



**FILED**

07-29-11  
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Decision \_\_\_\_\_

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

Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design, including Real Time Pricing, to Revise its Customer Energy Statements, and to Seek Recovery of Incremental Expenditures. (U39M)	Application 10-03-014 (Filed March 22, 2010)
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**CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION**

<b>Claimant:</b> The Vote Solar Initiative	<b>For contribution to D.11-05-047</b>	
<b>Claimed (\$):</b> \$140,113.25	<b>Awarded (\$):</b>	
<b>Assigned Commissioner:</b> Peevey	<b>Assigned ALJ:</b> Pulsifer	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
<b>Signature:</b>		/s/ Kevin T. Fox
<b>Date:</b>	July 29, 2011	<b>Printed Name:</b> Kevin T. Fox Attorney for the Vote Solar Initiative

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

**A. Brief Description of Decision:** D.11-05-037 adopts various residential rate design changes for PG&E customers, including creation of a CARE Tier 3 rate, reduction of baseline quantities and adoption of a nonbypassable Conservation Incentive Adjustment (CIA). D.11-05-047 rejects PG&E’s proposal to impose a residential customer charge and to eliminate non-CARE Tier 4.

**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	Claimant	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	May 19, 2010	
2. Other Specified Date for NOI:		
3. Date NOI Filed:	June 18, 2010	
4. Was the notice of intent timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.10-03-014	
6. Date of ALJ ruling:	November 30, 2010	
7. Based on another CPUC determination (specify):	R.10-05-006 (March 3, 2011); A.10-11-015 (June 3, 2011).	
8. Has the claimant demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.10-03-014	
10. Date of ALJ ruling:	November 30, 2010	
11. Based on another CPUC determination (specify):	R.10-05-006 (March 3, 2011); A.10-11-015 (June 3, 2011).	
12. Has the claimant demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision	D.11-05-047	
14. Date of Issuance of Final Decision:	June 2, 2011	
15. File date of compensation request:	July 27, 2011	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment

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

A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059) (For each contribution, support with specific reference to final or record.)

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p>1. Vote Solar’s testimony demonstrated that utility bill savings is the most important component of a customer’s decision to invest in PV. Vote Solar produced a table based on a typical PG&amp;E solar customer to illustrate the significance of bill savings compared to available incentives and tax credits in PG&amp;E’s service territory. See Ex. 16, Vote Solar-Rose, p. 19.</p>	<p>“We recognize that utility bill savings are the most important driver of a customer’s decisions to invest in PV.” D.11-05-047, p. 48 (§ 4.3.2 Discussion).</p>	
<p>2. Vote Solar testified that tier consolidation (i.e., eliminating Tier 4) will cause a significant reduction in customer bill savings and will extend the amount of time it takes for a customer’s system to “payback” the initial investment. See Ex. 16, Vote Solar-Rose, pp. 28-29. The Decision cites the essence of Vote Solar’s testimony in its discussion.</p>	<p>“The elimination of Tier 4 would cause a significant reduction in a customer’s annual bill savings associated with PV installations, and thereby extend the customer’s payback period.”D.11-05-047, p. 48 (§ 4.3.2 Discussion).</p>	
<p>3. Vote Solar testified that the success of the CSI program in PG&amp;E’s territory has led to a steep decline in incentives, making rate design increasingly important to achieving the overall CSI goals. See Ex. 16, Vote Solar-Rose, p. 19. The Decision echoes this portion of Vote Solar’s testimony in its discussion and Findings of Fact.</p>	<p>“Rate Design will play a larger role in the success of the CSI program as CSI incentive payments step down.” D.11-05-047, p. 48 (§ 4.3.2 Discussion), p. 44 (§ 4.3.1 Party Positions) (citing Vote Solar’s cross examination, Tr. at 521, line 1 to Tr. at 523, line 7, Vote Solar-Rose), p. 80 (Findings of Fact No. 23).</p>	
<p>4. Vote Solar testified and reiterated in briefs and comments how the CSI program spurs the residential solar market and how, in turn, the residential solar market contributes to California energy policies such as the Renewables</p>	<p>“The continuation of a four-tier rate design will preserve a price signal to encourage customers to install solar photovoltaic facilities and promote progress toward achieving the CSI goal of creating a self-sustaining</p>	

<p>Portfolio Standard, AB 32 greenhouse has reduction and the state’s loading order. <i>See</i> Ex. 16, Vote Solar-Rose, p. 9. Vote Solar testified that elimination of Tier 4 would negatively impact both the residential solar market and those broader energy goals. The Decision adopts Vote Solar’s position regarding the importance of retaining a fourth tier and cites the broader policy goals highlighted in Vote Solar’s testimony.</p>	<p>residential solar photovoltaic market. D.11-05-047, p. 48 (§ 4.3.2 Discussion); <i>see also</i> p. 80 (Findings of Fact No. 23) (“Promoting the market for residential PV helps advance the state’s loading order, meet greenhouse gas emission reduction goals, and achieve RPS compliance.”).</p>	
<p>5. Vote Solar testified that the underlying purpose of the CSI program is to create a residential solar market that can thrive without incentives. Vote Solar demonstrated that elimination of Tier 4 would dampen price signals to invest in PV and would impede the CSI goal of a self-sustaining PV market. <i>See</i> Ex. 16, Vote Solar-Rose, p. 39.</p>	<p><i>See Id.</i></p>	
<p>6. Vote Solar testified that PG&amp;E’s proposal to eliminate Tier 4 from residential rates goes too far and comes too soon after consolidation of Tier 4 and Tier 5 in June of 2010. <i>See</i> Ex. 16, Vote Solar-Rose, p. 38. Vote Solar explained that it is difficult to know the impacts of Tier 5 consolidation on the residential solar market. <i>See</i> Tr. at 511-12, Vote Solar-Rose.</p>	<p>“We conclude, however, that a complete consolidation of Tiers 3 and 4 goes to far. D.11-05-047, p. 48 (§ 4.3.2 Discussion).  “We conclude that it is too early to assess the effects of consolidating Tiers 4 and 5, which only took effect on June 1, 2010.” D.11-05-047, p. 48 (§ 4.3.2 Discussion).</p>	
<p>7. In addition to testifying extensively on the impact of PG&amp;E’s proposed rate design on residential solar, Vote Solar’s testimony, briefing and comments also contributed to the Decision’s discussion that the proposed rates would dampen conservation price signals. <i>See, e.g.</i>, Vote Solar Brief, pp. 10-12; Reply Brief, p. 2; Ex. 16, Vote Solar-Rose, p. 23. Vote Solar testified, commented and briefed that eliminating Tier 4 effectively removes any price distinction for usage above 200% of baseline. The Decision reflects Vote Solar’s characterization in its</p>	<p>“If Tier 4 were entirely eliminated, there would be no rate incentive to conserve for usage beyond 200 percent of baseline.” D.11-05-047, p. 48 (§ 4.3.2 Discussion).</p>	

discussion.		
8. Vote Solar testified that PG&E’s proposed fixed customer charge would reduce the price signal to conserve energy or invest PV because it represents a charge that cannot be mitigated by conservation measures and a charge that reduces the upper tier price signal for high-usage customer that are the most likely to invest in PV. (Ex. 16, Vote Solar-Rose, p.39). The Decision adopted a position that reflects Vote Solar’s testimony in its discussion and Findings of Fact.	“Because a fixed customer charge cannot be avoided by a customer’s reducing usage or being more energy efficient, the customer charge offers no conservation price signal.” D.11-05-047 at p.33 (§ 4.1.2 Discussion), p.79 (Finding of Fact No. 13).	

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

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y/N)	Y	
b. Were there other parties to the proceeding? (Y/N)	Y	
<b>c. If so, provide name of other parties:</b> <p>The following parties submitted testimony or filed comments or briefs involving the residential rate design issues resolved by D.11-05-047:</p> <p>Pacific Gas &amp; Electric Company, Solar Alliance, Sierra Club California, Disability Rights Advocates, Division of Ratepayer Advocates, Southern California Edison Company, The Utility Reform Network, Agricultural Energy Consumers Association, Kern County Taxpayers Association, County of Kern, Energy Producers and Users Coalition, Direct Access Customer Coalition, Marin Energy Authority, City and County of San Francisco, City of Hercules, California Large Energy Consumers Association and California Manufacturers and Technology Association.</p>		
<b>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b> <p>Vote Solar intervened in this proceeding because of its concern with two of PG&amp;E’s proposals: 1) to eliminate Tier 4 and 2) to impose a customer charge. Vote Solar’s organizational aim is to bring solar into the mainstream and its intervention helped put a spotlight on PG&amp;E’s residential customers who are furthering that goal by investing in solar. Vote Solar’s focus on residential solar customer impacts was unique and did not duplicate the efforts of DRA or any other party.</p> <p>Specifically, Vote Solar focused its efforts on modeling the potential impact of PG&amp;E’s proposed residential rate design on customers who either had invested</p>		

<p>in solar PV or were likely to do so; i.e., customers with usage in PG&amp;E’s upper tiers. Vote Solar’s model considered the average system size and likely usage profile of a PG&amp;E solar customer. Vote Solar then modeled and analyzed the potential impacts on the full range of solar production and customer usage profiles, demonstrating that the economic impact of PG&amp;E’s proposal was negative for nearly every solar customer configuration. Vote Solar was the only party to illustrate the loss of PV value for residential customers that would result from Commission approval of PG&amp;E’s proposals. The record would not include this critical information without Vote Solar’s contribution.</p> <p>Other parties cited Vote Solar’s unique contribution in support of their own assertions that PG&amp;E’s proposal would negatively impact the vitality of the residential solar market. <i>See, e.g.</i>, Solar Alliance Comments on the Alternate Proposed Decision of Commissioner Peevey Regarding Residential Rate Design, pp. 7-9; DRA Brief, p. 21. Vote Solar’s unique focus and modeling avoided duplication and supplemented the presentations of other parties.</p>	
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**C. Additional Comments on Part II** (use line reference # or letter as appropriate):

#	Claimant	CPUC	Comment

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

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

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)	CPUC Verified
<p>Vote Solar’s participation in this proceeding will result in benefits to ratepayers that far exceed Vote Solar’s cost of participation. Vote Solar contributed to the Commission’s conclusion that eliminating the distinction for usage above 200% of baseline (i.e. eliminating Tier 4) and imposing a customer charge would be harmful to the residential solar market and the state’s overall energy goals. <i>See</i> D.11-05-047, p. 48. Vote Solar’s comprehensive discussion of how the residential solar market contributes to the state’s various energy policy goals—such as reduction of greenhouse gas emissions—is reflected in the text and findings of the final decision. <i>See</i> D.11-05-047, p. 48 and Findings of Fact No. 23, p. 80. Vote Solar’s contribution is, in this way, reasonably related to environmental and economic interests that are hard to quantify, but substantial.</p> <p>Vote Solar’s participation helped inform the Commission that the CSI program might stagnate if customers lose the most important incentive to install PV: bill savings resulting from offset usage. Vote Solar’s testimony demonstrates that bill savings are the most important factor in a customer’s</p>	

decision to invest in PV. *See, e.g.*, Ex. 16, Vote Solar-Rose, p. 19; D.11-05-047, p. 48 (recognizing bill savings as the most important driver of customer decisions to invest in PV). This Decision has a direct consequence on PG&E’s solar customers and on the utility’s ability to meet its share of state energy goals, particularly the CSI goals. The benefits of the CSI program flow to all ratepayers through the environmental and operational benefits of distributed PV. *See* Ex. 16, Vote Solar-Rose, p. 9 (discussing how the CSI program contributes to the loading order, greenhouse gas reduction, peak-shaving, and RPS goals, among others).

Vote Solar’s participation in this proceeding preserved significant economic value for existing customers with PV who participate in the CSI program. Large numbers of PG&E customers have invested in solar to offset usage, becoming essential partners in the Commission’s ambitious solar goals. Vote Solar testified that there were nearly 21,000 PG&E customers with PV systems participating in the Commission managed CSI program, representing nearly 100 MW of capacity. *See* Ex. 16, Vote Solar-Rose, p. 7.

Vote Solar’s testimony demonstrated that customers with PV would suffer tangible economic damage under PG&E’s proposal, suggesting that the residential market, in light of declining CSI incentive levels, would slow down and put the Commission’s CSI goals in jeopardy. *See* Ex. 16, Vote Solar-Rose, pp. 30-7.

Vote Solar’s modeling of PG&E’s proposed rates, compared to those existing in June 2010, showed that a customer with an average sized PV system—per PG&E’s data—and upper tier usage would lose approximately \$6,000 in net present value under PG&E’s proposed rates. *Id.* at 32. If a mere fraction of PG&E’s 21,000 CSI customers avoided this level of loss due to Vote Solar’s participation, the benefits of that participation far exceed the costs. Vote Solar’s cost of participation is, thus, reasonable in light of what was at stake for PG&E’s solar customers and the future success of the CSI program.

**B. Specific Claim:**

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Kevin T. Fox	2010	93.6	285	Res. ALJ-247	26,676				
Kevin T. Fox	2011	23.8	285	Res. ALJ-267	6,783				

Thadeus B. Culley	2010	243.7	185	Res. ALJ-247	45,084.50				
Thadeus B. Culley	2011	100.8	185	Res. ALJ-267	18,648				
Joseph F. Wiedman	2010	9.5	285	Res. ALJ-247	2,707.50				
<b>Subtotal:</b>					<b>\$99,899.00</b>	<b>Subtotal:</b>			
<b>EXPERT FEES</b>									
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Adam Browning	2010	4.5	200	Res. ALJ-247	900.00				
Adam Browning	2011	0.5	200	Res. ALJ-267	100.00				
Gwen Rose	2010	206.75	150	Res. ALJ-247	31,012.50				
Gwen Rose	2011	3.25	150	Res. ALJ-267	487.50				
<b>Subtotal:</b>					<b>\$32,500</b>	<b>Subtotal:</b>			
<b>OTHER FEES</b>									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Tony Stearns (paralegal)	2011	3.4	110	D.11-06-034 Paralegal Rate	374.00				
Kevin Christopher (law clerk)	2010	30.4	110	D.10-01-021 Law Clerk Rate	3,344.00				
<b>Subtotal:</b>					<b>\$3,718.00</b>	<b>Subtotal:</b>			
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>									
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>
Kevin T. Fox	2010	1.4	142.50	50% of 2011 rate	199.50				
Kevin T. Fox	2011	1	142.50	50% of 2011 rate	142.50				
Joseph F. Wiedman	2011	1.1	142.50	50% of 2011 rate; Res. ALJ-267	156.75				
Thadeus B. Culley	2011	26.3	92.50	50% of 2011 rate	2432.75				
Tony Steans	2011	2	55.00	50% of 2011 rate	110.00				

Sky Stanfield	2010	2.3	142.50	50% of 2010 rate; Res. ALJ-247	327.75				
Kevin Christopher	2010	11.4	55.00	50% of 2010 rate	627.00				
					<b>Subtotal:</b>	<b>\$3996.25</b>	<b>Subtotal:</b>		
<b>COSTS</b>									
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>			
					<b>Subtotal:</b>		<b>Subtotal:</b>		
					<b>TOTAL REQUEST \$:</b>		<b>TOTAL AWARD \$:</b>		
<p>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.          **Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>									

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

Attachment or Comment #	Description/Comment
Attachment 1	<b>Certificate of Service</b>
Attachment 2	<b>Vote Solar's Filings in A.10-03-014</b>
Attachment 3	<b>Itemized Hours Report</b>
Attachment 4	<b>Resume of Gwendolyn Rose</b>
Comment 1	<p><b>Reasonableness of Vote Solar's Hours</b></p> <p>Vote Solar's hours are reasonable in the context of the level of effort required to participate in a fully litigated general rate case (GRC). Vote Solar's interest in preserving the vital residential solar market in PG&amp;E's territory required it to fully engage in advocacy before the Commission, through every stage of this proceeding leading up to D.11-05-47. Vote Solar's original estimate of work in its Notice of Intent (NOI) assumed that parties could reach a settlement compromise, as has been the typical result of previous GRCs before this Commission. Vote Solar maintained reasonable expenses given the high demand on legal resources required by a fully litigated GRC.</p> <p><u>1. Vote Solar's Expert Hours:</u></p> <p>Mr. Browning and Ms. Rose, as detailed below, are highly experienced with PV system modeling and assessing the impacts of electric utility rate design on residential customers. Mr. Browning and Ms. Rose are in-house representatives of Vote Solar, as Executive Director and Deputy Director, respectively, who brought the substantial institutional knowledge of the organization to this proceeding through testimony and other active participation.</p>

a. Vote Solar Expert: Gwen Rose

Gwen Rose is the Deputy Director of the Vote Solar Initiative and provided expert testimony on Vote Solar's behalf in this case.

Ms. Rose's hours are reasonable in light of the time intensive work of modeling potential impacts of PG&E's residential rate design on PG&E customers with PV. Ms. Rose created a range of customer profiles based on specific inputs derived from data responses from PG&E. The complexity and comprehensiveness of Ms. Rose's analysis required substantial time to model potential impacts on solar customers in varying climate zones and at varying amounts of usage and system production.

Ms. Rose also supervised Vote Solar's legal efforts in this proceeding as the organization's primary point of contact with the legal team. Ms. Rose expended a reasonable number of hours to review prepared documents prior to filing and in reviewing the filings of other parties.

Ms. Rose prepared for cross-examination by PG&E and expended a reasonable number of hours attending hearings for that purpose.

b. Vote Solar Expert: Adam Browning

Adam Browning is the Executive Director of the Vote Solar Initiative. Mr. Browning dedicated a reasonable number of hours to this proceeding to oversee the overall strategy and direction of efforts, including the development and utilization of Vote Solar's expert testimony. Mr. Browning's direct involvement in Vote Solar's activities are necessitated by his role as Executive Director, but he was able to minimize costs by delegating much of the work to Deputy Directory, Gwen Rose, and maintain a purely supervisory role over Vote Solar's expert testimony.

2. Vote Solar's Attorney's Hours:

Vote Solar stated in its NOI on page 3 that it intended to fully participate, as needed, and to take any action "reasonably necessary to work toward a productive resolution of issues raised in this proceeding." The demands of a fully litigated GRC required Vote Solar to expend substantial effort and hours to fully and effectively participate in this proceeding.

a. Drafting and Research:

Vote Solar's legal team expended a reasonable number of hours researching and drafting filings in this proceeding, given the volume of data to review in this GRC. Vote Solar's legal team conducted extensive research in preparing and submitting direct testimony for the record, briefs on the merits, and comments and reply comments on the two proposed decisions in this case.

b. Meetings and Strategy:

A relatively small number of hours were dedicated to "meetings," as classified in Vote Solar's Itemized Hours Report (Attachment 3). These meetings were critical to Vote Solar's efforts to coordinate strategy with its legal team and with other parties.

Comment 2

### **Reasonableness of Vote Solar's Rates**

Vote Solar's rates are modest in light of the range of rates approved for compensating experts and attorneys with the level of experience demonstrated by Vote Solar.

#### 1. Vote Solar's Expert Rates:

##### a. Gwen Rose:

Ms. Rose's requested compensation of \$150/hr is modest in light of her extensive experience in solar policy and in light of the range of compensation approved for experts with such experience in Resolution ALJ-267. Resolutions ALJ-247 (2010 rates) and ALJ-267 (2011 rates) approve a range of \$155 - \$270/hr for experts with between 7 – 12 years of experience. Ms. Rose, as demonstrated in her resume (Attachment 4), has over 10 years of relevant experience as a solar policy expert. Her requested compensation rate is, therefore, reasonable and should be approved.

Ms. Rose has served as the Deputy Director of Vote Solar since 2006 where she has actively worked with regulators, legislators, and renewable energy stakeholders to develop and implement solar policy changes in key states. Ms. Rose was the Solar Program Coordinator for the County of Marin from 2001 to June 2006. Ms. Rose has numerous publications and has served on several governmental advisory bodies related to solar issues. Ms. Rose earned a B.S. in Physical Environmental Sciences from the University of California, Berkeley in 2001.

##### b. Adam Browning:

Adam Browning is a co-founder and current Executive Director of the Vote Solar Initiative. Mr. Browning has extensive experience in solar policy development. Prior to founding the Vote Solar Initiative in 2001, Mr. Browning worked on the successful 2001 campaign for a solar bond in San Francisco. Mr. Browning worked for eight years with the United States Environmental Protection Agency (EPA) in the Region 9 office in San Francisco, including work on the Toxics Release Inventory program. While at EPA, Mr. Browning won the EPA's top pollution prevention award for developing a program that reduced air emissions of mercury from gold mines in Nevada by over five tons annually. Mr. Browning received a BA with Distinction from Swarthmore College in 1992, and served with the Peace Corps in Guinea-Bissau, West Africa.

Mr. Browning's request for a compensation rate of \$200/hr is reasonable in light of his decade of experience as Executive Director of Vote Solar and his eight years of experience in environmental policy with the EPA. The requested rate is reasonable in light of the fact that Resolutions ALJ-247 (2010 rates) and ALJ-267 (2011 rates) approve a range of \$155 - \$270/hr for experts with between 7 – 12 years of experience.

#### 2. Vote Solar's Attorney Rates:

##### a. Kevin T. Fox:

Kevin Fox is a partner at the law firm Keyes & Fox LLP, which has represented clients in regulatory proceedings before nearly 40 state public utility commissions. Mr. Fox

has developed a highly specialized law practice that focuses on assisting clients with achieving regulatory goals and objectives, in particular energy market transformation efforts that facilitate growth in distributed energy resources. Mr. Fox also advises renewable energy project developers on regulatory compliance matters and the drafting and negotiation of complex commercial agreements that facilitate renewable energy project development. In 2011, Mr. Fox was named by California's Daily Journal, a legal publication, as one of California's top 25 clean technology attorneys. Mr. Fox is a member of the California and Oregon bars. He received a J.D. from the University of California, Berkeley and a B.S. from the University of California, Davis, where he focused on energy policy analysis and planning and graduated with highest honors.

Mr. Fox is an attorney with over six years of experience in renewable energy related matters:

- 2004 – 2007. Stoel Rives LLP, Portland, Oregon. Renewable Energy Practice Group.
- May 2007 – June 2008. Wilson Sonsini Goodrich & Rosati P.C., San Francisco, California. Energy and Clean Technology Practice.
- June 2008 – Current. Partner at Keyes & Fox LLP, Oakland, California. Distributed Generation Law.

Mr. Fox's rate of \$285/hr is reasonable in light of his considerable experience on issues related to renewable energy and is within the range of \$280 - \$300/hr approved by the Commission in Resolutions ALJ-247 and ALJ-267. Mr. Fox has participated in multiple proceedings before the Commission during his last four years of practice.

b. Joseph F. Wiedman:

Joseph F. Wiedman is a partner with the law firm Keyes & Fox LLP and an attorney with over 6 years of experience in energy and communications law. Mr. Wiedman is a member of the California bar and earned his J.D. from the University of California, Berkeley in 2005. Mr. Wiedman earned a B.A. with Distinction and Honors in Economics and Russian and East European Studies from the University of Illinois in 1997. Mr. Wiedman earned a M.S. in Applied Economics from Illinois State University in 2000, with a focus on the economics of electricity, natural gas and telecommunications.

Mr. Wiedman has worked before the Commission for over 6 years on a broad range of matters including establishment and implementation of the California Solar Initiative, energy efficiency, greenhouse gas emissions regulation, and general rate cases.

Prior to joining Keyes & Fox, Mr. Wiedman worked at Goodin MacBride Squeri Day & Lamprey, LLP in the firm's Regulatory Practice Group from 2005-2008, assisting clients with energy and telecommunications matters before the California Public Utilities Commission. Mr. Wiedman publishes articles and gives presentations across the country on issues related to distributed-generation market design. During and prior to law school, Mr. Wiedman worked in academia, government, and private business related to regulation of the energy and telecommunications industries. Mr. Wiedman was a summer clerk at the Commission from May 2003 to August 2003.

Mr. Wiedman's rate of \$285/hr is reasonable in light of his considerable experience before the Commission on matters related to the CSI program and is within the range of \$280 - \$300/hr approved by the Commission in Resolutions ALJ-247 and ALJ-267.

c. Sky Stanfield:

Sky Stanfield is an attorney with over six years of experience in environmental and land use law. Ms. Stanfield joined the law firm of Keyes & Fox LLP in June 2010 as Of Counsel. Ms. Stanfield supervised the work of Kevin Christopher, a law clerk for Keyes & Fox discussed below, in preparing Vote Solar's Notice of Intent. Ms. Stanfield previously worked at the law firm of Farella, Braun & Martel LLP, from October 2006 to June 2010, where she advised clients on regulatory compliance with environmental laws and climate legislation, including AB 32.

Ms. Stanfield is a member of the California bar and earned a J.D. from the University of California, Berkeley in 2005. Ms. Stanfield earned a B.A. in Environmental Studies from Hobart and Williams Smith Colleges in 2000.

Ms. Stanfield's rate of \$285/hr is reasonable according to her years of experience and is within the range of \$280 - \$300/hr approved by the Commission in Resolution ALJ-247 for work performed in 2010.

d. Thadeus B. Culley:

Thadeus B. Culley is a first-year associate with the law firm Keyes & Fox LLP. Mr. Culley earned a B.A. in History from North Carolina State University in 1999, *cum laude*, and a J.D. from Tulane Law School in 2010, with a certificate in environmental law. Mr. Culley joined the law firm as an associate in September of 2010 and immediately began working on this proceeding. Mr. Culley previously worked for Keyes & Fox as a law clerk from May 2009 to May 2010, focusing on issues such as net metering, interconnection, and third-party ownership of renewable generation to support the firm's work before multiple state commissions. Mr. Culley also provided legal research and support for Mr. Fox in the summer of 2009 in R.08-08-009, contributing to briefing related to the Commission's jurisdiction to set a feed-in tariff price. Mr. Culley was a student attorney in Tulane's Environmental Law Clinic in fall of 2009 where he researched, drafted and filed briefs and motions in cases based on the federal Clean Water Act. Mr. Culley is a member of the California bar.

Mr. Culley's rate of \$185/hr is reasonable and consistent with previous Commission decisions awarding this rate to first-year attorneys. *See, e.g.*, D.06-04-050; D.05-11-031. This rate is also within the range of rates approved by the Commission in Resolution ALJ-247 and Resolution ALJ-267, for work performed in 2010 and 2011, respectively.

Vote Solar's Attorney Support Staff Rates:

e. Tony Stearns:

Tony Stearns is a paralegal with over 20 years of experience. Mr. Stearns joined Keyes & Fox LLP in March 2010. Mr. Stearns previously was a senior paralegal with Morrison & Foerster for eleven years, working out of their San Francisco office. Mr. Stearns's work at Morrison & Foerster primarily involved litigation and corporate finance. Mr. Stearns earned a B.A. in History and Education from Dartmouth College in 1987.

Mr. Stearns assisted in preparation of several filings in this proceeding and in preparation of this request. The rate of \$115/hr is reasonable for a paralegal of comparable experience. The rate of \$110/hr was also recently approved by the Commission for the 2011 work of a paralegal in D.11-06-034.

f. Kevin Christopher:

Kevin Christopher was a law clerk for Keyes & Fox from March 2010 to September 2010, assisting in the early phases of this proceeding and the drafting and filing of the Notice of Intent. Mr. Christopher was a law student at the University of San Francisco School of Law at the time of his work on this case. Mr. Christopher's previous experience includes:

- 1/09 – 5/09. Law Clerk at the United States Attorney's Office, San Francisco, California.
- 6/09 – 8/09. Judicial Extern at the United States District Court for the Northern District of California, San Francisco, California .
- 10/09 – 2/10. Legislative & Policy Analyst at the Green Vision Institute, San Francisco, California.

Mr. Christopher's rate of \$110 is reasonable in light of Commission precedent approving similar compensation rates for law clerks in 2010. *See* D.10-01-021.

Comment 3

**Allocation of Hours**

Allocation of Hours by Attorney, Expert and Activity Type

Attachment 3 contains the itemized hours report of all Attorney, Attorney Support, and Expert work done in this proceeding related to D.11-05-047. For the convenience of the Commission, the attached report is itemized by the following activity and issue descriptions to aid in review of this request.

<b>Activity Type</b>	<b>Description of Activity</b>
<b>Call</b>	This category includes phone calls between Vote Solar's experts and attorneys, settlement discussion phone conferences, and phone calls with representatives of other parties in this proceeding for the purpose of coordinating strategy.

	<b>Comp.</b>	<b>Intervenor Compensation.</b> This category includes all research, drafting, and review of documents as reasonably necessary to complete all tasks related to obtaining intervenor compensation in this proceeding. All work performed in this category receives 50% of the requested rates for all persons listed in Part III of this request.
	<b>Corresp.</b>	<b>Correspondence.</b> This category includes all time required to review or draft all emails, letters, facsimiles, or similar transmissions, sent or received by any of the persons listed above in Part III of this request. All correspondence classified in Attachment 3 relates solely to residential rate design issues resolved by D.11-05-047, classified below as A, B, or A/B.
	<b>Drafting</b>	This category includes the drafting and revising of every document submitted for filing, the preparation of direct and rebuttal testimony, and the preparation of any other document reasonably necessary to participate in this proceeding. This category includes time spent preparing summaries of other parties' filings or testimony.
	<b>Ex Parte</b>	This category includes time spent preparing for ex parte meetings with advisors to Commissioners, including time spent preparing written materials, reviewing record materials, and coordinating strategy for the meetings between persons listed above in Part III of this request. This category includes the time to draft and review ex parte notices for Vote Solar's meetings with advisors to Commissioners Peevey, Sandoval, and Ferron.
	<b>Hearing</b>	This category includes time spent attending and preparing for hearings conducted in this case from November 12, 2010 to November 22, 2010. This category includes the time spent preparing Vote Solar's witness for cross examination, preparing materials for Vote Solar's witness to reference on the stand, and time spent drafting questions to prepare the witness for cross examination.
	<b>Meeting</b>	This category includes meetings between the persons listed in Part III of this request for the purposes of coordinating strategy related to participation in this proceeding. This category also includes the attendance by Vote Solar's attorney to an all-party meeting noticed by Commissioners Simon and Sandoval.
	<b>Modeling</b>	This category includes all activities by Vote Solar's experts, listed in Part III of this request, reasonably necessary to compile, review, analyze, and present data for use in this proceeding. This category includes model design and all necessary efforts to ensure the validity and reliability of model results.
	<b>Review</b>	This category includes all time spent reviewing documents filed in this proceeding, all research reasonably necessary to participate in

this proceedings, including preparation for time spent in activities classified as a Meeting or Hearing in Attachment 3, below, and all research reasonably related to drafting, editing and providing citations to documents prepared for or filed in this proceeding by Vote Solar.

Allocation of Hours by Issue

Vote Solar’s entries relate solely to two issues resolved by D.11-05-047 for which Vote Solar made a substantial contribution: PG&E’s proposals to eliminate Tier 4 and to impose a customer charge. The majority of entries in Attachment 3 involve work on both issues.

To aid the Commission, Vote Solar reasonably estimates that it dedicated 90% of its time to Issue A (Tier Consolidation) and 10% of its time to Issue B (Customer Charge). Vote Solar marks all entries on Attachment 3 as “A/B,” where its work concerned a combination of these two issues. Where Vote Solar clearly worked on one issue in isolation, the “Issue” column in Attachment 3 will show either “A” or “B,” indicating that 100% of the time associated with the particular entry is dedicated to that issue.

Issue	Description of Issue
A	<b>Tier Consolidation.</b> This issue classification includes all work related solely to PG&E’s proposal to eliminate Tier 4 from its residential rate design.
B	<b>Customer Charge.</b> This issue classification includes all work related solely to PG&E’s proposal to impose a customer charge on its residential customers.
A/B	<b>Tier Consolidation and Customer Charge.</b> This issue classification includes a majority of Vote Solar’s work in this proceeding where it approached the impacts of PG&E’s tier consolidation and customer charge proposals together. All entries using this designation indicate that 90% of time work is allocated to Issue A and 10% of time worked is allocated to Issue B.

**D. CPUC Disallowances & Adjustments (CPUC completes):**

#	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 (Y/N)?**

--

If so:

Party	Reason for Opposition	CPUC Disposition

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

--

If not:

Party	Comment	CPUC Disposition

**FINDINGS OF FACT**

1. Claimant [has/has not] made a substantial contribution to Decision (D.) \_\_\_\_\_.
2. The claimed fees and costs [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$ \_\_\_\_\_.

**CONCLUSION OF LAW**

1. The claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Claimant is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime,

three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning \_\_\_\_\_, 200\_\_, the 75<sup>th</sup> day after the filing of claimant's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.
4. [This/these] proceeding[s] [is/are] closed.
5. 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 **CLAIM AND ORDER ON REQUEST FOR INTERVENOR COMPENSATION** by (check as appropriate):

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

to the following persons appearing on the official Service List:

douglass@energyattorney.com  
kmills@cfbf.com  
kfox@keyesandfox.com  
matthew@turn.org  
keith.mccrea@sutherland.com  
bruce.reed@sce.com  
ccollins@co.kern.ca.us  
kerntax@kerntaxpayers.org  
pk@utilitycostmanagement.com  
dbyers@landuselaw.com  
sue.mara@RTOadvisors.com  
hym@cpuc.ca.gov  
nao@cpuc.ca.gov  
rhd@cpuc.ca.gov  
thomas.long@sfgov.org  
norman.furuta@navy.mil  
nes@a-klaw.com  
whb@a-klaw.com  
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jarmstrong@goodinmacbride.com  
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pucservice@dralegal.org  
rwilliford@dralegal.org  
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wem@igc.org  
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mbrubaker@consultbai.com  
kjsimonsen@ems-ca.com  
case.admin@sce.com  
LEarl@SempraUtilities.com  
CentralFiles@SempraUtilities.com  
theresa.mueller@sfgov.org  
ethans@sunrunhome.com  
mang@turn.org  
bfinkelstein@turn.org  
ELL5@pge.com  
glsg@pge.com  
J4LR@pge.com  
filings@a-klaw.com  
kmsn@pge.com  
cpuccases@pge.com  
steven@moss.net  
salleyoo@dwt.com  
edwardoneill@dwt.com  
jeffgray@dwt.com  
cem@newsdata.com  
rjl9@pge.com  
regrelcpuccases@pge.com  
ehw2@pge.com  
chris@emeter.com  
jwiedman@keyesandfox.com  
rschmidt@bartlewells.com  
andykatz@sonic.net  
enriqueg@greenlining.org  
tomb@crossborderenergy.com  
sara@solaralliance.org  
ed.mainland@sierraclub.org  
wendy@econinsights.com  
brbarkovich@earthlink.net  
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bsl@cpuc.ca.gov  
dlf@cpuc.ca.gov  
fvr@cpuc.ca.gov  
jw2@cpuc.ca.gov  
lwt@cpuc.ca.gov  
lmi@cpuc.ca.gov  
mmg@cpuc.ca.gov  
rl4@cpuc.ca.gov  
srt@cpuc.ca.gov  
scr@cpuc.ca.gov  
trp@cpuc.ca.gov  
tcr@cpuc.ca.gov  
icompcordinator@cpuc.ca.gov  
samuelk@greenlining.org

Executed this 29th day of July, 2011, at Oakland, California.

/s/ Kevin T. Fox

Kevin T. Fox  
Keyes & Fox, LLP  
436 14<sup>th</sup> Street, Suite 1305  
Oakland, CA 94612  
Telephone: (510) 314-8201  
Facsimile: (510) 225-3848  
Email: [kfox@keyesandfox.com](mailto:kfox@keyesandfox.com)

**ATTACHMENT 2:**

Vote Solar's Filings and Submissions in A.10-03-014 relevant to D.11-05-047

Date Submitted	Document Type	Title of Document
4/26/10	Protest	"Protest of the Vote Solar Initiative"
6/18/10	Notice of Intent	"Notice of Intent to Claim Intervenor Compensation"
6/22/10	Law & Motion	"Motion of the Vote Solar Initiative for Leave to File Confidential Material Under Seal; Confidential Material Attached and Filed Under Seal"
10/6/10	Testimony	"Prepared Direct Testimony of Gwendolyn T. Rose on behalf of the Vote Solar Initiative"
10/29/10	Testimony	"Prepared Rebuttal Testimony of Gwendolyn T. Rose on behalf of the Vote Solar Initiative"
11/17/10	Testimony	"Prepared Direct Testimony of Gwendolyn T. Rose on behalf of the Vote Solar Initiative (Corrected Version Reflecting Errata Submitted November 17, 2010)"
12/20/10	Brief	"Opening Brief of the Vote Solar Initiative In Phase II of the Pacific Gas and Electric Company Test Year 2011 General Rate Case"
1/10/11	Reply	"Reply Brief of the Vote Solar Initiative"
4/25/11	Comments	"Comments of the Vote Solar Initiative on the Proposed Decision of Administrative Law Judge Pulsifer and the Alternate Decision of Commissioner Peevey"
5/2/11	Reply	"Reply Comments of the Vote Solar Initiative on the Proposed Decision of Administrative Law Judge Pulsifer and the Alternate Decision of Commissioner Peevey"

**ATTACHMENT 3:  
Itemized Hours Report**

Attorney Hours: 2010  
Joseph F. Wiedman-2010

<b>Date</b>	<b>Name</b>	<b>Description of Work</b>	<b>Issue</b>	<b>Activity</b>	<b>Time</b>
04/20/2010	J. Wiedman	Participation in conf. call re: PG&E GRC	A/B	Call	0.8
04/23/2010	J. Wiedman	Drafting protest to PG&E Phase II GRC	A/B	Drafting	2.5
06/03/2010	J. Wiedman	conf with K Christopher re: PG&E rate case strategy and issues	A/B	Meeting	0.4
09/16/2010	J. Wiedman	conf with TJC re: testimony issues	A/B	Meeting	0.4
09/20/2010	J. Wiedman	participation in SA conf call re: PG&E strategy	A/B	Call	1.1
09/21/2010	J. Wiedman	Conf with TBC re: testimony strategy	A/B	Meeting	0.3
09/23/2010	J. Wiedman	Review of testimony; corr with KTF and TBC re: strategy and contents	A/B	Review	1.5
11/01/2010	J. Wiedman	meeting with KTF to discuss strategy at hearings	A/B	Meeting	0.6
11/11/2010	J. Wiedman	conf with KTF re: strategy; researching issues for hearings	A/B	Meeting	0.4
11/16/2010	J. Wiedman	conf with TC re: settlement strategy	A/B	Meeting	0.2
11/17/2010	J. Wiedman	conf with KTF re: hearing strategy; researching various issues re: hearings	A/B	Meeting, Review	1.3
					<b>9.50</b>
Issue Allocation		A: 8.55 B: 0.95			

Kevin T. Fox- 2010

<b>Date</b>	<b>Name</b>	<b>Description of Work</b>	<b>Issue</b>	<b>Activity</b>	<b>Time</b>
04/19/2010	K. Fox	Call with A. Browning to discuss PG&E rate case strategy	A/B	Corresp.	0.3
04/26/2010	K. Fox	Draft, file and serve Vote Solar Protest	A/B	Drafting	1.9
04/28/2010	K. Fox	Review, summarize and forward ALJ notice of PHC	A/B	Review	0.5
05/06/2010	K. Fox	call with Sierra Club	A/B	Corresp.	0.2
05/07/2010	K. Fox	Forward PG&E Response to A. Browning and G. Rose	A/B	Review	0.4
05/17/2010	K. Fox	email summary of proceeding and key documents to G. Rose in preparation for PHC	A/B	Corresp.	0.5
06/02/2010	K. Fox	Review PG&E GRC scoping memo; correspondence with G. Rose re same	A/B	Corresp./ Review	0.7
06/14/2010	K. Fox	Review protests, responses and pre-hearing conference statements in preparation for client meeting	A/B	Review	1.5
06/15/2010	K. Fox	Review PG&E GRC phase II application and supporting testimony in preparation for meeting with client; meeting with G. Rose and A. Browning to discuss party positions and strategy	A/B	Meeting/ Review	2.1
06/16/2010	K. Fox	Meeting with K. Christopher re intervenor comp NOI requirements; correspondence with client re same; review CPUC rules and decisions re same	A/B	Corresp./ Meeting/ Review	1.1
06/20/2010	K. Fox	Draft Notice of Intent to Claim Intervenor Compensation	A/B	Drafting	0.6
06/20/2010	K. Fox	Edit, file and serve Notice of Intent to Claim Intervenor Compensation	A/B	Drafting	1.5
06/21/2010	K. Fox	Call with M. Nakahara at CPUC; review CPUC information on filing under seal	A/B	Corresp./ Review	0.4
08/11/2010	K. Fox	Provide information to Gwen re PG&E GRC party positions	A/B	Corresp.	1.1
08/12/2010	K. Fox	Review docket; review data request information; review updated PG&E testimony; correspondence with PG&E re	A/B	Review	5

		discovery; correspondence with G. Rose re discovery access			
08/26/2010	K. Fox	Outline initial testimony; meeting with G. Rose to discuss modeling	A/B	Drafting/ Meeting	2.5
08/27/2010	K. Fox	Correspondence with PG&E re settlement meeting	A/B	Corresp.	0.2
08/30/2010	K. Fox	Review past Vote Solar testimony on rate design; outline PG&E GRC testimony; correspondence with G. Rose	A/B	Corresp./ Review	4.5
09/02/2010	K. Fox	Draft data request and send to PG&E	A/B	Drafting	1.3
09/07/2010	K. Fox	Meeting with T. Culley re PG&E rate case research needs	A/B	Meeting	0.5
09/08/2010	K. Fox	Meeting with T. Culley re outline and research needs for testimony	A/B	Meeting	0.3
09/09/2010	K. Fox	Call S. Woo with PG&E re NDA and Vote Solar first data request; review PG&E GRC NDA	A/B	Call/ Review	0.7
09/14/2010	K. Fox	Meeting with T. Culley re PG&E GRC testimony; meeting with G. Rose to discuss modeling results and drafting testimony	A/B	Meeting	3.3
09/20/2010	K. Fox	Correspondence with client re development of testimony and modeling results; discussion re whether the support Solar Alliance proposal for alternative rate design	A/B	Corresp.	0.8
09/21/2010	K. Fox	Correspondence with client about testimony, modeling results and Vote Solar rate proposal	A/B	Corresp.	0.4
09/23/2010	K. Fox	Correspondence with G. Rose and T. Culley re modeling results, use of NREL model as an alternative, current status of testimony; correspondence re number of PG&E customers in tiers 4 and 5 on rates E1, E6 and E7	A/B	Corresp.	1
09/24/2010	K. Fox	Correspondence with parties re seeking delay in filing opening testimony	A/B	Corresp.	0.3
09/27/2010	K. Fox	Meeting with T. Culley re GRC testimony	A/B	Meeting	0.3
09/28/2010	K. Fox	Meeting with T. Culley re GRC testimony; review draft testimony; call G. Rose re modeling results	A/B	Corresp./ Meeting/ Review	2.6
09/29/2010	K. Fox	Review PG&E GRC testimony; edit and send to G. Rose	A/B	Review	2.6
10/01/2010	K. Fox	Review G. Rose edits to draft testimony sections; correspondence re strategy	A/B	Corresp./ Review/	0.9
10/04/2010	K. Fox	Correspondence with G. Rose; meeting with T. Culley; review and edit draft	A/B	Corresp./ Drafting/ Meeting	2.3
10/05/2010	K. Fox	Call with G. Rose re testimony and VSI statement of position	A/B	Call	0.4
10/06/2010	K. Fox	Draft and edit testimony	A/B	Drafting	8.5
10/08/2010	K. Fox	Call with G. Rose re PG&E re data request; meeting with T. Culley re parties' opening testimony	A/B	Call/ Meeting	0.8
10/13/2010	K. Fox	PG&E GRC Settlement Call	A/B	Call	2.4
10/14/2010	K. Fox	Provide summary to G. Rose re Wednesday's settlement conference; correspondence with T. Culley re rebuttal testimony	A/B	Corresp.	1.5
10/15/2010	K. Fox	Correspondence with G. Rose re opportunities for settlement	A/B	Corresp.	0.3
10/17/2010	K. Fox	Outline rebuttal testimony and send to G. Rose	A/B	Corresp.	1.3
10/18/2010	K. Fox	Call G. Rose; call with A. Browning; meeting with T. Culley	A/B	Call	0.5
10/19/2010	K. Fox	Review response to PG&E data request	A/B	Review	0.3
10/25/2010	K. Fox	Review PG&E GRC data request; review draft rebuttal testimony	A/B	Review	1.1
10/26/2010	K. Fox	Meeting with T. Culley re PG&E GRC data requests; review draft data request responses	A/B	Meeting	0.5
10/27/2010	K. Fox	Preparation and call with G. Rose to discuss rebuttal testimony	A/B	Review	1.7

10/28/2010	K. Fox	Meeting with T. Culley re PG&E data request	A/B	Meeting	0.2
10/29/2010	K. Fox	Review rebuttal testimony	A/B	Review	0.5
11/02/2010	K. Fox	Review PG&E case management statement and call G. Rose; respond to PG&E re case management statement	A/B	Corresp./ Review	1
11/10/2010	K. Fox	Meeting with T. Culley re GRC hearing preparation; call with G. Rose re same; all party settlement call; correspondence with G. Rose re settlement call	A/B	Call/ Meeting	2.7
11/11/2010	K. Fox	Review and edit questions for cross examination; forward same to G. Rose	A/B	Drafting	1
11/16/2010	K. Fox	Meeting with G. Rose to prepare for Thursday's hearing and G. Rose's testimony.	A/B	Meeting	2.5
11/16/2010	K. Fox	Prepare errata of initial direct testimony; meeting with G. Rose to prepare for cross-examination by PG&E; preparation for rate case hearing and cross-examination of Kern County witnesses	A/B	Drafting/ Meeting/ Review	5.6
11/17/2010	K. Fox	Preparation for Kern County cross-examination; review of errata to G. Rose initial testimony; review CPUC evidentiary rules; review party correspondence re settlement discussions and other issues; prepare G. Rose for cross-examination	A/B	Review/ Meeting	3.7
11/18/2010	K. Fox	Attend GRC hearing for cross examination for G. Rose	A/B	Hearing	4.5
11/22/2010	K. Fox	Correspondence with Solar Alliance and Sierra Club re settlement issues	A/B	Corresp.	0.3
11/23/2010	K. Fox	Meeting with T. Culley to discuss prior day's testimony and next steps in the GRC; call with Solar Alliance and Sierra Club; settlement call on residential rate design issues	A/B	Call/ Meeting	2.1
11/30/2010	K. Fox	Correspondence with parties re template for commenting on residential rate design issues	A/B	Corresp.	0.8
12/01/2010	K. Fox	Call with G. Rose to discuss Vote Solar position on TOU rate structures; settlement call with PG&E re TOU structures; correspondence with G. Rose re same	A/B	Call/ Corresp.	1.2
12/06/2010	K. Fox	Correspondence re opening brief outline	A/B	Corresp.	0.3
12/15/2010	K. Fox	Review draft of opening brief and edit; meeting with T. Culley re same	A/B	Drafting/ Meeting	2.4
12/17/2010	K. Fox	Review draft of opening brief and edit; meeting with T. Culley to discuss	A/B	Drafting/ Meeting	2
12/20/2010	K. Fox	Meeting with Thad to discuss modifications to opening brief; review modifications to opening brief and make additional edits	A/B	Drafting/ Meeting	1.2
					<b>93.6</b>
Issue Allocation		A: 84.24 B: 9.36			

### Thadeus B. Culley- 2010

Date	Name	Description of Work	Issue	Activity	Time
09/07/2010	T. Culley	Reviewed past pre-filed testimony examples; met with K. Fox to discuss strategy in developing testimony for PG&E GRC phase II.	A/B	Meeting/ Review	1.5
09/07/2010	T. Culley	Reviewed PG&E's redline version of testimony; met with K. Fox to discuss Gwen's model; Reviewed D.10-05-051; Reviewed pre-filed testimony for GEO for reference to California's CSI; Registered for online discovery access with PG&E.	A/B	Meeting/ Review	3

09/08/2010	T. Culley	Reviewed current E-1, E-6, and E-7 tariffs; read D.10-05-051 which collapses Tier 5 into Tier 4; Reviewed proposed GRC E-1/ E-6.	A/B	Meeting/ Review	1
09/08/2010	T. Culley	Took notes on PG&E testimony; worked on developing list of questions to counter the assumptions in the PG&E testimony; Checked cited studies for accuracy.	A/B	Drafting/ Review	1.6
09/08/2010	T. Culley	Reviewed PG&E's rate tables in redline version of update to testimony; gained access to PG&E online discovery and reviewed VSI pleadings and procedural background of GRC.	A/B	Review	1.5
09/08/2010	T. Culley	Compared Gwen's table 1d and 1b for relative loss of savings; identified and reviewed studies to support argument of rate design's incentive value to PV; reviewed selected PG&E data responses to TURN and DRA.	A/B	Review	2
09/08/2010	T. Culley	Read and Reviewed Chapter 6 of DRA's testimony.	A/B	Review	0.5
09/09/2010	T. Culley	Reviewed and made notes about relevant portions of DRA's testimony; reviewed notes on PG&E's testimony.	A/B	Review	1
09/10/2010	T. Culley	Reviewed Gwen's model and developed questions to expand explanation of the model. Reviewed rate structure charts in PG&E-8 redline draft and Chapter 1, 3-8; Researched the EPMC allocation method, comparing the current and proposed methods of allocating generation cost for E-6 (TOU).	A/B	Review	3
09/10/2010	T. Culley	Reviewed Bonbright chapter on marginal cost in rate design and Friedman study on nationwide off-peak rates compared to marginal costs;	A/B	Review	0.5
09/13/2010	T. Culley	Drafting first draft of testimony of Gwen Rose for PG&E GRC phase II.	A/B	Drafting	7.2
09/14/2010	T. Culley	Reviewing and editing draft of G. Rose's testimony to prepare for client meeting.	A/B	Drafting	0.5
09/14/2010	T. Culley	Meeting with K.Fox to plan client meeting with G.Rose of Vote Solar; Met with G. Rose and K.Fox, discussed GRC testimony and made revisions to testimony outline; Divided portions of testimony with G.Rose.	A/B	Drafting/ Meeting	3.2
09/15/2010	T. Culley	Editing and revising draft testimony of G.Rose. Emailed G.Rose to get peak time date for PG&E.	A/B	Corresp./ Drafting	1.3
09/15/2010	T. Culley	Researched CPUC Smart Grid docket for arguments on PV data arguments; Drafted policy answer to smart grid Q&A; drafted answers for G.Rose testimony.	A/B	Drafting/ Review	1.7
09/15/2010	T. Culley	Drafting testimony for G.Rose.	A/B	Drafting	0.7
09/16/2010	T. Culley	Review PG&E data responses to VSI; researched CPUC smart grid docket for citations in that portion of Q&A; revise and redraft Section II testimony of G.Rose.	A/B	Drafting/ Review	1.5
09/17/2010	T. Culley	Editing G. Rose testimony; emailed sections to J.Wiedman; Added citations to part II of testimony; Reading emails from G.Rose and T.Beach regarding SA proposal.	A/B	Corresp./ Drafting	1.5
09/17/2010	T. Culley	editing and rewriting loading order and smart grid question in section II of G. Rose testimony	A/B	Drafting	1.6
09/20/2010	T. Culley	email G.Rose about conference call. Reviewed Solar Alliance draft of testimony in advance of call.	A/B	Corresp./ Review	1.1
09/20/2010	T. Culley	Conference call with Solar Alliance, presentation by T.Beach on SA proposal. Took notes and wrote email to G.Rose and K.Fox regarding issues discussed and strategy of whether to join on to any part of the proposal.	A/B	Call	1.6

09/23/2010	T. Culley	Reviewed emails from K.Fox and G.Rose regarding status of models; incorporated and edited G.Rose's sections into main testimony document.	A/B	Drafting/ Review	1.7
09/23/2010	T. Culley	Revisions to entire testimony document and adding and researching citations for sections II and V.	A/B	Drafting	2
09/23/2010	T. Culley	Review and respond to email by J.Wiedman on restructuring section II to emphasize CSI; phone call with G.Rose discussing status update of models and drafting timeline; emailed current draft of testimony document to K.Fox.	A/B	Call/ Corresp./ Review	2
09/24/2010	T. Culley	Research and gather reports to support expanded policy section; ARB AB 32 analysis, LBNL NEM CBA, decisions of CPUC relevant to REC issue, CEC documents relevant to on-site generation arguments.	A/B	Review	1.5
09/24/2010	T. Culley	Revising testimony to incorporate J.Wiedman's suggested restructuring of Section II. Researched and reviewed ARB reports for CSI references, CEC CSI impact study.	A/B	Review	2
09/27/2010	T. Culley	Discuss status of GRC testimony with K.Fox; clean up citations in draft. Research looking for CPUC decisions where commission made statement regarding use of inclining block rates for efficiency.	A/B	Drafting/ Meeting/ Review	1
09/28/2010	T. Culley	Discuss G.Rose NPV chart with K.Fox; conference call with G.Rose over modifying chart and setting deadlines for testimony drafts, discussed developing Q&A to explain model assumptions; creating new question outline of section 2 of testimony to incorporate K.Fox revisions.	A/B	Call/ Drafting/ Meeting	1.2
09/28/2010	T. Culley	Rephrasing questions in section II and breaking out into new section; continue work on new question outline of section 2 of testimony to incorporate K.Fox revisions.	A/B	Drafting	0.6
09/28/2010	T. Culley	Drafting revised section 2 questions and revising answers; Finished Section II draft.	A/B	Drafting	2.7
09/29/2010	T. Culley	Drafting and revising Q&A in section II and III. Revising questions in Sections IV-VII. Sent draft to K.Fox via email for review.	A/B	Drafting	3
09/30/2010	T. Culley	Review testimony per K.Fox edits and comments; finish citations for work already cited; discuss peak system demand Q&A with K.Fox to identify relevant studies and reports.	A/B	Drafting/ Meeting	2
09/30/2010	T. Culley	work on peak system demand Q&A; incorporate LBNL and Itron studies into that Q&A.	A/B	Drafting	1.5
09/30/2010	T. Culley	Continue incorporating K.Fox edits. Email J.Wiedman for information on Smart Grid docket to be used in smart grid Q&A in section II. Searching PG&E discovery site for 8760 data in workpapers; con't edits according to document comments by K.Fox.	A/B	Drafting/ Review	2
10/01/2010	T. Culley	incorporate G.Rose edits into draft of testimony; revise responses according to suggestions from G.Rose	A/B	Drafting	1.1
10/01/2010	T. Culley	research filing requirements and look at other testimony to see whether referenced data responses should be included as attachments. Searching for workpapers with 8760 data; emailed K.Fox regarding finding 8760 data.	A/B	Corresp./ Review	0.7
10/03/2010	T. Culley	Drafting and revising testimony with additions from K.Fox and G.Rose; preparing document for filing; reviewing email chain between K.Fox and G.Rose for edits regarding impact on existing and future customers.	A/B	Drafting	0.5
10/04/2010	T. Culley	Drafting and revising testimony with additions from K.Fox and G.Rose; preparing document for filing; discuss	A/B	Drafting/ Meeting	2

10/05/2010	T. Culley	Drafting and revising testimony with edits from K.Fox and G.Rose; preparing document for filing; incorporating G.Rose's answers explaining Vote Solar's model and section on customer impacts.	A/B	Drafting	4
10/06/2010	T. Culley	Drafting and revising testimony with edits from K.Fox and G.Rose; incorporating G.Rose's answers explaining Vote Solar's model and section on customer impacts; Call G.Rose for further explanation of model assumptions. Discuss draft with K.Fox	A/B	Call/ Drafting/ Meeting	2.7
10/06/2010	T. Culley	Drafting and revising testimony with edits from K.Fox and G.Rose; incorporating G.Rose's answers explaining Vote Solar's model and section on customer impacts; Call G.Rose for further explanation of model assumptions. Final check of citations. Prepare service and cover letters for ALJ/Commissioner.	A/B	Drafting	8
10/07/2010	T. Culley	Print and organize all other parties' testimony. Read, review and take notes on parties testimony.	A/B	Review	1.5
10/07/2010	T. Culley	Print and organize all other parties' testimony. Read, review and take notes on parties testimony. Prepare document with notes and email it to K.Fox.	A/B	Drafting/ Review	4
10/08/2010	T. Culley	Printed excerpts of relevant testimony for K.Fox. Drafted summary of other parties testimony for K.Fox and G.Rose; Emailed summary to K.Fox and G.Rose.	A/B	Corresp./ Review	1.7
10/13/2010	T. Culley	Called into settlement conference with other parties.	A/B	Call	2.3
10/14/2010	T. Culley	Printed and read County of Kern's testimony of 10/6/10. Made strategy notes on rebuttal testimony reflecting developments in the settlement conference.	A/B	Drafting	1.1
10/15/2010	T. Culley	email K.Fox regarding settlement ideas and notes on developing rebuttal testimony.	A/B	Drafting	0.2
10/18/2010	T. Culley	Drafting rebuttal and developing Q&A for rate design (section II).	A/B	Drafting	1.1
10/18/2010	T. Culley	Drafting rebuttal: putting K.Fox's outline into Q&A form and developing additional questions.	A/B	Drafting	1.5
10/19/2010	T. Culley	preparing data response for PG&E's workpapers request; assembling all of documents into one pdf file.	A/B	Drafting	1.5
10/19/2010	T. Culley	preparing cover letter for data response to PG&E's workpapers request; assembling all of documents into one pdf file; review with K.Fox; email and serve documents to E.Lucha of PG&E, G.Rose and K.Fox.	A/B	Drafting	1.5
10/19/2010	T. Culley	Draft rebuttal and develop questions in customer charge section (Section II).	A/B	Drafting	1.5
10/20/2010	T. Culley	Drafting rebuttal sections I and II; review latest PG&E data request (DR_1). Identified sections for G.Rose to address by Friday. Email G.Rose document with notes.	A/B	Corresp./ Drafting	1.8
10/20/2010	T. Culley	Drafting rebuttal sections I and II, adding citations to testimony; Phone call w/ G.Rose to discuss approach to data request. Email K.Fox about conversation with G.Rose.	A/B	Call/ Corresp./ Drafting	2.3
10/20/2010	T. Culley	Drafting rebuttal sections I and II, adding citations to testimony; 2 phone calls w/ G.Rose to individually go over the questions in the data request. Finished First Draft, emailed to K.Fox.	A/B	Call/ Drafting	3.5
10/24/2010	T. Culley	Creating separate documents for data responses; drafting answers and editing G.Rose's text into answer documents.	A/B	Drafting	2
10/25/2010	T. Culley	Added G.Rose's final additions to separate data response document for PG&E DR_1. Drafting answers and preparing for K.Fox to review.	A/B	Drafting	2.2

10/26/2010	T. Culley	Revising Vote Solar rebuttal testimony according to K.Fox edits; Edit question on data response after email from G.Rose regarding contents; email data responses to E.Lucha (PG&E).	A/B	Drafting	1.8
10/26/2010	T. Culley	Revising draft of rebuttal testimony per K.Fox's edits.	A/B	Drafting	0.4
10/26/2010	T. Culley	Meet with K.Fox to discuss data response; incorporate edits into data response, prepare files as individual pdfs; final proof reading of responses.	A/B	Drafting/ Meeting	1.8
10/27/2010	T. Culley	revisions to rebuttal testimony; phone call w. G.Rose to discuss modeling of SA proposal and whether to fit that into the rebuttal. Pre-call discussion with K.Fox regarding draft rebuttal and strategy moving forward.	A/B	Call/ Drafting	2
10/27/2010	T. Culley	Proofread draft of rebuttal, revisions, draft answer to question on Solar Alliance proposal. Email to G.Rose; Prepare Data Response_2 document template and email to G.Rose to answer.	A/B	Corresp./ Drafting	1.7
10/28/2010	T. Culley	Phone call w. G.Rose to discuss last draft of rebuttal and whether to include additional issue raised by Solar Alliance. Read KernTax's rebuttal testimony. Reviewed DR_2 with K.Fox and submitted Vote Solar's data response to J.Wu @ PG&E.	A/B	Call/ Review	1
10/29/2010	T. Culley	Final revisions and proof reading of rebuttal. Served rebuttal on other parties.	A/B	Drafting	1.5
11/01/2010	T. Culley	Read through rebuttal testimony and send email to G.Rose and A.Browning regarding PG&E's rebuttal of Vote Solar's testimony.	A/B	Corresp./ Review	0.5
11/02/2010	T. Culley	Phone call with K.Fox and G.Rose regarding hearings and case management schedule and deciding on parties to cross-examine	A/B	Call	0.5
11/04/2010	T. Culley	Review rebuttal testimony of other parties submitted on 10/29 and take notes for G.Rose and K.Fox.	A/B	Drafting/ Review	1.2
11/04/2010	T. Culley	Review rebuttal testimony of other parties submitted on 10/29 and take notes for G.Rose and K.Fox. email summary document to K.Fox and G.Rose.	A/B	Corresp./ Drafting/ Review	2
11/04/2010	T. Culley	Phone call strategy session with T.Beach, S. Birmingham, G.Rose, K.Fox.	A/B	Call	0.5
11/09/2010	T. Culley	Creating a notebook for Gwen for Cross examination.	A/B	Review	1.2
11/10/2010	T. Culley	Phone call with G.Rose and K.Fox to discuss preparations for Cross exam and ideas for pending settlement call.	A/B	Call	0.7
11/10/2010	T. Culley	Work on developing potential cross examination questions for G.Rose for preparation for evidentiary hearing.	A/B	Drafting/ Review	1
11/10/2010	T. Culley	Work on developing potential cross examination questions for G.Rose for preparation for evidentiary hearing.	A/B	Drafting/ Review	2.7
11/10/2010	T. Culley	Settlement phone call with all parties interested in residential rate design issues in K.Fox's office. Discuss possible settlement strategy with K.Fox after phone call.	A/B	Call/ Meeting	1.5
11/11/2010	T. Culley	Continue developing practice cross exam questions for G.Rose in preparation for hearing.	A/B	Drafting/ Review	1.2
11/11/2010	T. Culley	Preparing notebook for hearing for G.Rose for cross exam.	A/B	Review	0.5
11/12/2010	T. Culley	Attended Phase II hearing on residential rate design and took notes on cross exam of all scheduled witnesses. Conferred with G.Rose during 10 minute break to review testimony of that session.	A/B	Hearing	2.5

11/12/2010	T. Culley	Attended Phase II hearing on residential rate design and took notes on cross exam of all scheduled witnesses. Conferred with G.Rose during 10 minute break to review testimony of that session.	A/B	Hearing	2.5
11/15/2010	T. Culley	Attended Phase II hearing on residential rate design and took notes on cross exam of all scheduled witnesses. Conferred with G.Rose during 10 minute break to review testimony of that session.	A/B	Hearing	3
11/15/2010	T. Culley	Attended Phase II hearing on residential rate design and took notes on cross exam of all scheduled witnesses. Conferred with G.Rose during 10 minute break to review testimony of that session.	A/B	Hearing	2.5
11/15/2010	T. Culley	Prepared and updated witness notebook for G.Rose for cross examination.	A/B	Review	2.4
11/16/2010	T. Culley	Meeting with K.Fox to go over potential cross examination questions for G.Rose. Worked on developing Questions for Kern County on cross.	A/B	Drafting/ Meeting	3.9
11/16/2010	T. Culley	Settlement call with parties on residential rate design issues. Briefly discussed settlement call with T.Beach after call concluded.	A/B	Call	2.2
11/16/2010	T. Culley	Work on Errata document to G.Rose testimony.	A/B	Call	0.7
11/17/2010	T. Culley	Working on Errata to G.Rose Testimony and Correcting Testimony to reflect the Errata.	A/B	Drafting	1.6
11/17/2010	T. Culley	Read through transcripts of 11/12/10 and 11/15/10 and copy sections for G.Rose in the Central Filing office of the CPUC. Updated this in G.Rose's cross examination notebook.	A/B	Review	1
11/17/2010	T. Culley	Change Errata per K.Fox's edits. Prepared service list and served all persons on A-10-03-014 the Errata and Corrected Testimony of G.Rose. Print copies of Errata in order to have enough for interested parties at hearing. Print other material needed for binder for K.Fox's presentation of witness G.Rose and potential Cross of other witnesses.	A/B	Drafting/ Review	5
11/18/2010	T. Culley	Printed additional 10 copies of Errata and Corrected Testimony of G.Rose prior to morning hearing.	A/B	Hearing	0.4
11/18/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses. Assisted K.Fox in presenting witness G.Rose.	A/B	Hearing	3
11/18/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses. Assisted K.Fox in presenting witness G.Rose.	A/B	Hearing	1.5
11/19/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses.	A/B	Hearing	3
11/19/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses.	A/B	Hearing	2.7
11/22/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses.	A/B	Hearing	3
11/22/2010	T. Culley	Attended hearing of GRC Ph II and took notes on Cross of witnesses.	A/B	Hearing	3.5
11/23/2010	T. Culley	Strategy phone call with G.Rose, A.Katz, T.Beach, K.Fox, to discuss settlement options and preferences.	A/B	Call	0.5
11/23/2010	T. Culley	Settlement phone call with parties regarding residential rate design.	A/B	Call	0.5
11/29/2010	T. Culley	Reviewed transcripts from GRC that G.Rose emailed. Took notes on where to locate discussion of customer charge.	A/B	Review	1

12/01/2010	T. Culley	Reviewed briefing requirements and scoping memo. Reviewed suggested format for brief put forward by PG&E and TURN. Responded to K.Fox email regarding that suggested format, approving.	A/B	Corresp./ Review	0.5
12/02/2010	T. Culley	Settlement Call with all parties to residential rate design.	A/B	Call	1.2
12/06/2010	T. Culley	Creating outline of brief for GRC; residential portion.	A/B	Drafting	1.7
12/06/2010	T. Culley	Begin drafting opening brief.	A/B	Drafting	4
12/07/2010	T. Culley	Drafting opening brief.	A/B	Drafting	2.9
12/07/2010	T. Culley	Create revised outline for customer charge and Tier Consolidation sections.	A/B	Drafting	1
12/09/2010	T. Culley	Drafting Brief and revisions according to restructuring of customer charge and tier consolidation sections.	A/B	Drafting	1
12/09/2010	T. Culley	Drafting Brief and revisions according to restructuring of customer charge and tier consolidation sections.	A/B	Drafting	2.5
12/10/2010	T. Culley	Reviewing and retrieving hearing exhibits from PG&E website. Editing and drafting opening brief; Review hearing transcripts for support on customer charge issue.	A/B	Drafting/ Review	1
12/10/2010	T. Culley	Drafting opening brief.	A/B	Drafting	1
12/10/2010	T. Culley	Drafting opening brief.	A/B	Drafting	0.2
12/11/2010	T. Culley	Drafting opening brief; reviewing transcripts for support and citations.	A/B	Drafting/ Review	1.2
12/11/2010	T. Culley	Drafting opening brief; reviewing transcripts for support and citations.	A/B	Drafting/ Review	1
12/12/2010	T. Culley	Drafting opening brief; reviewing transcripts for support and citations.	A/B	Drafting/ Review	2.5
12/13/2010	T. Culley	Drafting and revising opening brief; reviewing transcripts for support and citations.	A/B	Drafting/ Review	3
12/13/2010	T. Culley	Drafting and revising opening brief; reviewing transcripts for support and citations.	A/B	Drafting/ Review	2
12/14/2010	T. Culley	Reviewing first full draft of Opening Brief, editing and revisions.	A/B	Drafting	3.7
12/14/2010	T. Culley	Reviewing first full draft of Opening Brief, editing and revisions. Emailed finished first draft to K.Fox for review.	A/B	Drafting	1
12/15/2010	T. Culley	Meeting with K.Fox to go over restructuring the brief.	A/B	Meeting	0.5
12/16/2010	T. Culley	Drafting and editing opening brief per revisions from meeting with K.Fox.	A/B	Drafting	3
12/16/2010	T. Culley	Drafting and editing opening brief per revisions from meeting with K.Fox; respond to G.Rose email regarding status of brief. Continue to edit and draft.	A/B	Corresp./ Drafting	5.5
12/17/2010	T. Culley	Review draft of brief with G.Rose on phone call and make edits.	A/B	Drafting	2.2
12/17/2010	T. Culley	Create table of authorities and contents, draft summary of recommendations; make revisions to body of brief.	A/B	Drafting	1
12/17/2010	T. Culley	Meeting with K.Fox to discuss 2nd round of revisions; provide citations to the record in body of brief.	A/B	Drafting/ Meeting	1.7
12/19/2010	T. Culley	Editing and revising body of brief per K.Fox suggestions. Checking all citations for accuracy.	A/B	Drafting	1.5
12/20/2010	T. Culley	Meet with K.Fox to discuss final draft of brief. Edit brief, prepare for service, review ALJ's ruling on judicial notice re: DisabRa's motion;	A/B	Drafting/ Meeting/ Review	4
12/20/2010	T. Culley	Make final edits to opening brief, serve on all parties and paper service to ALJ Pulsifer; File with CPUC.	A/B	Drafting	1
12/21/2010	T. Culley	Retrieve opening briefs of other parties from PG&E's website; review other parties briefs and take notes.	A/B	Drafting/ Review	4.7
12/22/2010	T. Culley	Finish reviewing opening briefs and taking notes; email summary to A. Browning and G. Rose of Vote Solar.	A/B	Corresp./ Review	1.7

12/22/2010	T. Culley	Create initial outline for reply brief; Begin drafting opening sections of Reply brief.	A/B	Drafting	3
12/23/2010	T. Culley	Drafting Reply brief; revising outline.	A/B	Drafting	1.5
12/31/2010	T. Culley	Drafting and revising public policy/ratemaking objective section.	A/B	Drafting	1.5
			A/B		<b>243.70</b>
Issue Allocation		A: 219.33 B: 24.37			

### Attorney Support Staff Hours: 2010

#### Kevin Christopher (law clerk)- 2010

Date	Name	Description of Work	Issue	Activity	Time
06/02/2010	K. Christopher	Began researching and organizing docket submissions for PG&E rate case	A/B	Review	2.8
06/03/2010	K. Christopher	Reviewed and organized filings for PG&E rate case	A/B	Review	5.5
06/04/2010	K. Christopher	Completed summaries of party filings; Researched party interests; Researched ratepayer financing models	A/B	Review	6.5
06/07/2010	K. Christopher	Reviewed and analyzed party filings for Phase II; compared party arguments with SCE rate setting case and with Phase I proceedings; conducted background research on party positions	A/B	Review	6.5
06/09/2010	K. Christopher	Added MEA comments to PG&E ratesetting binder	A/B	Review	0.1
06/11/2010	K. Christopher	Formulated matrix for PG&E Phase II rate-setting case according to CPUC scoping memo	A/B	Drafting	4.1
06/15/2010	K. Christopher	Prepared for meeting with G Rose, A Browning, & K Fox, reviewing filings; met with above persons to discuss case strategy related to residential rate structure, case management;	A/B	Meeting/ Review	2.8
06/17/2010	K. Christopher	Reviewed marginal rate tables; participated in conference call w/ PG&E and related parties	A/B	Call/ Review	2.1
					<b>30.4</b>
Issue Allocation		A: 27.36 B: 3.04			

### Expert Hours: 2010

#### Adam Browning-2010

Date	Name	Description of Work	Issue	Activity	Time
8/5/10	A.Browning	Review PG&E application	A/B	Review	1.0
8/11/10	A.Browning	Meeting to discuss VSI positions on PG&E GRC Phase II Application	A/B	Meeting	0.5
10/20/10	A.Browning	Review VSI testimony	A/B	Review	1.0
11/8/10	A.Browning	Review summary of parties' rebuttal testimony	A/B	Review	0.5
11/8/10	A.Browning	Review summary of parties' opening testimony	A/B	Review	0.5
12/20/10	A.Browning	Review VSI Opening Brief	A/B	Review	0.5
12/22/10	A.Browning	Review opening brief summary of parties' positions	A/B	Review	0.5
					<b>4.5</b>
Issue Allocation		A: 4.05 B: 0.45			

#### Gwendolyn T. Rose-2010

Date	Name	Description of Work	Issue	Activity	Time
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08/02/10	Gwen Rose	Reviewed PG&E application	A/B	Review	4.00
08/11/10	Gwen Rose	Internal meeting to discuss VSI positions on PG&E GRC Phase II Application	A/B	Meeting	0.75
08/12/10	Gwen Rose	Set up access to PG&E regulatory site	A/B	Review	1.00
08/12/10	Gwen Rose	Data request drafted re: billing determinants	A	Drafting	0.50
08/13/10	Gwen Rose	Regional load profiles calculated for SF, SJ, Fresno, Bakersfield	A	Modeling	2.50
08/17/10	Gwen Rose	developed VSI model inputs for E6 & E7, including baseline qty, rates	A	Modeling	4.00
08/18/10	Gwen Rose	developed VSI model inputs for E1, including baseline qty, rates	A	Modeling	4.00
08/18/10	Gwen Rose	Reviewed PG&E workpapers RD_RES_GRC.xls and Res E6 2011 GRC.xls	A	Review	2.00
08/18/10	Gwen Rose	Data request drafted re: billing determinants	A	Drafting	2.00
08/19/10	Gwen Rose	worked on revenue-neutral rate calculations for VSI model	A	Modeling	4.00
08/20/10	Gwen Rose	Modeling for E1: San Francisco	A	Modeling	7.00
08/23/10	Gwen Rose	Modeling for E1: San Jose	A	Modeling	5.00
08/24/10	Gwen Rose	Modeling for E1: Bakersfield	A	Modeling	5.00
08/25/10	Gwen Rose	Modeling for E6: Fresno, Bakersfield	A	Modeling	3.00
08/26/10	Gwen Rose	Modeling for E7: Fresno, Bakersfield	A	Modeling	3.00
08/27/10	Gwen Rose	Modeling for E6 & E7: San Francisco, San Jose	A	Modeling	3.00
08/30/10	Gwen Rose	drafted data requests to PG&E	A	Modeling	1.00
08/31/10	Gwen Rose	Modeling for E6 & E7: averaged results	A	Modeling	4.00
08/31/10	Gwen Rose	Modeling for E1: averaged results	A	Modeling	4.00
08/31/10	Gwen Rose	Reviewed data requests and responses	A	Modeling	2.00
09/13/10	Gwen Rose	Modeling for E1: San Francisco	A	Modeling	6.50
09/14/10	Gwen Rose	Meet with Kevin Fox at K&F office	A	Modeling	2.00
09/14/10	Gwen Rose	Draft testimony outline	A/B	Modeling	2.50
09/14/10	Gwen Rose	Modeling for E1: San Jose	A	Modeling	6.00
09/15/10	Gwen Rose	Modeling for E1: Bakersfield	A	Modeling	5.25
09/16/10	Gwen Rose	Modeling for E6: Fresno, Bakersfield	A	Modeling	5.50
09/17/10	Gwen Rose	Modeling for E7: Fresno, Bakersfield	A	Modeling	5.25
09/17/10	Gwen Rose	Modeling for E6 & E7: San Francisco, San Jose	A	Modeling	4.00
09/20/10	Gwen Rose	NPV modeling for E1: San Francisco	A	Modeling	8.00
09/21/10	Gwen Rose	NPV modeling for E1: San Jose	A	Modeling	3.00
09/22/10	Gwen Rose	NPV modeling for E1: Bakersfield	A	Modeling	1.00
09/23/10	Gwen Rose	NPV modeling for E6: Fresno, Bakersfield	A	Modeling	3.00
09/24/10	Gwen Rose	NPV modeling for E7: Fresno, Bakersfield	A	Modeling	3.00
09/24/10	Gwen Rose	NPV modeling for E6 & E7: San Francisco, San Jose	A	Modeling	3.00
09/24/10	Gwen Rose	Review and analyze PV loss model results	A	Modeling	5.00
09/27/10	Gwen Rose	modeling verification tests using NREL Solar Advisor Model	A	Modeling	5.00
09/29/10	Gwen Rose	Drafted testimony and prepare graphs on modeling results for changes in NPV	A	Drafting	5.50
10/01/10	Gwen Rose	Drafted testimony and prepare graphs on modeling results for changes in annual energy savings	A	Drafting	6.00
10/07/10	Gwen Rose	Reviewed TURN, Sierra Club, Solar Alliance, DRA and KernTax testimony	A/B	Review	4.00
10/21/10	Gwen Rose	Response to PG&E DR No. 1, Q1 and 3	A/B	Drafting	0.75
10/22/10	Gwen Rose	Response to PG&E DR No.1, Q5, 7, 8 and 9	A/B	Drafting	1.50
10/26/10	Gwen Rose	Response to PG&E DR No.2, Q1	A/B	Drafting	1.00
10/27/10	Gwen Rose	call with K&F to discuss rebuttal testimony	A/B	Call	0.50
10/27/10	Gwen Rose	Modeling errata compiled	A/B	Drafting	4.50
10/28/10	Gwen Rose	Edited rebuttal testimony	A/B	Drafting	2.00

11/02/10	Gwen Rose	Call with K&F to discuss settlement issues and rebuttal	A/B	Call	0.50
11/03/10	Gwen Rose	Preparation for hearings cross-examination	A/B	Hearing	2.00
11/04/10	Gwen Rose	Reviewed PG&E, TURN, Sierra Club, Solar Alliance, DRA and KernTax rebuttal testimony	A/B	Review	3.50
11/04/10	Gwen Rose	Call with K&F and Solar Alliance re: upcoming hearings	A/B	Call	1.00
11/10/10	Gwen Rose	Preparation for hearings cross-examination	A/B	Hearing/ Review	7.50
11/11/10	Gwen Rose	Preparation for hearings cross-examination	A/B	Hearing/ Review	7.25
11/12/10	Gwen Rose	Hearings Day 1	A/B	Hearing	5.50
11/15/10	Gwen Rose	Hearings Day 2	A/B	Hearing	4.50
11/16/10	Gwen Rose	2nd Settlement Call	A/B	Call	1.00
11/16/10	Gwen Rose	call with Sierra Club + Solar Alliance regarding settlement	A/B	Call	1.00
11/16/10	Gwen Rose	Errata for testimony	A/B	Drafting	3.00
11/18/10	Gwen Rose	Hearings Day 3	A/B	Hearing	5.00
11/19/10	Gwen Rose	Hearings Day 4	A/B	Hearing	5.00
11/24/10	Gwen Rose	Transcript order at CPUC	A/B	Review	0.25
12/02/10	Gwen Rose	Settlement call with PG&E on TOU issues	A/B	Call	1.00
12/16/10	Gwen Rose	email/discussion with K&F regarding TOU issues in Opening Brief	A/B	Corresp.	0.25
12/17/10	Gwen Rose	Review and edits to Opening Brief	A/B	Drafting	0.50
12/21/10	Gwen Rose	Reviewed PG&E, TURN, Sierra Club, Solar Alliance and DRA opening briefs	A/B	Review	2.50
					<b>206.75</b>
Issue Allocation		A: 199.375 B: 7.375			

### Intervenor Compensation Preparation Time: 2010

Date	Name	Description of Work	Issue	Activity	Time
06/15/2010	K. Christopher	Researched Notice of Intervenor rules; began preparing NOI for submission	A/B	Comp.	1.9
06/16/2010	K. Christopher	Drafted notice of intent for intervenor compensation; met w/ K Fox to discuss draft; discussed customer representation with A Browning; researched employee representation;	A/B	Comp.	2.4
06/17/2010	S. Stanfield	Conference with K. Fox and K. Christopher regarding filing of Intervenor Compensation forms; review relevant materials.	A/B	Comp.	1.4
06/17/2010	K. Christopher	Researched NOI and drafted second version, submitted to K Fox for review	A/B	Comp.	2.7
06/18/2010	S. Stanfield	Assist K. Christopher in research filing standards and reviewing documents for Intervenor Compensation filing.	A/B	Comp.	0.9
06/18/2010	K. Christopher	Incorporated final revisions into NOI draft; discussed w/ S Stanfield, J Keyes, and CPUC advisor	A/B	Comp.	1.9
06/18/2010	K. Christopher	Compiled, formatted NOI docs for electronic and mail service	A/B	Comp.	0.4
09/21/2010	T. Culley	Researched intervenor comp. issue regarding duplication; emailed K.Fox and G.Rose results of research.	A/B	Comp.	0.5
06/22/2010	K. Fox	Revise and file Vote Solar NOI and Motion to File Under Seal	A/B	Comp	1.4

06/22/2010	K. Christopher	Formatted documents under seal in envelopes for Commission; delivered docs to San Francisco;	A/B	Comp.	2.1
					<b>15.6</b>
Issue Allocation		A: 14.04 B: 1.56			

## Attorney Hours: 2011

Kevin T. Fox-2011

Date	Name	Description of Work	Issue	Activity	Time
01/05/2011	K. Fox	Review reply brief; call with A. Katz of Sierra Club; meeting with T. Culley to discuss reply brief revisions	A/B	Call/ Meeting/ Review	2.3
01/06/2011	K. Fox	Meeting with T. Culley re reply brief	A/B	Meeting	0.2
01/06/2011	K. Fox	Review and edit reply brief	A/B	Drafting	0.8
01/10/2011	K. Fox	Meeting with T. Culley re reply brief; review GRC reply brief and edit	A/B	Drafting/ Meeting	2.6
01/12/2011	K. Fox	Meeting with T. Culley to discuss GRC reply briefs	A/B	Meeting	0.3
01/18/2011	K. Fox	Correspondence with A. Katz at Sierra Club re oral argument	A/B	Corresp.	0.2
02/01/2011	K. Fox	Correspondence with G. Rose re GRC strategy	A/B	Corresp.	0.3
02/08/2011	K. Fox	Call with G. Rose re organizing ex parte communications	A/B	Call	0.5
03/08/2011	K. Fox	Correspondence with G. Rose re GRC strategy; call with J. Wiedman re GRC strategy and participating on commercial rate design; call with G. Rose re same	A/B	Call/ Corresp.	1
03/09/2011	K. Fox	Call with G. Rose	A/B	Call	0.3
04/06/2011	K. Fox	Review PD and alternate PD on residential rate design issues; send email to client summarizing the PD and alternate PD	A/B	Corresp./ Drafting/ Review	2.6
04/12/2011	K. Fox	Meeting with T. Culley to discuss comments on PD and alternate PD; call with G. Rose re same; post-call meeting with T. Culley to outline comments on PD and alternate PD	A/B	Call/ Meeting	1.2
04/18/2011	K. Fox	Review ex parte notices and correspond with client about scheduling ex parte meetings	A/B	Corresp./ Review	0.3
04/18/2011	K. Fox	Review outline of PD and Alternate PD comments; meeting with T. Culley re same	A/B	Meeting/ Review	0.8
04/20/2011	K. Fox	Correspondence with G. Rose re ex parte meetings; review and edit draft GRC comments	A/B	Corresp./ Drafting	1
04/21/2011	K. Fox	Meeting with T. Culley to discuss edits to comments on PD and Alternate; review revised GRC comments on PD and Alternate	A/B	Meeting/ Review	1.4
04/22/2011	K. Fox	Correspondence re GRC ex parte meetings	A/B	Corresp.	0.3
04/25/2011	K. Fox	Review and edit comments on PD and Alternate	A/B	Drafting	1.6
04/27/2011	K. Fox	Meeting with T. Culley re GRC reply brief	A/B	Meeting	0.2

04/27/2011	K. Fox	Review summary of GRC opening comments; correspondence with TURN re letter on customer charge; correspondence with G. Rose re ex parte meetings and Vote Solar reply comments; correspondence with t. Culley re reply comment outline.	A/B	Corresp./ Review	0.9
04/29/2011	K. Fox	review reply brief; correspondence with T. Culley re same	A/B	Corresp./ Review	0.5
04/30/2011	K. Fox	Edit reply comments	A/B	Drafting	2.7
05/02/2011	K. Fox	Correspondence with T. Culley re all party meeting on residential rate design issues	A/B	Corresp.	0.3
05/09/2011	K. Fox	Call with T. Culley re meetings with Commissioners' staff re PD and Alternate and last Friday's all party meeting with Commissioners Sandoval and Simon	A/B	Call	0.5
05/11/2011	K. Fox	Review GRC ex parte notices and edit; correspondence with T. Culley re same	A/B	Corresp./ Drafting	0.3
05/17/2011	K. Fox	Review and edit ex parte notice	A/B	Drafting	0.3
05/20/2011	K. Fox	Correspondence with G. Rose re GRC open meeting	A/B	Corresp.	0.2
05/26/2011	K. Fox	Meeting with T. Culley	A/B	Meeting	0.2
					<b>23.8</b>
Issue Allocation		A: 21.42 B: 2.38			

### Thadeus B. Culley-2011

Date	Name	Description of Work	Issue	Activity	Time
01/01/2011	T. Culley	Review Public Policy section of reply brief; make revisions.	A/B	Drafting/ Review	0.7
01/03/2011	T. Culley	Drafting reply brief.	A/B	Drafting	0.6
01/03/2011	T. Culley	Drafting reply brief.	A/B	Drafting	2.2
01/03/2011	T. Culley	Drafting reply brief.	A/B	Drafting	2
01/04/2011	T. Culley	Revising/Drafting reply brief. Reviewing PG&E's opening brief.	A/B	Drafting/ Review	3.3
01/04/2011	T. Culley	Revisions and Drafting Reply Brief.	A/B	Drafting	3.1
01/05/2011	T. Culley	Meeting with K.Fox to discuss reply draft and discuss edits/re-writes. Phone Call with Andy Katz to discuss strategy of responding to PG&E opening brief solar section.	A/B	Call/ Meeting	1.5
01/06/2011	T. Culley	Rewrite reply draft per K.Fox edit/suggestions.	A/B	Drafting	4.2
01/06/2011	T. Culley	Rewrite reply draft per K.Fox edit/suggestions.	A/B	Drafting	2.2
01/09/2011	T. Culley	Reply revisions and citations.	A/B	Drafting	1.3
01/10/2011	T. Culley	Revisions to reply brief. Incorporate G.Rose suggestions; emailed draft to A.Katz, K.Fox, G.Rose. Cite checked all footnotes and citations.	A/B	Corresp./ Drafting	4.1
01/10/2011	T. Culley	Revisions to reply draft per K.Fox edits. Service of brief and filing with CPUC.	A/B	Drafting	3
01/12/2011	T. Culley	Read and summarize other parties' reply briefs. Email K.Fox, G.Rose, A.Browning summary notes.	A/B	Corresp./ Review	1.7
02/08/2011	T. Culley	Status update phone call with K.Fox and G.Rose concerning next steps (e.g. oral argument and ex parte strategy)	A/B	Call	0.5
04/05/2011	T. Culley	review all Ex Parte Filings; review ALJ Pulsifer's Proposed Decision.	A/B	Review	1.7
04/06/2011	T. Culley	Review Alternate and PD decision sections on Tier consolidation and customer charge.	A/B	Review	0.5

04/12/2011	T. Culley	Create document with statutory provision (379.1 and 379.9) with comment bubbles explaining differing interpretations between PD and Alternate Decisions. Email to K.Fox and G.Rose in advance of strategy call.	B	Drafting	0.8
04/12/2011	T. Culley	Meeting with K.Fox to discuss strategy in responding to PD/Alternate Decisions and to approach ex parte meetings; Phone call with G.Rose and K.Fox.	A/B	Call/ Meeting	1.1
04/12/2011	T. Culley	Review ex parte rules and how that might affect strategy of reaching out to aligned parties.	A/B	Review	1
04/12/2011	T. Culley	Create outline template of Comments on PD/Alternate.	A/B	Drafting	0.3
04/12/2011	T. Culley	Research statutory argument on customer charge. Review TURN's protest to PG&E's application and Motion to Strike the customer charge; read and review all filings in response to the motion; include outline of statutory argument in opposition to customer charge in outline document.	B	Review	2.5
04/13/2011	T. Culley	Add citations and research support for points in Comment outline.	A/B	Drafting	2.5
04/15/2011	T. Culley	Read legislative opinion on SB 695 and research statutory interpretation cases cited in the opinion. Revisions to Statutory Interpretation portion of Comment outline.	B	Drafting/ Review	0.5
04/18/2011	T. Culley	Discuss edits to outline with K.Fox and drafting comments.	A/B	Drafting/ Meeting	0.3
04/18/2011	T. Culley	Drafting Comments on the PD and Alternate.	A/B	Drafting	1.7
04/19/2011	T. Culley	Drafting Comments on PD and Alternate: Customer Charge Introduction.	A/B	Drafting	1
04/19/2011	T. Culley	Review draft of Comments on PD and Alternate and make edits.	A/B	Drafting	0.5
04/20/2011	T. Culley	Complete Drafting Comments on PD and Alternate. Email to K.Fox.	A/B	Drafting	5
04/21/2011	T. Culley	Meet with K.Fox to discuss draft of Comments on Alternate and PD; draft comments and add citations.	A/B	Drafting/ Meeting	6.2
04/25/2011	T. Culley	Draft TOU section for Opening Comments. Review Solar Alliance comments and modify TOU section. Edit and review comments. Prepare service and serve comments.	A/B	Drafting/ Review	5.5
04/26/2011	T. Culley	Read all comments submitted on PD and Alternate. Create summary document for client and outline of positions for purposes of drafting reply comments.	A/B	Review	3.5
04/27/2011	T. Culley	Email G.Rose regarding summary of other party comments and ex parte meeting strategy. Create document for handout.	A/B	Corresp./ Drafting	1.5
04/27/2011	T. Culley	Prepare and submit form ex parte meeting requests for meetings with advisors to Sandoval, Ferron and Simon.	A/B	Drafting	1
04/28/2011	T. Culley	Drafting Reply Comments.	A/B	Drafting	2.6
04/28/2011	T. Culley	Drafting Reply Comments. Email draft to K.Fox.	A/B	Drafting	3.8
04/29/2011	T. Culley	Edit reply comments, add citations. Research Water Code § 10110(e).	A/B	Drafting	1.5
05/02/2011	T. Culley	Edit reply and create final draft version of reply comments on the PD and Alternate. Serve and file reply comments.	A/B	Drafting	3
05/03/2011	T. Culley	Create talking points document for 5/6/11 all party meeting with Commissioners Simon and Sandoval. Work on talking points outline for meetings with Advisors on 5/9/11 for G.Rose. Email draft of outline to K. Fox.	A/B	Drafting	1.8
05/03/2011	T. Culley	Draft prepared comments for All-party meeting; discussion with J.Wiedman on strategy and procedure related to an all-party meeting.	A/B	Drafting/ Meeting	1

05/05/2011	T. Culley	Preparing Ex Parte Notice template; preparing and reviewing materials for all party meeting.	A/B	Drafting/ Review	2
05/05/2011	T. Culley	reviewing materials for all party meeting and revising notes.	A/B	Review	1.5
05/06/2011	T. Culley	Read April 2011 CSI cost-effectiveness report and prepare responses based on its findings (in case brought up in all-party meeting). Review testimony and transcripts and other relevant record evidence to support talking points.	A/B	Review	2.5
05/06/2011	T. Culley	Attend and participate in all-party meeting with Commissioners Simon and Sandoval.	A/B	Meeting	2.8
05/09/2011	T. Culley	Meet with G.Rose to prep for Ex Parte Meetings. Reviewed talking points with G.Rose. Met with C.Kersten (Sandoval) and M.Colvin and S.Thomas (Ferron).	A/B	Ex Parte	2.8
05/09/2011	T. Culley	Follow up research on the GRC settlement related to question in ex parte meeting. Draft separate ex parte notice description of days meetings.	A/B	Drafting/ Review	1.8
05/10/2011	T. Culley	Edit Ex Parte Drafts; Draft email request for meeting w. S.Murtishaw. Email K.Fox both.	A/B	Drafting	1.3
05/11/2011	T. Culley	Finalize ex parte notices with edits from K.Fox. File with CPUC and email to T.Stearns for service.	A/B	Drafting	0.5
05/16/2011	T. Culley	Meet with G.Rose to discuss meeting agenda; meet with Commissioner Peevey's advisor, S.Murtishaw at the Commission.	A	Ex Parte	0.7
05/16/2011	T. Culley	Draft Ex Parte Notice for meeting with S.Murtishaw. Email to K.Fox.	A	Drafting	0.5
05/19/2011	T. Culley	Respond to G.Rose question regarding agenda on 5/26/11 business meeting. Read over meeting procedures.	A/B	Corresp.	0.5
05/23/2011	T. Culley	Review Revisions to PD and Alternate. Discuss with K.Fox. Review Ex Parte Notices from other parties in last 4 days.	A/B	Meeting/ Review	0.4
05/25/2011	T. Culley	Email G.Rose concerning 5/26 meeting and forward recent filings from 5/24.	A/B	Corresp.	0.3
05/26/2011	T. Culley	Attend Commission Business meeting with G.Rose. PD adopted.	A/B	Meeting	2
					<b>100.8</b>
Issue Allocation		A: 87.42 B: 13.38			

### Attorney Support Staff Hours: 2011

#### Tony Stearns-2011

Date	Name	Description of Work	Issue	Activity	Time
04/25/2011	T. Stearns	Assist in filing comments on Proposed Decisions.	A/B	Filing	0.4
05/02/2011	T. Stearns	Edit reply comments and assist with filing with CPUC.	A/B	Drafting	0.8
05/11/2011	T. Stearns	Proofread and serve ex parte notices.	A/B	Filing	0.8
05/17/2011	T. Stearns	Proofread and serve Notice of ex parte communication.	A/B	Filing	1.4
					<b>3.4</b>
Issue Allocation		A: 3.06 B: 0.34			

### Expert Hours: 2011

#### Adam Browning-2011

Date	Name	Description of Work	Issue	Activity	Time
1/12/11	A.Browning	Review Summary of Parties' reply briefs	A/B	Review	0.5
					<b>0.5</b>
Issue Allocation		A: 0.45 B: 0.05			

### Gwendolyn T. Rose-2011

Date	Name	Description of Work	Issue	Activity	Time
01/06/11	Gwen Rose	Review draft reply brief	A/B	Review	0.50
01/09/11	Gwen Rose	Review and edit draft reply brief	A/B	Drafting	1.00
01/10/11	Gwen Rose	Email, phone call regarding reply brief	A/B	Call/ Corresp.	0.50
01/12/11	Gwen Rose	Reviewed PG&E reply brief	A/B	Review	1.00
01/12/11	Gwen Rose	Reviewed summary of parties' reply briefs	A/B	Review	0.25
					<b>3.25</b>
Issue Allocation		A: 2.925 B: 0.325			

### Intervenor Compensation Preparation Time: 2011

Date	Name	Description of Work	Issue	Activity	Time
03/08/2011	J. Wiedman	researching issues re: testimony and intervenor comp; call with KTF re: current issues in docket re: same	A/B	Comp.	1.1
5/27/11	T.Culley	Intervenor Comp (50% rate): Research request for award process. Review guidelines on CPUC website.	A/B	Comp.	0.7
6/1/11	T.Culley	50% Intervenor Comp Preparation. Gathering necessary materials to prepare requests.	A/B	Comp.	0.5
6/1/11	T.Culley	50% Intervenor Comp Preparation. Begin filling in first 3 sections of intervenor comp award request.	A/B	Comp.	0.8
6/6/11	T.Culley	50% Intv. Comp Prep: Locating citations to the record and creating table of contributions.	A/B	Comp.	1.2
6/6/11	T.Culley	50% PG&E: Create and review time entry report for all of Keyes & Fox work on GRC.	A/B	Comp.	0.9
7/13/11	T. Stearns	INTERVENOR: confer with T. Culley and prepare invoice/summary of time billed to rate case; download and review TURN exemplar from Docket 08-08-009.	A/B	Comp.	0.8
07/19/2011	T.Culley	50% COMP: Compiling time sheets into one master document. Review time entries for duplicates.	A/B	Comp.	1.7
07/19/2011	T.Stearns	INTERVENOR: confer with T. Culley and revise table of time billed to rate case.	A/B	Comp.	0.6
07/20/2011	T.Culley	50% COMP: Creating Attachment three; creating final format of hours entry table, sort by person, by year.	A/B	Comp.	1
07/21/2011	T.Culley	50 % COMP: Drafting explanations of how VS avoided duplication and Reasonableness of hours.	A/B	Comp.	3
07/21/2011	T.Culley	50 % COMP: Draft reasonableness of rates section. Create activity classification in hours table. Draft section on benefits of participation. Review and edit entire document.	A/B	Comp.	6.5
07/21/2011		INTERVENOR: confer with T. Culley and revise table of time billed to rate case.	A/B	Comp.	0.6
07/22/2011	T.Culley	50 % Comp: Drafting and revising Comp request.	A/B	Comp.	3
07/23/2011	T.Culley	50% Comp: Drafting and revising Reasonableness sections. Proof read and print for K.Fox.	A/B	Comp.	3
7/24/2011	K.Fox	Reviewing Draft of Intervenor Comp. Request. Email T. Culley revisions and questions	A/B	Comp.	1

07/25/2011	T.Culley	50% Comp: Final edits and revisions per K.Fox edits. Add G.Rose resume and description of experience. Update K.Fox description. Add citations to decisions supporting T.Stearns and K.Christopher rates.	A/B	Comp.	4
					<b>30.4</b>
Issue Allocation		A: 27.36 B: 3.04			

## ATTACHMENT 4:

**Gwendolyn Rose**  
**245 Gate 5 Road**  
**Sausalito, CA 94965**  
[pengwen@gmail.com](mailto:pengwen@gmail.com)

### **Biographical Sketch**

At the Vote Solar Initiative, Gwen works on regulatory policies that help bring solar into the mainstream, including establishing and protecting solar-friendly rates via general rate cases. Prior to Vote Solar, Gwen developed Marin County's solar and climate protection programs, where her work on solar GIS mapping and public agency solar procurement earned the "Best Progress in the Western Region" Award from the Department of Energy's Million Solar Roofs Program.

### **Education and Training**

B.S., Physical Environmental Sciences, University of California, Berkeley, 2001  
49<sup>th</sup> Annual Regulatory Studies Program, Institute for Public Utilities/NARUC, University of Michigan, 2007

Green Building Professional Certification Course, National Association of the Remodeling Industry, 2005  
Women's Photovoltaic Design & Installation Course, Solar Energy International, 2004

### **Professional Experience**

#### **Deputy Director, The Vote Solar Initiative (2006 – Present)**

Work with regulatory and legislative policy makers and renewable energy stakeholders to develop and implement critical solar policy changes in key states. Coordinate local permitting initiative, Project: Permit. Participate in regulatory proceedings to establish incentive programs, net metering and interconnection rules, and solar-friendly rates via utility general rate cases. Served as an expert witness in PG&E's 2011 Phase 2 General Rate Case, modeling the impact of proposed utility tariffs on customer economics. The analysis involved side-by-side comparisons of multiple rate structures in order to understand how a customer's bill savings change as a result of changes in rate structures. Under SCE 2011 GRC, examined the proposed distribution upgrades for Catalina Island and the opportunity for distributed renewable energy projects to defer distribution investments.

#### **Solar Program Coordinator, County of Marin (2001 – June 2006)**

Coordinated the solar program for the Community Development Agency and spearheaded solar installations for the Department of Public Works. Managed Marin's partnership under the DOE Million Solar Roofs Initiative. Facilitated the County of Marin's first photovoltaic (PV) project and subsequently initiated the installation of more than 500 kilowatts of photovoltaic capacity on municipal buildings in Marin. Secured \$15.7 Million in federal Clean Renewable Energy Bonds (CREBs) for solar project development for multiple cities and school districts. Provided technical assistance to commercial, residential and public sector, such as energy and economic

performance of solar energy systems, site surveys, financing and procurement packages; organized community events, including tours, workshops and seminars; prepared grant proposals and managed grant awards; managed graduate student interns, wrote solar and climate policies for the Marin Countywide Plan.

### **Publications**

Gwen Rose. *Survey of Solar Permitting Practices for Colorado Local Jurisdictions*. 2011. 5 pages.

<http://votesolar.org/wp-content/uploads/2011/03/COPermitReport.pdf>

James Rose, Emma Webber, Adam Browning, Shaun Chapman, Gwen Rose, Claudia Eyzaguirre, Jason Keyes, Kevin Fox, Rusty Haynes, Keith McAllister, Maureen Quinlan, Colin Murchie. *Freeing the Grid, Best and Worst Practices in State Net Metering Policies and Interconnection Standards, 2008 Edition*. 100 pages. [http://www.newenergychoices.org/uploads/FreeingTheGrid2008\\_report.pdf](http://www.newenergychoices.org/uploads/FreeingTheGrid2008_report.pdf)

Gwen Johnson (Rose), Dana Armanino. *GIS Tools for Community Development Applications*. Solar 2004: Proceedings of 33rd ASES Annual Conference. 6 pages.

[http://www.co.marin.ca.us/depts/CD/main/comdev/ADVANCE/Sustainability/Energy/solar/solarpotent/pdf/SolarPotentialMap\\_ASES.pdf](http://www.co.marin.ca.us/depts/CD/main/comdev/ADVANCE/Sustainability/Energy/solar/solarpotent/pdf/SolarPotentialMap_ASES.pdf)

### **Synergistic Activities**

- Instructor, UC Berkeley Extension. *Solar Energy: Understanding Policy Driven Markets*. Spring and Fall 2009.
- Served on City of SF Solar Task Force, 2007 - 2008.
- Served on California Energy Commission's New Solar Homes Partnership Advisory Committee, 2006-2008.
- Served on Marin County's Community Choice Aggregation Technical Advisory Panel, 2006-2007.
- Developed Marin Solar Map to assess potential for solar development on rooftops and parking lots using Geographic Information Systems (GIS) tools, 2004. The project was replicated by several local government agencies, including Santa Barbara, Santa Monica and San Diego.