by other parties	1.50
7/26/12	Matt Freedman	TR1	Discussion of LTPP case issues at TURN energy meeting	0.25
8/3/12	Matt Freedman	EH	Review of cross-examination estimates submitted by other parties	0.50
8/6/12	Matt Freedman	EH	Preparation for evidentiary hearings	4.50
8/7/12	Matt Freedman	EH	Attendance at evidentiary hearings	6.00
8/7/12	Matt Freedman	EH	Preparation of cross examination for ISO witnesses	1.50
8/8/12	Matt Freedman	EH	Preparation of cross examination for ISO witnesses	2.25
8/8/12	Matt Freedman	EH	Attendance at evidentiary hearings	7.00
8/9/12	Matt Freedman	EH	Attendance at evidentiary hearings	5.50
8/10/12	Matt Freedman	EH	Attendance at evidentiary hearings	5.00
8/13/12	Matt Freedman	EH	Preparation of cross examination for AREM witnesses	0.75
8/13/12	Matt Freedman	EH	Review of hearing transcript	0.50
8/13/12	Matt Freedman	EH	Communication w/Earthjustice re: questions for PG&E witness Frazier Hampton	0.25
8/14/12	Matt Freedman	EH	Attendance at evidentiary hearings	3.50
8/15/12	Matt Freedman	EH	Attendance at evidentiary hearings, review of transcript	3.50
8/16/12	Matt Freedman	EH	Review of hearing transcript	0.75
8/17/12	Matt Freedman	EH	Review of hearing transcript	0.50
9/14/12	Matt Freedman	TR1	Review of AREM data request to TURN, communication w/Kevin Woodruff and Dan Douglass (AREM) re: TURN responses	0.50
9/19/12	Matt Freedman	TR1	Initial outlining of opening LTPP brief	2.50
9/19/12	Matt Freedman	TR1	Review and edits to TURN response to AREM/DACC/MEA interrogatory	0.50
9/20/12	Matt Freedman	TR1	Review of LTPP transcripts, development of briefing outline	2.00
9/21/12	Matt Freedman	TR1	Final review and edits to TURN response to AREM/DACC/MEA interrogatory	0.50
9/21/12	Matt Freedman	TR1	Drafting of opening brief	5.50
9/22/12	Matt Freedman	TR1	Drafting of opening brief	2.50
9/23/12	Matt Freedman	TR1	Drafting of opening brief	5.50
9/24/12	Matt Freedman	TR1	Final edits to opening brief	1.25
10/3/12	Matt Freedman	TR1	Review/edits to draft TURN/CEJA/Sierra Club response to PG&E motion	1.00
10/5/12	Matt Freedman	TR2	Review, edits and final drafting of TURN comments on revised LTPP scenarios	0.75
10/9/12	Matt Freedman	TR2	Edits to TURN response to post-workshop questions (per ALJ ruling)	1.00
10/11/12	Matt Freedman	TR1	Review of opening briefs submitted by various parties, drafting of TURN reply brief	3.50
10/12/12	Matt Freedman	TR1	Drafting of TURN reply brief	4.00
10/17/12	Matt Freedman	TR2	Edits to TURN reply comments on revised procurement scenarios	0.50
10/17/12	Matt Freedman	TR2	Edits to TURN reply comments on post-workshop questions	0.50
10/18/12	Matt Freedman	TR2	Final edits to TURN reply comments on revised procurement scenarios	0.25
12/7/12	Matt Freedman	TR2	Review of Gamson PD on Track 2 issues	1.25
12/10/12	Matt Freedman	TR2	Drafting of TURN comments on Gamson PD on Track 2 issues	1.00
12/14/12	Matt Freedman	TR2	Review of opening comments on Track 2 Gamson PD	1.25
12/17/12	Matt Freedman	TR2	Drafting/editing TURN reply comments on Track 2 Gamson PD	0.75
12/17/12	Matt Freedman	RenInt	Review of Kevin Woodruff draft email to Energy Division re: CAISO integration studies	0.25
1/3/13	Matt Freedman	TR1	Initial review of Gamson PD on Phase 1 issues	1.00
1/11/13	Matt Freedman	TR1	Review of Gamson Track 1 PD	1.50
1/14/13	Matt Freedman	TR1	Review of opening comments on Gamson PD filed by other parties	2.25

Date	Atty	Task	Description	Time Spent
1/14/13	Matt Freedman	TR1	Drafting/edits to TURN opening comments on Gamson PD	2.00
1/21/13	Matt Freedman	TR1	Drafting/editing TURN reply comments on Gamson Track 1 PD	1.50
2/8/13	Matt Freedman	TR1	Review of revised Gamson PD on LTPP issues	0.50
3/21/13	Matt Freedman	TR3	Review of ALJ Gamson ruling on Track III issues, message to Kevin Woodruff re: Track III comments	0.25
4/23/13	Matt Freedman	TR3	Review of Woodruffoutline for Phase 3 LTPP comments	0.50
4/26/13	Matt Freedman	TR3	Review and edits to TURN Track III comments	1.25
5/1/13	Matt Freedman	RenInt	Discussion with Kevin Woodruffre: renewable integration, LTPP issues	0.50
5/8/13	Matt Freedman	TR3	Review/edits to TURN reply comments on Track III issues	1.25
5/8/13	Matt Freedman	TR4	Review of Gamson ruling, Woodruffnotes re: status conference, drafting notes to Tom Long re: status conference issues	1.00
6/12/13	Matt Freedman	TR4	Review of IEP motion for acceleration of Track 4, correspondence with Kevin Woodruffre: TURN position	0.25
6/17/13	Matt Freedman	TR4	Review of PG&E data request #1 to TURN, correspondence with TURN consultants re: responses	0.25
6/26/13	Matt Freedman	TR4	Discussion with Tom Long re: SONGS replacement issues	0.25
8/9/13	Matt Freedman	TR4	Review and edits to TURN Data Request #2 to CAISO	0.25
9/3/13	Matt Freedman	GP	Preparation for PHC - review of case materials, Gamson ruling, notes from Kevin Woodruff	0.50
9/3/13	Matt Freedman	TR4	Review/edits to TURN DR#1 to SCE, TURN DR#1 to SDG&E	0.25
9/4/13	Matt Freedman	EH	Attendance at PHC	1.50
9/4/13	Matt Freedman	GP	Discussion with Kevin Woodruffre: schedule and strategy for Tracks 2 and 4	0.50
9/9/13	Matt Freedman	GP	Discussion with Kevin Woodruffre: Track 4 and 2 schedule comments	0.50
9/9/13	Matt Freedman	GP	Drafting of TURN comments on Track 2/4 schedule and sequencing issues	2.50
9/10/13	Matt Freedman	GP	Final review/edits to TURN comments on Track 2/4 schedule and sequencing	0.75
9/10/13	Matt Freedman	GP	Preliminary review of opening comments on Track 2/4 schedule and sequencing submitted by other parties	0.50
9/17/13	Matt Freedman	GP	Review of ALJ ruling re: revised schedule for Track 2/4, review of various Track 4 SCE data responses to TURN	0.75
9/20/13	Matt Freedman	TR4	Review and comments on Kevin Woodruffoutline for Track 4 testimony	0.25
9/30/13	Matt Freedman	TR4	Preliminary review/organization of Track 4 opening testimony by other parties	0.50
9/30/13	Matt Freedman	TR4	Review/edits to Woodrufftestimony on Track 4 issues	1.50
10/14/13	Matt Freedman	TR4	Review/edits to Woodruffdraft rebuttal testimony on Track 4 issues, conversation with Woodruff to discuss edits and other case issues	0.75
10/14/13	Matt Freedman	TR4	Initial review of rebuttal testimony by other parties, edits to TURN DR#4 to CAISO	0.50
10/15/13	Matt Freedman	TR4	Review of ALJ Gamson update re: hearings. Discussion with Tom Long re: upcoming PHC and Woodrufftestimony	0.25
10/18/13	Matt Freedman	TR4	Review of CAISO motion to limit scope of Track 4 hearings, communication with Tom/Kevin re: TURN response and notes for upcoming PHC	1.00
10/22/13	Matt Freedman	GP	Review of PHC transcript, communication with Tom Long and Kevin Woodruffre: hearings	0.50
10/25/13	Matt Freedman	EH	Preparation for evidentiary hearings and review of testimony	2.50
10/27/13	Matt Freedman	EH	Hearing preparation, cross prep, review of testimony, review of cross exhibits submitted by various parties	4.25
10/28/13	Matt Freedman	EH	Review of transcripts, preparation of cross-examination for CAISO/SDG&E witnesses	2.25
10/28/13	Matt Freedman	EH	Participation at evidentiary hearings	5.00
10/29/13	Matt Freedman	EH	Review of transcripts, preparation of cross-examination for SCE witnesses	1.00
10/29/13	Matt Freedman	EH	Participation at evidentiary hearings	5.50
10/30/13	Matt Freedman	EH	Review hearing transcripts, preparation of cross for remaining SCE witnesses	0.50
10/30/13	Matt Freedman	EH	Participation at evidentiary hearings	5.50
10/31/13	Matt Freedman	EH	Review of transcript, preparation of cross-examination for AREM (Rochman) and IEP (Monson)	1.50
10/31/13	Matt Freedman	EH	Participation at evidentiary hearings	5.00
11/1/13	Matt Freedman	EH	Participation at evidentiary hearings	3.50
11/18/13	Matt Freedman	TR4	Review of Woodruffdraft outline for LTPP Track 4 brief, comments on outline	0.50
11/19/13	Matt Freedman	TR4	Meeting with Tom Long and Kevin Woodruff re: LTPP Track 4 brief	0.75
1/8/14	Matt Freedman	TR3	Review/edits to TURN comments on technical scenarios	0.50
1/14/14	Matt Freedman	TR3	Review/edits to draft TURN reply comments on LTPP scenarios	0.50
1/15/14	Matt Freedman	TR3	Final edits to TURN reply comments on LTPP scenarios	0.50
2/11/14	Matt Freedman	TR4	Initial review of Track 4 Gamson PD	0.50
2/27/14	Matt Freedman	TR4	Review of Track 4 Proposed Decision of ALJ Gamson	1.25
3/3/14	Matt Freedman	TR4	Review/edit of TURN opening comments on Track 4 PD	1.00
3/9/14	Matt Freedman	TR4	Review of opening comments on Gamson PD submitted by various parties	1.50
3/10/14	Matt Freedman	TR4	Review/edits to TURN reply comments on Gamson PD	1.00
4/17/14	Matt Freedman	TR3/AFR	Review of Sierra Club Application for Rehearing of D.14-02-040; Legal research on Bagley Key	2.50
4/18/14	Matt Freedman	TR3/AFR	Drafting of TURN response to Sierra AFR D.14-02-040	2.25
5/9/14	Matt Freedman	comp	Drafting of TURN compensation request	4.00
5/10/14	Matt Freedman	comp	Drafting of TURN compensation request	4.00
5/11/14	Matt Freedman	comp	Drafting of TURN compensation request	6.00
5/12/14	Matt Freedman	comp	Drafting of TURN compensation request	5.00
5/13/14	Matt Freedman	comp	Drafting of TURN compensation request	6.00
Total: Matt Freedman				201.75

Attorney: MH

8/3/12	Marcel Hawiger	TR1/EE	Research CPUC decisions re using DR to defer gen capacity	0.75
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Date	Atty	Task	Description	Time Spent
1/9/13	Marcel Hawiger	GP	Skim Gamson PD on LCR and CAM	0.25
8/13/13	Marcel Hawiger	TR4	Read CEJA comments on DG potential workshop	0.25
9/9/13	Marcel Hawiger	GP	Read NRDC draft comments on schedule for LTPP	0.25
2/12/14	Marcel Hawiger	TR3	Read and edit Kevin's comments on Tr 3 PD	0.50
2/13/14	Marcel Hawiger	TR3	Read sections of Track 3 PD on CAM and transparency; TC mtg w/ Kevin; finalize edits on comments on PD	1.25
2/18/14	Marcel Hawiger	TR3	Finalize comments on Tr3 PD	0.25
2/24/14	Marcel Hawiger	TR3	Edit and finalize reply comments drafted by Kevin	0.50
2/24/14	Marcel Hawiger	TR3	Read comments on PD of ARem, MCE, WPTF, ORA, SC/CEJA, PG&E, SCE	1.50
3/5/14	Marcel Hawiger	GP	Skim comments from 3/3 of parties (ISO, POC, VSI, NRG, CEERT, EDF, TURN) re tr4 PD	0.50
3/12/14	Marcel Hawiger	GP	Skim various ex parte notices re Tr4 PD	0.25
Total: MH				6.25
<u>Attorney: NS</u>				
7/6/12	Nina Suetake	GP	Read scoping ruling	0.50
7/6/12	Nina Suetake	GP	Read/draft emails re: TURN position and issues for PHC	0.25
7/6/12	Nina Suetake	GP	Read TURN comments for background	1.00
7/9/12	Nina Suetake	GP	Review draft testimony to prep for PHC	0.50
7/9/12	Nina Suetake	GP	Attend PHC	2.00
7/9/12	Nina Suetake	GP	Read/draft emails re: issues for PHC	0.25
7/9/12	Nina Suetake	GP	Read/draft emails re: clarifying ALJ statements from PHC	0.25
7/30/12	Nina Suetake	TR1/CAM	Read TURN testimony	2.00
8/2/12	Nina Suetake	TR1/CAM	Talk to MF re: cost allocation issue for hearings	0.25
Total: NS				7.00
<u>Attorney: TL</u>				
5/8/13	Tom Long	GP	Begin review of materials for 5/10/13 PHC and discuss with Matt	0.50
5/9/13	Tom Long	GP	Read recommended positions for PHC of Kevin, Matt, and ph call w/Kevin re same (0.25)	1.00
5/10/13	Tom Long	GP	Participate in status conf re Track 2 and Track 4	1.50
5/14/13	Tom Long	GP	Prep e-mail to Matt summarizing tentative Track 2 and 4 scheds discussed at PHC	0.25
6/26/13	Tom Long	TR4	Discuss w/Matt TURN potential participation in CEC/CPUC W/S re planning for SONGS retirement	0.25
6/27/13	Tom Long	TR4	Rev invitation/draft agenda for CEC/CPUC w/s and prep e-mail to Matt, Marcel re options for TURN role	0.50
9/30/13	Tom Long	LivPilot	Ph call w/Comm Florio re C. Mitchell participation in SCE pilot symposium planning and discuss same w/Matt	0.25
10/15/13	Tom Long	GP	Discuss issues for PHC w/Matt	0.25
10/18/13	Tom Long	TR4	Review KW opening and rebuttal testimony in prep for PHC	0.75
10/18/13	Tom Long	TR4	Conf call w/ ORA and environ parties re coordinating cross, PHC issues	1.00
10/20/13	Tom Long	TR4	Prepare e-mails to Kevin, Matt re prep for PHC	0.50
10/21/13	Tom Long	TR4	Review e-mails from KW, Matt, ALJ Rulings re prep for PHC	0.75
10/21/13	Tom Long	TR4	Rev CAISO m/limit scope of hearings, DRA response, KW analysis, and review decisions cited by CAISO	1.00
10/22/13	Tom Long	GP	Attend PHC	2.25
10/22/13	Tom Long	TR4	Prep e-mail to Matt recapping key points from PHC	0.50
10/31/13	Tom Long	TR4	Discuss w/Matt issues in covering evid hearings for him	0.25
11/1/13	Tom Long	TR4	Cover evid hearings for Matt and inform Matt re issues raised	1.75
11/5/13	Tom Long	TR4	Meet w/Matt re hand off of brief responsibilities	0.25
11/6/13	Tom Long	LivPilot	Attend CPUC workshop re SCE Preferred Resources Pilot	5.50
11/18/13	Tom Long	TR4	Rev KW draft outline of op. br. and prep e-mail to KW, Matt re clarifying drafting responsibilities	0.50
11/19/13	Tom Long	TR4	Conf call w/Kevin, Matt re key points for op brief	0.50
11/19/13	Tom Long	TR4	Overview of record of evid hrg	0.50
11/21/13	Tom Long	TR4	Rev and respond to KW e-mail re load-shedding cost-benefit tables	0.25
11/22/13	Tom Long	TR4	Ph call w/KW re questions, changes to draft	1.00
11/22/13	Tom Long	TR4	Rev and do initial edits of KW draft of opening brief	2.50
11/23/13	Tom Long	TR4	Detaild edits to KW draft	2.50
11/24/13	Tom Long	TR4	Rev and edit KW's revised draft and draft FOFs and COLs	1.00
11/25/13	Tom Long	TR4	Final edits to opening brief	0.50
11/26/13	Tom Long	LivPilot	Rev and analyze C. Mitchell proposal for collaborative work effort with SCE on PRP	0.50
12/2/13	Tom Long	TR4	E-mails w/KW re approach for reply brief	0.25
12/6/13	Tom Long	TR4	Coordinate responsibilities w/Kevin, Matt	0.25
12/9/13	Tom Long	TR4	Discuss issues for reply briefs (new procurement authorization, CAM) w/KW	0.75
12/9/13	Tom Long	TR4	Initial review of opening briefs	2.00
12/10/13	Tom Long	TR4	Initial review of opening briefs	0.75
12/10/13	Tom Long	TR4	Detailed review of briefs of CAISO (1.25), SCE (0.25)	1.50
12/12/13	Tom Long	TR4	Rev KW outline of reply brief	0.25
12/12/13	Tom Long	TR4	Rev and edit KW draft re need/modeling (load shedding) issues	1.00
12/13/13	Tom Long	TR4	Rev and edit Part 2 of KW draft reply (cost allocation)	1.00
12/13/13	Tom Long	TR4	Ph call w/KW re TURN response to other parties on add'l procurement, needed revisions to draft reply	1.25
12/14/13	Tom Long	TR4	Rev and edit KW draft #2 of reply brief	0.50

Date	Atty	Task	Description	Time Spent
12/15/13	Tom Long	TR4	Rev and edit KW draft #3 of reply brief	0.75
12/16/13	Tom Long	TR4	Final review of reply brief	0.25
1/22/14	Tom Long	LivPilot	Phone call w/C. Mitchell re her role in implementation/review of Preferred Resources Pilot	0.75
Total: TL				40.00
Grand Total				1092.50

Attachment 3
Cost/Expense Detail

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R.12-03-014 EXPENSES

Date	Atty	Case	Task	Description	Amount
<u>Activity: \$Auto/Park/Toll</u>					
7/15/13	K Woodruff	R12-03-014	\$Auto/Park/Toll	Parking at Sacramento airport	\$34.00
Total: \$Auto/Park/Toll					\$34.00
<u>Activity: \$Cons Travel</u>					
7/14/13	K Woodruff	R12-03-014	\$Cons Travel	Round trip air fare from SMF-BUR	\$429.80
11/5/13	C Mitchell	R12-03-014	\$Cons Travel	private car Reno-SF and return 450 mi. 11/5-11/7): 450 miles @ \$0.55 to attend workshops	\$225.00
Total: \$Cons Travel					\$654.80
<u>Activity: \$Copies</u>					
4/6/12	Matt	R12-03-014	\$Copies	Copies of Comments of The Utility Reform Network on the Order Instituting Rulemaking for the Commissioner and ALJ	\$1.20
5/17/12	Matt	R12-03-014	\$Copies	Copies of Notice of Intent to Claim Intervenor Compensation and, if requested (and checked), ALJ Ruling on Showing of Significant Financial Hardship for the Commissioner and ALJ	\$1.60
6/25/12	Matt	R12-03-014	\$Copies	Copies of Prepared Testimony of Kevin Woodruff on Behalf of The Utility Reform Network Regarding Track I - Local Reliability for the Commissioner and ALJ	\$17.20
7/23/12	Matt	R12-03-014	\$Copies	Copies of Reply Testimony of Kevin Woodruff on Behalf of The Utility Reform Network Regarding Track I - Local Reliability for the Commissioner and ALJ	\$4.20
8/10/12	NS	R12-03-014	\$Copies	Colour Drop Inv. 14219; 535 pages	\$63.85
9/24/12	Matt	R12-03-014	\$Copies	Copies of Opening Brief of The Utility Reform Network for the Commissioner and ALJ	\$6.80
9/24/12	Matt	R12-03-014	\$Copies	Copies of Opening Brief of The Utility Reform Network for the ALJ	\$3.40
10/5/12	Matt	R12-03-014	\$Copies	Copies of Comments of The Utility Reform Network in Response to the Assigned Commissioner Ruling Setting Forth Standardized Planning Scenarios for the Commissioner and ALJ	\$0.80
10/9/12	Matt	R12-03-014	\$Copies	Copies of Response of The Utility Reform Network to Post-Workshop Questions for the Commissioner and ALJ	\$1.20
10/12/12	Matt	R12-03-014	\$Copies	Copies of Reply Brief of The Utility Reform Network for the Commissioner and ALJ	\$2.20
10/19/12	Matt	R12-03-014	\$Copies	Copies of Reply Comments of The Utility Reform Network in Response to the Assigned Commissioner Ruling Setting Forth Standardized Planning Scenarios for the Commissioner and ALJ	\$0.80
10/23/12	Matt	R12-03-014	\$Copies	Copies of Reply Comments of The Utility Reform Network Regarding Post-Workshop Questions for the Commissioner and ALJ	\$0.60
12/10/12	rap	R12-03-014	\$Copies	Copies for comments regarding rate setting sent to ALJ and Commissioner.	\$0.80
12/17/12	rap	R12-03-014	\$Copies	Copies for Reply Comments sent to ALJ and Commissioner.	\$1.00
1/14/13	rap	R12-03-014	\$Copies	Copies for Comments sent to ALJ and Commissioner.	\$1.60
1/22/13	JG	R12-03-014	\$Copies	Copies for Reply Comments sent to ALJ and Commissioner.	\$1.20
4/26/13	JG	R12-03-014	\$Copies	Copies for Opening Comments Of TURN on Track III Rules Issues sent to ALJ and Commissioner.	\$1.00
5/10/13	JG	R12-03-014	\$Copies	Copies of Reply Comments of TURN on Track III Rules Issues sent to ALJ and Commissioner.	\$1.40

Date	Atty	Case	Task	Description	Amount
7/15/13	JG	R12-03-014	\$Copies	Copies of Response of The Utility Reform Network to the Joint Motion of The Division of Ratepayer Advocates, California Environmental Justice Alliance, and Sierra Club California to Amend the Revised Scoping Memo to Reflect the Closure of the San Onofre Nuclear Power Station Generation Facilities sent to ALJ and Commissioner.	\$0.60
9/10/13	JG	R12-03-014	\$Copies	Copies of Comments Of TURN On Track 2 And 4 Scheduling Proposals sent to ALJ and Commissioner.	\$1.20
10/28/13	MF	R12-03-014	\$Copies	Colour Drop Inv. 90970; B&W copies 1100 @ .11 each = \$121.00 plus tax \$10.59	\$131.59
10/29/13	MF	R12-03-014	\$Copies	Colour Drop Inv. 90983 B&W copies 315 @ .11 each = \$34.65 plus tax \$3.03	\$37.68
10/29/13	MF	R12-03-014	\$Copies	Colour Drop Inv. 90976; B&W copies 410 @ .11 each = \$45.10 plus tax \$3.95	\$49.05
11/25/13	JG	R12-03-014	\$Copies	Copies of Opening Brief Of The Utility Reform Network On Track 4 Issues sent to ALJ and Commissioner.	\$5.00
12/16/13	JG	R12-03-014	\$Copies	Copies of Reply Brief Of TURN On Track 4 Issues sent to ALJ and Commissioner.	\$2.80
1/8/14	JG	R12-03-014	\$Copies	Copies of Comments of TURN on Workshop Planning Assumptions For Use In The 2014 Long Term Procurement Plan Proceeding And The CAISO 2014-2015 Transmission Planning Process sent to ALJ and Commissioner.	\$0.80
2/18/14	JG	R12-03-014	\$Copies	Copies of Opening Comments of TURN on the Proposed Decision of ALJ Gamson in track 3 of the 2012 LTTP sent to ALJ and Commissioner.	\$1.60
2/24/14	JG	R12-03-014	\$Copies	Copies of Reply Comments of TURN sent to Parties, ALJ and Commissioner.	\$2.00
3/3/14	rap	R12-03-014	\$Copies	Copies of Comments of TURN on Track 4 Proposed Decision of ALJ Gamson.	\$1.50
3/10/14	JG	R12-03-014	\$Copies	Copies of Reply Comments of TURN on Track 4 Proposed Decision of ALJ Gamson sent to ALJ and Commissioner.	\$2.20
Total: \$Copies					\$346.87
<u>Activity: \$Lodging</u>					
8/11/12	K Woodruff	R12-03-014	\$Lodging	Hotel in S.F. (3 nights)	\$554.65
7/15/13	K Woodruff	R12-03-014	\$Lodging	Hotel in LA	\$166.58
11/5/13	C Mitchell	R12-03-014	\$Lodging	hotel -- Inn at Opera lodging (11/5-11/7) to attend meetings in San Francisco with Commissioner Florio and participate in November 6 Symposium	\$492.88
Total: \$Lodging					\$1,214.11
<u>Activity: \$Postage</u>					
4/6/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Comments of The Utility Reform Network on the Order Instituting Rulemaking to the Commissioner and ALJ	\$2.20
5/17/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Notice of Intent to Claim Intervenor Compensation and, if requested (and checked), ALJ Ruling on Showing of Significant Financial Hardship to the Commissioner and ALJ	\$2.20
6/25/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Prepared Testimony of Kevin Woodruff on Behalf of The Utility Reform Network Regarding Track I - Local Reliability to the Commissioner and ALJ	\$4.60
7/23/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Reply Testimony of Kevin Woodruff on Behalf of The Utility Reform Network Regarding Track I - Local Reliability to the Commissioner and ALJ	\$2.60
9/24/12	Matt	R12-03-014	\$Postage	Postage to mail copy of Opening Brief of The Utility Reform Network to the ALJ	\$1.50

Date	Atty	Case	Task	Description	Amount
9/24/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Opening Brief of The Utility Reform Network to the Commissioner and ALJ	\$3.00
10/5/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Comments of The Utility Reform Network in Response to the Assigned Commissioner Ruling Setting Forth Standardized Planning Scenarios to the Commissioner and ALJ	\$2.20
10/9/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Response of The Utility Reform Network to Post-Workshop Questions to the Commissioner and ALJ	\$2.20
10/12/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Reply Brief of The Utility Reform Network to the Commissioner and ALJ	\$2.20
10/19/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Reply Comments of The Utility Reform Network in Response to the Assigned Commissioner Ruling Setting Forth Standardized Planning Scenarios to the Commissioner and ALJ	\$1.80
10/23/12	Matt	R12-03-014	\$Postage	Postage to mail copies of Reply Comments of The Utility Reform Network Regarding Post-Workshop Questions to the Commissioner and ALJ	\$1.80
12/10/12	rap	R12-03-014	\$Postage	Postage for reply comments regarding rate setting sent to ALJ and Commissioner.	\$1.80
12/17/12	rap	R12-03-014	\$Postage	Postage for Reply Comments sent to ALJ and Commissioner.	\$2.20
1/14/13	rap	R12-03-014	\$Postage	Postage for Comments sent to ALJ and Commissioner.	\$2.20
1/22/13	JG	R12-03-014	\$Postage	Postage for Reply Comments sent to ALJ and Commissioner.	\$2.20
2/28/13	JG	R12-03-014	\$Postage	Postage to mail NDA agreement to PG&E, attention Sharon Tatai.	\$1.12
4/26/13	JG	R12-03-014	\$Postage	Postage for Opening Comments Of TURN on Track III Rules Issues sent to ALJ and Commissioner.	\$2.24
5/10/13	JG	R12-03-014	\$Postage	Postage for Reply Comments of TURN on Track III Rules Issues sent to ALJ and Commissioner.	\$2.24
7/15/13	JG	R12-03-014	\$Postage	Postage for Response of The Utility Reform Network to the Joint Motion of The Division of Ratepayer Advocates, California Environmental Justice Alliance, and Sierra Club California to Amend the Revised Scoping Memo to Reflect the Closure of the San Onofre Nuclear Power Station Generation Facilities sent to ALJ and Commissioner.	\$1.84
9/10/13	JG	R12-03-014	\$Postage	Postage for Comments Of TURN On Track 2 And 4 Scheduling Proposals sent to ALJ and Commissioner.	\$2.24
11/25/13	JG	R12-03-014	\$Postage	Postage for Opening Brief Of The Utility Reform Network On Track 4 Issues sent to ALJ and Commissioner.	\$2.64
12/16/13	JG	R12-03-014	\$Postage	Postage for Reply Brief Of TURN On Track 4 Issues sent to ALJ and Commissioner.	\$2.24
1/8/14	JG	R12-03-014	\$Postage	Postage for Comments of TURN on Workshop Planning Assumptions For Use In The 2014 Long Term Procurement Plan Proceeding And The CAISO 2014-2015 Transmission Planning Process sent to ALJ and Commissioner.	\$1.84
2/18/14	JG	R12-03-014	\$Postage	Postage for Opening Comments of TURN on the Proposed Decision of ALJ Gamson in track 3 of the 2012 LTPP sent to ALJ and Commissioner.	\$2.38
2/24/14	JG	R12-03-014	\$Postage	Postage for Reply Comments of TURN sent to Parties, ALJ and Commissioner.	\$4.76
3/3/14	rap	R12-03-014	\$Postage	Postage for Comments of TURN on Track 4 Proposed Decision of ALJ Gamson.	\$3.57
3/10/14	JG	R12-03-014	\$Postage	Postage for Reply Comments of TURN on Track 4 Proposed Decision of ALJ Gamson sent to ALJ and Commissioner.	\$3.57
Total: \$Postage					\$65.38
Grand Total					\$2,315.16