Revised May 2014

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations	Rulemaking 11-10-023 (Filed October 20, 2011)

INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK

Intervenor: The Utility Reform Network (TURN)		**For contribution to Decision (D.) 14-06-050**
Claimed: $ 48,336.07		**Awarded: $**
Assigned Commissioner: Michel 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: 9/2/14	**Printed Name:**	**Thomas J. Long**

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

A. Brief description of Decision:	Decision 14-06-050 adopts, among other things: an interim "flexible capacity" framework for 2015 through 2017 as an additional component of Resource Adequacy (RA) requirements; flexible capacity obligations for 2015; and minor refinements to the RA program for 2015.

B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	N/A	
2. Other specified date for NOI:	Nov. 28, 2011	

3. Date NOI filed:	May 11, 2012 (see comment below)	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.11-11-008	
6. Date of ALJ ruling:	January 3, 2012	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.11-11-008	
10. Date of ALJ ruling:	January 3, 2012	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-06-050	
14. Date of issuance of Final Order or Decision:	July 1, 2014	
15. File date of compensation request:	September 2, 2014	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
3	On August 31, 2012, ALJ Gamson issued a ruling accepting TURN's late-filed NOI and determining that TURN's eligibility for intervenor compensation would start on May 11, 2012, the date on which TURN filed its NOI. All of the hours claimed in this request were incurred after May 11, 2012.	
15	The 60th day after the issuance of D.14-06-050 fell on Saturday, August 30, 2014 and the following Monday was the Labor Day holiday when the Commission was closed. Pursuant to Rule 1.15 of the Commission's Rules of Practice and Procedure, this Request for Compensation is timely filed on the first	

	business day thereafter.	

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. The Decision (p. 13) encouraged CAISO to consider the following TURN recommendations for the 2015 Flexible Capacity Needs Assessment: (1) the CAISO should develop a Flexible Capacity Needs Assessment computation manual; and (2) the CAISO should compute flexible requirements based on summer and non-summer seasons	TURN 5/8/14 Comments, pp. 2-3	
2. Consistent with TURN's recommendations, the Decision (p. 16) attempted to minimize differences between the flexible capacity requirements adopted by the CPUC and the CAISO's FRAC-MOO proposal and stated the Commission's expectation that the CAISO will align its FRAC-MOO proposal as closely as possible the Commission's adopted framework.	TURN 2/24/14 Comments, p. 3 TURN 3/6/14 Comments, p. 2 TURN 4/18/14 Comments, pp. 4-5.	
3. Consistent with TURN's recommendation, the Decision (p. 20) determines that, for the 2015 RA year, the Commission will use load-ratio share to allocate flexibility requirements among Load Serving Entities (LSEs), as a practical interim solution.	TURN 2/24/14 Comments, pp. 1-2.	
4. Consistent with TURN's	TURN 2/18/14 Comments, pp. 2-4	

recommendation, with respect to the issue of CAM and CHP resources procured outside the procuring IOU service areas, the Decision (p. 41) agrees with the concerns raised by TURN and other parties regarding the initial Energy Division (ED) proposal, further agrees with TURN that adopting ED's separate proposed Scheduled Outage Replacement Rule for CAM and CHP resources obviates the need for certain elements of the initial ED proposal, and adopts the revised ED proposal supported by TURN and other parties.	TURN 3/3/14 Comments, pp. 3-4 TURN 4/18/14 Comments, p. 2 TURN 4/25/14 Comments, pp. 1-2	
5. Consistent with TURN's recommendation, the Decision (p. 60) declines to adopt an ELCC model and ELCC-based QC values for wind and solar resources because there was not sufficient time for vetting and iteration of ED's proposed methodology.	TURN 2/18/14 Comments, pp. 1-2 TURN 3/3/14 Comments, pp. 1-3 TURN 4/18/14 Comments, p. 1	

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

	Intervenor's Assertion	CPUC Discussion
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: With respect to the first substantial contribution listed above, TURN believes that it was the only party to make that recommendation. For the other substantial contributions, depending on the issue, one or more of the following other parties may have had a position similar to TURN: ORA, NRG, PG&E, SCE, CAISO and/or AReM.		
d. Intervenor's claim of non-duplication: TURN and ORA represented similar interests in this proceeding. (While both represented ratepayer interests, TURN		

[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.

alone focuses its representation on the interests of residential and small commercial customers.) TURN accordingly took steps to coordinate with ORA, as appropriate. For example, TURN took the lead in analyzing CAISO's flexible capacity needs assessment for 2015 and making recommendations for improving CAISO's process for the 2016 assessment. In addition, TURN devoted relatively more resources than ORA to explaining the issues with the ELCC model that necessitating postponing its use for estimating QC values for wind and solar resources. The fact that other parties shared TURN's perspective on various other issues did not result in TURN's undue duplication with those parties. A rulemaking proceeding of this nature attracts a range of parties, and some degree of overlap in positions is inevitable. In the specific case of the issues here, the range of interests represented by parties with positions overlapping with TURN's varied widely, from generators to marketers to utilities to consumer representatives. TURN's positions were based on the independent analysis of its highly experienced and respected expert, Kevin Woodruff, and complementary to the offerings of others. TURN's independent perspective contributed to a full record upon which the Commission could base its determinations. For all of these reasons, TURN submits that the Commission should find no undue duplication between TURN's participation and that of DRA or other parties.	

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

#	Intervenor's Comment	CPUC Discussion

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

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

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
TURN's advocacy reflected in D.14-06-050 addressed policy and implementation matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.14-06-050, given the nature of the issues presented. While it is difficult to place a dollar value on Resource Adequacy (RA) issues, TURN submits that our participation should result in reduced customer costs by promoting accurate flexible capacity needs assessments and minimizing implementation costs. In this case as in prior RA proceedings, these benefits far exceed the modest cost of TURN's participation. (*See, i.e.* D.12-06-014, issued in R.09-10-032, as well as D.09-11-029, issued in R.08-01-025, and D.07-03-011, issued in R.05-12-013 (two earlier RA proceedings), which found that the benefits from	

TURN's participation on RA policy issues outweighed the costs of TURN's participation.) For all of these reasons, the Commission should find that TURN's efforts here have been productive.	
b. Reasonableness of hours claimed: This Request for Compensation includes approximately 160 total substantive hours for TURN's attorney and consultant, or the equivalent of four weeks of full-time work by a single person (40 hours/week). TURN submits that this is a reasonable amount of time, given that this phase of the proceeding, resulting in D.14-06-050, spanned ten months, required careful analysis of two highly detailed flexible capacity proposals by the Joint Parties and by Energy Division, required careful scrutiny of several new and complex proposals, involved several days of workshops and ISO stakeholder meetings, and involved eight formal pleadings filed by TURN (excluding compensation-related pleadings) and three sets of stakeholder comments to the CAISO. TURN was efficient in staffing this proceeding and pursuing our objectives. As reflected in the attached timesheets, Mr. Long was TURN's sole attorney in this phase of the case. Throughout this phase, Mr. Long was assisted by outside consultant Kevin Woodruff, of Woodruff Expert Services, the same expert TURN has extensively relied on in previous Resource Adequacy rulemaking proceedings. Once again, Mr. Long relied heavily on Mr. Woodruff, resulting in Mr. Woodruff's incurring more than 80% of TURN's total hours (excluding intervenor compensation-related time). This reliance on Mr. Woodruff's extensive expertise significantly reduced TURN's attorney hours and thereby resulted in efficiencies in TURN's participation in this proceeding. TURN's work on the flexible capacity issues in this phase of the docket included a significant number of hours reviewing and commenting upon CAISO FRAC-MOO proposals. This work reflects the intertwined nature of the Commission's and CAISO's flexible capacity policies. Accordingly, TURN participated in the CAISO stakeholder process that developed the FRAC-MOO, including participating in meeting and filing written comments on issues related to the computation of total and "category specific" flexible needs. This participation in the CAISO process was integral to TURN's substantial contributions on flexible capacity issues enumerated in Section II.A and should be fully compensated. TURN claims 4.0 hours (approximately 2% of TURN's total substantive hours, mostly incurred by Kevin Woodruff) for its work analyzing the ISO's Local Capacity Requirements (LCR) study. As D.14-06-050 reflects, LCR was one of the issues resolved in the Decision. The time incurred related to the LCR issue was devoted to understanding and	

analyzing the ISO study and its results. TURN presented a concern about the CAISO analysis in stakeholder comments to the CAISO. TURN was sufficiently satisfied with the CAISO's response to TURN's comments that TURN did not see a reason to file any comments with the CPUC. Nevertheless, the fact that TURN undertook to scrutinize the CAISO study and found no problems worth commenting upon could give the Commission confidence that the ISO study and results were reliable. In this respect, TURN's analysis made a substantial contribution to the final decision adopting the ISO study results, and TURN did so efficiently by incurring a small number of hours and avoiding the filing of an unnecessary pleading with the Commission. Accordingly, TURN submits that these hours are reasonable and should be compensated.

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

TURN's request also includes 7.5 hours devoted to the preparation of this request for compensation by Mr. Long. This is a reasonable figure consistent with the scale of the proceeding and TURN's level of involvement in it. Mr. Long has prepared this request because of his involvement in all stages of this phase of the proceeding and his detailed knowledge of TURN's work effort.

c. Allocation of hours by issue:

TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes for its substantive (non-compensation-related) work:

Code	**Description**
Flex Cap (or FC)	Work specifically related to Flexible Capacity requirements and implementation issues
ELCC	Work specifically related to the proposed ELCC methodology for calculating QC for wind and solar resources
CAM	Work specifically related to the initial and revised Energy Division proposals regarding CAM and CHP resources procured outside the serving IOUs service areas
LCR	Work specifically related to Local Capacity Requirements for 2014
GP	Work related to general participation in this proceeding, such as reviewing the scoping memo and other rulings, review of workshop notices, and

	other procedural matters
Comp	Work related to intervenor compensation.

- Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding, in recognition of the fact that the workshops and comments often addressed several discrete issues in a relatively short time frame, the time entries coded # represent approximately 20% of the total hours. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries as follows, based on the following percentages derived from the time TURN devoted to the major issues in the docket:

Flexible Capacity– 92.75 hours - 77.1%
ELCC – 12.50 hours – 10.4%
CAM –10.75 hours – 8.9%
LCR – 4.25 hours – 3.5%

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.

B. Specific Claim:*

CLAIMED						CPUCA WARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Thomas J. Long - attorney	2013	6.75	$555.00	D.14-04-015, p. 28	$3,746.25			
T. Long	2014	18.25	$555.00	See comment #1	$10,128.75			
Kevin Woodruff - expert	2013	20.75	$240.00	D.12-11-050, p. 17	$4,980.00			
K. Woodruff	2014	114.00	$240.00		$27,360.00			
				Subtotal:	$ 46,215.00	*Subtotal:*		$
INTERVENOR COMPENSATION CLAIM PREPARATION **								

Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate	Total $
T. Long	2014	7.5	$555.00	½ of approved rate (see comments #1 below)	$2,081.25			
[Preparer 2]								
					Subtotal: $ 2,081.25		*Subtotal:* $	

COSTS

#	Item	Detail	Amount	Amount
	Phone	Telephone expense related to R.11-10-023, current phase	$11.99	
	Photocopying	Expenses associated with copying pleadings related to R.11-01-023, current phase	$9.00	
	Postage	Expense associated with mailing pleadings related to R.11-10-023, current phase	$18.83	
		TOTAL REQUEST: $ 48,336.07		TOTAL AWARD: $

**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

ATTORNEYINFORMATION

Attorney	Date Admitted to CA BAR[2]	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Thomas J. Long	12/86	124776	No

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

Attachment or Comment #	Description/Comment
Comment #1	At the time of preparing this request, the Commission had not determined the amount by which intervenor attorney hourly rates will be raised for 2014. Accordingly, for 2014, TURN's request uses the approved 2013 rate for Mr. Long. TURN respectfully requests that the Commission adjust Mr. Long's hourly rate by the amount of any general increase it may determine is appropriate for 2014 intervenor hourly rates.
1	**Certificate of Service**

[2] This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch .

2	**Daily Time Record for Attorney and Consultant with Coded Time Entries**
3	**Cost Detail**

D. CPUC Disallowances and Adjustments (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?	

If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	

If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.

2. The requested hourly rates for Intervenor'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 compensation 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. Intervenor is awarded $_____.

2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor 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 Intervenor'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 by Customer

I hereby certify that I have this day served a copy of the foregoing **INTERVENOR COMPENSATION CLAIM OF [Intervenor's Name] AND DECISION ON INTERVENOR COMPENSATION CLAIM** by (check as appropriate):

[ ] hand delivery;
[ ] first-class mail; and/or
[ ] electronic mail

to the following persons appearing on the official Service List:

[Insert names and addresses from official Service List]

Executed this [day] day of [month], [year], at [city], California.

[Signature]

[Typed name and address]

Attachment 1
Certificate of Service

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

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

Revised May 2014

Attachment 2

Contemporaneous Time Sheets for Attorney and Expert Witness

Date	Atty	Case	Task	Description	Time Spent
Attorney: K Woodruff					
8/1/13	K Woodruff	R11-10-023	Flex Cap	Listened to portion of CAISO stakeholder meeting regarding FRAC-MOO tariff.	0.50
8/5/13	K Woodruff	R11-10-023	GP	Reviewed Scoping Ruling; provided additional comments to client.	0.50
9/18/13	K Woodruff	R11-10-023	ELCC	Reviewed Energy Division slides regarding coming ELCC analysis	0.25
9/18/13	K Woodruff	R11-10-023	Flex Cap	Discussed FRAC-MOO tariff and other flexible capacity issues with other parties (CEERT,J.Caldwell/CLECA,B.Barkovich).	0.50
10/7/13	K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO FRAC-MOO straw proposal.	0.50
10/8/13	K Woodruff	R11-10-023	Flex Cap	Continued reviewing CAISO FRAC-MOO straw proposal.	0.25
10/9/13	K Woodruff	R11-10-023	Flex Cap	Prepared for and participated in CAISO FRAC-MOO stakeholder call; reported to client.	4.25
10/14/13	K Woodruff	R11-10-023	Flex Cap	Began reviewing materials for 10/15 workshop.	0.25
10/15/13	K Woodruff	R11-10-023	ELCC	Prepared for and participated in CPUC workshop on ELCC issues; reported to client.	1.00
10/15/13	K Woodruff	R11-10-023	Flex Cap	Prepared for and participated in CPUC workshop on flexible capacity policy issues; reported to client.	5.25
10/22/13	K Woodruff	R11-10-023	ELCC	Prepared informal comments for ED regarding ELCC and flexible capacity modeling.	1.25
11/11/13	K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO's latest FRAC-MOO tariff proposal.	0.25
11/12/13	K Woodruff	R11-10-023	Flex Cap	Continued reviewing CAISO FRAC-MOO tariff proposal.	0.25
11/25/13	K Woodruff	R11-10-023	Flex Cap	Participated in CAISO Flexible Capacity Requirements computation call; reported to client.	2.75
12/5/13	K Woodruff	R11-10-023	Flex Cap	Began preparing comments for CAISO on method for computing flexible capacity requirement.	0.25
12/6/13	K Woodruff	R11-10-023	Flex Cap	Completed and submitted comments to CAISO on flexible capacity procurement computations.	1.75
12/10/13	K Woodruff	R11-10-023	Flex Cap	Communicated with client and ORA (C.Ungson) regarding CAISO delay of meeting on Preferred Resource Auction and scheduling of additional CAISO meeting on FRAC-MOO tariff.	0.25
12/11/13	K Woodruff	R11-10-023	Flex Cap	Communicated with Energy Division (M.Lakhchaura) and ORA (C.Ungson) regarding CAISO FRAC-MOO meeting.	0.25
12/17/13	K Woodruff	R11-10-023	Flex Cap	Reviewed slides from FRAC-MOO stakeholder meeting.	0.25
12/19/13	K Woodruff	R11-10-023	Flex Cap	Reviewed slides from FRAC-MOO stakeholder meeting.	0.25
1/9/14	K Woodruff	R11-10-023	Flex Cap	Discussed pending RA issues with client; reviewed CAISO FRAC-MOO presentation	0.50

Date	Atty	Case	Task	Description	Time Spent
1/9/14	K Woodruff	R11-10-023	ELCC	reviewed ED's proposed ELCC modeling paper (0.50)	0.50
1/10/14	K Woodruff	R11-10-023	Flex Cap	Discussed FRAC-MOO issues with Energy Division (C.Morey,J.Ikle,C.Walker,D.Brooks,M.Lakhchaura); reported to client.	1.25
1/16/14	K Woodruff	R11-10-023	Flex Cap	Listened to Market Surveillance Committee discussion of CAISO's latest FRAC-MOO proposal.	2.50
1/17/14	K Woodruff	R11-10-023	#	Reviewed Energy Division draft proposals for 1/27 workshop.	1.50
1/21/14	K Woodruff	R11-10-023	Flex Cap	Continued reviewing CAISO FRAC-MOO proposal.	0.25
1/22/14	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO FRAC-MOO proposal.	0.75
1/23/14	K Woodruff	R11-10-023	Flex Cap	Prepared for and participated in portion of CAISO stakeholder call regarding FRAC-MOO tariff.	2.75
1/24/14	K Woodruff	R11-10-023	#	Reviewed materials for 1/27 RA workshop; communicated issues to client.	3.00
1/27/14	K Woodruff	R11-10-023	#	Prepared for and participated in workshop on RA issues; discussed with client afterwards.	5.25
1/28/14	K Woodruff	R11-10-023	Flex Cap	Discussed workshop and FRAC-MOO comments with ORA (R.Ciapagea,Y.Laskov) and CLECA (B.Barkovich); began outlining comments to CAISO on FRAC-MOO.	2.00
1/30/14	K Woodruff	R11-10-023	Flex Cap	Completed draft comments to CAISO; sent to client.	5.00
1/31/14	K Woodruff	R11-10-023	Flex Cap	Discussed comments with client and completed comments; sent to CAISO.	0.75
2/10/14	K Woodruff	R11-10-023	ELCC	Began preparing comments on RA issues; asked ED for clarification on RA rules for co-located storage.	1.25
2/11/14	K Woodruff	R11-10-023	ELCC	Continued preparing comments on RA issues.	0.75
2/13/14	K Woodruff	R11-10-023	ELCC	Began preparing comments on issues from January 27 workshop.	1.00
2/13/14	K Woodruff	R11-10-023	Flex Cap	Participated in CAISO call regarding FRAC-MOO tariff.	2.25
2/14/14	K Woodruff	R11-10-023	CAM	Completed draft comments on January 27 workshop issues.	3.50
2/19/14	K Woodruff	R11-10-023	Flex Cap	Reviewed ED's proposal for implementation of flexibility requirements.	1.25
2/20/14	K Woodruff	R11-10-023	Flex Cap	Prepared draft comments for CAISO on FRAC-MOO	1.50
2/20/14	K Woodruff	R11-10-023	Flex Cap	Prepared draft comments for CPUC on ED flexibility implementation proposal.	4.50
2/21/14	K Woodruff	R11-10-023	Flex Cap	Completed comments for CAISO on FRAC-MOO; sent to CAISO.	1.50
2/24/14	K Woodruff	R11-10-023	Flex Cap	Reviewed client's edits on comments; discussed with client.	0.50
2/26/14	K Woodruff	R11-10-023	#	Discussed RA policy issues with SDG&E (N.Tang).	0.25

Date	Atty	Case	Task	Description	Time Spent
2/27/14	K Woodruff	R11-10-023	#	Reviewed parties' comments on Jan. 27 workshop materials.	2.50
2/28/14	K Woodruff	R11-10-023	#	Completed review of parties' comments; began preparing reply comments.	1.00
2/28/14	K Woodruff	R11-10-023	ELCC	Prepare reply comments	2.00
2/28/14	K Woodruff	R11-10-023	CAM	Prepare reply comments	1.75
3/1/14	K Woodruff	R11-10-023	Flex Cap	Prepared draft-final version of reply comments on RA issues reviewed at January 27 workshop.	1.00
3/3/14	K Woodruff	R11-10-023	#	Discussed final version of comments with client; began reviewing parties' 2/24 comments for replies on March 6.	3.00
3/4/14	K Woodruff	R11-10-023	Flex Cap	Began preparing reply comments in response to parties' 2/24 comments.	2.50
3/5/14	K Woodruff	R11-10-023	Flex Cap	Completed reply comments; sent to client; reviewed client's edits.	3.50
3/10/14	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO latest FRAC-MOO proposal; commented to client and ORA (PSpencer).	0.50
3/17/14	K Woodruff	R11-10-023	LCR	Began preparing comments to CAISO regarding LCR study assumption (Oakley).	0.75
3/18/14	K Woodruff	R11-10-023	LCR	Completed comments to CAISO on LCR study; sent to client.	0.50
3/19/14	K Woodruff	R11-10-023	LCR	Completed comments to CAISO on LCR study; sent to CAISO.	0.25
4/1/14	K Woodruff	R11-10-023	GP	Reviewed agenda and report for April 9 workshop; communicated with client.	0.50
4/2/14	K Woodruff	R11-10-023	Flex Cap	Reviewed agenda and ED's revised flexible capacity report; prepared data request for CAISO regarding flexible requirements study.	2.00
4/3/14	K Woodruff	R11-10-023	#	Began reviewing other ED RA proposals.	0.25
4/5/14	K Woodruff	R11-10-023	#	Reviewed additional ED RA proposals.	0.50
4/7/14	K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO flexible capacity estimate; provided client comments on workshop issues.	1.25
4/8/14	K Woodruff	R11-10-023	Flex Cap	Reviewed ED revised flexible capacity proposal (0.50)	0.50
4/8/14	K	R11-10-023	CAM	Communicated with other parties and ORA and CAC regarding ED's revised CHP RA proposal.	0.50
4/9/14	K Woodruff	R11-10-023	Flex Cap	Continued reviewing ED revised flexible capacity proposal; participated in workshop.	7.25
4/9/14	K Woodruff	R11-10-023	LCR	Reviewed CAISO LCR presentations for 4/10 conference call.	0.50
4/10/14	K Woodruff	R11-10-023	LCR	Participated in CAISO call regarding Local Capacity Requirements; reported to client; researched potential RA issues for comment.	1.75
4/11/14	K Woodruff	R11-10-023	#	Prepared outline of potential comments on RA issues; discussed with client.	1.00
4/15/14	K Woodruff	R11-10-023	ELCC	Began preparing comments on RA issues.	1.50
4/15/14	K Woodruff	R11-10-023	CAM	Prep comments	1.75
4/16/14	K Woodruff	R11-10-023	Flex Cap	Completed draft comments on RA issues; sent to client.	3.25

Date	Atty	Case	Task	Description	Time Spent
	4/17/14 K Woodruff	R11-10-023	Flex Cap	Reviewed CAISO updated flexible capacity presentation; reviewed client's comments and edited RA comments further.	1.00
	4/21/14 K Woodruff	R11-10-023	#	Reviewed parties' comments.	1.50

Date	Atty	Case	Task	Description	Time Spent
	4/21/14 K Woodruff	R11-10-023	CAM	Began preparing reply comments.	1.00
	4/22/14 K Woodruff	R11-10-023	Flex Cap	Completed draft reply comments; sent to client; .	2.50
	4/22/14 K Woodruff	R11-10-023	Flex Cap	reviewed CAISO EFC calculation data for compliance with data request	0.75
	4/24/14 K Woodruff	R11-10-023	Flex Cap	Reviewed client comments on draft reply comments; made additional edits.	0.25
	4/25/14 K Woodruff	R11-10-023	#	Completed reply comments; reviewed other parties' reply comments.	0.50
	5/1/14 K Woodruff	R11-10-023	Flex Cap	Began reviewing CAISO report on flexible capacity needs; reported to client.	0.50
	5/1/14 K Woodruff	R11-10-023	LCR	Began reviewing CAISO report on Local Capacity Requirements; reported to client.	0.25
	5/4/14 K Woodruff	R11-10-023	Flex Cap	Continued reviewing CAISO report on flexible capacity needs.	0.25
	5/5/14 K Woodruff	R11-10-023	Flex Cap	Communicated with client regarding opportunity to comment on flexible capacity study.	0.25
	5/7/14 K Woodruff	R11-10-023	Flex Cap	Began preparing comments on CAISO Flexible Capacity Requirements study; discussed with client.	4.25
	5/8/14 K Woodruff	R11-10-023	Flex Cap	Completed comments; sent to client.	1.50
	5/9/14 K Woodruff	R11-10-023	Flex Cap	Reviewed other party's (PG&E's) comments on CAISO FCR study; commented to client.	0.25
	5/27/14 K Woodruff	R11-10-023	GP	Began reviewing Proposed Decision; communicated with client.	0.50
	6/8/14 K Woodruff	R11-10-023	#	Reviewed Proposed Decision.	2.50
	6/9/14 K Woodruff	R11-10-023	#	Reviewed Proposed Decision.	2.25
	6/11/14 K Woodruff	R11-10-023	Flex Cap	Discussed PD with ORA (P.Spencer).	0.25
	6/12/14 K Woodruff	R11-10-023	Flex Cap	Discussed PD with PG&E (P.Griffes).	0.25
	6/13/14 K Woodruff	R11-10-023	#	Reviewed PD; discussed PD and potential comments with client.	1.25
	6/14/14 K Woodruff	R11-10-023	ELCC	Prepared draft comments on PD	0.50
	6/14/14 K Woodruff	R11-10-023	CAM	Prepared draft comments on PD	0.50
	6/14/14 K Woodruff	R11-10-023	Flex Cap	Prepared draft comments on PD	1.00
	6/16/14 K Woodruff	R11-10-023	#	Discussed draft comments and related issues with client.	0.50
	6/17/14 K Woodruff	R11-10-023	Flex Cap	Reviewed parties' reply comments; communicated with client regarding potential reply comments.	2.00
	6/18/14 K Woodruff	R11-10-023	ELCC	Discussed wind and solar QC issues and other issues with client and wind and solar QC issues with CalWEA (N.Rader,D.Shirmohammadi).	1.00
	6/23/14 K Woodruff	R11-10-023	Flex Cap	Prepared draft reply comments on PD; sent to client.	0.75
Total: K Woodruff					134.75
Attorney: TL					
	9/16/13 TL	R11-10-023	GP	Rev Ph 3 scoping memo and calendar due dates; initial review of ED draft proposal for ES and DR	0.75
	10/8/13 TL	R11-10-023	GP	Discuss workshop coverage,FRAC-MOO, other upcoming events	0.25

Date	Atty	Case	Task	Description	Time Spent
10/14/13	TL	R11-10-023	#	Prep for w/s (0.25); review ED paper re QC/EFCC for ES and DR	1.00
10/15/13	TL	R11-10-023	#	Attend w/s re QC, EFC for DR and energy storage	2.75
10/15/13	TL	R11-10-023	Flex Cap	Attend w/s re use limited resources for flex capacity (1.5)	1.50
10/22/13	TL	R11-10-023	ELCC	Rev KW informal comments to ED re ELCC methodologies	0.25
12/6/13	TL	R11-10-023	Flex Cap	Rev and edit KW draft cmts to CAISO re flex cap requirement computtion methodology	0.25
1/9/14	TL	R11-10-023	GP	Meet w/KW to plan for next steps	0.25
1/10/14	TL	R11-10-023	Flex Cap	Rev and respond to KW e-mail re issues in CAISO FRAC-MOO proposal	0.25
1/26/14	TL	R11-10-023	#	Rev KW summary of topics for 1/27 workshop	0.25
1/31/14	TL	R11-10-023	FC	Rev and edit KW cmts to CAISO re FRAC-MOO proposal	0.25
2/10/14	TL	R11-10-023	FC	Initial review of Staff Proposal re FC framework	0.50
2/14/14	TL	R11-10-023	CAM	Rev KW draft comments on Staff proposals re QC and RAM issues and discuss RAM issues w/KW	0.75
2/16/14	TL	R11-10-023	CAM	Edit KW draft comments and prep e-mail to KW re same	0.75
2/18/14	TL	R11-10-023	CAM	Rev e-mail response from KW and made add'l edits to draft cmts	0.25
2/20/14	TL	R11-10-023	FC	Rev and edit KW draft cmts to CAISO re revised FRAC-MOO proposal	0.50
2/21/14	TL	R11-10-023	FC	Rev and edit KW revised draft re FRAC-MOO and phone call w/KW re clarifying his points (0.25)	0.75
2/24/14	TL	R11-10-023	FC	Rev and edit KW draft comments re ED FC proposals; phone call w/KW re same (0.25)	1.00
2/26/14	TL	R11-10-023	GP	Rev Scoping Memo re reply comment opportunity and e-mail to KW re same	0.25
3/3/14	TL	R11-10-023	ELCC	Rev and edit KW draft reply comments re 1/27 ED workshop (QC, RAM)	0.50
3/5/14	TL	R11-10-023	FC	Rev and edit KW draft reply cmts re Staff FC proposals	0.75
3/18/14	TL	R11-10-023	LCR	Rev KW draft cmts to CAISO re LCR study	0.25
4/8/14	TL	R11-10-023	GP	Overview of docs/proposals for 4/9 workshop	0.75
4/9/14	TL	R11-10-023	ELCC	Listen to w/s re QC/EFC for DR and ES and RA proposals	0.75
4/9/14	TL	R11-10-023	#	Ph call w/KW re his assessment of workshop and potential issues for comments	0.25
4/9/14	TL	R11-10-023	FC	Listen to workshop presentations re CAISO needs assessment, and Staff Proposals re FC implementation	1.50
4/11/14	TL	R11-10-023	#	Rev KW outline re post-W/s comments and phone call w/KW re same	0.50
4/16/14	TL	R11-10-023	#	Rev and edit KW draft post w/s cmts	1.00
4/21/14	TL	R11-10-023	#	Rev and comment upon KW ideas for reply comments on w/s issues	0.25

Date	Atty	Case	Task	Description	Time Spent
	4/23/14 TL	R11-10-023	#	Rev and edit KW post-w/s reply cmts	0.25
	4/23/14 TL	R11-10-023	FC	Ph call w/KW re approach for overdue DR responses from CAISO re FC requirements data	0.25
	4/25/14 TL	R11-10-023	#	Rev/edit KW revised reply cmts on w/s proposals and phone call w/KW re same	0.25
	5/6/14 TL	R11-10-023	GP	Research 4/9 transcript re scope of comments on 5/8; prep e-mail to KW re same	0.25
	5/7/14 TL	R11-10-023	FC	Rev KW outline and Discuss issues for cmts on CAISO FCR w/KW	0.50
	5/8/14 TL	R11-10-023	FC	Rev and edit KW draft cmts re CAISO FCR	0.50
	6/13/14 TL	R11-10-023	GP	Phone call w/KW re issues/strategy for TURN cmts on PD	1.00
	6/13/14 TL	R11-10-023	GP	Scan PD	0.25
	6/15/14 TL	R11-10-023	GP	Detailed review of PD	1.00
	6/16/14 TL	R11-10-023	FC	Rev and edit KW cmts re PD(0.75) and phone call w/KW re my edits re FC needs calculation	1.25
	6/17/14 TL	R11-10-023	FC	Exchange e-mails w/KW re plans for reply cmts re PD	0.25
	6/23/14 TL	R11-10-023	FC	Rev and edit KW draft reply cmts	0.25
Total: TL					25.00
Compensation Claim Hours:					
	8/28/14 TL	R.11-10-023	Comp	Prep comp request	1.25
	8/31/14 TL	R.11-10-023	Comp	Prep comp request	2.50
	9/2/14 TL	R.11-10-023	Comp	Prep comp request	3.75
Grand Total					167.25

Attachment 3

Expenses

Date	Atty	Case	Task	Description	Amount
Activity: $Copies					
2/18/14	JG	R11-10-023	$Copies	Copies of Post-Workshop Comments of TURN sent to ALJ and Commissioner.	$1.00
2/24/14	JG	R11-10-023	$Copies	Copies of Comments of TURN on staff proposal on implementation of flexible capacity procurement framework sent to party member, ALJ and Commissioner.	$1.60
3/3/14	JG	R11-10-023	$Copies	Copies of Reply Comments of TURN on Staff proposals and January 27 workshop sent to party member, ALJ and Commissioner	$1.80
3/6/14	JG	R11-10-023	$Copies	Copies of Reply Comments sent to party member, ALJ and Commissioner.	$1.50
4/18/14	rap	R11-10-023	$Copies	Copies of Comments of TURN on resource adequacy proposals sent to ALJ.	$0.70
4/28/14	JG	R11-10-023	$Copies	Copies of Reply Comments of TURN on resource adequacy proposals sent to ALJ.	$0.60
5/8/14	JG	R11-10-023	$Copies	Copies of Comments of TURN on CAISO's Flexible Capacity Requirements Study sent to ALJ.	$0.90
6/16/14	JG	R11-10-023	$Copies	Copies of Comments of TURN sent to ALJ.	$0.60
6/23/14	JG	R11-10-023	$Copies	Copies of Reply Comments of TURN on the Proposed Decision sent to ALJ.	$0.30
Total: $Copies					$9.00
Activity: $Phone					
10/31/13	**	R11-10-023	$Phone	Telepacific Invoice 10/31/2013	$1.86
11/30/13	**	R11-10-023	$Phone	Telepacific Invoice 11/30/2013	$0.47
1/31/14	**	R11-10-023	$Phone	Telepacific Invoice 1/31/14	$1.05
2/28/14	**	R11-10-023	$Phone	Telepacific Invoice 2/28/14	$1.30
3/31/14	**	R11-10-023	$Phone	Telepacific Invoice 3/31/14	$0.25
4/30/14	**	R11-10-023	$Phone	Telepacific Invoice 4/30/14	$3.27
6/30/14	**	R11-10-023	$Phone	Telepacific Invoice 6/30/14	$3.79
Total: $Phone					$11.99
Activity: $Postage					
2/18/14	JG	R11-10-023	$Postage	Postage for Post-Workshop Comments of TURN sent to ALJ and Commissioner.	$2.38
2/24/14	JG	R11-10-023	$Postage	Copies of Comments of TURN on staff proposal on implementation of flexible capacity procurement framework sent to party member, ALJ and Commissioner.	$3.57

Date	Atty	Case	Task	Description	Amount
3/3/14	JG	R11-10-023	$Postage	Postage for Reply Comments of TURN on Staff proposals and January 27 workshop sent to party member, ALJ and Commissioner	$3.57
3/6/14	JG	R11-10-023	$Postage	Postage for Reply Comments sent to party member, ALJ and Commissioner.	$3.57
4/18/14	rap	R11-10-023	$Postage	Postage for Comments of TURN on resource adequacy proposals sent to ALJ.	$1.19
4/28/14	JG	R11-10-023	$Postage	Copies of Reply Comments of TURN on resource adequacy proposals sent to ALJ.	$1.19
5/8/14	JG	R11-10-023	$Postage	Postage for Comments of TURN on CAISO's Flexible Capacity Requirements Study sent to ALJ.	$1.19
6/16/14	JG	R11-10-023	$Postage	Postage for Comments of TURN sent to ALJ.	$1.19
6/23/14	JG	R11-10-023	$Postage	Postage for Reply Comments of TURN on the Proposed Decision sent to ALJ.	$0.98
Total: $Postage					$18.83
Grand Total					$39.82

Attachment 4

TURN hours allocated by issue

ALLOCATION OF HOURS

R.11-10-023

ATTORNEYS AND CONSULTANTS

	Billing Period	Hourly Rate	Flex Cap	CAM	ELCC	LCR	#	GP	Total Substantive Hours (not including comp)	Total Compensation (non-travel, non-comp)
Kevin Woodruff	2013	$240	17.75		2.50			0.50	20.75	$4,980.00
	2014	$240	64.75	9.00	8.50	4.00	26.75	1.00	114.00	$27,360.00
Thomas Long	2013	$555	1.75		0.25		3.75	1.00	6.75	$3,746.25
	2014	$555	8.50	1.75	1.25	0.25	2.75	3.75	18.25	$10,128.75
TOTAL			92.75	10.75	12.50	4.25	33.25	6.25	159.75	$46,215.00
TOTAL % HOURS ALLOCATED			58.06%	6.73%	7.82%	2.66%	20.81%	3.91%	100.00%	