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02-21-12

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Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

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.	Application 10-03-014 (Filed March 22, 2010)
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INTERVENOR COMPENSATION CLAIM OF AGRICULTURAL ENERGY CONSUMERS ASSOCIATION AND DECISION ON INTERVENOR COMPENSATION CLAIM OF AGRICULTURAL ENERGY CONSUMERS ASSOCIATION

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Claimant: Agricultural Energy Consumers Association (AECA)	For contribution to D. 11-12-053
Claimed (\$): 63,148.88	Awarded (\$):
Assigned Commissioner: Michael Peevey	Assigned ALJ: Thomas R. 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).	
Signature:	/s/
Date: 2/21/12	Printed Name: Michael Boccadoro

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

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A. Brief Description of Decision:	D.11-12-053 Adopts the Electric Marginal Costs, Revenue Allocation, and Non-Residential Rate Design Settlements in PG&E's Phase II GRC
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
4	1. Date of Prehearing Conference:	May 19, 2010
	2. Other Specified Date for NOI:	
	3. Date NOI Filed:	June 18, 2010
	4. Was the NOI timely filed?	
Showing of customer or customer-related status (§ 1802(b)):		
5	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):	
	8. Has the Claimant demonstrated customer or customer-related status?	
Showing of “significant financial hardship” (§ 1802(g)):		
6	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):	
	12. Has the Claimant demonstrated significant financial hardship?	
Timely request for compensation (§ 1804(c)):		
7	13. Identify Final Decision:	D.11-12-053
	14. Date of Issuance of Final Order or Decision:	December 22, 2011
	15. File date of compensation request:	February 21, 2012
	16. Was the request for compensation timely?	

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

#	Claimant	CPUC	Comment
8			In multiple decisions over the past two decades (D.95-07-093; D.96-08-040; D.96-11-048; D.02-06-014; D.03-09-067), and most recently in D.06-04-065, the Commission has found that where an individual AECA member has annual electricity bills of less than \$50,000, that member’s economic interest has been considered small in comparison to the costs of participation. For purposes of this proceeding, AECA had 309 active individual members (excluding agricultural associations and water district members) with 211 of those members having electricity bills of less than \$50,000. As a result AECA is seeking 68% (211÷309) of the total compensation found reasonable in this proceeding.

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

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

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Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<p>1. AECA litigation position set forth in testimony, Exh. 156:</p> <p>a. As required by state law, reduce agricultural TOU rates to be at or below proposed system average</p> <p>b. Freeze remaining agricultural tariffs at current levels prior to migrating customers to TOU rates</p> <p>c. Enable agricultural customers to use smart meters to “virtually aggregate” (e.g., master meter) energy use at a given farm or ranch</p> <p>d. Maintain existing off-peak/peak energy rate differential to encourage load shifting away from system peaks</p> <p>e. Adopt energy-only rate sensitive to anticipated system demand conditions as alternative to critical peak period or peak-day pricing rate</p> <p>f. Initiate Commission investigation or stakeholder workshop at address proper assignment of costs to agricultural class</p>	<p>a. Exh. 156, pp. 2, 36-39.</p> <p>b. Exh. 156, pp. 2, 36-39.</p> <p>c. Exh. 156, pp. 2, 40-42.</p> <p>d. Exh. 156, pp. 2, 42-46.</p> <p>e. Exh. 156. pp. 3, 46-48</p> <p>f. Exh. 156, pp. 3, 36, 39-40.</p> <p>As described in the following sections, AECA was a party to the Settlement, approved by the Commission, that resolved through negotiation and mutual compromise the marginal cost, revenue allocation, and agricultural rate issues raised by AECA in testimony. (D.11-12-053, and Appendix A, Settlement Agreement on Marginal Cost and Revenue Allocation, and Appendix F, Supplemental Settlement Agreement Agricultural Rate Design Issues.)</p>	

<p>2. AECA was an Active Party to Settlement on Revenue Allocation and Marginal Cost Issues.</p> <p>Settlement Agreement resolves all marginal costs and revenue allocation issues except specific marginal costs to be used solely for purpose of establishing rate floors for customer retention/attraction. (See 1.a, b, d, e, and f above for list of issues raised by AECA in testimony.)</p> <p>“Settlement Agreement does not adopt any party’s marginal cost principles or proposals, but, for purposes of calculating the revenue allocation uses PG&E’s updated marginal costs, as provided in its January 7, 2011 testimony.”</p> <p>Settlement Agreement calls for various workshops to address marginal cost and revenue allocation issues. (See 1.f above, raised by AECA in testimony.)</p>	<p>D.11-12-053, p. 2-3 and Appendix A, Settlement Agreement on Marginal Cost and Revenue Allocation, p. 2.</p> <p>D.11-12-053, p. 2, and Appendix A, pp. 3-4.</p> <p>D.11-12-053, p. 2, and Appendix A, pp. 8-12.</p> <p>D.11-12-053, pp. 8-9, and Appendix A, pp. 18-25.</p>	
<p>3. AECA was an Active Party to Settlement on Agricultural Rate Design</p> <p>“The Ag Settlement addresses all rate design issues for the Agricultural customer class.” (See 1.a – f above for issues raised in AECA testimony.)</p> <p>AECA’s participation in Settlement Agreement contributed to minimal increase for the ag class (1.5%) compared to proposed 6.9% increase. (See 1.a and b above, raised by AECA in testimony.)</p> <p>AECA’s participation in Settlement Agreement contributed to appropriate off-peak/peak differentials. (See 1.d above,</p>	<p>D.11-12-053, p. 58-61, and Appendix F, Supplemental Settlement Agreement on Agricultural Rate Design Issues.</p> <p>D.11-12-053, p. 58, and Appendix F, pp. 2-4.</p> <p>Appendix F, Exhibit A.</p> <p>Appendix F, Exhibit A.</p>	

<p>raised by in AECA testimony.)</p> <p>AECA developed Aggregation Study proposal and work plan ultimately adopted in lieu of aggregation rates. (See 1.c above, raised by AECA in testimony.)</p> <p>“Settlement does not adopt an agricultural aggregation tariff as proposed by AECA. Instead, the Settling Parties agree to facilitate and Agricultural Settlement Account Aggregation Study (Study), to be completed by the second quarter of 2013.” (See 1.c. above.)</p>	<p>D.11-12-053, p. 61, and Appendix F, p. 10 and Exhibit C.</p> <p>D.11-12-053, p. 61, and Appendix F, p. 10 and Exhibit C.</p>	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: California Farm Bureau Federation (CFBF)		
<p>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:</p> <p>AECA and CFBF have historically coordinated our efforts in rate case proceedings before the CPUC and did so here. While both parties are seeking reasonable rates for agricultural customers, AECA has also aggressively pursued rate stability, demand management incentives and successfully pointed out the inherent flaws in PG&E’s development of marginal costs to calculate rates for the agricultural class. AECA’s evaluation of PG&E’s EPMC-base has consistently documented agricultural class allocation inconsistencies and volatility. AECA’s aggressive efforts have continually resulted in substantially reduced rate increases from those proposed by PG&E, similar to the result in this proceeding. AECA has also pursued the creation of demand-side management incentives, such as appropriate off-peak/peak energy rate differentials and creation of aggregation options to encourage load shifting away from system peaks.</p> <p>AECA’s efforts to avoid duplication with other parties and aggressive pursuit of important issues should be recognized by the Commission.</p>		

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

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#	Claimant	CPUC	Comment
			<p>AECA was an active party to the Settlement Agreement on Marginal Costs and Revenue Allocation filed on March 14, 2011 and adopted in D.11-12-053 (Appendix A).</p> <p>As in previous PG&E Phase II proceedings, the Settlement Agreement did not adopt any of the settling parties' marginal cost principles or proposals as the basis for the Revenue Allocation Settlement. The settling parties agreed to the negotiated settlement without litigating the various principles or proposals. AECA played a significant role in the final Revenue Allocation proposal reached as a part of the settlement. AECA successfully advocated for a minimal increase for agricultural customers. PG&E had proposed to adjust all agricultural rates by 6.9% over system average rates. AECA's efforts in the proceeding, which cast considerable doubt on PG&E's marginal cost methodologies, calculations and allocations, directly resulted in the 1.5% agricultural increase ultimately adopted.</p> <p>Consistent with AECA's proposal in testimony to conduct a workshop to address proper assignment of costs to the agricultural class, Settlement Agreement calls for various workshops to address marginal cost and revenue allocation issues.</p> <p>AECA's active participation and expertise in the Agricultural Rate Design Settlement directly led to appropriate off-peak/peak differentials to further encourage load shifting, minimize agricultural impacts and appropriately allocate class revenues. AECA's active review and analysis of rate design proposals and implications and bill impact analysis also contributed substantially to the settlement. Finally, AECA's active pursuit of virtual aggregation rates led directly to the agreement on inclusion of an aggregation study in the final settlement. AECA developed the final aggregation study scope and tasks included in the final settlement.</p>

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

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

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<p>a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</p> <p>AECA's request for intervenor compensation seeks an award of \$63,148.88 (\$92,866 X .68). The Commission should have little trouble concluding that it is reasonable in light of the benefits achieved through AECA's participation in the proceeding. AECA's efforts on marginal cost and revenue allocation resulted in a direct decrease from PG&E's proposed</p>	<p>CPUC Verified</p>
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6.9% increase to 1.5% for agricultural customers, or a savings of over \$20 million per year in 2011, 2012 and 2013. The adopted agricultural class revenue requirement was based entirely on a broad settlement in which AECA played a major role in achieving.

AECA also played a significant role in the rate design aspect of this proceeding and in the aggregation study proposal, however, direct ratepayer benefits are hard to calculate for these efforts.

In sum, the Commission should conclude that AECA's overall request is reasonable in light of the substantial benefits to PG&E agricultural customers that were directly attributable to AECA's participation.

b. Reasonableness of Hours Claimed.

AECA's request is reasonable in light of the scope of the proceeding and the length and complexity of settlement negotiations. AECA's requested amount is far below its NOI total estimate of \$107,750. The reduced amount of the request reflects AECA's efforts to minimize participation costs. AECA is not seeking travel or other costs of participation. In addition, AECA used junior economic experts to conduct research, respond to discovery, review data responses and conduct bill impact analysis and rate design scenarios further keeping costs in check. While the case was not fully litigated, settlement discussions were lengthy, complex and sometimes contentious and are reflected in the number of conference calls to achieve settlement of the agricultural rate design. While fewer hours of AECA's attorney were needed, more of Mr. Boccadoro's time was necessary due to the unfortunate loss of Mr. Geis in early 2011. Given the number of parties in the ag settlement it should not be surprising that the negotiations carried on for 4 months. AECA submitted comprehensive testimony documenting the continued shortcomings inherent in PG&E's marginal cost and revenue allocation calculations. AECA expert testimony also comprehensively addressed rate design issues including development of an aggregation tariff option.

AECA submits that the requested hours are reasonable, both for each attorney and expert individually and in the aggregate. AECA respectively asks that its request be granted.

c. Allocation of Hours by Issue

In general, all of AECA's efforts in this proceeding focused on ensuring just and reasonable rates for the agricultural class, through use of a correct marginal cost methodology and appropriate rate design. A detailed allocation of hours by issue is provided in the time record spreadsheets included as Attachment 2 hereto.

B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ann Trowbridge Attorney	2010	17.4	\$375	ALJ-267	\$6,525			
Ann Trowbridge Attorney	2011	.2	\$375	ALJ-267	\$75			
Steven Moss Consultant	2010	57.2	\$200	D.10-05-009 ALJ-267	\$11,440			
Steven Moss Consultant	2011	42.4	\$200	D.10-05-009 ALJ-267	\$8480			
Richard McCann Consultant	2010	87.1	\$185	D. 06-04-065 ALJ-267	\$16,113.50			
Richard McCann Consultant	2011	36.4	\$195	D. 06-04-065 ALJ-267	\$7,098			
Michael Boccadoro Executive Director/ Advocate	2010	30.2	\$190	D. 07-05-048 ALJ-267	\$5,738			
Michael Boccadoro Executive Director/ Advocate	2011	34.9	\$200	D. 07-05-048 ALJ-267	\$6,980			

Dan Geis Asst. Executive Director/ Advocate	2010	103.6	\$155	D. 07-05-048 ALJ-267	\$16,058			
Dan Geis Asst. Executive Director/ Advocate	2011	4.8	\$155	D. 07-05-048 ALJ-267	\$744			
Ashley Spalding Consultant	2010	131.8	\$85	ALJ-267	\$11,203			
Subtotal:					\$90,454.50	Subtotal:		

OTHER FEES

Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):

Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
[Person 1]			\$					
[Person 2]								
Subtotal:						Subtotal:		

INTERVENOR COMPENSATION CLAIM PREPARATION **

Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ann Trowbridge Attorney	2010	2.5	\$187.50	ALJ-267	\$468.75			
Ann Trowbridge Attorney	2012	3.00	\$192.50	ALJ-267	\$577.50			
Michael Boccardo Executive Director/ Advocate	2010	.6	\$95	D. 07-05-048 ALJ-267	\$57			

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Michael Boccadoro Executive Director/ Advocate	2012	11.3	\$100	D. 07-05-048 ALJ-267	\$1,130			
Dan Geis Asst. Executive Director/ Advocate	2010	2.3	\$77.50	D. 07-05-048 ALJ-267	\$178.25			
Subtotal:					\$2411.50	Subtotal:		

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COSTS					
#	Item	Detail		Amount	Amount
	n/a				
Subtotal:					Subtotal:
TOTAL REQUEST \$:				\$92,866	TOTAL AWARD \$:

When entering items, type over bracketed text; add additional rows as necessary.

*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.

**Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate.

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

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Attachment or Comment #	Description/Comment
Attachment 1	List of relevant AECA Submittals in A.10-03-014 in support of this request
Attachment 2	Staff time records
Attachment 3	A. Trowbridge resume
Comment 1	AECA is not claiming any costs in this request. AECA has used electronic mail communication, phone and conference calls to reduce filing and meeting costs and keep overall costs to a minimum, further adding to the reasonableness of its claim.
Comment 2	Rationale for Michael Boccadoro's hourly rates: AECA is requesting an hourly rate of \$190 for Mr. Boccadoro's work performed in 2010 and \$200 for work performed in 2011. He last received \$150 per hour for work performed in 2006 (D. 07-05-048). He has over 18 years of experience as an energy policy and resource management expert.
Comment 3	Rationale for Ann Trowbridge's hourly rates: AECA is requesting an hourly rate of \$375 in 2010 and 2011, and \$385 in 2012 which places her at the low end of the

	range for attorneys with 13-plus years of experience. Ms. Trowbridge graduated from University of the Pacific McGeorge School of Law in 1993 and has practiced extensively before the CPUC since the late 1990s.
Comment 4	Rationale for Steven Moss’ hourly rates: AECA is requesting an hourly rate of \$200 per hour for Mr. Moss’ time in 2010 and 2011. Mr. Moss last received \$190 for work performed in 2008-2009 (D. 10-05-009). AECA requests Mr. Moss step increase to \$200. Mr. Moss has over 20 years of experience in energy consulting.
Comment 5	Rationale for Richard McCann’s hourly rates: AECA is requesting \$185 for Dr. McCann’s time in 2010 and \$195 in 2011. He last received \$175 hour for work performed for AECA in 2005 (D. 06-04-065) and has over 18 years of experience in energy consulting.
Comment 6	Rationale for Ashley Spalding hourly rates: AECA is requesting \$85 hour for work performed by Ms. Spalding in 2010 and 2011. Ms. Spalding joined Aspen Environmental as an Energy Analyst in 2010 and has participated in a wide range of energy planning projects. She has participated in Aspen Environmental’s contract work for the CPUC, California Energy Commission, Western Area Power Administration and Transmission Agency of Northern California, amongst others. The requested rate (\$85) is below the energy expert floor of \$125 hour for energy experts with 0-6 years of experience and is therefore reasonable.
Comment 7	Issue Codes for detailed time sheets POL – Policy SETT – Settlement MC/RA – Marginal cost and revenue allocation RD – Rate design LEG – Legal GP – General Participation INT – Intervenor Compensation Preparation

D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):

#	Reason

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PART IV: OPPOSITIONS AND COMMENTS
 Within 30 days after service of this Claim, Commission Staff
 or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

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

Party	Reason for Opposition	CPUC Disposition

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

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.
2. The requested hourly rates for Claimant's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$ _____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of 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. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 75th day after the filing of Claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT 1

LIST OF RELEVANT AECA SUBMITTALS IN A.10-03-014 IN SUPPORT OF THIS REQUEST

1. Prepared Direct Testimony of Richard McCann, Ph.D on Marginal Costs, Revenue Allocation, and Rate Design Issues on Behalf of The Agricultural Energy Consumers Association (Exhibit 156)

ATTACHMENT 2

Ann Trowbridge

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
6/1/2010	GP/LEG	Review issue for Phase II	0.5	0.5					
6/1/2010	GP/LEG	Participate in teleconference w/ D. Geis, S. Moss, R. McCann re: Phase II, discovery, settlement issues	1.3	1.3					
8/23/2010	GP/LEG	Review data response, draft follow-up request, including teleconference re: data request	1.6		0.5	0.5		0.3	0.3
8/24/2010	GP/LEG	Review and comment on second set of data requests	0.3		0.1	0.1	0.1		
8/24/2010	GP/LEG	Draft meet & confer letter on first data response	0.3		0.1	0.1		0.1	
9/8/2010	GP/LEG	Review testimony issues and draft testimony outline	2.3		0.3	0.5	0.5	0.5	0.5
9/8/2010	GP/LEG	Teleconference w/ D. Geis regarding testimony	0.5		0.1	0.2		0.1	0.1
9/9/2010	GP/LEG	Review issues regarding PG&E data response	0.1		0.05	0.05			
9/10/2010	GP/LEG	Review PG&E response to meet & confer	0.2					0.1	
9/14/2010	GP/LEG	Review messages re: data request and confidentiality issues	1		0.25	0.25		0.5	
9/15/2010	GP/LEG	Teleconference re: data request w/ PG&E	0.2			0.1		0.1	
9/20/2010	GP/LEG	Focus review of PG&E Phase II testimony	1	1					
10/6/2010	GP/LEG	Review and comment on AECA testimony	3.2		0.75	0.75	0.75	0.75	0.2
10/6/2010	GP/LEG	Teleconference with D. Geis regarding testimony	0.4		0.1	0.1	0.1	0.1	
10/6/2010	GP/LEG	Review CFBF testimony	0.4		0.1	0.1	0.1		0.1
10/14/2010	GP/LEG	Teleconference re: Phase II settlement	0.2	0.2					
10/15/2010	GP/LEG	Review Phase II schedule considerations	0.2	0.2					
10/19/2010	GP/LEG	Compile & transmit workpapers on AECA testimony	0.4		0.1	0.1	0.1	0.1	
11/10/2010	GP/LEG	Finalize response to PG&E DR#3	0.2	0.2					
11/18/2010	MC/RA	Teleconference w/ D. Geis re: Phase II settlement, review P.U. Code 744	1.2		0.1	0.1	0.8	0.1	0.1
11/19/2010	MC/RA	Commence legal research re: PG&E ag IOU tariffs	0.7			0.2	0.3	0.1	0.1
11/22/2010	MC/RA	Conclude research on 744, teleconference w/ D. Geis	0.5			0.5			
11/30/2010	MC/RA	Teleconference w/ D. Geis re: P&E GRC Phase II settlement	0.5			0.2	0.1	0.1	0.1
12/8/2010	GP/LEG	Review PG&E status report re: settlement discussions, revised proposed schedule for GRC Phase II	0.2	0.2					
TOTAL 2010			17.4	3.6	2.55	4.65	2.15	2.95	1.5

17.4

Ann Trowbridge

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
1/5/2011	GP/LEG	Review and comment on draft AECA data response 2	0.2		0.1	0.1			
TOTAL 2011			0.2	0	0.1	0.1	0	0	0

Intervenor Compensation

6/17/2010	INT	Review, NOI filing, correspond w/ D. Geis	1						
6/18/2010	INT	Finalize, file & serve NOI in Phase II	1.5						
2/21/2012	INT	Research current substantive and procedural intervenor compensation rules	0.5						
2/15/2012	INT	Draft sections of Intervenor Compensation Claim	1						
2/21/2012	INT	Review and finalize and file Intervenor on Compensation	1.5						
TOTAL			5.5						

Richard McCann

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
5/17/2010	GP	Review PG&E application	3						
6/1/2010	GP	Review issues, prepare for conference, call with client re: Phase II issues	2.2	1	0.3	0.3	0.3	0.3	
6/2/2010	GP	Review PG&E application	4.75	4.75					
7/9/2010	GP	Review rate design issues; conference with Moss	2.5		0.25	0.25	2		
8/2/2010	MC/RA	Research; review application; develop data requests	4.25		2.25	2			
9/1/2010	GP	Initial meeting to discuss testimony development	1	1					
9/2/2010	MC/RA	Research; begin developing MC/RA testimony	4.5		2.5	2			
9/3/2010	MC/RA	Research; revenue allocation analysis	4.2		4.2				
9/6/2010	MC/RA	Research; marginal cost issues	5.9		5.9				
9/7/2010	AGG	Research; account aggregation	5.1					5.1	
9/8/2010	MC/RA	Initiate testimony drafting - RA issues	6.5		3	3.5			
9/9/2010	RD	Final rough draft of testimony - RA issues	4.9				4.9		
10/1/2010	RA/MC/RD	Revise draft testimony; confer w/ Geis	4.7		1.5	1.5	0.7	0.5	0.5
10/4/2010	RD	Edit/revise testimony; confer w/ client	6.7				6		0.7
10/5/2010	RA/MC/RD	Final review and edit of testimony	3.6		0.5	0.6	1	1	0.5
10/7/2010	MC/RA	Review intervenor testimony	6.9		3	3	0.9		
10/8/2010	MC/RA	Review intervenor testimony	4.6		2	2	0.6		
10/11/2010	MC/RA	Research MC issues; review intervenor testimony	8		6	1	1		
10/12/2010	RA	Analyze RA implications of intervenor testimony/confer with client	3.8			3.8			
TOTAL 2010			87.1	9.75	27.2	24.15	17.4	6.9	1.7

87.1

Richard McCann

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
3/8/2011	SETT	Review settlement issues/proposal	4.8			4.8			
3/9/2011	SETT	Analyze RD issues/proposals/options	4.5				2.5	1	1
3/10/2011	SETT	Participated in call; confer w/ Moss	2.1			1.5			0.6
3/24/2011	SETT	Prepare for and participate in call	1.7		0.2		1		0.5
3/31/2011	SETT	Prepare for and participate in call	1.8		0.5	0.7			0.6
4/12/2011	SETT	Research and preparation	3.8		1.5	1.5		0.4	0.4
4/14/2011	SETT	Participate in settlement call	1.1		0.3	0.3			0.5
4/28/2011	SETT	Review rate design proposal; analyze	1.9				1.5	0.4	
4/28/2011	SETT	Participate in call	1.1				0.5	0.3	
5/2/2011	SETT	Confer w/ Moss; bill impact analysis	0.9			0.4	0.25	0.3	0.25
5/10/2011	SETT	Prepare for and participate in call	1.4				0.5	0.5	0.4
5/18/2011	SETT	Prepare for and participate in call	1.2				0.5	0.5	0.2
6/9/2011	SETT	Prepare for settlement disc./ analyze RD	4.1				3.1		1
6/10/2011	SETT	Prepare for settlement disc./ implications / rate scheduled impacts	2.8				1.5	1	0.3
7/1/2011	SETT	Review TOU migration impacts	0.7			0.7			
7/1/2011	SETT	Participate in call	0.9				0.35	0.35	0.2
7/8/2011	SETT	Review revise rate proposal- RD issues	1.1				0.5	0.3	0.3
7/14/2011	SETT	Review final settlement proposal / illustrative rates	0.5			0.25	11.45	0.25	5
TOTAL 2011			36.4	0	2.5	10.2	11.45	5	7.25

36.4

Steven Moss

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU
5/31/2010	GP	Initial review of application	4.6	4.6					
6/1/2010	RAMC/RI	Preparation and conference call w/ Geis	2		0.25	0.25	0.5	0.5	0.5
7/9/2010	RAMC/RI	Review application; conference w/ Boccadoro	3.5	2.25	0.25	0.25	0.25		0.25
7/9/2010	GP	Review PG&E update	1.2	1.2					
8/2/2010	RAMC/RI	Review MC/RA issues in application	3.4		1.7	1.7			
8/3/2010	RAMC/RI	Finish application review / confer w/ McCann	6.2		0.8	0.8	3.3	0.3	1
9/1/2010	RAMC/RI	Research; review application; outline testimony issues	3.8		1	1	1	0.5	0.3
9/2/2010	RAMC/RI	Research; develop testimony; conference w/ Boccadoro	3.6		0.5	1	0.5	0.8	0.8
9/9/2010	GP	Review DRA testimony	2.4	2.4					
10/1/2010	RAMC/RI	Research and develop testimony	6.1		2	2	2	0.1	
10/4/2010	RAMC/RI	Draft testimony; edit	6.8		2	2	2	0.8	
10/5/2010	RAMC/RI	Finalize testimony; edit; confer w/ client	6.5		2	2	2	0.5	
10/7/2010	GP	Review intervenor testimony	7.1	7.1					
TOTAL 2010			57.2	17.55	10.5	11	11.55	3.75	2.85

57.2

Steven Moss

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU
3/8/2011	SETT	Review RD issues; prepare & participate in settlement discussions	3.2		0.6	0.6	2		
3/9/2011	SETT	Analyze RD issues; prepare & confer w/ Boccadoro	3.4		0.5	0.5	2	0.4	
3/10/2011	SETT	Participate in settlement negotiations	1.9		0.5	0.5		0.5	0.4
4/12/2011	SETT	Analyze options on revenue shortfall	5.5		0.5	5			
4/13/2011	SETT	Review RD issues; analyze implications	3.9				3.9		
6/8/2011	SETT	Preparation; analysis for RD settlement	2.9				1	1	0.9
6/9/2011	SETT	Preparation; Participate in settlement discussions	3.8				1	1.4	1.4
6/10/2011	SETT	Review rate schedule impacts; conference w/ Boccadoro	1.3				0.7	0.3	0.3
7/14/2011	SETT	Review settlement docs/filing	2				1	0.75	0.25
8/3/2011	SETT	Review settlement protest; conference w/ Boccadoro	1.8				0.8	1	
3/24/2011	SETT	Review proposal; participate in call	1.1				0.5	0.6	
3/31/2011	SETT	Review; participate in call	0.9				0.4	0.25	0.25
4/14/2011	SETT	Prepare for call	1.2				0.5	0.7	
4/26/2011	SETT	Review aggregation proposal; comment	1.1					1.1	
4/28/2011	SETT	Participate in call	1.6				0.6	1	
5/2/2011	SETT	Prepare; review proposals; call	1.3				0.5	0.5	0.3
5/10/2011	SETT	Participate in call	1				0.5	0.25	0.25
5/18/2011	SETT	Review revenue neutrality / unbundle RD	1.9			0.5	1	1	0.4
7/1/2011	SETT	Review counter offers; review ag study; edit; participate in call	2.6				1	1.6	
TOTAL 2011			42.4	0	2.1	7.1	17.4	11.35	4.45

42.4

Ashley Spalding

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
7/9/2010	MC/RA	Review RA and MC methodologies / application	4.5		2	2.5			
7/19/2010	MC/RA	Review application / MC issues	1.4		1.4				
8/2/2010	MC/RA	Review PG&E update; analyze MC implications	3.9	1	1.9	1			
8/3/2010	RA/MC/RD	Research & prepare data requests	2.9		1	1	0.9		
8/4/2010	MC	Data analysis - customer MC implications / review figure forecasts	4.6		2.6	2			
8/5/2010	MC	Meeting w/ McCann / data analysis / review TOU rates	3.4		1.4	1			1
8/6/2010	MC	Review RA implications / data analysis / EPMC allocated revenues	4.9			4.9			
8/9/2010	RA/MC	Data analysis / MC scenarios / calculate non-EPMC allocated revenues	5.3		2	3.3			
8/10/2010	RA/MC	Computer runs / MC analysis / PG&E demand forecast	4.5		2	2.5			
8/11/2010	RA/MC	Computer runs / MC implications / calculate service reliability by class	4.9		2	2.9			
8/12/2010	GP	Review data requests / responses / analyze revenue allocation	5.2		0.25	4.25	0.25	0.2	0.25
8/13/2010	GP	Review data requests / responses / discuss w/ McCann / run RA model	4.9		0.25	3.9	0.25	0.25	0.25
8/16/2010	MC/RA	Data analysis / MC scenarios / prep for testimony	7.4		6	1.4			
8/17/2010	MC/RA	Data analysis / research / prep for testimony / MC assumptions	4.8		4	0.8			
8/18/2010	MC/RA	Data analysis / research / prep for testimony / MC assumptions	7.1		6	1.1			
8/19/2010	MC/RA	Data analysis / research / prep for testimony / load profile comparison	5.9		0.9	5			
8/20/2010	RD	Review RD issues and implications	2.5				2.5		
9/1/2010	GP	Meeting to discuss testimony / research RD issues	3.7				3.7		
9/2/2010	MC/RA	Review analyze data responses / testimony prep	3.4		1	1	1	0.2	0.2
9/3/2010	RA/MC	Review analyze data responses / RA implications	2.4		0.4	2			
9/6/2010	RA/MC	Research/analyze data responses	6.6		0.6	6			
9/7/2010	RA/MC	Develop RA analysis / implications	3.4			3.4			
9/8/2010	RA/MC	Develop MC analysis / implications	4.2		4.2				
9/9/2010	RA/MC/RD	Review DRA Testimony / MC analysis	6.6	2	4.6				
9/10/2010	RA/MC/RD	Review DRA Testimony / RA analysis	7.2	2		5.2			
9/13/2010	RA	Review RA scenarios in preparation for testimony	3.5			3.5			
9/14/2010	RA	Review RA scenarios in preparation for testimony	2.5			2.5			
9/15/2010	MC	Computer runs / analyze MC scenarios	3.3		3.3				
9/16/2010	MC	Analyze MC implications / prepare for testimony	3.2		3.2				
10/1/2010	GP/RA	Meeting w/ McCann / review RA issues / RA scenarios	3.7			3.7			
TOTAL 2010			131.8	5	51	64.85	8.6	0.65	1.7

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU
4/30/2010	GP	Review TURIN protest; discussion w/ Geis	1.2	1.2					
5/17/2010	GP	Review PG&E application	2.8	2.8					
5/18/2010	GP	Review PG&E application; discussion w/ Geis	2.2	2.2					
6/1/2010	GP	Prepare for and participate in strategy conf call	2.8	2.8					
6/2/2010	GP	Review ALJ ruling/AC scoping memo	0.8	0.8					
9/13/2010	GP	Review DRA testimony/conference w/ Geis	2.6	2.6					
9/14/2010	GP	Finish DRA testimony review	0.9	0.9					
9/15/2010	GP	Meet and confer w/ Geis	2.1	2.1					
9/16/2010	MC/RA/RE	Review outline for AECA testimony/case strategy	1.2		0.3	0.3		0.3	
9/22/2010	GP	Review AECA case strategy w/ Board members via calls	2.4	2.4					
10/4/2010	MC/RA/RE	Review AECA testimony/edit	1.8		0.4	0.4	0.4	0.4	0.2
10/5/2010	MC/RA/RE	Review AECA testimony/edit/confer w/ Geis	2.1		0.4	0.4	0.4	0.4	0.5
10/12/2010	GP	Review relevant int testimony/confer w/ Geis	1.1	1.1					
10/13/2010	GP	Conference w/ Geis re: settlement conference	0.8	0.8					
10/15/2010	GP	Review case schedule	0.4	0.4					
11/17/2010	RA	Review P.U. Code 744; confer w/ Geis	1.1	1.1		1			
11/30/2010	SETT	Teleconference re: settlement issues	1.1	1.1					
12/15/2010	SETT	Confer w/ Executive Board re: RAMC settlement	2.1		0.3	2			
12/20/2010	SETT	Confer w/ Geis re: RAMC settlement	0.8		0.3	0.5			
TOTAL 2010			30.2	21.2	1.5	4.6	1.1	1.2	0.6

30.2

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU
3/10/2011	SETT	Prepare for and participate in settlement /prep for	2.2		0.2	1		0.5	0.5
3/24/2011	SETT	Prepare for and participate in settlement discussions	2.8		0.3	2		0.25	0.25
3/31/2011	SETT	Prepare for and participate in settlement discussions	2.1		0.1	1.5		0.25	0.25
4/13/2011	SETT	Review PG&E counter offers	1.1		0.1	0.25	0.25	0.25	0.25
4/13/2011	SETT	Prepare for call	0.9			0.4	0.25	0.25	0.25
4/13/2011	SETT	Participate in settlement call	1.5		0.25	0.5	0.25	0.25	0.25
4/14/2011	SETT	Develop aggregation study proposal	2.1					2.1	1.6
4/20/2011	SETT	Revise aggregation study; confer w/ Moss	1.6				1.6		
4/28/2011	SETT	Review rate design scenarios	1.1				1.1		
4/28/2011	SETT	Develop rate design counter offer; confer w/ Moss	1.1				1.1		
4/28/2011	SETT	Participate in call	0.6				0.6		
5/2/2011	SETT	Review PG&E counter offers	1.2				0.2	0.25	0.25
5/2/2011	SETT	Review revised rate design scenario; call	1.2		0.1	0.1	0.6	0.1	0.5
5/5/2011	SETT	Review revised settlement docs	0.4		0.1	0.1	0.1	0.1	0.1
5/10/2011	SETT	Participate in call	1.3		0.1	0.25	0.5	0.25	0.2
5/13/2011	SETT	Review unbundled RD spreadsheets	0.6				0.5	0.1	0.1
5/14/2011	SETT	Review unbundled RD spreadsheets	0.8				0.5	0.3	
5/18/2011	SETT	Review revenue neutral analysis	1.1			0.6	0.5		
6/28/2011	SETT	Review RD issues w/ Board members	1.8			0.8	1		
6/29/2011	SETT	Review RD issues w/ Board members; settlement docs	2.2			0.7	0.5	1	
6/30/2011	SETT	Review RD issues; confer w/ Moss	1.7				0.5	1	0.2
7/1/2011	SETT	Review settlement RD issues - TOU migration; participate in call	2.6				1	0.8	0.8
7/12/2011	SETT	Review final settlement illustrative rates	1.4				1.4		
12/28/2011	GP	Review final adopted decision	1.2	1.2					
TOTAL 2011			34.9	1.2	1.15	8.1	11.25	8.9	4.3

34.9

DATE	ACTIVITY	DESCRIPTION	HOURS
6/16/2010	INT	Review NOI filing/edit	0.6
2/14/2012	INT	Research IC issues/rates	2.1
2/15/2012	INT	Review decision/settlements/draft IC response	5.2
2/17/2012	INT	Finalize IC request; confer w/ Trowbridge	4
TOTAL			11.9

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
4/12/2010	GP	Review PG&E Phase II filing	4.8	4.8					
4/13/2010	GP	Review PG&E Phase II filing	2.8	2.8					
5/19/2010	GP	Participate in PHC	3.2	3.2					
5/28/2010	GP	Review ALJ ruling and scoping memo	0.8	0.8					
6/1/2010	GP	Prep for strategy, conference call participate in call	2.8	2.8					
7/6/2010	GP	Review PG&E update	2.2	2.2					
8/24/2010	GP	Teleconference re: data request; meet & confer - prep - correspondence re: same	1.2	1.2					
9/9/2010	GP	Review DRA testimony; review data response	4.8	3.8	0.2	0.2	0.2	0.2	0.2
9/10/2010	GP	Review data responses; identify AECA priority issues	2.6		0.5	0.6	0.5	0.5	0.5
9/14/2010	GP	Develop data requests; issues	2.5		0.5	0.5	0.5	0.5	0.5
9/15/2010	GP	Develop outline for AECA testimony; meet & confer w/ Boccadoro; coordinate with CFBF	4.6	1.1	0.7	0.7	0.7	0.7	0.7
9/16/2010	GP	Follow up re: AECA testimony; meet & confer w/ AECA Board members; review draft	5.1	1.1	0.8	0.8	0.8	0.8	0.8
9/20/2010	GP	Review DRA testimony; data responses	3.6	3		0.2	0.2	0.1	0.1
9/22/2010	GP	Review issues for testimony w/ AECA board	5.1		0.1	1.25	1.25	1.25	1.25
9/24/2010	GP	Review AECA testimony issues	4.6		0.6	1	1	1	1
9/28/2010	GP	Testimony development - confer w/ Moss & McCann	5.2		0.7	1.25	1.25	1.25	1.25
10/1/2010	GP	Testimony development - review issues	3.9		0.9	0.75	0.75	0.75	0.75
10/4/2010	GP	Review AECA testimony; confer w/ Boccadoro	4.6		0.6	1	1	1	1
10/5/2010	GP	Review AECA testimony; revise comment	2.8		0.3	0.5	0.5	0.5	0.5
10/6/2010	GP	Finalize and file AECA testimony	4.1	1.6	0.5	0.5	0.5	0.5	0.5
10/10/2010	GP	Review intervenor testimony	4.6	4.6					
10/11/2010	GP	Review intervenor testimony	4.2	4.2					
10/12/2010	GP	Review intervenor testimony	6.1	6.1					
10/13/2010	SETT	Participate in settlement conference; preparation; follow up	2.1	2.1					
10/14/2010	SETT	Prep for teleconference re: Phase II	0.8		0.4	0.4			
10/15/2010	SETT	Review settlement proposals/issues	1.6		0.5	0.5		0.3	0.3
10/16/2010	SETT	Review Phase II schedule	0.6	0.6					
10/18/2010	GP	Compile AECA work papers	2.6	2.6					
11/9/2010	GP	Review data requests; issues	1.2		0.6	0.6			
11/17/2010	GP	Review P.U. Code 744; confer w/ Boccadoro	2.1		2.1	2.1			
11/22/2010	GP	Confer w/ attorney re: 744 issues	0.5		0.5	0.5			
11/30/2010	SETT	Teleconference re: MC/RA settlement	2		1	1			
12/15/2010	SETT	Confer w/ Board re: MC/RA settlement	2.9		0.5	2.4			
12/20/2010	SETT	Confer w/ Boccadoro re: MC/RA settlement	1		0.25	0.75			
			TOTAL 2010	48.6	9.65	17.5	9.15	9.35	9.35

103.6

DATE	ACTIVITY	DESCRIPTION	HOURS	GP-General Policy	MC-Marginal Cost Methods	RA-Revenue Allocation	RD-Rate Design	AA-Account Aggregation	TOU-TOU migration
1/10/2011	GP	Review PG&E update filing	2.2	2.2					
1/12/2011	MC/RA	Review MC/RA settlement issues	2.6		1	1.6			
			TOTAL 2011	2.2	1	1.6	0	0	0
Intervenor Compensation									
6/16/2010	INT	Develop draft NOI; confer w/ Boccadoro	1.1						
6/17/2010	INT	Review and revise NOI; confer w/ Trowbridge	1.2						
			TOTAL 2.3						

ATTACHMENT 3



ANN L. TROWBRIDGE

3620 American River Drive, Suite 205
Sacramento, CA 95864

Email: atrowbridge@daycartermurphy.com
Phone: (916) 570-2500 ext. 103
Fax: (916) 570-2525

Areas of Law

Energy
Environmental

Admitted to Practice in:

California

EXPERIENCE

Represent variety of competitive service provider interests in California Public Utilities Commission ratemaking and regulatory proceedings.

Represent coalition of participants in the distributed generation/distributed energy resources industry in regulatory proceedings before the California Public Utilities Commission.

Represent coalition of agricultural energy consumers before the California Public Utilities Commission regarding agricultural rate issues.

Represent developers of gas storage projects before the California Public Utilities Commission with respect to applications for certificates of public convenience and necessity and related CEQA compliance.

Represent parties to complex renewable resource procurement transactions.

Represent publicly owned utilities with respect to electric service matters.

Represent publicly owned utilities in formation and annexation proceedings.

Represent developers of distributed generation/distributed energy resources in power sales agreement and interconnection transactions.

Represent proponents of energy projects in all stages of development: financing, site acquisitions, due diligence, permitting, interconnection, and ongoing compliance.

Conduct environmental due diligence for purchasers in energy asset acquisition transactions, including review of environmental site assessments and transaction documents.

Assist clients with environmental audits to identify and address potential compliance issues.

Represented large industrial customer group in all aspects of ratemaking before the California Public Utilities Commission.

Represented developer of 670MW gas-fired power plant in the California Energy Commission siting process.

Represented developer of rice straw-to-ethanol plant before the California Energy Commission during the siting, permitting and related environmental review process.

Represented developer of power plant before the California Energy Commission during the Commission's environmental review of facility decommissioning plan.

Prepared and negotiated complex agreement between federal and state agencies and power plant owner which implemented significant California Energy Commission project mitigation conditions relating to federal and state Endangered Species Acts.

Represented bidder in auction of fossil-fuel fired power plants by negotiating indemnifications relating to potential site contamination and by reviewing related environmental provisions in purchase and sale documents. Negotiated access agreements on behalf of landowners to facilitate the evaluation and clean-up of contamination by third parties.

Assisted in drafting variance request from the California Air Resources Board's diesel fuel specification requirements.

Professional Honors

Recognized in the 2006 through 2012 Editions of *The Best Lawyers in America*
Recognized as 2006 *Northern California Super Lawyer*

MEMBERSHIPS

State Bar of California, Environmental Law Section, *Member*

Sacramento County Bar Association, Environmental Law Section, *Member*

American Public Power Association, *Member*

California Municipal Utilities Association, *Member*

Conference of California Public Utility Counsel, *Member*

Energy Bar Association, *Member*

EDUCATION

University of the Pacific, McGeorge School of Law (J.D., 1993)

University of California, Davis (B.A., 1983)

PUBLICATIONS

California Onsite Generation, "Combined Heat and Power: A Spontaneous Solution" May 2008, *Author*

California Onsite Generation, "CHP DG: Can't Buy Me Love" August 2007, *Author*

Spark, the on-line gateway for readers of *Public Utilities Fortnightly* magazine, "Will California Finally Make Good on its Promise to Include DG in the State's Energy Mix?" September 2005, *Author*

California Onsite Generation, Regulatory and Policy Update, "The Itron Report: Progress or Sideways?" April 20, 2005, *Author*

NAESCO Newsletter, "Will DG Be On Permanent Standby In California?" November 2004, *Author*

PRESENTATIONS

United States Energy Association, “Accelerating Combined Heat & Power Deployment: Unique Solutions and Common Approaches”, 2010, *Speaker*

California Municipal Utilities Association, Annual Conference, “Statewide Initiatives and Public Agencies” (with Arlen Orchard, Sacramento Municipal Utilities District’s general counsel), 2010, *Speaker*

Intermountain Combined Heat & Power Association, 6th Annual USCHPA Policy Summit, “Setting a State Public Utilities Commission Agenda,” 2005, *Speaker*

United States Combined Heat & Power Association, 6th Annual CHP Policy Summit, “How Do You Set the Agenda of a State PUC,” 2005, *Speaker*

National Association of Energy Service Companies, 2003 Mid-Year Conference, “Standby Rates and Tariff Requirements: Ensuring a Future for Distributed Energy Resources,” 2003, *Speaker*

Distributed Generation and On-Site Power, 7th Annual Conference, “The California Experience: Developing DG Projects in a Re-Regulated Market,” 2003, *Speaker*

West Coast Landmen, 19th Annual Institute, “What Went Wrong With Deregulation,” 2001, *Speaker*

COMMUNITY

University of the Pacific, McGeorge School of Law, LL.M. in Water Resources Law, *Advisory Board Member*

Boy Scouts of America, Golden Empire, *Den Leader*

Targeting Type 1 Diabetes, *Former Board Member and Co-Founder*

Juvenile Diabetes Research Foundation, *Former Board Member*

Sacramento-Sierra Chapter of American Diabetes Association, *Former Board Member and Legislative Committee Co-Chair*

***Ann L. Trowbridge
Day Carter & Murphy LLP
Supplement to Resume***

Representative CPUC Work

Representing Publicly Owned Utilities

2006-2008 Long-Term Procurement Plan Proceeding (Merced Irrigation District and Modesto Irrigation District)

Advocated for exemption from nonbypassable charges relating to investor-owned utility procurement activities for municipal departing load in two-phase proceeding. Involved preparation of testimony, extensive cross-examination, and ex parte meetings at the Commission.

Annual PG&E ERR/CTC proceeding (Merced Irrigation District and Modesto Irrigation District)

Participate in PG&E's annual ERR/CTC proceeding to ensure fair CTC rate. Involves discovery, cross-examination, settlement negotiations.

PG&E 2007 and 2011 General Rate Cases, Phase 1 (Merced Irrigation District and Modesto Irrigation District)

Participated in settlement agreements with PG&E that no ratepayer dollars will be used to fund PG&E's customer retention activities. Involved discovery, preparation of testimony, cross-examination and several settlement negotiation sessions.

2004 and 2006 Publicly Owned Utility Annexations (Sacramento Municipal Utility District)

Obtained favorable CPUC resolution regarding effect of SMUD annexations on PG&E's remaining customers. Involved detailed written filings, numerous meetings.

2002-2008 Customer Responsibility Surcharges Proceedings (Merced Irrigation District and Modesto Irrigation District)

Participated in various proceedings that included written filings and hearings and resulted in various CRS exemptions.

Representing Large Customer Interests

Interruptible Program – California Industrial Users (2002-2003)

Advocated for extension of interruptible program. Involved written filings, participation in workshops and ex parte meetings with Commissioners and their advisors.

Southern California Edison (SCE) Bill Limited (2003) – California Industrial Users

Advocated for extension of SCE bill limited. Participated in ex parte and meetings with CPUC Commissioners and their advisors, sought and was granted the opportunity to present final oral argument.

Representing Distributed Generation (DG) Interests

2006-2008 Long-Term Procurement Plan Proceeding (California Clean DG Coalition)

Advocated for exemption from nonbypassable charges relating to routing investor-owned utility procurement activities for customer generation departing load in two-phase proceeding. Involved preparation of testimony, extensive cross-examination, and ex parte meetings at the Commission.

2002-2008 Customer Responsibility Surcharges – California Clean DG Coalition

Advocated for settlement and Commission decision providing for no Customer Responsibility Surcharges for small gas-fired distributed generation. Involved written filings, preparation of testimony, hearings and lengthy settlement negotiations.

Subsequently advocated for Commission approval of increase in size limit of distributed generation facilities eligible for Cost Responsibility Surcharges exemptions.

Other

2008-2009 Ongoing: Gill Ranch Storage, LLC

Represented Gill Ranch Storage, LLC in connection with application for Certificate of Public Convenience and Necessity to construct and operate a natural gas storage facility in Madera County, including review under the California Environmental Quality Act. Continue to represent regarding CPUC regulatory matters.

1998-2000 Lodi Gas Storage, L.L.C.

Represented Lodi Gas Storage, L.L.C. in connection with application for Certificate of Public Convenience and Necessity to construct and operate a natural gas storage facility in San Joaquin County, including review under the California Environmental Quality Act. Involved cross-examination, negotiations with community members, and ex parte meetings with Commissioners.



Academic Background

MS, Agricultural and Resource Economics, University of California, Davis, 2010
BS, Environmental Economics and Policy, University of California, Berkeley, 2009

Professional Experience

Ms. Spalding joined Aspen as an Energy Analyst in 2010 and has contributed to, conducted and assisted with economic analysis for a variety of energy planning projects, the most recent of which is the DRECP Conservation Strategy and Planning Project.

Aspen Environmental Group.....2010-present

- **Hidden Hills Solar Energy Generator Fiscal Impacts, California Energy Commission (2012).** Assessing reasonably expected to occur fiscal impacts in Inyo County from constructing and operating the proposed HHSEGS solar photovoltaic utility-scale power projects. The report will be submitted in the AFC docket on behalf of the Commission Staff.
- **Desert Renewable Energy Conservation Plan, California Energy Commission (2011-present).** Developing estimates for cost of implementing different alternatives for managing the environmental consequences from developing renewable power in southeast California. This analysis involves collecting program and project data on environmental mitigation and habitat conservation efforts, and estimating the cost of acquiring land for habitat restoration and rehabilitation.
- **Distributed Generation Interconnection Technical Assistance, California Energy Commission (2011-present).** The Distribution Interconnection Settlement process (formerly the Rule 21 Working Group) is a consensus-based settlement process to update and reform the existing distribution system interconnection procedures. The Aspen Team facilitates engineering discussions, reviews and proposes changes to the interconnection procedures, assists staff in preparing for settlement meetings, and develops the revised tariff language and form agreements. Ms. Spalding takes notes during each meeting of the settlement committee and prepares them for settlement participant distribution.
- **Burning Man Festival Environmental Assessment, Black Rock LLC and Bureau of Land Management (2011-present).** Preparing analysis of the socio-economic impacts and contributions in northern Nevada from the annual Burning Man Festival. The analysis is part of environmental assessment prior to BLM renewing Black Rock LLC's permit for the festival.
- **Analytic Support for Long Term Procurement Plan OIR, California Public Utilities Commission Energy Division (2011-present).** Reviewed California Independent System Operator (CAISO) and three utilities' resource acquisition plan out to 2020. The review included inspection of the CAISO's renewable integration and PLEXOS system modeling, and assessment of the utilities' projected financial cost models.
- **Review of Salkhit Wind Project Economic Benefits in Mongolia, Millennium Challenge Corporation and Lawrence Berkeley National Laboratory (2011-present).** Review the economic modeling conducted by the sponsors of a proposed wind project at Ulan Bator, Mongolia prior to the MCC providing a grant. Benefits assessed include reduce GHG and local air pollution emissions and improved utility reliability.

- **Agricultural Rate Setting Testimony, Agricultural Energy Consumers Association (2010-present).** Prepared testimony about agricultural economic issues related to energy use, linkage to California water management policy, and utility rates in Pacific Gas and Electric Co. and Southern California Edison Co. rate proceedings. Analyzed various aspects of electric industry restructuring and examined marginal cost principles and applications.
- **Master-Meter Rate Setting Testimony, Western Manufactured Housing Communities Association (2010-present).** Examined issues associated with the structure of and cost associated with providing electric service to master-metered mobile home parks. Prepared testimony in Pacific Gas and Electric Co., Southern California Edison Co. and San Diego Gas and Electric Co. rate proceedings on establishing “master-meter/submeter credits” provided to private mobile home park utility systems.
- **Electricity Supply Reliability Assessment Model, California Energy Commission (2010-present).** Updating the CEC’s resource adequacy assessment tool to extend analysis from the coming summer out to 2020, and to incorporate uncertainty about generating resource and load management performance, and load forecasts.
- **Food Processing Industry Emission Intensive Trade Exposed Indices Analysis for AB 32, California League of Food Processors (2011).** Calculated California-specific Energy Intensive Trade Exposed (EITE) Industry Indices for California’s food processing sector using federal and state data sources that could be updated by the Air Resources Board staff. These calculations follow the parameters specified in the current AB 32 California Cap and Trade Program (CCTP). Additional analysis prepared other measures of economic impacts from participating in the CCTP. The results are to be used for discussions relating to implementation of AB 32 by the ARB.
- **Los Robles Mobile Home Estates Water Utilities Rates Development, Evans Management (2011).** Using engineering and accounting data provided by the community manager, set water rates to be charged for metered water usage in a mobile home park.
- **Diesel Powering the U.S. Economy Report, Diesel Technology Forum (2011).** Assisted in analyzing the impacts and contributions to the U.S. economy of the diesel technology production, fuel production and services industries. The study included assessing and estimating how the technology facilitates economic activity in diesel reliant industries such agriculture, construction and freight hauling.
- **Clean Energy Vision Report, Western Grid Group (2010-2011).** Assisted Western Resource Advocates’ Energy Program in the development of a 2050 Clean Energy Vision for the west that provides clean energy portfolios and the associated transmission for the west for 2030 and 2050.
- **South San Joaquin Irrigation District Plan to Provide Retail Electric Service, Sphere Plan, MSR, and Annexation, South San Joaquin Irrigation District (2010).** Assisted in preparing an environmental document for use by San Joaquin LAFCO in the Sphere Plan and Municipal Services Review, including the Proposal to provide retail electric service.
- **Greenhouse Gas Inventory for Santa Barbara County, County Office of Long Range Planning (2010).** Ms. Spalding assisted in developing an inventory of greenhouse gas emissions in the unincorporated county for 2007 and forecasting the baseline for 2020 and 2035, excluding state-owned and federal lands, and be reconciled with the CO2 inventory being constructed by the SBCAPCD for the entire county. The inventory relied on detailed energy use data from the California Energy Commission, vehicle travel forecasts from the Santa Barbara County Association of Governments, GHG emission factors from the California Air Resources Board, oil and gas production data from the Division of Oil, Gas and Geothermal Resources, and other industry-specific data. The emission data was then mapped



geographically, based on over three dozen GIS layers. Baseline economic forecasts were developed from the SBCAG. The inventory will be used in developing the county’s Climate Action Strategy.

- **Southern Nevada Water Authority Technical Support (2010).** Assisting in analyzing the economic feasibility of a solar resource area in southeastern Nevada.
- **Petroleum Industry Emission Intensive Trade Exposed Indices Analysis for AB 32, Western States Petroleum Association (2010).** Calculation of California-specific Energy Intensive Trade Exposed (EITE) Industry Indices for California’s petroleum production and refining sectors using federal and state data sources that could be updated by the Air Resources Board staff. These calculations would follow the parameters specified in the current Waxman-Markey bill for reducing greenhouse gas (GHG) emissions, and well as for the European Union and Australia. The results are to be used for discussions relating to implementation of AB 32 by the ARB.

UC Davis, Agricultural and Resource Economics 2009-2010

- Reader, Analysis for Production Management, March–June 2010
- Tutor, Agricultural Policy March–June 2010
- Tutor, Microeconomic Theory, September–December 2009

Publications

- Spalding, A., Villas-Boas, S., “Investigating price pass-through in local milk markets,” 10th International Marketing Trends Conference, January 2011

Professional Affiliations

- Agricultural and Applied Economics Association

Activities and Honors

- President, Environmental Economics and Policy Student Association, 2008-2009
- UC Berkeley, top 10% of graduating class