

Decision **PROPOSED DECISION OF ALJ DeANGELIS (Mailed 10/6/16)****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U 338-E) for Approval of the Results of Its 2013 Local Capacity Requirements Request for Offers for the Moorpark Sub-Area.	Application 14-11-016 (Filed November 26, 2014)
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**DECISION DENYING COMPENSATION TO WORLD BUSINESS ACADEMY**

<b>Intervenor: World Business Academy</b>	<b>For contribution to Decision (D.) 16-05-050</b>
<b>Claimed: \$110,524.00</b>	<b>Awarded: \$0.00</b>
<b>Assigned Commissioner: Michel P. Florio</b>	<b>Assigned ALJ: Regina DeAngelis</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.16-05-050 (“Decision”), which arose from an Alternate Proposed Decision (“APD”) by Commissioner Peterman, approved in part SCE’s application for approval of contracts to meet need for the Moorpark sub-area identified in Track 1 (D.13-02-015) of the 2012 Long Term Procurement Plan proceeding as a result of retirements of once-through-cooling facilities. The Decision approved contracts for the 262 MW Puente gas plant and 12 MW of preferred resources. The Decision did not approve an extended contract for the existing 54 MW Ellwood peaker and associated 0.5 MW of new energy storage, leaving the application open to consider the reliability need for these projects in a subsequent decision.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	<b>Claimant</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):	January 28, 2015	Verified
2. Other Specified Date for NOI:	N/A	
3. Date NOI Filed:	February 20, 2015	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:	None to date	Addressed herein.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		No, see discussion below in Part I.c..
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:	None to date	Addressed herein.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		No, see discussion below in Part I.c.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.16-05-050	Verified
14. Date of Issuance of Final Order or Decision:	June 1, 2016	Verified
15. File date of compensation request:	July 21, 2016	Verified
16. Was the request for compensation timely?		Yes

**C. Additional Comments on Part I:**

#	Intervenor's Comment(s)	CPUC Discussion
8, 12	<p>This request is the World Business Academy's ("Academy") third request for intervenor compensation. On October 16, 2015, the Administrative Law Judge ("ALJ") Division issued a Proposed Decision ("PD") denying with prejudice the application of the Academy for intervenor compensation in connection with the Commission's Decision Approving Settlement Agreement as Amended and Restated by Settling Parties, issued on November 25, 2014 ("the 11/25/14 Decision"). That PD was riddled with serious misrepresentations and factual errors, and on November 2, 2015, the Academy submitted a detailed and substantive set of Comments rebutting these errors.</p> <p>Notwithstanding the Academy's compelling arguments against the validity of that PD, the Commission adopted a Decision (D.15-11-034) on November 19, 2015 that essentially followed the PD. That Decision included just over a page of additional language (at pages 7-9) purporting to respond to the Academy's November 2 Comments. This additional language takes the Academy to task for seeking, in its Comments, to justify its eligibility for Intervenor Compensation as a "Category 3" customer, rather than as a "Category 1" customer, which was the Academy's original justification (a justification, by the way, which the assigned ALJ in the proceeding, Melanie Darling, specifically found to be legitimate in her July 12, 2013 e-mail to the Academy's attorney at the time. The new language in D.15-11-034 also stated that: "WBA's assertion that it is an eligible Category 3 customer is untimely."</p> <p>In view of the fact that D.15-11-034 was legally erroneous, as well as a violation of the Academy's due process rights, on December 21, 2015, the Academy timely filed an Application for Rehearing of D.15-11-034. To date, nearly seven months later, the Commission has not yet acted on the Academy's Application for Rehearing. Attached to that Application for Rehearing was a Revised and Restated Notice of Intent to Claim Intervenor Compensation in which the Academy provided a thorough and convincing case that the Academy falls squarely within the category of environmentally oriented groups whom the Commission has</p>	<p>World Business Academy (WBA) is ineligible for intervenor compensation in this proceeding. Based on WBA's NOI filing on February 20, 2015, in this proceeding and in I. 12-10-013, WBA is not a "customer" as defined by Code Section 1802(b). WBA is not a Category 1 customer, as it has not shown that it represents the interests of residential or small business customers. WBA is also not a Category 3 customer, as its submitted bylaws do not meet the requirements. It has also not shown "significant financial hardship" as defined by Code Section 1802(g) as it has not submitted the required financial documents. (See also D. 16-05-059, which denied rehearing of D. 15-11-034) WBA is therefore ineligible to seek compensation.</p> <p>WBA's Revised and Restated NOI to seek Intervenor Compensation was filed on July 22, 2016. This NOI presents new facts and arguments distinct from those presented in its original NOI, filed February 20, 2015. Although this amended NOI (filed July 21, 2016) is untimely for Phase I, it will be utilized to consider WBA's intervenor compensation</p>

	<p>consistently found in the past to be eligible to apply for intervenor compensation under Category 3.</p> <p>Because the Commission has not yet acted on the Academy's Application for Rehearing, the Academy is filing, contemporaneously with this Claim, a Motion for Acceptance of Revised and Restated Notice of Intent to Seek Intervenor Compensation, in which the Academy provides persuasive evidence that it qualifies for Category 3 customer status consistent with the requirements of Pub. Util. Code § 1802(b), and that the Academy has demonstrated significant financial hardship consistent with the requirements of Pub. Util. Code § 1802(g).</p> <p>Hence, the Commission can and should find in <b><u>this</u></b> proceeding that the Academy qualifies for Category 3 customer status consistent with the requirements of Pub. Util. Code § 1802(b), and that the Academy has demonstrated significant financial hardship consistent with the requirements of Pub. Util. Code § 1802(g).</p>	<p>eligibility going forward in this proceeding.</p>
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**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>The Academy's substantial contribution in this case relates to its unique role in protesting and providing evidence to demonstrate that SCE's Application in this matter did not support Commission approval of the a proposed contract between SCE and NRG for the refurbishment of the existing 54-MW Ellwood gas-fired peaker.</p> <p>Rather, the Academy argued and presented evidence that SCE should and could meet the identified local</p>	<p>Protest of the World Business Academy, dated January 12, 2015</p> <p>Testimony of Rinaldo S. Brutoco, President of the World Business Academy, dated April 8, 2015</p> <p>Testimony of Robert Perry, Director of Energy Research, World Business Academy, dated April 8, 2015</p>	<p>Whether Intervenor substantially contributed is not addressed because interenor fails to demonstrate eligibility.</p>

<p>capacity needs with advanced, versatile technologies, like fuel cell-powered microgrids, which are much more compatible with California's clean energy future than the antiquated, dirty gas-fired resources that SCE proposed to procure in this application.</p> <p>The Commission's finding, in Finding of Fact 15 of D.16-05-050 that: "The record is incomplete regarding evaluation of the reliability need for the Ellwood contract and whether the Ellwood contract is the best way to meet any such need," as well as its decision not to approve the proposed Ellwood contract in that Decision, is a direct and proximate result of the Academy's active participation on this issue.</p> <p>A recitation of the Table of Contents of the Testimony of Academy witness, Robert Perry is an apt summary of the substance of the evidence that the Academy presented on this point:</p> <p>"II. SCE'S PROPOSED REFURBISHMENT OF THE ELLWOOD PLANT DOES NOT MEET THE IDENTIFIED LCR NEED</p> <p>"III. SCE'S PROPOSED REFURBISHMENT OF THE ELLWOOD PLANT WILL POSE SERIOUS ADVERSE ENVIRONMENTAL HAZARD</p> <p>"IV. THE DISTRIBUTED ALTERNATIVE PROJECT THAT THE COMMISSION SHOULD DIRECT SCE TO PROCURE</p>	<p>Testimony of Professor Scott Samuelsen on Behalf of the World Business Academy, dated April 8, 2015</p> <p>Opening Brief of the World Business Academy, dated July 22, 2015</p> <p>Reply Brief of the World Business Academy, dated August 5, 2015</p> <p>Comments of the World Business Academy in Opposition to Commissioner Florio's Proposed Alternate Decision</p>	
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<p>V. THE ACADEMY’S DISTRIBUTED ALTERNATIVE PROJECT IS MORE COST EFFECTIVE THAN SCE’S PROPOSED GAS TURBINES</p> <p>Of equal relevance to the Commission’s ultimate decision on the proposed Ellwood contract in D.16-05-050 is this brief excerpt from the Testimony of Academy witness, Rinaldo S. Brutoco:</p> <p>“Q: Is there a better LCR solution for the Santa Barbara ENA than what SCE has proposed in its Application in this proceeding?  “A: There most certainly is a better solution. The discussion above demonstrates that the Santa Barbara ENA faces unique challenges requiring a distributed solution outside of the traditional transmission grid planning paradigm. Functionally, the Santa Barbara ENA exists in a virtual peninsula, with one tenuous connection to the high-voltage regional grid, and with an inadequate alternative source when that tenuous connection is eventually severed.  “Given the extreme and exigent circumstances described above, the only true solution for providing the Santa Barbara ENA with reliable power is to develop local distributed power generation and storage facilities utilizing fuel cell and battery technologies in tandem with</p>		<p>Whether Intervenor substantially contributed is not addressed because interenor fails to demonstrate eligibility.</p>
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large-scale development of renewable resources (*i.e.*, the massive deployment of PV as quickly as possible as a primary energy source with a parallel development of fuel cells and storage to reliably and effectively integrate that solar energy into the grid in an environmentally superior manner).”

It is worth noting that, consistent with the position taken by the Academy during the proceeding, the January 11, 2016 Proposed Decision of ALJ Regina DeAngelis recommended that the Ellwood contract not be approved, because it was not possible to establish, based on the record adduced to that point, that said contract was reasonable.

However, in an alternate issued that same day, Assigned Commissioner Mike Florio proposed to approve the Ellwood contract on the grounds that it was a “necessary component in addressing reliability needs in the Goleta area.” (Alt. P.D., at 18)

In its Comments on the PDs, the Academy strenuously objected to the Florio Alternate by pointing out the numerous factual, legal and policy errors that it contained with regard to its proposed approval of the Ellwood contract.

Ultimately, on Feb. 13, 2016,

Commissioner Peterman issued her own Alternate PD, which found, in Finding of Fact # 6 that: “The record is incomplete regarding evaluation of the reliability need for the Ellwood contract and whether the Ellwood contract is the best way to meet any such need.” This Finding reflected the underlying concerns that were at the core of the Academy’s participation in this proceeding, and was identical in its wording to Finding of Fact # 15 in D.16-05-050 as ultimately adopted by the Commission.

In sum, there was no other party to this proceeding that took such an active role in raising the question as to whether there were other reasonable alternatives to the proposed Ellwood refurbishment – a question that the D.16-05-050 explicitly acknowledged in determining that the Commission should take a serious, further look into this question before approving the Ellwood contract. There can therefore be no doubt that the Academy’s efforts in this proceeding did, in fact, make a significant contribution to D.16-05-050.

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

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b>	yes	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	yes	Verified
<b>c. If so, provide name of other parties: ORA, CEJA</b>		Verified
<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>The Academy avoided duplication with ORA and CEJA, whose efforts focused primarily on the proposed contract between SCE and NRG for the much larger Puente plant in Oxnard, which was also a subject of this proceeding. The Academy trusted ORA, CEJA and the City of Oxnard to address the issues raised by the proposed Puente contract, and other than mentioning those issues in its initial Protest in this case, the Academy's efforts during the course of the proceeding were focused exclusively on the proposed Ellwood refurbishment, a fact that can be said of none of the other parties to the proceeding. The Academy's restriction of its efforts in this case to the issues raised by the proposed Ellwood refurbishment demonstrates the Academy's commitment to avoid duplication of effort in this proceeding.</p>		Whether duplication existed is not addressed because intervenor is ineligible for compensation for failure to establish customer status under § 1802(b).

**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>During the course of this proceeding, the Academy only undertook tasks or activities that it deemed necessary to be able to make an effective presentation of its core concern to decision-makers, specifically, that the proposed contract for the refurbishment of the 54-MW Ellwood plant should not be approved. This involved the preparation of extensive testimony, motions, attendance at hearings, the preparation of briefs and negotiations with various other parties to explore possible settlement options.</p>	<p><b>CPUC Discussion</b></p> <hr/> <p>The reasonableness of costs are not addressed because intervenor is ineligible for</p>
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<p>All of Academy's tasks were reasonably calculated to achieve its core interest in this proceeding and all bear a reasonable relationship to the ultimate outcome it has sought in this proceeding, namely, for the Commission not to approve the proposed contract for the Ellwood refurbishment, because there are other, better and more cost-effective ways to solve the existing reliability problem in the Goleta sub-area.</p> <p>All of the Academy's attorney time, as reflected in Attachment 1, and its staff time, as reflected in Attachment 2, were indispensable parts of the team that the Academy assembled in order to be able to make its case in this proceeding. The Academy's ultimate request for compensation of <b>\$110,524.00</b> is reasonable in light of the complexity and difficulty of pulling together the highly sophisticated technical, economic and policy evidence and legal arguments that supported the Academy's efforts to make the case that the proposed Ellwood refurbishment project and its associated contract should not be approved.</p> <p>Finally, the eminent Scott Samuelsen, Professor of Mechanical, Aerospace, and Environmental Engineering at the University of California, Irvine, provided his Testimony on behalf of the Academy at no cost to the Academy, and the Academy is not seeking reimbursement for Professor Samuelsen's efforts on its behalf.</p>	<p>compensation for failure to establish customer status under § 1802(b).</p>
<p><b>b. Reasonableness of hours claimed:</b></p> <p><u>Attorneys</u>                  The Academy takes seriously its responsibility to California's ratepayers as an intervenor. Its hours are reasonable and reflect conscientious efforts to limit the expenses associated with participation to solely those topics pertinent to the Academy's key concerns. The Academy reviewed all relevant filings, as is necessary to competently participate in the proceeding, but limited its active participation to only one attorney. The Academy avoided excessive billing of attorney time by substantially limiting its participation to one key issue in the case, namely, the reasonableness of the proposed Ellwood refurbishment. The hours spent by the Academy's attorney to research and draft the documents submitted in this proceeding and to support the development of the Academy's testimony are reasonable and within the customary range for projects of similar complexity and scope.</p>	<p>The reasonableness of hours claimed is not addressed based on finding that intervenor is ineligible for compensation for failure to establish customer status under § 1802(b).</p>

Academy Staff

The time billed by Academy staff were all directly related to the production of evidence that the Academy ultimately did present in this proceeding.

Robert Perry, the Academy's Director of Energy Research, spent the largest amount of time on this case, both in reviewing materials filed by other parties to the proceeding, in researching the technical and economic feasibility -- and the environmental superiority -- of alternative generation technologies that could substitute for the gas peakers proposed for approval, including fuel cells, various storage technologies, the optimal locations for siting solar facilities in Santa Barbara County, as well as the social costs of carbon. Mr. Perry also prepared extensive testimony showing that the proposed Ellwood refurbishment made no sense from a technical or economic standpoint, and that there were feasible and cost-effective non-carbon-emitting generation technologies that could easily substitute for the proposed Ellwood refurbishment.

Rinaldo S. Brutoco, the Academy's President, also prepared extensive testimony that focused on the larger policy implications of allowing projects like the Ellwood refurbishment to go forward. Mr. Brutoco also led the Academy's overall effort in this proceeding, overseeing the work of the rest of the Academy staff and providing policy direction and support to the Academy's attorney.

Matt Renner, the Academy's Executive Director, who is situated in Northern California, was of particular value in being able to attend, along with the Academy's lawyer, Mr. Chaset, various ex parte meetings in this matter that took place (and were duly noticed to the service list) with a number of the Commissioners' offices over the course of the proceeding.

<p><b>c. Allocation of hours by issue:</b></p> <p>The timesheets included in Attachment 2 demonstrate that all of the Academy's efforts in this proceeding were associated with one single issue from among the six issues that were set forth in the March 13, 2015 Scoping Memo specifically, Issue 6: "Is the 54 MW Ellwood Refurbishment project appropriate for the Commission to consider in this proceeding and, if so, is the contract reasonable?"</p> <p>The Academy devoted no time to any other issue that was raised in the proceeding and seeks no intervenor compensation in connection with any other issue.</p>	<p>The reasonableness of hours claimed is not addressed based on finding that intervenor is ineligible for compensation for failure to establish customer status under § 1802(b).</p>
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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 \$
L. Chaset	2014	3.6	\$370/hr	Res. ALJ-281	\$ 1,332.00	0	\$0.00	\$0.00
L. Chaset	2015	66.4	\$380/hr	Res. ALJ-281	\$ 25,232.00	0	\$0.00	\$0.00
L. Chaset	2016	22.9	\$390/hr	Res. ALJ-281	\$ 8,931.00	0	\$0.00	\$0.00
R. Brutoco	2014-16	28.1	\$400/hr	Mr. Brutoco has no prior adopted rate. This rate complies with the law. See Resolution ALJ- 287, P.U.C. Section 1806 and D08-04-010. See also Attachment	\$ 11,240.00	0	\$0.00	\$0.00

				4 for more information supporting the basis for Mr. Brutoco's requested rate.				
J. Brown	2014-16	38.2	\$320/hr	Dr. Brown has no prior adopted rate. This rate complies with the law. See Resolution ALJ- 287, P.U.C. Section 1806 and D08-04-010. See also Attachment 4 for more information supporting the basis for Dr. Brown's requested rate.	\$ 12,224.00	0	\$0.00	\$0.00
R. Perry	2014-16	139.9	\$320/hr	Mr. Perry has no prior adopted rate. This rate complies with the law. See Resolution ALJ- 287, P.U.C. Section 1806 and D08-04-010. See also Attachment 4 for more information supporting the basis for Mr. Perry's requested rate.	\$ 44,768.00	0	\$0.00	\$0.00

M. Renner	2015-16	10.0	\$320/hr	Mr. Renner no prior adopted rate. This rate complies with the law. See Resolution ALJ- 287, P.U.C. Section 1806 and D08-04-010. See also Attachment 4 for more information supporting the basis for Mr. Renner's requested rate.	\$ 3,200.00	0	\$0.00	\$0.00
<b>Subtotal: \$106,927.00</b>						<b>Subtotal:\$0.00</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>
L. Chaset	2015	3.4	\$190/hr	50% of rate	\$ 633.00	0	\$0.00	\$0.00
L. Chaset	2016	15.2	\$195/hr	50% of rate	\$ 2,964.00	0	\$0.00	\$0.00
<b>Subtotal: \$3,597.00</b>						<b>Subtotal:\$0.00</b>		
<b>TOTAL REQUEST: \$110,524.00</b>						<b>TOTAL AWARD: \$0.00</b>		
<p>*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.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate</p>								

<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>12</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>
Laurence Chaset	June 1976	68750	NO

**D. CPUC Disallowances and Adjustments:**

<b>Item</b>	<b>Reason</b>
A	WBA is ineligible to seek intervenor compensation for Phase 1. See Discussion in Part B.

**PART IV: OPPOSITIONS AND COMMENTS**

<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>	No
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<b>Party</b>	<b>Comment</b>	<b>CPUC Discussion</b>
World Business Academy	World Business Academy (WBA) filed comments asserting that the Commission should treat WBA's NOI filed on July 22, 2016 as having been filed on February 20, 2015, in order to utilize the new NOI for purposes of reviewing eligibility to receive compensation for participation related to D.16-06-050.	The Commission analyzed WBA's comments and decided not to utilize WBA's July 22, 2016 NOI to consider its eligibility to claim compensation for D. 16-05-050.

<sup>1</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

**FINDINGS OF FACT**

1. World Business Academy does not qualify as a Category 1 or Category 3 “customer” as defined by Pub. Util. Code § 1802(b).
2. World Business Academy has not provided required financial documents to show “significant financial hardship” as defined by Pub. Util. Code § 1802(g).
3. Comments were filed by World Business Academy. No adjustments were made to the award based on these comments.

**CONCLUSION OF LAW**

1. The Claim does not satisfy all requirements of Pub. Util. Code §§ 1801-1812.
2. World Business Academy is ineligible to seek intervenor compensation for contribution to Decision 16-05-050, because it is not a customer under the applicable law.
3. World Business Academy’s February 20, 2015 NOI is denied based on the Commission’s findings in D.15-11-034.
4. World Business Academy’s July 22, 2016 NOI is denied as untimely under applicable law.

**ORDER**

1. The World Business Academy’s request for compensation is denied.
2. The comment period for today’s decision is not waived.
3. This decision is effective today.

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

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

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D1605050		
<b>Proceeding(s):</b>	A14011016		
<b>Author:</b>	ALJ DeAngelis		
<b>Payer(s):</b>	N/A		

**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>
World Business Academy	July 21, 2016	\$110,524.00	\$0.00	N/A	Ineligible for Intervenor Compensation

**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>
Laurence	Chaset	Attorney	World Business Academy	\$370.00	2014	\$0.00
Laurence	Chaset	Attorney	World Business Academy	\$380.00	2015	\$0.00
Laurence	Chaset	Attorney	World Business Academy	\$390.00	2016	\$0.00
Rinaldo	Brutoco	Expert	World Business Academy	\$400.00	2014	\$0.00
Rinaldo	Brutoco	Expert	World Business Academy	\$400.00	2015	\$0.00

Rinaldo	Brutoco	Expert	World Business Academy	\$400.00	2016	\$0.00
Jerald	Brown	Expert	World Business Academy	\$320.00	2014	\$0.00
Jerald	Brown	Expert	World Business Academy	\$320.00	2015	\$0.00
Jerald	Brown	Expert	World Business Academy	\$320.00	2016	\$0.00
Matt	Renner	Expert	World Business Academy	\$320.00	2015	\$0.00
Matt	Renner	Expert	World Business Academy	\$320.00	2016	\$0.00
Robert	Perry	Expert	World Business Academy	\$320.00	2014	\$0.00
Robert	Perry	Expert	World Business Academy	\$320.00	2015	\$0.00
Robert	Perry	Expert	World Business Academy	\$320.00	2016	\$0.00

**(END OF APPENDIX)**