

Decision PROPOSED DECISION OF ALJ BUSHEY (Mailed 3/6/2014)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U902M), Southern California Edison Company (U338E), Southern California Gas Company (U904G) and Pacific Gas and Electric Company (U39M) for Authority to Establish a Wildfire Expense Balancing Account to Record for Future Recovery Wildfire-Related Costs.

Application 09-08-020
(Filed August 31, 2009)

**INTERVENOR COMPENSATION CLAIM OF RUTH HENRICKS AND
DECISION ON INTERVENOR COMPENSATION CLAIM OF RUTH HENRICKS**

Claimant: Ruth Henricks	For contribution to D.12-12-029
Claimed (\$): 224,544.86	Awarded: \$ 0.00
Assigned Commissioner: Michael Peevey, succeeding Mark Ferron and Timothy A. Simon	Assigned ALJ: Maribeth Bushey

1. Summary

This decision denies intervenor compensation to Ruth Henricks for failing to make a substantial contribution to Decision 12-12-029. This proceeding is closed.

2. Background

San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and Pacific Gas & Electric Company (PG&E) jointly applied to the California Public Utilities Commission (Commission) for authority to establish a Wildfire Expense

Balancing Account (WEBA) to record costs associated with wildfires and to recover WEBA balances via the utilities' retail rates.

The Consumer Protection and Safety Division (CPSD), Disability Rights Advocates (DisAB),¹ the Office of Ratepayer Advocates (ORA),² Ruth Henricks, Mussey Grade Road Alliance (Alliance), and The Utility Reform Network (TURN) protested the application.

On December 21, 2009 the assigned Commissioner and assigned Administrative Law Judge (ALJ) ruled the application required amendment prior to the scheduling of hearings and additionally directed the parties to meet and confer. After amendment, on August 10, 2010, the applicants submitted their amended application. CPSD, DisAB, the ORA, Ruth Henricks, the Alliance, and TURN submitted protests.

On January 3, 2012, the assigned Commissioner granted the unopposed motion of PG&E and SCE to withdraw from this application. The assigned Commissioner, however, denied approval of PG&E's and SCE's memorandum account request.

Evidentiary hearings for the remaining applicants, SDG&E and SoCalGas, were held on January 11, 12, and 13, 2012 before the assigned ALJ. Parties filed and served opening and reply briefs. Opening briefs were filed and served on February 17, 2012, and reply briefs on March 9, 2012.

¹ Effective September 2, 2011, the Center for Accessible Technology assumed DisAB's role in this proceeding.

² The Office of Ratepayer Advocates was formerly known as the Division of Ratepayer Advocates (DRA). (See Stats. 2013, Ch. 356, Sec. 42.)

On December 20, 2012, the Commission issued Decision (D.) 12-12-029 and denied the request of SDG&E and SoCalGas for a Wildfire Expense Balancing Account, but kept open their Wildfire Expense Memorandum Accounts authorized in Resolution E-4311.

On February 24, 2013, Henricks filed her claim for intervenor compensation for \$224,544.86.

3. Opposition to Henrick's Claim

SDG&E and SoCalGas responded in opposition to Henricks' claim for intervenor compensation on March 28, 2013. The utilities asked the Commission to deny the entire claim for the following reasons: (1) Henricks failed to substantially contribute to the Commission's orders in this proceeding; (2) Henricks failed to respond to the request by the ALJ to coordinate her efforts with the other intervenors; and (3) Henricks failed to keep her costs at a reasonable level.

The remaining applicants contended that Henricks' participation in the proceeding "was limited to an issue related to the robustness of general-liability insurance markets and an overarching recommendation that no rate recovery of any Joint Applicants' uninsured wildfire costs should be permitted via the proposed balancing account."³ In the D.12-12-029, the Commission did not mention Henricks' insurance issues, except for a brief statement that she pursued said issues, and "did not adopt her position that any recovery of any of the

³ *Response of Applicants San Diego Gas & Electric Company (U902M) and Southern California Gas Company (U904G) to Request for Intervenor Compensation by Ruth Henricks at 2, March 28, 2013, Application (A.) 09-08-020.*

remaining applicants' uninsured wildfire costs should be barred per se."⁴ Due to Henricks' lack of contribution to the proceeding, the remaining applicants concluded that the Commission is required to deny her claim for intervenor compensation.

The remaining applicants explained that Henricks' claim of substantial contribution to the decision is based on her eliciting an "admission" from SDG&E regarding recovery, via a Wildfire Expense Balancing Account, of certain uninsured costs stemming from the 2007 San Diego Wildfires. While such admission did occur, the remaining applicants stated that the Commission bases intervenor compensation requests on the effect of the intervenor's contributions on the outcome of the proceeding. Here, the remaining applicants concluded, the admission induced by Henricks had no impact on the Commission's decision and thus cannot form the basis for a finding of substantial contribution. Furthermore, the remaining applicants contended, the "admission" provoked by Henricks' was already common knowledge to the Commission and details of the Wildfire Expense Balancing Account were previously set forth in Resolution E-4311.

Remaining applicants also argued that pursuant to Pub. Util. Code § 1808 the Commission should deny Henricks request for intervenor compensation because Henricks' participation was obstructive, rather than helpful, to the process of resolving the application. The remaining applicants indicated that Henricks' counsel diverted the attention of the ALJ and the Commission from addressing substantive issues and that Henricks' counsel was not well-versed or

⁴ *Id.* (Emphasis in original.)

understanding of the Commission's Rules of Practice and Procedure. The remaining applicants concluded that Henricks' participation delayed and obstructed the Commission's timely fulfillment of its responsibilities.⁵

The remaining applicants noted that the ALJ directed Henricks to coordinate her participation in this proceeding with the other parties in order to avoid replicating work.⁶ While Henricks claimed that she coordinated with the other intervenors in her request for compensation, the requests of two other intervenors, TURN and DisAB, show only limited contact and synchronization with Henricks. The Alliance, however, designated four areas of coordination with Henricks. The remaining applicants analyzed this alleged coordination and demonstrated that it was limited to the parties' joint filing on March 3, 2011. While the Alliance authored the filing, and claimed 2.8 hours for the work, Henricks spent approximately 9.5 hours reviewing, editing, and conducting further research on the filing. The remaining applicants contended that the Commission intended coordination between parties to reduce the costs of litigating before the Commission, and not to dramatically increase the cost of participation, such as occurred here. SDG&E and SoCalGas noted that Sections 1801(f) and 1802.5 of the Public Utilities Code should be read to discourage the unnecessary participation of parties whose interests are already represented in a proceeding and to block compensation for those parties who do

⁵ Cal. Pub. Util. Code § 1808.

⁶ *ALJ Ruling on Ruth Henricks' Notice of Intent to Claim Intervenor Compensation*, June 15 2011, at 4, 5.

not substantially supplement, complement, or contribute to the work of another party.⁷

The remaining applicants also challenged the reasonableness of Henricks' claimed fees and costs, which are nearly as much as the combined claims of the three other parties seeking intervenor compensation. The remaining applicants concluded that none of the material findings of facts or conclusions of law in the Commission's decision can be attributed to Henricks' participation.

4. Henrick's Reply to Opposition

Henricks stated she made substantial contributions to the proceeding and "succeeded in: (1) disproving any claims of an insurance crisis; (2) exposing the claim for fire costs as not having been properly noticed in the application; (3) stopping the secret settlement; (4) revealing violation of the open meeting laws; and (5) creating public awareness of the issues that affect ratepayers."⁸ In addition, Henricks argued that she did not delay the proceedings since her participation sought to avoid an unjust result. Henricks felt such participation should be considered a substantial contribution to the proceeding. Lastly, Henricks argued her contributions were coordinated with other parties and did not result in duplicative work. Henricks claimed that her efforts were substantial elements in ensuring that the utilities were not able to increase their rates in the present proceeding.

⁷ Cal Pub. Util. Code § 1801(f); *id.* § 1802.5.

⁸ *Ruth Henricks' Reply to San Diego Gas & Electric Company's (U902M) and Southern California Gas Company's (U904G) Response to Request for Intervenor Compensation by Ruth Henricks*, A.09-08-020, March 02, 2013, at 2.

Henricks reiterated her contention that she was the only party to expose that there was no insurance crisis impacting the utilities, and joined the Alliance to request dismissal of the application since SDG&E had not demonstrated the existence of a fire insurance crisis. Henricks argued that the lack of crisis went directly to the core of SDG&E's case and once it was established that there was no insurance market crisis, SCE and PG&E sought to be removed from the proceeding.

Henricks also argued that her participation made known to the Commission her belief that the application process and the potential award of 2007 fire costs could cause a violation of due process and substantial rights. Henricks also claimed that that she brought media attention to the proceeding, which raised ratepayer awareness of the issues and such scrutiny ultimately lead to ratepayers not being charged for the costs of 2007 fires. In addition, Henricks argued that she alone voiced concerns over the alternative decision proposed by Commissioner Simon, as it may have violated open meeting laws.

5. Requirements for Awards of Compensation and Evaluation of Henricks' Request

The intervenor compensation program, which is set forth in Pub. Util. Code §§ 1801-1812, requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation if they make a substantial contribution to the Commission's proceedings. The statute provides that the utility may adjust its rates to collect the amount awarded from its ratepayers.

All of the following procedures and criteria must be satisfied for an intervenor to obtain a compensation award:

1. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent (NOI) to claim compensation within 30 days of the prehearing conference (PHC), pursuant to Rule 17.1 of the

- Commission's Rules of Practice and Procedure (Rules), or at another appropriate time that we specify. (§ 1804(a).)
2. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)
 3. The intervenor must file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)
 4. The intervenor must demonstrate "significant financial hardship." (§§ 1802(g) and 1804(b)(1).)
 5. The intervenor's presentation must have made a "substantial contribution" to the proceeding, through the adoption, in whole or in part, of the intervenor's contention or recommendations by a Commission order or decision or as otherwise found by the Commission. (§§ 1802(i) and 1803(a).)
 6. The claimed fees and costs must be reasonable (§ 1801), necessary for and related to the substantial contribution (D.98-04-059), comparable to the market rates paid to others with comparable training and experience (§ 1806), and productive (D.98-04-059).

In the discussion below, the procedural issues in Items 1-4 above are combined and a separate discussion of Items 5-6 follows.

5.1. Preliminary Procedural Issues

Under § 1804(a)(1) and Rule 17.1(a)(1), a customer who intends to seek an award of intervenor compensation must file an NOI before certain dates.

Henricks filed her NOI on October 12, 2010. On June 15, 2011 the assigned ALJ issued a ruling, finding that the NOI was timely filed and that Henricks, based on past filings with the Commission, satisfied the requirements for eligibility to request compensation pursuant to compliance with Pub. Util. Code §§ 1801-1812 and the Commission's regulations. Moreover, the ALJ provided additional guidance to Henricks. The ruling served as notice to Henricks that:

“1) If Henricks’ future NOIs do not provide the required information they will be rejected; and 2) That Henricks will have the burden to demonstrate the reasonableness of the costs she may ultimately claim for compensation and to demonstrate that her efforts were not duplicative of the work of other parties.”⁹ Additionally, in bold text, the ALJ stated: “We urge Henricks to control her budget and to coordinate effectively her efforts with other parties, to avoid unnecessary duplication.”¹⁰

In A.09-08-019, Henricks filed, under seal, balance sheets and profits and loss statements for the year 2010 for the two businesses she owns and in that proceeding she demonstrated that effective participation, without the opportunity for compensation, would constitute a significant financial hardship, as defined by Pub. Util. Code § 1802(g). Since significant financial hardship was established in that proceeding, pursuant to the provisions of Pub. Util. Code § 1804(b)(1), the finding may be extended to this proceeding, as occurred in the ALJ Ruling on Henricks’ NOI.¹¹ Henricks, therefore, has demonstrated a significant financial hardship despite not having made such a showing in her NOI. In addition, Henricks demonstrated her status as a customer since she undertook to represent others before the Commission, thus becoming a Category I customer under Pub. Util. Code § 1802(b)(1)(A).

⁹ *ALJ Ruling on Ruth Henricks’ Notice of Intent to Claim Intervenor Compensation*, June 15, 2011, at 5.

¹⁰ *Id.* at 6.

¹¹ See D.11-12-015, *Decision Denying Intervenor Compensation to Ruth Henricks for Lack of Substantial Contribution to Decision 10-12-053*, Dec. 01, 2011, at 8; *ALJ Ruling on Ruth Henricks’ Notice of Intent to Claim Intervenor Compensation* at 8.

Henricks timely filed her request for intervenor compensation on February 26, 2013 to D.12-12-029.

We affirm the finding of eligibility to claim intervenor compensation from the June 15, 2011 ruling and find that Henricks has demonstrated significant financial hardship. Therefore, we conclude that Henricks has satisfied all the procedural requirements necessary to make a request for compensation in this proceeding.

5.2. Substantial Contribution and Reasonable Fees/Costs

In evaluating whether a customer made a substantial contribution to a proceeding, we look at several factors. First, we look at whether the Commission adopted one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer.¹² Second, if the customer's contentions or recommendations paralleled those another party, we look at whether the customer's participation unnecessarily duplicated or materially supplemented, complemented, or contributed to the presentation of another party.¹³

As described in Pub. Util. Code § 1802(i), the assessment of whether the customer made a substantial contribution requires the exercise of judgment:

In assessing whether the customer meets this standard, the Commission typically reviews the record, composed in part of pleadings of the customer and, in litigated matters, the hearing transcripts, and compares it to the findings, conclusions, and orders in the decision to which the customer asserts it

¹² See Pub. Util. Code § 1802(i).

¹³ See *Id.* §§ 1801.3(f) and 1802.5.

contributed. It is then a matter of judgment as to whether the customer's presentation substantially assisted the Commission.¹⁴

With this guidance in mind, we have reviewed the claimed contributions Henricks made to the proceeding and find that Henricks has not demonstrated any substantial contribution to this proceeding.

Henricks' request for compensation Part II. A., addressing substantial contribution, refers only to the decision's description of the evidence presented by Henricks and arguments as to how Henricks solicited information during the proceeding. The passages in the decision, however, merely summarize the information put forth by Henricks and do not show how any of the information made a substantial contribution to the decision. Henricks is unable to show any reference to discussion sections in the decision that would indicate the decision appeared to consider, rely upon, or otherwise use any of Henricks arguments or evidence. The Commission has pointed out that a distinction exists between the mere recitation of the claims offered by an intervenor, and its actual reliance on such claims in a manner that establishes that a substantial contribution has been made.¹⁵ Simply acknowledging a party's participation "by itself cannot constitute a substantial contribution."¹⁶

Pub. Util. Code § 1802(i) defines substantial contribution as the customer's presentation that substantially assisted the Commission in the making of its decision because it has adopted factual and legal contentions or policy recommendations presented by the intervenor. Section 1802.5 allows

¹⁴ D.98-04-059, 79 CPUC2d 628 at 653.

¹⁵ See D.04-05-004 at 11.

¹⁶ *Id.* at 11-12.

compensation for an intervenor's compensation that materially supplements, complements, or contributes to the presentation of another party, provided that the intervenor's own participation makes a substantial contribution to a Commission order or decision. Merely helping another party to participate effectively does not constitute a substantial contribution by the intervenor, nor does such help seem reasonably necessary to the intervenor's own substantial contribution. Our review of D.12-12-029 does not reveal any areas in which Henricks made a substantial contribution or where Henricks assisted other parties in joint efforts that aided the Commission in the making of its decision because it adopted factual and legal contentions, or policy recommendations, presented by Henricks.

In reviewing Henricks' claim for compensation beyond Part II. A., which is intended to address substantial contribution, we find that in Part II. B., Duplication of Effort, Henricks asserts that her counsel worked closely with other attorneys and shared information obtained through an investigation with the Alliance. The claim also states Henricks remained in contact with the Alliance so as to avoid duplication. Based on the filings of the other intervenors, it appears Henricks only coordinated her efforts with the Alliance and such coordination, upon further review, only occurred for a joint filing submitted on March 3, 2011. That filing opposed the applicants' motion to stay the procedural schedule and consisted of six pages of text, the first four of which were a straightforward recitation of the procedural history, and the final two pages were policy argument with no legal analysis. The Alliance authored the filing, and claimed 2.8 hours for the work, but Henricks spent approximately 9.5 additional hours reviewing, editing, and conducting further research. Henricks offered no explanation for this disproportionate expenditure of time to edit a very brief

document drafted by another party. The assigned Commissioner granted the applicants' motion, over the opposition, on March 14, 2011. Here, Henricks' coordination resulted in increased, and unexplained, time spent on a very brief document. This evidence does not support a finding that Henricks coordinated with other intervenors to adhere to the statutory provisions governing the intervenor compensation program.

In Part III A., the section of the claim for compensation that addresses reasonableness of the requested compensation, Henricks appears to argue that because the WEBA application was not granted and because the settlement negotiations failed, Henricks participation was justified and warranted and that her participation resulted in saving ratepayers from paying whatever increased rates may have occurred had the application been approved. The Commission in D.12-12-029, however, only referenced the work of Henricks in the summary of evidence presented section, which is not sufficient to demonstrate a substantial contribution.

As set forth above, we have reviewed Henricks' assertions of substantial contribution and have evaluated Henricks' request for intervenor compensation. Neither Henricks' intervenor compensation claim nor the decision itself demonstrates Henricks' substantial contribution to the Commission's consideration of the issues in this proceeding. Henricks provided no information or analysis that the Commission or the ALJ relied upon in their deliberations and Henricks failed to influence the Commission on any of the issues she raised. Accordingly, we conclude that Henrick's claim for intervenor compensation should be denied.

While Section 1802.5 allows for an intervenor to be eligible for full compensation where its participation materially supplements, complements, or

contributes to the presentation of another party, compensation may only occur if the contribution or the participation contributed to the Commission order. Here, Henricks' participation did not adequately assist the Alliance or any other intervening party and, therefore, Henricks does not qualify for compensation under § 1802.5.

Due to these conclusions, there is no need to further evaluate the reasonableness of Henricks' claim.

6. Comments on Proposed Decision

Pub. Util. Code § 311, subdivision (g)(1), provides that a decision must be served on all parties and be subject to at least 30 days review and comment prior to a vote by the Commission. Rule 14(c)(6) provides that this 30-day comment period may be waived on proposed decisions issued in proceedings in which no hearings were conducted for a decision on a request for compensation pursuant to § 1801 et seq. Here, because of the denial of the request, the proposed decision of ALJ Bushey was mailed to the parties in accordance with § 311. Parties were allowed to file and serve comments no later than 10 days after the date of service of the proposed decision pursuant to Rule 14.6(c)(6) of the Commission's Rules of Practice and Procedure. No reply comments were allowed.

On March 17, 2014, Henricks filed comments on the Proposed Decision (PD) regarding the Intervenor Compensation claim. Henricks stated her counsel worked for over three years on this proceeding, preventing ratepayers from becoming fire insurers of last resort and preventing the imposition of unjust and unreasonable rates upon ratepayers. Henricks' research proved that there was no failure of the catastrophic fire insurance market. In addition, Henricks claimed she stopped unnecessary negotiations and prevented unwanted settlements. Because settlement negotiations failed, PG&E and SCE removed

themselves from the proceeding. Henricks contended the PD does not give her credit for her efforts “to keep the settlement from resulting in added, but unwarranted, rate increases for fire insurance.”¹⁷

Henricks additionally stated the PD ignored the “Narrative Presentation” made in Attachment 9 to her compensation request. Henricks claimed this attachment provided detailed accounting of the contributions Henricks made to D.12-12-029. Furthermore, Henricks asserted the Commission displays favoritism and retaliates against enthusiastic advocacy. Henricks stated that she was key in ensuring PG&E and SCE dropped their demand for more rates for fire insurance and that she uncovered a hidden plan of SDG&E to recover for the 2007 fire costs, despite not seeking recovery in their application. Henricks claimed this attempt at recovery violated numerous rules and her counsel exacted an admission during cross-examination.

Henricks claimed the ALJ, by allowing SDG&E to attempt recovery of 2007 fire costs, violated Rule 13.6(a) of the Commission’s Rules of Practice and Procedure. In addition, Henricks stated others Commission Rules of Practice and Procedure were violated: Rule 1.12 of the Rules of Practice and Procedure was violated since an amendment to the application was allowed after the issuance of the scoping memo; Rule 12.3 was violated because discovery was not allowed on 2007 cost recovery issues and because discovery had not started prior to the close of the comment period; and Rule 13.1(b) was violated since notice for the hearing on the issue of SD&GE’s 2007 fire cost recovery was placed on page 5

¹⁷ *Petitioner Ruth Henricks’ Comments on Proposed Decision of Administrative Law Judge (ALJ) Maribeth A. Bushey on Intervenor Compensation Claim of Ruth Henricks (For Contribution to D.12-12-029)*, March 17, 2014, at 2.

of its Rebuttal Testimony. Such notice, Henricks claimed, similarly violated the due process rights of the protestors.

Henricks stated she filed her application for intervenor compensation on February 26, 2013 and that, per California Public Utilities Code § 1804(e), a decision was required within 75 days. A decision on her claim was not made within this time frame. Since her compensation request was not denied within 75 days, Henricks claimed “the Commission has waived its ability to deny the application for compensation.”¹⁸ Henricks argued the untimely decision violates the due process and equal protection rights of both herself and the law firm representing her.

For these reasons, Henricks stated that the determination which concluded she had not made substantial contribution to D.12-12-029 was “false and untrue” and therefore amounted to “an abuse of discretion.”¹⁹ Lastly, Henricks claimed that the decision violated the privileges and immunities clause of the California Constitution since the ALJ “granted privilege and immunities to favored professional intervenors TURN and Center for Accessible Technology, while denying just compensation to Ms. Henricks.”²⁰

In conclusion, Henricks claimed that a denial of her compensation request would mean the Commission had “[a]cted without or in excess of its power or

¹⁸ *Id.* at 5.

¹⁹ *Id.*

²⁰ *Id.* at 5-6.

jurisdiction”, had not “proceeded in a manner required by law”, and had issued a decision not supported by the findings.²¹

We have carefully reviewed each of Henricks’ claims and found no justification to revise the proposed decision. Henricks reiterates her claims of substantial contribution, which are addressed above. The procedural issues of due process on the hearing notice and discovery go to the merits of this proceeding and should have been raised during that phase of the proceeding. The decisions granting intervenor compensation to TURN and Center for Accessible Technology set forth the basis for those awards. Henricks should have filed an application for rehearing if she wished to dispute those decisions. Finally, Public Utilities Code §§ 1801 – 1812 gives the Commission authority to review and grant or deny, in whole or in part, intervenor compensation requests. We conclude, therefore, that Henricks’ have shown no legal or factual error in the proposed decision that requires revisions, and we decline to revise the decision as requested.

7. Assignment of Proceeding

Michael R. Peevey is the assigned Commissioner and Maribeth A. Bushey is the assigned ALJ in this proceeding.

Findings of Fact

1. Henricks has satisfied the procedural requirements necessary to be eligible for compensation in this proceeding.
2. Henricks did not make a substantial contribution to D.12-12-029 as described herein.

²¹ *Id* at 6 (citing to Cal. Pub. Util. Code § 1757 and *The Utility Reform Network v. Public Utilities Commission* (2008) 166 Cal. App. 4th 522, 533).

Conclusions of Law

1. Henricks has not fulfilled the requirements of California Public Utilities Code §§ 1801-1812, which govern the awards of intervenor compensation and is not entitled to intervenor compensation for her participation in the proceeding leading to D.12-12-029.

2. Henricks request for intervenor compensation for her participation in the proceeding leading to D.12-12-029 should be denied.

3. This order should be effective today.

O R D E R

IT IS ORDERED that the Request for Intervenor Compensation filed by Ruth Henricks on February 26, 2013, is denied.

This order is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D14	Modifies Decision?	No
Contribution Decision(s):	D1212029		
Proceeding(s):	A0908020		
Author:	ALJ Bushey		
Payer(s):	San Diego Gas & Electric/Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Ruth Henricks	2/24/13	\$224,544.86	\$0.00	No	Lack of substantial contribution to Decision

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Michael	Aguirre	Attorney	Ruth Henricks	\$400	2010	NA
			Ruth Henricks	\$400	2011	NA
			Ruth Henricks	\$400	2012	NA
Maria	Severson	Attorney	Ruth Henricks	\$330	2010	NA
			Ruth Henricks	\$330	2011	NA
			Ruth Henricks	\$330	2012	NA
Unknown	Unknown	Paralegal	Ruth Henricks	\$50	2010	NA
Unknown	Unknown	Paralegal	Ruth Henricks	\$50	2011	NA
Unknown	Unknown	Paralegal	Ruth Henricks	\$50	2012	NA
Kimberly	Raguma	Preparer	Ruth Henricks	\$40	2012	NA

(END OF APPENDIX)