

Decision 17-11-032 November 30, 2017

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

Order Instituting Rulemaking to Adopt Rules and Procedures Governing Commission-Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leakage Consistent with Senate Bill 1371.

Rulemaking 15-01-008

**DECISION GRANTING INTERVENOR COMPENSATION TO THE UTILITY REFORM NETWORK FOR CONTRIBUTION TO D.17-06-015**

<b>Intervenor:</b> The Utility Reform Network (TURN)	<b>For contribution to Decision (D.) 17-06-015</b>
<b>Claimed:</b> \$39,517.96	<b>Awarded:</b> \$38,325.46
<b>Assigned Commissioner:</b> Clifford Rechtschaffen	<b>Assigned ALJ:</b> Colette Kersten

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.17-06-015 implemented the requirements of SB 1371 by adopting: 1) reporting requirements for tracking methane emissions, 2) twenty-six mandatory best practices in the area of natural gas leak detection, leak repair and leak prevention, 3) cost recovery mechanisms, and 4) a process for developing biennial compliance plans to be submitted starting in 2018. The Commission set a scope for Phase 2 of this rulemaking to continue technical work on emissions reporting, compliance plans, data collection, cost effectiveness analysis, performance metrics, and several other outstanding issues.
--	--

**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:	06/08/2015	Verified
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	07/08/2015	Verified
4. Was the NOI timely filed?		Yes.
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4)):</b>		
5. Based on ALJ ruling issued in proceeding number:		TURN customer status is stated in R.14-05-001.
6. Date of ALJ ruling:		09/05/2014
7. Based on another CPUC determination (specify):	See Comment #1	See Commission discussion on Comment #1.
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b))</b>		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001	Verified
10. Date of ALJ ruling:	09/05/2014	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.17-06-015	Verified
14. Date of issuance of Final Order or Decision:	06/19/2017	Verified
15. File date of compensation request:	08/18/2017	Verified
16. Was the request for compensation timely?		Yes.

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

#	Intervenor’s Comment(s)	CPUC Discussion
Comment 1	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding and thus its request for eligible customer status. As explained in the Commission’s Intervenor Compensation guide, “normally, an ALJ Ruling need not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g); (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN’s NOI.	In order to be eligible to seek compensation, an entity must prove customer status. In this instance, customer status for TURN was found in R.14-05-001 along with their proof of financial hardship.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059).**

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. Cost Effectiveness Consideration</p> <p>TURN supported the use of cost effectiveness criteria to focus adoption of those practices that provide the greatest reduction in methane per dollar spent.</p> <p>While the Commission found that there is no statutory threshold requirement of cost-effectiveness, both cost and affordability should be important considerations in choosing best practices.</p> <p>The Commission found that collection of data will allow for consideration of cost effectiveness in future</p>	<p>TURN Reply Comments, Dec. 4, 2015, p. 3-6.</p> <p>TURN Comments, May 6, 2016, p. 2-4.</p> <p>TURN Reply Comments, Dec. 9, 2016, p. 4-6.</p> <p>TURN Presentation, Nov. 3, 2016, p. 6.</p> <p>D.17-06-015, pp. 44-46 (summary of TURN position); 48 (“we also agree with TURN that costs and ratepayer affordability are important considerations to keep in mind when developing best practices.”); 50 (“cost-effectiveness is an important factor to consider in the analysis of the Best Practices as implemented (including</p>	<p>Verified</p>

<p>refinements to Best Practices.</p>	<p>pilot projects and other specified flexibility measures) to determine whether refinements to the Best Practices are needed.”);51-52 (“With the implementation of the program and the required reporting to be submitted in 2020, Commission Staff will have sufficient additional information to evaluate the cost-effectiveness of each individual compliance plan and best practices.”); p. 72-73 (“Because not enough is known at this time about the full cost of many Best Practices or their ultimate effectiveness in reducing methane, the utilities are provided with significant flexibility to put their efforts and resources toward the most promising Best Practices, while allowing for continued research and/or pilot programs where appropriate.”)</p>	
<p>2. Best Practices – General</p> <p>TURN supported the best practices proposed by SED as a result of the working group process.</p> <p>The Commission amended some of the proposed best practices, but agreed that SB 1371 does not require mandating the same set of Best Practices to be implemented by each gas corporation without any flexibility.</p>	<p>TURN Comments, February 10, 2017, p. 1-2.</p> <p>D.17-06-015, p. 66 (“SB 1371 does not state that the Commission must require each operator under its jurisdiction to implement the same detailed set of mandatory Best Practices, as CUE and EDF contend, with little or no ability to tailor the Best Practices to fit an operator’s unique system or to phase in or pilot Best Practices as warranted (ibid. at 2). “); 67-68 (“While we support increased stringency for the Best Practices, we also support some needed flexibility provisions in the Best Practices that allow utilities to submit requests and justification for exemption or modification of specific Best Practices as appropriate.”);</p>	<p>Verified</p>

<p>3. Best Practices – Lead Surveys (BP 15)</p> <p>TURN argued that BP 15 should not be mandated, but additional data should be gathered to analyze the relative effectiveness of different leak survey methods.</p> <p>The Commission adopted BP 15 as a mandatory best practice, but with allowable leak detection alternatives, and the Commission found that collecting more data as recommended by TURN may justify modifications in the future.</p>	<p>TURN Comments, May 6, 2016, p. 5-7. TURN Comments, Feb. 10, 2017, p. 2-4.</p> <p>D.17-06-015, p. 64-65 (summary of TURN position); 78-79 (“This leak detection Best Practice establishes a requirement for leak survey intervals of three years for all distribution pipelines formerly under the five-year leak survey requirement, unless the utility can justify more effective leak survey cycles at a less frequent interval using a risk assessment approach.”); 80 (“we believe TURN’s suggestion will help us determine an appropriate future mandatory leak survey frequency for distribution mains and service pipelines.”).</p>	<p>Verified</p>
<p>4. Cost Recovery</p> <p>TURN opposed the authorization of balancing accounts due to the difficulty of segregating costs that may be duplicative of costs presently authorized in rate cases; and TURN opposed the authorization of memorandum accounts due to the fact that these costs were not new and unanticipated.</p> <p>The Commission authorized the establishment of two-way balancing accounts for best practice implementation, and one-way balancing accounts for certain pilot and R&amp;D activities. The Commission ordered the utilities to submit Tier 3 advice letters by</p>	<p>TURN Comments, Dec. 9, 2016, p. 2-3</p> <p>D.17-06-015, p. 129-130 (summary of TURN position);</p> <p>D.17-06-015, p. 131-135.</p>	<p>Verified</p>

<p>October 31, 2017 to determine forecasts and caps for the balancing accounts.</p> <p>The Commission modified the language in OP 11 consistent with TURN’s recommendation that no forecast be adopted until approval of the compliance plans.</p>	<p>TURN Comments on PD, June 5, 2017, p. 4-5.</p> <p>D.17-06-015, p. 142-143.</p>	
<p>5. Participation in Best Practice Working Groups</p> <p>Pursuant to direction in the Scoping Memo, staff convened a “Best Practices Working Group” to provide input regarding potential best practices that would meet the requirements of SB 1371. The BPWG met several times in 2015-2016.</p> <p>TURN criticized the best practices proposed in the first SED Report (March 2016), and supported the best practices recommended by SED in the December 2016 report following work in the Best Practices Working Group. These recommendations were influenced by stakeholder participation in numerous working groups. TURN’s contribution to the final recommendations is reflected in the differences between the SED best practices proposals from early 2016 to late 2016.</p>	<p>TURN Comments, May 6, 2016.</p> <p>TURN Comments, February 10, 2017, p. 1-2.</p> <p>D.17-06-015, pp. 55-57, 126-127.</p>	<p>Verified</p>

**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>	<b>Yes</b>	Verified.
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	<b>Yes</b>	Verified.
<b>c. If so, provide name of other parties:</b> Some of TURN’s positions were aligned with the positions of the utilities.		Verified
<b>d. Intervenor’s claim of non-duplication:</b> TURN's compensation in this proceeding should not be reduced for duplication of the showings of other parties. In a proceeding involving multiple participants, it is virtually impossible for TURN to completely avoid some duplication of the work of other parties. In this case, TURN took reasonable steps to keep such duplication to a minimum, and to ensure that when it did happen, our work served to complement and assist the showings of the other parties.  In this proceeding TURN was often the only intervenor representing the economic and safety interests of small bundled service customers. ORA was the only other consumer representative actively participating in the proceeding, and while our efforts sometimes overlapped to a limited degree, our showings were largely complementary. The other primary intervenors – EDF and CCUE – promoted increased utility investments in methane detection and leak avoidance strictly due environmental or job creation benefits.  Any incidental duplication that may have occurred here was more than offset by TURN’s unique contribution to the proceeding. Under these circumstances, no reduction to our compensation due to duplication is warranted given the standard adopted by the Commission in D.03-03-031.		Verified

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

<b>#</b>	<b>Intervenor’s Comment</b>	<b>CPUC Discussion</b>
A.3 and A.4	<u>Partial Success</u>  The statutory definition of “substantial contribution” in Section 1802 of the PU Code states that a contribution results because the Commission “has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or	Noted

	<p>procedural recommendations presented by the customer.”</p> <p>The Commission has interpreted the “in whole or in part” provision, in conjunction with Section 1801.3, so as to effectuate the legislature’s intent to encourage effective and efficient intervenor participation. The Commission has established as a general proposition that when a party makes a substantial contribution in a multi-issue proceeding, it is entitled to compensation for time and expenses even if it does not prevail on some of the issues. See, for example, D.98-04-028; D.98-08-016, pp. 6, 12; D.00-02-008, pp. 4-7, 10.</p> <p>The standard for an award of intervenor compensation is whether TURN made a substantial contribution to the Commission’s decision, not whether TURN prevailed on each and every issue. For example, the Commission recognized that it “may benefit from an intervenor’s participation even where the Commission did not adopt any of the intervenor’s positions or recommendations.” See, D.08-04-004, pp. 5-6. See, also, D.09-04-027, p. 4; D.10-06-046, p. 5.</p> <p>The Commission should compensate TURN for all work in this proceeding, despite the fact that the Commission rejected TURN’s primary recommendation regarding BP 15 and cost recovery.</p>	
<p>A.5.</p>	<p><u>Participation in Working Groups</u></p> <p>The Commission has encouraged the use of working groups to resolve complex issues among multiple stakeholders (D.96-08-040, 67 CPUC 2d 562, 568); and has held that compensation for working group activities is consistent with these goals. D.97-02-047, mimeo. p. 2.</p> <p>Staff convened the Best Practices Working Group (BPWG) pursuant to direction in the Scoping Memo (p. 13-14) in this rulemaking.</p>	<p>Noted</p>

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<b>a. Intervenor’s claim of cost reasonableness:</b>	<b>CPUC Discussion</b>
<p>Phase 1 of this rulemaking addressed technical and policy issues and did not involve specific cost forecasts or cost authorization. Thus, it is not possible to quantify the economic benefits of TURN’s participation. However, TURN’s participation and substantial contributions should provide both economic and environmental benefits to utility customers by promoting consideration of cost effectiveness in the selection of best practices, by furthering appropriate and effective leak detection best practices, and by promoting transparency in future cost recovery. TURN submits that the value of our participation in this Phase 1 warrants the relatively modest expenditure of resources claimed in this request.</p>	<p>Verified</p>
<p><b>b. Reasonableness of hours claimed:</b>                      TURN devoted a total of 81.50 attorney hours and 20.73 expert hours in this Phase 1 of the rulemaking. TURN suggests that given the scope of the issues covered during over two-years of workshops and litigation, this is an extremely small amount of time requested for compensation.</p> <p>Indeed, TURN actively minimized our role in this proceeding by attending only a few of the workshops and focusing our efforts on addressing primarily the issue of cost effectiveness, and best practices related to leak survey and leak detection.</p> <p>Almost all of the attorney hours in this proceeding were due to the work of TURN’s lead attorney, Marcel Hawiger. Mr. Hawiger has been a staff attorney with TURN since 1998. Mr. Hawiger has been the lead attorney on multiple proceedings, including several proceedings addressing natural gas infrastructure and gas pipeline O&amp;M and capital investments.</p> <p>In this proceeding, Mr. Hawiger was responsible for all litigation and working group activities.</p> <p>TURN expert Eric Borden provided limited technical assistance and coverage in 2015 for one working group meeting.</p> <p>Mr. John Sugar of JBS Energy provided some limited technical assistance concerning leak survey methods. Mr. Sugar had covered this area in prior PG&amp;E rate cases.</p>	<p>The Commission agrees that the amount of hours claimed is generally reasonable, though some specific activities have been disallowed, <i>see</i> part III, section C, CPUC Disallowances and Adjustments.</p>
<p><b>c. Allocation of hours by issue:</b></p> <p>TURN uses a combination of activity and issue codes when itemizing the hourly work performed by attorneys and consultants. The main activity codes used for time accounting in this proceeding include the following:</p>	<p>The 81 hours summarized by TURN to the left excludes 0.5</p>

<b>Code</b>	<b>Description</b>	<b>Attorney Hours</b>	<b>Expert Hours</b>	attorney hours encountered elsewhere within this document.
GP	General work necessary for participation which does not necessarily vary with the number of issues	12.75	5.75	
#	Work covering multiple issues that cannot be easily segregated	5.75	0	
c/e	Cost effectiveness methodology for evaluating leak reduction	28.25	0	
BP	Evaluation of best practices, with focus on leak survey and leak repair	16.25	8.73	
BPWG	Participation at workshops re. best practices (best practice working group)	18	6.25	
<b>Total</b>		<b>81</b>	<b>20.73</b>	

Some of the daily work in this proceeding spanned multiple issues and could not be separately coded by issue. TURN generally used the activity code “#” to denote work that covers multiple issues and cannot be easily allocated to specific issues.

Some work is fundamental to active participation in a Commission proceeding, and may not be allocable by issue and/or the amount of time required may not vary by the number of issues. Examples of these tasks include reviewing other parties’ testimony and filings, reviewing the proposed and any alternate decision; attending prehearing conferences and ex parte meetings; and preparing compensation filings. TURN uses the activity code “GP” to represent such general participation time that is not allocable by issue.

Based on a review of the actual daily time sheets, a review of TURN’s testimony and pleadings, and personal recollection by the attorney of record, TURN provides the following approximate allocation of time by the major issues addressed by TURN in this proceeding:

<b>Issue</b>	<b>Description of Issue</b>	<b>% of Time</b>
c/e	Cost effectiveness methodology for evaluating leak reduction	40%
CR	Cost recovery - Balancing and memorandum account	10%

<p>Leak Survey BP</p> <p>Frequency of leak survey cycle (BP 15)</p> <p>Other issues related to best practices for leak survey, leak detection and leak repair</p> <p>30%</p> <p>20%</p>	<p>As TURN described in the opening section of this compensation request, our substantial contributions to both the specific findings as well as the general decision-making in this proceeding warrant an award of full compensation for the relatively limited amount of time spent on this proceeding. However, should the Commission determine that a reduction is called for on any particular issue, it should determine the appropriate reduction to the hours that fall into that category and, if necessary, apply an appropriate percentage reduction to the hours designated “#.”</p>
---	--

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
<u>Attorney</u>								
Marcel Hawiger	2015	25.50	\$410	D.16-11-016	\$10,455.00	25.50	\$410	\$10,455.00
Marcel Hawiger	2016	42.00	\$415	D.16-06-024	\$17,430.00	42	\$415	\$17,430.00
Marcel Hawiger	2017	12.75	\$425	Res. ALJ-345 (2.14% COLA for 2017)	\$5,418.75	10.25	\$425	\$4,356.25
Robert Finkelstein	2017	0.25	\$520	Res. ALJ-345 (2.14% COLA for 2017)	\$130.00	0	\$520	\$0.00
Thomas Long	2015	1	\$570	D.15-06-021, p. 28	\$570.00	1	\$570	\$570.00
<u>Expert</u>								
Eric Borden	2015	16.25	\$180	D.16-05-015, p. 14	\$2,925.00	16.25	\$180	\$2,925.00
John Sugar	2016	4.48	\$220	D.16-11-004 (2015 rate)	\$985.60	4.48	\$220	\$985.60
<b>Subtotal: \$37,914.35</b>						<b>Subtotal: \$36,721.85</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>
Marcel Hawiger	2017	7.5	\$212.50	One-half of 2017 requested rate	\$1,593.75	7.5	\$212.5	\$1,593.75
<b>Subtotal: \$1,593.75</b>						<b>Subtotal: \$1,593.75</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
	Copying	Copying of testimony and pleadings for ALJ and Commissioner offices			\$4.10	\$4.10		
	FedEx/Postage	Postage and FedEx for testimonies and pleadings to CPUC			\$5.76	\$5.76		
<b>Subtotal: \$ 9.86</b>						<b>\$9.86</b>		
<b>TOTAL REQUEST: \$39,517.96</b>						<b>TOTAL AWARD: \$38,325.46</b>		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). 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 are typically compensated at ½ of preparer’s normal hourly rate</p>								
<b>ATTORNEY INFORMATION</b>								
<b>Attorney</b>		<b>Date Admitted to CA BAR<sup>1</sup></b>		<b>Member Number</b>		<b>Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation</b>		
Marcel Hawiger		1/1998		194244		No		
Robert Finkelstein		06/1990		146391		No		
Thomas Long		12/1986		124776		No		

<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>.

**C. CPUC Disallowances and Adjustments:**

Item	Reason
Comments on Proposed Decision	Mr. Hawiger claimed 2.25 hours were spent writing comments on the proposed decision filed on 5/5/17. It was also claimed that a 0.25 hour meeting took place between Mr. Hawiger and Mr. Finklestein regarding strategies for writing these comments, which both attorneys requested compensation for attending. There are no comments on the proposed decision from TURN currently within the proceeding record, therefore these hours have been deducted from the claim total.

**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
<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	Yes

**FINDINGS OF FACT**

1. TURN has made a substantial contribution to D.17-06-015.
2. The requested hourly rates for TURN’s representatives 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 \$38,325.46.

**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 shall be awarded \$38,325.46.
2. Within 30 days of the effective date of this decision, Alpine Natural Gas Operating Company No. 1 LLC, Pacific Gas and Electric Company, San Diego Gas & Electric

Company, Southern California Edison Company, Southern California Gas Company, Southwest Gas Corporation, and West Coast Gas Company shall pay TURN their respective shares of the award, based on their California-jurisdictional gas revenues for the 2016 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 November 1, 2017, 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.

This decision is effective today.

Dated November 30, 2017, at San Francisco, California.

MICHAEL PICKER

President

CARLA J. PETERMAN

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

Commissioners

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

<b>Compensation Decision:</b>	D1711032	<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D1706015		
<b>Proceeding(s):</b>	R1501008		
<b>Author:</b>	ALJ Kersten		
<b>Payer(s):</b>	Alpine Natural Gas Operating Company No. 1 LLC, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Southern California Gas Company, Southwest Gas Corporation, and West Coast 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	August 8, 2017	\$39,517.96	\$38,325.46	N/A	Unsubstantiated activities

**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>
Marcel	Hawiger	Attorney	TURN	\$410	2015	\$410
Marcel	Hawiger	Attorney	TURN	\$415	2016	\$415
Marcel	Hawiger	Attorney	TURN	\$425	2017	\$425
Robert	Finkelstein	Attorney	TURN	\$520	2017	\$520
Thomas	Long	Attorney	TURN	\$570	2015	\$570
John	Sugar	Expert	TURN	\$220	2016	\$220
Eric	Borden	Expert	TURN	\$180	2015	\$180

**(END OF APPENDIX)**