

Decision \_\_\_\_\_

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

In the Matter of the Application of San Diego Gas & Electric Company (U902G) and Southern California Gas Company (U904G) for Authority To Revise Their Rates Effective January 1, 2013, in Their Triennial Cost Allocation Proceeding

Application 11-11-002  
(Filed November 1, 2011)

**DECISION AWARDING INTERVENOR COMPENSATION  
TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION  
TO DECISION 14-06-007.**

<b>Intervenor: The Utility Reform Network</b>	<b>For contribution to Decision (D.) 14-06-007</b>
<b>Claimed: \$541,798.57</b>	<b>Awarded: \$540,329.22</b>
<b>Assigned Commissioner: Michel Florio</b>	<b>Assigned ALJ: Douglas Long</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	In D.14-06-007, the Commission addressed three issues. First, it adopted a plan for pipeline Safety Enhancement, although it found that the utility-proposed budget was too rudimentary to approve at this stage. Second, the Commission adopted an all-party settlement that addressed many of the revenue allocation and rate design issues for the SDG&E and SoCalGas Triennial Cost Allocation Proceeding (TCAP). Third, it addressed specific proposals not covered by the all-party settlement, including rejection of the proposal to allocate the costs of Safety Enhancement efforts differently than other costs allocated on the basis of costs of providing service to all customer classes, and rejection of a residential customer charge for SDG&E gas customers.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in  
Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	1/30/12	Correct.
2. Other specified date for NOI:		
3. Date NOI filed:	2/27/12	Correct.
4. Was the NOI timely filed?		Yes, TURN timely filed the notice of intent to claim intervenor compensation.
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.12-11-009/ I.13-03-007 (PG&E 2014 GRC)	Correct.
6. Date of ALJ ruling:	9/6/13	Correct.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes.
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009/ I.13-03-007 (PG&E 2014 GRC)	Correct.
10. Date of ALJ ruling:	9/6/13	Correct.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, TURN demonstrated significant financial hardship.

<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.14-06-007	Correct.
14. Date of issuance of Final Order or Decision:	6/19/14	06/20/2014
15. File date of compensation request:	08/05/14	Correct.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for intervenor compensation.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>This proceeding presented a range of issues, all of which put residential and small business core customers at substantial risk of disproportionately bad outcomes. The Sempra Utilities’ PSEP proposals asked the Commission to adopt Phase 1A cost estimates of \$1.4 billion for capital costs and \$262 million of O&amp;M expenses for the 2012-15 period, amounts that could lead to significant rate increases to the transportation rates of the various customer classes. This overall risk was compounded for core customers by the utility-proposed allocation, which would have assigned them over 90% of those costs. The utility proposals to abandon the “new customer only” approach to developing marginal customer costs in favor of the “rental method,” and to introduce a residential customer charge for SDG&amp;E gas customers, all put the utilities smallest customers at risk of seeing disproportionate increases to their gas rates. As described in more detail below, TURN achieved remarkable success in its</p>	<p>TURN relies largely on our opening and reply briefs as the sources for citations to where the arguments and evidence supporting our substantial contributions appear in the record of this proceeding. The cited pages from those briefs should point the Commission toward the prepared and oral testimony and other record evidence supporting TURN’s position. Should the Commission conclude that it needs further support for any of the substantial contributions described here, TURN requests an</p>	<p>Verified.</p>

<p>challenges to the utilities’ proposals. There should be no question that TURN made a number of very substantial contributions to the proceeding and the resulting decision.</p>	<p>opportunity to supplement this showing with additional citations as appropriate.</p>	
<p><b>1. PSEP – Inadequacy of SoCalGas and SDG&amp;E showing to permit determining reasonableness of requested cost recovery:</b></p> <p>TURN challenged the utilities’ request for an authorized revenue requirement and rate recovery of PSEP costs due to a number of general concerns regarding the inadequacy of their showing, including the preliminary nature of their cost estimates and their basis on minimal engineering; the as-yet incomplete analysis of which pipeline segments would be tested and which would be replaced; the absence of any formal reasonableness review under the utilities’ proposal; and reliance on an ill-conceived “Engineering Advisory Board” to mask some of the deficiencies.</p> <p>The Commission stated that it “agree[d] with TURN that SDG&amp;E and SoCalGas’s proposals as offered in this proceeding are incomplete and are an inadequate platform for authorizing construction or granting rate relief.” It also specifically cited TURN’s concerns regarding the proposed advisory board in declining to adopt that portion of the utilities’ proposal.</p>	<p>TURN PSEP Opening Brief at 4-9.</p> <p>D.14-06-007 at. 28.</p>	<p>Verified.</p>
<p><b>2. Responsibility for Phase 1 Costs – Burden of Proof and Distinction Between Penalties and Disallowances:</b></p> <p>TURN argued that costs that were the result of the Sempra Utilities’ imprudence may not be recovered from ratepayers, and such disallowance of recovery is not a penalty but rather the outcome required under the Public Utilities Code.</p> <p>The Commission’s discussion of ratemaking principles applicable in reasonableness applications generally agreed with TURN’s positions.</p>	<p>TURN PSEP Opening Brief at 13-19.</p> <p>D.14-06-007 at 31-32 (including “where imprudent actions by the gas system operator have led to</p>	<p>Verified.</p>

	<p>unreasonable costs, we will assign those costs to shareholders.”) See also Conclusion of Law 13.</p>	
<p><b>3. Responsibility for Phase 1 costs – Assignment to Sempra Utilities’ shareholders:</b></p> <p>For pipe segments installed in 1955 or later for which the Sempra Utilities lack adequate pressure test records, TURN recommended that the Commission require shareholders to absorb the entire cost of pressure testing and replacing those segments.</p> <p>The Commission rejected the Sempra Utilities’ position that ratepayers should bear the entirety of pressure testing and pipe replacement costs associated with PSEP. Instead, for post-mid-1961 pipes lacking sufficient records, the Commission decided that shareholders shall bear an amount equal to the cost of pressure testing the pipe plus the undepreciated balance of capital expenditures associated with that pipe.</p>	<p>TURN Opening Brief at 19-39; TURN Reply Brief at 6-23.</p> <p>D.14-06-007 at 33-36; Conclusions of Law 14 and 15.</p>	<p>Verified.</p>
<p><b>4. Reasonableness of Phase 1 Recommendations – Decision-Making Process:</b></p> <p>The Sempra Utilities presented a decision tree and proposed that projects that were the product of the decision tree be presumed reasonable. TURN argued that even if the Commission found the decision tree to be a useful tool, it could not establish a presumption of reasonableness for projects, and after-the fact reasonableness review would still be necessary.</p> <p>The Commission agreed that while the decision tree was reasonable, it was not a substitute for a finding of reasonableness. Instead, subsequent applications for review of Phase 1 projects would need to demonstrate that the work was consistent with the analytical approach reflected in the decision</p>	<p>TURN PSEP Opening Brief at 38-43; TURN PSEP Reply Brief at 23-25.</p> <p>D.14-06-007 Conclusions of Law 5 and 18.</p>	<p>Verified.</p>

<p>tree, <b>and</b> that the associated costs were reasonable.</p>		
<p><b>5. Reasonableness of Phase 1 Recommendations – Base Case and Proposed Case:</b></p> <p>TURN challenged the inclusion of “interim safety” efforts as part of Phase 1, contending that the underlying activities were safety record search costs that should not be recovered from ratepayers. TURN also raised concerns about inclusion of pre-1946 pipe replacement costs as part of the Proposed Case.</p> <p>The Commission did not address the “interim safety” costs in Phase 1 directly, but agreed that companies should not recovery costs associated with searching for test records of pipeline testing.” And while it did not agree with TURN’s broad concern about inclusion of pre-1946 pipes in Sempra’s proposal, it noted that the requirement of detailed records for all testing and replacement work would permit TURN to raise its concerns in review of future Sempra applications seeking cost recovery for PSEP projects.</p>	<p>TURN PSEP Opening Brief at 49-73.</p> <p>D.14-06-007 at 28 and 39.</p>	<p>Verified.</p>
<p><b>6. Reasonableness of Phase 1 Cost Estimates:</b></p> <p>TURN raised a number of concerns about the showing the Sempra Utilities’ made to support the claimed reasonableness of their Phase 1 forecasts, including the reliance on “Class 5” level estimates, the inclusion of inappropriate contingency amounts in the forecasts, and the increased forecasts due to an “incentive compensation loader” added to forecasts.</p> <p>After noting the “Class 5” nature of the utilities’ budgeting efforts, the Commission found as a general matter that the budget proposals of the utilities were “clearly not sufficient to justify this Commission to authorize for ratemaking purposes.” And the Commission excluded the incentive</p>	<p>TURN PSEP Opening Brief at 73-83.</p> <p>D.14-06-007 at 25-26 (Class 5) and FOF 16 and COL 16 (incentive compensation loader).</p>	<p>Verified.</p>

<p>compensation loader, but on a more limited scale than TURN had proposed (only the loader as applied to utility executives).</p>		
<p><b>7. TCAP – Inter-class allocation of PSEP costs:</b></p> <p>The Sempra Utilities, largely supported by non-core customer groups, sought to have PSEP costs allocated based on “equal percentage of authorized margin” (EPAM) that would result in 90+% of the costs allocated to core customers. TURN, along with ORA, proposed use of “functionalized” allocation akin to the approach the Commission uses for allocating other utility costs.</p> <p>The Commission rejected the proposal to adopt an EPAM allocator, and instead relied on the existing functionalized cost allocation method.</p>	<p>TURN TCAP Opening Brief at 4-8 (policy issues) and 8-19 (functionalized v. EPAM); Reply Brief at 4-7 and 7-23.</p> <p>D.14-06-007 at 47-50; Findings of Fact 23-24 and Conclusion of Law 30.</p>	<p>Verified.</p>
<p><b>8. TCAP – Allocation of PSEP Costs to Backbone Transmission Customers:</b></p> <p>The Sempra Utilities and customers taking Backbone Transmission Service (BTS) sought to allocate none of the PSEP costs to the BTS customers through the BTS rate. TURN joined Southern California Generation Coalition and ORA in opposing this outcome. TURN rebutted the arguments supporting the BTS exemption, pointing out that the shippers are SoCalGas customers paying cost-of-service rates, and relying on the SCGC analysis that a substantial portion of the PSEP work was proposed for facilities serving customers paying the BTS rate.</p> <p>The Commission, citing only SCGC on this issue, agreed that BTS customers should bear PSEP costs consistent with the allocation of transmission costs to that class under the existing revenue allocation method.</p>	<p>TURN TCAP Opening Brief at 19-22; Reply Brief at 24-26.</p> <p>D.14-06-007 at 49-50.</p>	<p>Verified.</p>
<p><b>9. TCAP -- PSEP Rate Design:</b></p> <p>The Sempra Utilities’ PSEP proposal included</p>		<p>Verified.</p>

<p>a number of rate design issues, including having a separate line item on the bill for PSEP-related charges; and charging residential customers a fixed charge related to PSEP, while other customers would pay a volumetric rate. The Scoping Memo stated that the TCAP phase (Phase 2) would include all issues as proposed by the Sempra Utilities in their application. TURN challenged the separate line item, and the proposal for a fixed charge for residential customers only.</p> <p>The Commission did not address these issues directly, finding that in the absence of an adopted PSEP revenue requirement, there was no need to address most of the PSEP-specific cost allocation and rate design issues the parties had addressed in the proceeding.</p>	<p>A.11-11-002 Scoping Memo at 9.</p> <p>TURN TCAP Opening Brief at 22-26; Reply Brief at 26-28.</p> <p>D.14-06-007 at 49.</p>	
<p><b>10. TCAP – Settlement of Non-PSEP Revenue Allocation and Rate Design Issues:</b></p> <p>TURN played an active role in the settlement discussions that resulted in presentation to the Commission of a proposed settlement on nearly all revenue allocation and rate design disputes other than PSEP cost allocation and the SDG&amp;E residential customer charge. The settlement resolved issues addressed in TURN’s testimony, particularly with regard to the development of a reasonable marginal customer cost.</p> <p>The Commission adopted the proposed settlement without modification, and included a summary of thereof in the decision.</p>	<p>Testimony of William Marcus of JBS Energy (11/16/12); Supplemental Testimony of William Marcus Regarding LRMC Methodology and Customer Cost (12/7/12).</p> <p>Phase 2 Settlement Agreement (3/20/13), now Attachment III to D.14-06-007.</p> <p>D.14-06-007 at 42-45; Finding of Fact 19 and Conclusion of Law 27.</p>	<p>Verified.</p>
<p><b>11. TCAP – Proposed New Customer Charge For SDG&amp;E Residential Gas Customers:</b></p> <p>SDG&amp;E proposed adoption of a new customer charge for its residential gas customers. TURN was the only party that opposed the SDG&amp;E proposal (ORA opted to not</p>	<p>TURN TCAP Opening Brief at 26-35; Reply Brief at 28-38. ORA Opening Brief at 15.</p>	<p>Verified.</p>

<p>comment on it). TURN raised a number of arguments for rejecting the SDG&amp;E proposal, including the customer charge working at cross purposes with the Commission’s efforts to promote conservation and energy efficiency.</p> <p>The Commission rejected the SDG&amp;E proposal, citing the dilution of conservation and energy efficiency price signals.</p>	<p>D.14-06-007 at 41, and Finding of Fact 22.</p>	
<p><b>12. Procedural substantial contribution requiring supplemental showing from Sempra Utilities:</b></p> <p>TURN’s protest challenged the adequacy of the utilities’ showing on two of its proposals. For the marginal customer costs, TURN questioned the utilities’ showing relying on the “rental method” when the Commission had regularly adopted the “new customer only method” for developing the marginal customer cost. And on the SDG&amp;E residential gas customer charge proposal, TURN called for further explanation of why SDG&amp;E’s proposal was different than the PG&amp;E proposal the Commission had just rejected six months before the Sempra Utilities’ application was filed.</p> <p>The Scoping Memo directed the Sempra Utilities to make a supplemental showing addressing the deficiencies identified in TURN’s Protest.</p>	<p>TURN Protest at 2-5.</p> <p>Scoping Memo (2/24/12) at 10.</p>	<p>Verified.</p>
<p><b>13. Transfer of Sempra Utilities PSEP to TCAP application proceeding:</b></p> <p>On March 20, 2012, a proposed decision issued in R.11-02-019 addressing the transfer of the Commission’s review of the Sempra Utilities’ PSEP to the recently filed TCAP application proceeding. On April 9, 2012, TURN submitted comments on the proposed decision raising concerns about the analysis as described in the PD, and calling for changes in order to clarify that the outcome on certain issues had not been pre-determined but were,</p>	<p>TURN Comments on Proposed Decision in R.11-02-019 at 1-8.</p>	<p>Verified.</p>

<p>in fact, subject to review in A.11-11-002.</p> <p>In D.12-04-021, the Commission described TURN’s comments as “succinct and persuasive” and modified the final decision as requested.</p>	<p>D.12-04-021 at 10.</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<p><b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>1</sup></b></p>	<p><b>Yes</b></p>	<p><b>Yes.</b></p>
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	<p><b>Yes</b></p>	<p><b>Yes.</b></p>
<p><b>c. If so, provide name of other parties:</b> In the PSEP phase, TURN’s overarching position was similar to the general position of Southern California Generation Coalition (SCGC) and Southern California Indicated Producers (SCIP), in that all three groups were trying to mitigate the revenue requirement and rate impacts of the increased pipeline safety spending. However, in the TCAP phase TURN’s position on the appropriate inter-class allocation of PSEP costs was strongly opposed by both those groups.</p>	<p><b>Yes.</b></p>	
<p><b>d. Intervenor’s claim of non-duplication:</b> In light of the broad scope of the proceeding, the magnitude of the requested rate increase, and the importance and novelty of the safety issues and utility spending proposals, TURN worked hard to coordinate its efforts with other like-minded parties in order to ensure that all important issues were addressed from a customer perspective. Our time records include a number of entries (usually coded as “Coord” or “GP”) for efforts that were primarily devoted to communicating with the other parties about matters such as procedural strategies and issue area allocation.</p> <p>In particular, TURN worked closely with ORA and SCGC in the PSEP phase to divide up issues and, when addressing the same issue, to present a different argument or perspective on such issue. Such active coordination</p>	<p><b>Agreed.</b></p>	

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<sup>1</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>ensured that our respective presentations offered different recommendations or supported similar recommendations with different arguments. In this way, TURN believes that the Commission ended up with a more robust record upon which to evaluate the issues at hand, while keeping duplication to a minimum.</p> <p>In the TCAP phase, the potential for duplication existed only with ORA, as on inter-class revenue allocation and similar issues TURN was generally at odds with SCGC and other non-core customer and shipper parties. TURN worked very closely with ORA to coordinate development of initial positions in testimony (permitting TURN to address a relatively limited range of the marginal cost and revenue allocation issues), thus ensuring a minimum of duplication. Where such duplication occurred, TURN’s work sought to add to or reinforce the ORA recommendations (such as TURN’s different approach to treating replacement costs in the New Customer Only marginal customer cost calculation that both TURN and ORA supported).</p> <p>In sum, the Commission should find that TURN’s participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenors.</p>	
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**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$550,000 as the reasonable cost of our participation in the proceeding. In light of the scope of the proceeding, the breadth and quality of TURN’s work, and the benefits achieved through TURN’s participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The Sempra Utilities’ PSEP proposals asked the Commission to adopt Phase 1A cost estimates of \$1.4 billion for capital costs and \$262 million of O&amp;M expenses for the 2012-15 period.<sup>2</sup> The revenue requirement impacts associated with those figures would have caused substantial bill increases to SoCalGas and SDG&amp;E gas customers generally. And with nearly all of the costs associated with distribution or transmission pipelines, the majority of the costs would be borne by the utilities’</p>	<p style="text-align: center;"><b>CPUC Discussion</b></p> <hr/> <p style="text-align: center;"><b>Verified.</b></p>
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<sup>2</sup> Sempra Utilities’ PSEP Opening Brief at 5.

<p>core customers.</p> <p>Though the Commission did not address the entirety of the cost estimates put forward due to the inadequacy of the utilities’ showing, it adopted two outcomes that will serve to reduce the PSEP costs ultimately included in rates. The assignment to shareholders of the costs of pressure testing and undepreciated balance for post-July 1961 pipelines for which the utilities do not have historical records will likely reduce by at least 14% the costs borne by ratepayers for pipeline replacements in that category. And requiring shareholders to bear the costs of any PSEP-related incentive compensation paid to executives will further reduce costs to ratepayers. While the specific impacts of these elements of the decision were not calculated on the record, and will not be known with precision until the utilities present sufficiently supported spending proposals for specific projects, the Commission can reasonably assume that the savings to ratepayers from these two elements alone will likely dwarf the amount of compensation sought here.</p> <p>The amount of requested intervenor compensation also compares very favorably with the benefits of TURN’s substantial contribution on PSEP cost allocation issues. The functionalized allocation would assign approximately 56-62% of PSEP costs to the utilities’ residential customers, while the rejected EPAM allocation would have assigned over 90% of those costs to residential customers. (Ex. SCG-136 (Comparison Exhibit)). The annual difference to residential customers from adopting the functionalized allocation will be substantially higher than the \$550,000 sought here.</p> <p>In sum, the Commission should conclude that TURN’s overall request is reasonable in light of the substantial benefits to SCG and SDG&amp;E ratepayers that were attributable to TURN’s participation in the case.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>The number of hours recorded by TURN’s attorneys and consultants for work on this combined PSEP and TCAP application is quite substantial. However, as TURN’s counsel reviewed the daily time records for preparation of this request for compensation, several factors emerged that explain the relatively large number of hours. First and foremost, this proceeding cobbled together two separate matters, each of which was substantial in its own right. The PSEP portion of this proceeding involved the review of an array of issues associated with a broad new program proposed to address safety-related issues.<sup>3</sup> The TCAP portion of the instant</p>	<p>Verified, <i>but see</i> “CPUC Disallowances and Adjustments” in Part III.D.</p>

<sup>3</sup> In this regard, the PSEP portion of this proceeding resembles the PG&E Distribution Reliability Improvement Program (DRIP) PG&E proposed in 2008 and that led to D.10-06-048.

*Footnote continued on next page*

proceeding was the regular review of the utilities' marginal costs, revenue allocation and rate design, with the added wrinkle of the PSEP inter-class cost allocation issue.

Second, the proceeding played out in a way that required addressing many PSEP issues in two different ways. The Sempra Utilities' proposals and associated cost forecasts were in a very preliminary stage of development, so much so that TURN and others argued that they were generally insufficient to warrant adopting an authorized revenue requirement at this time. Therefore, TURN devoted time and effort toward developing a record that would support such recommendations. But in the event that the Commission might choose to adopt an authorized revenue requirement, TURN needed to address the specific forecasts the utilities presented for each of the PSEP programs. In effect, TURN's PSEP-related efforts often involved arguing in the alternative, with a primary emphasis on rejecting the Sempra Utilities' forecasts due to their preliminary nature, but secondary arguments addressing the specifics of a number of those forecasts.

Third, there is time devoted to issues that the Scoping Memo indicated would be addressed in the final decision but, due to the way the proceeding played out, were not addressed or even mentioned in that decision.<sup>4</sup> The associated hours are included here because intervenors should not be required to bear the risk that issues that they had every reason to believe were within the scope of the proceeding throughout the more than two-year course of the proceeding would not be addressed in the final decision.

As described below and as further reflected in the time records attached to this request, the number of hours for each TURN representative was reasonable under the circumstances present here.

TURN Attorneys:

Robert Finkelstein played a prominent role for TURN throughout this proceeding. In the PSEP phase he and Thomas Long shared responsibility for developing and presenting TURN's position. Mr. Finkelstein was TURN's primary attorney for issues associated with the reasonableness of the Sempra Utilities' cost estimates,

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TURN was awarded approximately \$355,000 for our work in the 2008-2010 time frames in that proceeding.

<sup>4</sup> For example, the Scoping Memo stated that Phase 2 would include "all issues as proposed by both Applicants in the application . . ." Scoping Memo at 9. But the decision did not address issues regarding Phase 1 revenue requirements and associated ratemaking because the Commission chose to not set a Phase 1 revenue requirement at this time and left the associated ratemaking to be decided at a later point in time.

both at the broad level and for the specific programs the utilities put forward and the resulting revenue requirement impacts. In the TCAP phase Mr. Finkelstein served as TURN's lead attorney, covering all of the marginal cost, revenue allocation and rate design issues, including the PSEP cost allocation issue. The 310-315 hours he recorded in both 2012 and 2013 are the equivalent of approximately nine 35-hour weeks during each year, a reasonable amount for a proceeding of this magnitude. The Commission should similarly find reasonable the amount of hours devoted to specific tasks. For example, in late summer 2012 Mr. Finkelstein recorded approximately 56 hours to preparing for and attending the second week of Phase 1 evidentiary hearings for which he bore responsibility (and, similarly, Mr. Long recorded approximately 60 hours for the witnesses and testimony he covered, most but not all of whom appeared in the first week of hearings). Given the wide range of issues presented by the Sempra Utilities' PSEP testimony, these are very reasonable amounts for the effort associated with preparing for and playing an active role in two weeks of hearings. TURN submits that the Commission should find reasonable each of the task-specific subtotals for Mr. Finkelstein and Mr. Long.

As noted above, Thomas Long took the lead role on behalf of TURN during the PSEP phase of the proceeding, particularly on issues similar to those that at the time had recently been litigated (but not decided) in the PG&E PSEP proceeding (for which Mr. Long served as TURN's lead counsel). Mr. Long recorded just over 200 hours for his work in 2012, nearly all of which was associated with the PSEP phase. This represents the equivalent of 5-6 weeks of full-time work on the proceeding, a very reasonable amount given the complexity of the PSEP-related issues. In 2013, Mr. Long recorded very few hours, consistent with his very limited role in the TCAP phase of the proceeding. In 2014, Mr. Long recorded approximately 45 hours prior to the issuance of the final decision, all of which had to do with preparing the majority of TURN's comments on the Proposed Decision and developing and implementing TURN's ex parte communication strategy while the PD was pending before the Commission. In comparison, Mr. Finkelstein recorded approximately 13 hours in 2014, all of which involved his work on the PD, either directly on TCAP issues or consulting with Mr. Long regarding the PD's treatment of PSEP issues.

TURN has included in this request a very small number of hours associated with the work of two other TURN staff attorneys. Marcel Hawiger recorded approximately 15 hours in late 2011 and 2012 as Mr. Finkelstein and Mr. Long took advantage of his knowledge and experience developed in previous gas cost allocation proceedings and as one of TURN's counsel in the PG&E PSEP proceeding. Nina Suetake represented TURN at the prehearing conference due to scheduling conflicts, and recorded approximately 3 hours to prepare for and attend the prehearing conference in early 2012.

TURN submits that the recorded hours are reasonable, both as described above, as

set out in the attached hourly time records, and as demonstrated in the wide-ranging substantial contribution TURN made in this proceeding. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request.

JBS Energy:

JBS Energy played an important role in TURN's participation in both the PSEP phase and the TCAP phase of the proceeding. The TURN testimony in both phases was sponsored by William Marcus, Principal Economist at JBS. However, Mr. Marcus recorded a relatively small number of hours for his work in this proceeding, as he relied heavily on others in the firm to perform the underlying review and analysis to support the testimony. Jeff Nahigian performed this role in the PSEP phase, spending 170 hours (the equivalent of approximately five weeks of full-time work) in the development of the TURN testimony addressing, among other things, the utilities' cost estimating approach, the Valve Enhancement Plan, and technology enhancements.<sup>5</sup> John Sugar assumed this role in the TCAP phase, spending approximately 160 hours on the TURN testimony addressing marginal customer costs, PSEP cost allocation, and the proposed residential customer charge.<sup>6</sup> And Greg Ruszovan of the firm, whose specialties include data compilation and analysis, devoted approximately a week's time in June 2012 to providing critical assistance regarding data analysis of the utilities' pipe data to support Mr. Long's Phase 1 testimony.

TURN submits that the Commission should find reasonable all of the hours included in this request for compensation for the work of JBS Energy on this matter.

Review and preparation of comments on PD in R.11-02-019 transferring PSEP issues to TCAP: TURN has included in this request 8.0 hours recorded in April 2012 for work Thomas Long devoted to preparing TURN's comments on the proposed decision issued in R.11-02-019 regarding the transfer of review of the Sempra Utilities' PSEP to the TCAP application proceeding. As TURN noted in the request for compensation filed in R.11-02-019, Mr. Long's hours devoted to this work were excluded from that request.

Meetings or discussions involving more than one TURN attorney or expert witness:

A relatively small percentage of hours and hourly entries reflect internal and external meetings involving two or more of TURN's attorneys and expert witnesses.

<sup>5</sup> Testimony of William Marcus on PSEP Issues, June 19, 2012.

<sup>6</sup> Testimony of William Marcus on TCAP Issues, November 16, 2012, and Supplemental Testimony, December 7, 2012.

In past compensation decisions the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. TURN's attorneys met among themselves to develop and execute case strategy, and otherwise as necessary to coordinate their work on the different issues on which each had primary responsibility. For the meetings that were among TURN's attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN's strategy for this proceeding. None of the attendees are there in a duplicative role – each is an active participant, bringing his or her particular knowledge and expertise to bear on the discussions. As a result, TURN is able to identify issues and angles that would almost certainly never come to mind but for the “group-think” achievable in such settings.

There were also meetings with other parties at which more than one attorney represented TURN on occasion. The Commission should understand that this is often essential in a case such as this one, with a wide range of issues that no single person is likely to master. TURN's requested hours do not include any for a TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting's purpose. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

Compensation Request Preparation Time: TURN is requesting compensation for 19.25 hours devoted to compensation-related matters, primarily preparation of this request for compensation (18.75 hours). While higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the size and complexity of the request for compensation itself. The underlying proceeding was the equivalent of two separate applications, involving the review of the Sempra Utilities' PSEP proposal and then the more typical TCAP issues, compounded by the inter-class allocation of PSEP costs. TURN submits that had the two proceedings remained separate, the Commission could reasonably have expected to see two requests for compensation requiring approximately 12-15 hours each to prepare.

Mr. Finkelstein prepared this request for compensation because his extensive knowledge of all aspects of this proceeding, combined with his experience with major energy proceedings in general, would enable him to prepare the request in a more efficient manner than if it were prepared by one of the other attorneys. In addition, the request for compensation is due during a period when TURN's attorney ranks are temporarily depleted, so assigning the preparation work to another attorney with a lower hourly rate was not an option.

In sum, the Commission should find that the number of hours claimed is fully

reasonable in light of the complexity of the issues and TURN’s relative success on the merits.																						
<p><b>c. Allocation of hours by issue:</b></p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. Where relevant, TURN has generally indicated in the code whether the work was in the PSEP phase or the TCAP phase. The following codes relate to specific substantive issue and activity areas addressed by TURN.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>GP and GP T</td> <td>General Participation -- work that was essential to effective participation in the case and that would not vary with the number of issues that TURN addresses, for the most part. The designation “GP T” indicates GP work during the TCAP phase of the proceeding.</td> </tr> <tr> <td>GH and GH T</td> <td>General Hearing -- Hearing-related (preparation and participation), but not issue-specific. For the PSEP hearings, Mr. Finkelstein and Mr. Long divided up witness and cross-examination responsibilities and limited the time that both attorneys were in the hearing room at the same time. When such overlap occurred, TURN’s attorneys used the time in the hearing room to perform other substantive work (such as preparing for the next witness in queue), with the time recorded to the related substantive issue. The designation “GH T” indicates GH work during the TCAP phase of the proceeding.</td> </tr> <tr> <td>CR</td> <td>Cost responsibility and cost sharing issues (PSEP)</td> </tr> <tr> <td>RM</td> <td>Ratemaking issues including reasonableness review, advice letter proposal, memorandum account/retroactive ratemaking, AFUDC, and rates subject to refund (PSEP)</td> </tr> <tr> <td>Valve</td> <td>Issues related to proposed Valve Automation Program (PSEP)</td> </tr> <tr> <td>Cost</td> <td>Cost forecasting issues (PSEP), including quality of forecasts</td> </tr> <tr> <td>PC</td> <td>Proposed Case – specifics of the Sempra Utilities’ proposed case, such as accelerated miles and technology enhancement. (PSEP)</td> </tr> <tr> <td>TP</td> <td>Transfer PD – preparation of comments in R.11-02-019 on proposed decision transferring Sempra PSEP to the Sempra Utilities’ TCAP application proceeding.</td> </tr> <tr> <td>MCC</td> <td>Marginal Customer Cost (TCAP)</td> </tr> </tbody> </table>		Code	Description	GP and GP T	General Participation -- work that was essential to effective participation in the case and that would not vary with the number of issues that TURN addresses, for the most part. The designation “GP T” indicates GP work during the TCAP phase of the proceeding.	GH and GH T	General Hearing -- Hearing-related (preparation and participation), but not issue-specific. For the PSEP hearings, Mr. Finkelstein and Mr. Long divided up witness and cross-examination responsibilities and limited the time that both attorneys were in the hearing room at the same time. When such overlap occurred, TURN’s attorneys used the time in the hearing room to perform other substantive work (such as preparing for the next witness in queue), with the time recorded to the related substantive issue. The designation “GH T” indicates GH work during the TCAP phase of the proceeding.	CR	Cost responsibility and cost sharing issues (PSEP)	RM	Ratemaking issues including reasonableness review, advice letter proposal, memorandum account/retroactive ratemaking, AFUDC, and rates subject to refund (PSEP)	Valve	Issues related to proposed Valve Automation Program (PSEP)	Cost	Cost forecasting issues (PSEP), including quality of forecasts	PC	Proposed Case – specifics of the Sempra Utilities’ proposed case, such as accelerated miles and technology enhancement. (PSEP)	TP	Transfer PD – preparation of comments in R.11-02-019 on proposed decision transferring Sempra PSEP to the Sempra Utilities’ TCAP application proceeding.	MCC	Marginal Customer Cost (TCAP)	Verified.
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PA	PSEP Revenue Allocation (TCAP)
CustChg	SDG&E Proposed Residential Customer Charge
Settle	Work associated with the settlement of most TCAP issues other than PSEP allocation and SDG&E residential customer charge.
PD	Proposed Decision – work on reviewing and commenting on the Proposed Decision, and engaging in ex parte communications and other post-PD activities
Proc	Procedural -- Procedural matters (such as determining the proceeding to which review of the Sempra PSEP should be assigned), scheduling matters, common briefing outline. This category also includes time recorded in the last quarter of 2013 as TURN explored with SCGC options for updating the PSEP phase record with information regarding the Sempra Utilities’ recorded to-date spending.
Coord	Coordination with other parties -- meetings and e-mails with DRA and other intervenors about issue coverage, cross examination coordination etc.
Comp	Time devoted to compensation-related pleadings
#	<p>Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a small portion, approximately 7%, of the total hours. TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries as follows, based on the following percentages derived from the time TURN devoted to the major issues in the docket:</p> <p>Cost – 15%                  PC – 10%                  Ratemaking – 25%                  MCC–25%                  PA -- 25%</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable</p>

opportunity for TURN to supplement this showing accordingly.	
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**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein	2012	309.75	\$480	D.13-08-022	\$148,680	309.75	480.00	148,680.00
R. Finkelstein	2013	317.5	\$490	D.14-05-015	\$155,575	316 [1]	490.00	154,840.00
R. Finkelstein	2014	13.25	\$490	2013 Rate (See Comment 1)	\$6,492.50	13.25	490.00	6,492.50
Thomas Long	2011	3.75	\$520	D.13-05-007	\$1,950	3.75	520.00	1,950.00
T. Long	2012	204	\$530	D.13-10-065	\$108,120	203.75 [2]	530.00	107,987.50
T. Long	2013	1.5	\$555	D.14-05-015	\$832.50	1.5	555.00	832.50
T. Long	2014	45	\$555	2013 Rate (See Comment 1)	\$24,975	44.08 [3]	555.00	24,464.40
Marcel Hawiger	2011	2.25	\$350	D.12-05-034	\$787.50	2.25	350.00	787.50
M. Hawiger	2012	12.75	\$375	D.13-08-022	\$4,781.25	12.50 [4]	375.00	4,687.50
Nina Suetake	2012	3.25	\$315	D.13-08-022	\$1,023.75	3.25	315.00	1,023.75
William Marcus	2011	2.25	\$250	D.13-05-008	\$562.50	2.25	250.00	562.50
W. Marcus	2012	27.33	\$260	D.13-08-022	\$7,105.80	27.33	260.00	7105.80
W. Marcus	2013	31.43	\$265	D.14-05-015	\$8,328.95	31.43	265.00	8,328.95
W. Marcus	2014	0.5	\$265	2013 Rate (See Comment 1)	\$132.50	0.5	265.00	132.50
Jeff Nahigian	2012 (to 8/12)	164.75	\$195	D.13-08-022	\$32,126.25	164.75	195.00	32,126.25

**PROPOSED DECISION**

J. Nahigian	2012 (post 9/12)	0.75	\$200	D.13-08-022	\$150	0.75	200.00	150.00
John Sugar	2012 (to 8/12)	35.78	\$200	D.13-08-022	\$7,156	35.78	200.00	7,156.00
J. Sugar	2012 (post 9/12)	100	\$205	D.13-08-022	\$20,500	100.01 [5]	205.00	20,502.50
Greg Ruzovan	2012 (to 8/12)	34.97	\$195	D.13-08-022 (for work in 2011)	\$6,819.15	34.97	195.00	6,819.15
<b>Subtotal:</b>								
<b>\$536,098.65</b>						<b>Subtotal: \$534,629.30</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>Hours</b>	<b>Rate</b>	<b>Total \$</b>
R. Finkelstein	2012	0.5	\$240	½ of approved 2012 rate	\$120	0.5	\$240.00	120.00
R. Finkelstein	2014	18.75	\$245	½ of approved 2013 rate	\$4,593.75	18.75	\$245.00	4,593.75
<b>Subtotal: \$4,713.75</b>						<b>Subtotal: \$4,713.75</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
	Photocopying	Copies made of TURN pleadings and testimony for service, and of cross-examination exhibits for evidentiary hearings			\$471.20	\$471.20		
	Phone	Expenses for phone calls for this proceeding			\$8.47	\$8.47		
	Postage	Expenses for postage for this proceeding			\$59.91	\$59.91		
	Lexis/Nexis				\$446.59	\$446.59		
<b>Subtotal: \$986.17</b>						<b>Subtotal: \$986.17</b>		
<b>TOTAL REQUEST: \$541,798.57</b>						<b>TOTAL AWARD: \$540,329.22</b>		
**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all								

claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

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

<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>7</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation</b>
Thomas Long	December 1986	124776 <i>[corrected by the Commission]</i>	No
Robert Finkelstein	June 1990	146391	No
Marcel Hawiger	January 1998	194244	No
Nina Suetake	December 2004	234769	No

**C. Intervenor’s Comments on Part III**

<b>Comment #</b>	<b>Comment</b>
Comment 1	TURN is not requesting here that the Commission establish an hourly rate at the stated levels for 2014 for any of its attorneys or expert witnesses. At the time this request for compensation was submitted, the Commission had not yet determined the general “cost-of-living” adjustment for 2014. Therefore, TURN is using the \$490 hourly rate as a placeholder for whatever rate results from application of any general adjustment the Commission may adopt for 2014 to the previously authorized rate for work each attorney or expert witness performed in 2013.

**D. CPUC Disallowances and Adjustments:**

<b>Item</b>	<b>Reason</b>
[1]	On 11/18/2013, Finkelstein’s timesheet lists 1.5 hours spent discussing an “upcoming ex parte meeting.” When compared to the docket card for this proceeding, no notice of an ex parte meeting, within the vicinity of November 18, 2013, is found. As such,

<sup>7</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	TURN is not entitled to compensation for this work.
[2]	On 07/18/2012, Long’s timesheet indicates 0.25 hours were spent to “Scan Sempra rebuttal testimony.” The scanning of documents is clerical in nature and is not compensable by the Commission as such costs are factored into the rates granted to attorneys. 0.25 hours are deducted from Long’s 2012 award.
[3]	<p>On 05/06/2014, Long indicated 0.25 hours were spent in a phone call with Sepideh Khosrowjah, Commissioner Florio’s Chief of Staff. No ex parte notice mentions this conversation. The commission will not compensate TURN for this time.</p> <p>On 05/07/2014, Long indicated 0.75 hours were spent in an ex parte meeting with Commission Florio. While the ex parte notice was properly submitted, the notice indicated the meeting lasted for 0.5 hours. The Commission will not compensate TURN for the extra 0.25 hours.</p> <p>On 05/13/2014, Long indicated 0.75 hours were spent in an ex parte meeting with Commission Picker. While the ex parte notice was properly submitted, the notice indicated the meeting lasted for 0.5 hours. The Commission will not compensate TURN for the extra 0.25 hours.</p> <p>On 05/14/2014, Long indicated 0.50 hours were spent in an ex parte meeting with Commission Peevey. While the ex parte notice was properly submitted, the notice indicated the meeting lasted for 0.33 hours. The Commission will not compensate TURN for the extra 0.17 hours.</p> <p>For the above reasons, the Commission deducts 0.92 hours from Long’s 2014 award.</p>
[3]	On 01/04/2012, Hawiger’s timesheet indicates 0.5 hours were spent to “prepare and send DR 01 to Sempra.” The sending of documents is clerical in nature and is not compensable by the Commission as such costs are factored into the rates granted to attorneys. 0.25 hours are deducted from Hawiger’s 2012 award.
[4]	By the Commission’s calculations, Sugar worked 100.1 hours after September in 2012.

**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No.
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<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	Yes.
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**FINDINGS OF FACT**

1. The Utility Reform Network has made a substantial contribution to D.14-06-007.
2. The requested hourly rates for The Utility Reform Network’s representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$540,329.22.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. The Utility Reform Network is awarded \$540,329.22.
2. Within 30 days of the effective date of this decision, San Diego Gas and Electric Company and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2013 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning October 19, 2014, the 75<sup>th</sup> day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision is waived.
4. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D.14-06-0007		
<b>Proceeding(s):</b>	A.11-11-002		
<b>Author:</b>	ALJ Long		
<b>Payer(s):</b>	San Diego Gas and Electric Company, Southern California Gas Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
The Utility Reform Network	08/05/2014	\$541,798.57	\$540,329.22	No.	See Part III.D of this decision.

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Robert	Finkelstein	Attorney	The Utility Reform Network	\$480	2012	\$480
Robert	Finkelstein	Attorney	The Utility Reform Network	\$490	2013	\$490
Robert	Finkelstein	Attorney	The Utility Reform Network	\$490	2014	\$490

Thomas	Long	Attorney	The Utility Reform Network	\$520	2011	\$520
Thomas	Long	Attorney	The Utility Reform Network	\$530	2012	\$530
Thomas	Long	Attorney	The Utility Reform Network	\$555	2013	\$555
Thomas	Long	Attorney	The Utility Reform Network	\$555	2014	\$555
Marcel	Hawiger	Attorney	The Utility Reform Network	\$350	2011	\$350
Marcel	Hawiger	Attorney	The Utility Reform Network	\$375	2012	\$375
Nina	Suetake	Attorney	The Utility Reform Network	\$315	2012	\$315
William	Marcus	Expert	The Utility Reform Network	\$250	2011	\$250
William	Marcus	Expert	The Utility Reform Network	\$260	2012	\$260
William	Marcus	Expert	The Utility Reform Network	\$265	2013	\$265
William	Marcus	Expert	The Utility Reform Network	\$265	2014	\$265
Jeff	Nahigian	Expert	The Utility Reform Network	\$195	2012	\$195
Jeff	Nahigian	Expert	The Utility Reform Network	\$200	2012	\$200

John	Sugar	Expert	The Utility Reform Network	\$200	2012	\$200
John	Sugar	Expert	The Utility Reform Network	\$205	2012	\$205
Greg	Ruszovan	Expert	The Utility Reform Network	\$195	2012 to 8/2012	\$195