

Decision 11-07-027 July 14, 2011

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

Order Instituting Rulemaking to Consider  
Revisions to the Planning Reserve Margin for  
Reliable and Cost-Effective Electric Service.

Rulemaking 08-04-012  
(Filed April 10, 2008)

**DECISION GRANTING REQUEST OF THE UTILITY REFORM NETWORK  
FOR INTERVENOR COMPENSATION FOR SUBSTANTIAL CONTRIBUTIONS TO  
DECISION 10-09-024**

|  |   |
|--|---|
| <b>Claimant:</b> The Utility Reform Network    | <b>For contribution to Decision (D.)</b> 10-09-024  |
| <b>Claimed (\$):</b> \$76,840.03               | <b>Awarded (\$):</b> \$76,097.05                    |
| <b>Assigned Commissioner:</b> Michael R.Peevey | <b>Assigned ALJs:</b> David Gamson and Mark Wetzell |
| <b>Claim Filed:</b>                            | November 23, 2010                                   |

**PART I: PROCEDURAL ISSUES**

- A. Brief Description of Decision:** D.10-09-024 closed Rulemaking (R.) 08-04-012 with no change to the current Planning Reserve Margin (PRM), concluding that “there is more preliminary discussion needed regarding the recent California Independent System Operator (CAISO) study, as well as potentially other studies and methodological questions before the PRM issues are ripe for decision” (Decision, at 4).

**B. Claimant 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 (NOI) to claim compensation (§ 1804(a)):</b> |                 |                      |
| 1. Date of Prehearing Conference:   | June 2, 2008    | Correct              |
| 2. Date NOI Filed:  | July 2, 2008    | Correct              |
| 3. Was the notice of intent timely filed?   |                 | Yes                  |
| <b>Showing of customer or customer-related status (§ 1802(b)):</b>                |                 |                      |

|   |  |  |
|---|--|--|
| 4. Based on ALJ ruling issued in proceeding number:                   | Scoping Memo in this proceeding, R.08-04-012, at18 | Correct  |
| 5. Date of ALJ ruling:  | September 30, 2008                                 | Correct  |
| 6. Has the claimant demonstrated customer or customer-related status? |  | Yes  |
| <b>Showing of “significant financial hardship” (§ 1802(g)):</b>       |  |  |
| 7. Based on ALJ ruling issued in proceeding number:                   | Scoping Memo in this proceeding, R.08-04-012, at18 | Correct (the Ruling relies on the rebuttable presumption created by the ruling of April 18, 2008 in A.07-12-021) |
| 8. Date of ALJ ruling:  | September 30, 2008                                 | Correct  |
| 9. Has the claimant demonstrated significant financial hardship?      |  | Yes  |
| <b>Timely request for compensation (§ 1804(c)):</b>                   |  |  |
| 10. Identify Final Decision   | D.10-09-024  | Correct  |
| 11. Date of Issuance of Final Decision:                               | September 24, 2010                                 | Correct  |
| 12. File date of compensation request:                                | November 23, 2010                                  | Correct  |
| 13. Was the request for compensation timely?                          |  | Yes  |

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

| # | Claimant | CPUC | Comment  |
|---|----------|------|--|
| A | X        |      | <p>This case was somewhat unusual, in that concluded without the issuance of a substantive decision on the merits of the issues under consideration. However, TURN was an extremely active participant throughout the proceeding and its expert consultant Kevin Woodruff provided substantial assistance to the CAISO’s and Energy Division’s efforts to develop the input data and modeling conventions needed to run the CAISO’s GE MARS model using California system data. Mr. Woodruff participated in all of the several working groups that were organized to assist and monitor the data gathering and modeling process, and contributed his expertise to the effort to develop accurate generator forced outage rate data for use in the model. Ultimately Energy Division informed the ALJ that the funds for the GE MARS work were exhausted, and the ALJ suspended the procedural schedule for roughly an entire year, after which the Commission ultimately decided that the proceeding should simply be closed.</p> <p>In past situations where a proceeding has been terminated without a substantive decision on the merits, this Commission has routinely awarded intervenor compensation to active participants despite that unusual end result. Examples</p> |

|  |  |  |
|--|--|--|
|  |  | <p>include: D.07-07-031 in A.99-09-053 (PG&amp;E Market Valuation of its Hydro System); D.04-03-031 in A.99-12-024 (SCE’s Market Valuation of its Hydro System); D.03-06-065 in A.99-03-013, <i>et al.</i> (Revenue Cycle Services/Direct Access Service Fees); D.02-08-061 in A.00-01-009 (SCE Post-Transition Rates); D.02-03-035 in A.00-05-024 (SCE Four Corners/Palo Verde Valuation); D. 03-05-029 in A.99-03-014 (PG&amp;E GRC Phase 2); and D.02-03-034 in A.00-05-026 (SCE SSID Valuation). As this Commission stated in D.04-04-031:</p> <p style="padding-left: 40px;">We also agree that denying compensation here would be inconsistent with the intent expressed in Pub. Util. Code § 1801.3(b) that the intervenor compensation statutes should “be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” As we stated in D.02-08-061, “we see no reason to increase the intervenor’s [financial] risk [of participation] by denying compensation in a proceeding that is prematurely terminated for reasons that are not reasonably foreseen and are beyond [the intervenor’s] control.” (<i>Mimeo.</i>, at 8.)</p> <p>Here the reasons for granting compensation to TURN are even more compelling than in those prior cases for at least two reasons: 1) the ultimate outcome of the proceeding here was to leave the existing PRM in place, a result that was consistent with TURN’s overall objective in the proceeding, and 2) TURN’s participation went well beyond normal “advocacy” and included its consultant’s efforts to assist Energy Division and the CAISO in data gathering and analysis, in attempt to help move the proceeding forward. Given all of these considerations, compensation is entirely justified in this case.</p> |
|--|--|--|

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Description (by Claimant) of Claimant’s contributions to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059)**

| <b>Contribution</b>   | <b>Citation to Decision or Record</b>                                | <b>Showing Accepted by CPUC</b> |
|---|--|---------------------------------|
| See Part I.C, above.  |  | Yes                             |
| The Commission’s decision left the existing PRM in place, consistent with TURN’s overall objective in the proceeding.   | TURN’s 2/26/10 comments, t1-2; D.10-09-024, t1                       | Yes                             |
| The Scoping Memo consolidated Phases 1 and 2 as originally envisioned in the OIR itself in order to avoid the need for a “feedback loop” as described by TURN in its PHC statement. | TURN’s 4/25/08 PHC Statement, at 5; 9/30/08 Scoping Memo, at 3-4.    | Yes                             |
| TURN took the initiative to help resolve vexing and difficult confidentiality and   | TURN’s 7/25/08 Motion; 10/20/08 ALJ ruling, at 2 and <i>passim</i> . | Yes                             |

|   |   |     |
|---|---|-----|
| model access issues in this proceeding by submitting its July 25, 2008 Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4. The ALJ's 10/20/08 ruling adopted the essential features of TURN's proposal. |   |     |
| The Commission closed the proceeding, consistent with TURN's recommendation in its 2/26/10 comments.  | TURN's 2/26/10 comments, at 2; D.10-09-024, at 1. | Yes |

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

|  | <b>Claimant</b> | <b>CPUC Verified</b> |
|--|-----------------|----------------------|
| <b>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</b>   | Yes             | Correct              |
| <b>b. Were there other parties to the proceeding?</b>  | Yes, many       | Yes                  |
| <b>c. If so, provide name of other parties:</b><br><br>See service list for R.08-04-012 in attached certificate of service. DRA was the only other <i>active</i> party representing the interests of small consumers.  |                 | Correct              |
| <b>d. Description (by Claimant) of how Claimant coordinated with DRA and other parties to avoid duplication or how Claimant's participation supplemented, complemented, or contributed to that of another party:</b><br><br>TURN actively coordinated with DRA throughout the proceeding, but TURN – through its expert consultant Kevin Woodruff – took the most active role in the various technical working groups that conducted the vast majority of the work in this case. Due to the collaborative nature of the working group process, there was no duplication of effort among the parties. |                 | Yes                  |

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

| <b>Explanation (by Claimant) of how the cost of Claimant's participation bore a reasonable relationship with benefits realized through participation</b>  | <b>CPUC Verified</b> |
|---|----------------------|
| TURN's work in this proceeding helped to contribute to the Commission's ultimate conclusion that this case could be closed without making any change to the adopted PRM. Any increase in the PRM, as advocated by certain other parties, would have resulted in increased procurement costs amounting to tens of millions of dollars for residential and other small consumers. TURN's costs of participation were quite modest relative to its degree of success in the proceeding and the magnitude of the issues at stake. | Correct              |

**B. Specific Claim\*:**

| CLAIMED                                     |             |                                    |          |                  |                    | CPUC AWARD                          |       |          |             |
|---|-------------|------------------------------------|----------|------------------|--------------------|-------------------------------------|-------|----------|-------------|
| ATTORNEY AND ADVOCATE FEES                  |             |                                    |          |                  |                    |                                     |       |          |             |
| Item  | Year        | Hours                              | Rate     | Basis for Rate   | Total              | Year                                | Hours | Rate     | Total       |
| M.P. Florio                                 | 2007        | 0.50                               | \$520    | D.10-10-014      | \$260.00           | 2007                                | 0.50  | \$520    | \$260.00    |
| M.P. Florio                                 | 2008        | 52.50                              | \$535    | D.10-10-014      | \$28,087.50        | 2008                                | 52.50 | \$535    | \$28,087.50 |
| M. P. Florio                                | 2009        | 1.50                               | \$535    | Res. ALJ-235     | \$802.50           | 2009                                | 1.50  | \$535    | \$802.50    |
| M.P. Florio                                 | 2010        | 5.75                               | \$535    | Res. ALJ-247     | \$3,076.25         | 2010                                | 5.75  | \$535    | \$3,076.25  |
| N. Suetake                                  | 2008        | 2.50                               | \$225    | D.09-04-027      | \$562.50           | 2008                                | 2.50  | \$225    | \$562.50    |
| <b>Subtotal:</b>                            |             |                                    |          |                  | <b>\$32,788.75</b> | <b>Subtotal:</b> <b>\$32,788.75</b> |       |          |             |
| EXPERT FEES                                 |             |                                    |          |                  |                    |                                     |       |          |             |
| Item  | Year        | Hours                              | Rate     | Basis for Rate   | Total              | Year                                | Hours | Rate     | Total \$    |
| Kevin Woodruff                              | 2007        | 25.00                              | \$225    | D.10-10-014      | \$5,625.00         | 2007                                | 25.00 | \$225    | \$5,625.00  |
| Kevin Woodruff                              | 2008        | 138.0                              | \$225    | D.10-10-014      | \$31,050.00        | 2008                                | 138.0 | \$225    | \$31,050.00 |
| Kevin Woodruff                              | 2009        | 19.50                              | \$225    | Res. ALJ-235     | \$4,387.50         | 2009                                | 19.50 | \$225    | \$4,387.50  |
| Kevin Woodruff                              | 2010        | 2.50                               | \$225    | Res. ALJ-247     | \$562.50           | 2010                                | 2.50  | \$225    | \$562.50    |
| Bill Marcus                                 | 2008        | 0.75                               | \$250    | D.10-05-015      | \$187.50           | 2008                                | 0.75  | \$250    | \$187.50    |
| <b>Subtotal:</b>                            |             |                                    |          |                  | <b>\$41,812.50</b> | <b>Subtotal:</b> <b>\$41,812.50</b> |       |          |             |
| INTERVENOR COMPENSATION CLAIM PREPARATION** |             |                                    |          |                  |                    |                                     |       |          |             |
| Item  | Year        | Hours                              | Rate     | Basis for Rate   | Total              | Year                                | Hours | Rate     | Total       |
| M.P. Florio                                 | 2008        | 0.50                               | \$267.50 | 50% of 2008 rate | \$133.75           | 2008                                | 0.50  | \$267.50 | \$133.75    |
| M.P. Florio                                 | 2010        | 5.00                               | \$267.50 | 50% of 2010 rate | \$1,337.50         | 2010                                | 5.00  | \$267.50 | \$1,337.50  |
| <b>Subtotal:</b>                            |             |                                    |          |                  | <b>\$1,471.25</b>  | <b>Subtotal:</b> <b>\$1,471.25</b>  |       |          |             |
| COSTS                                       |             |                                    |          |                  |                    |                                     |       |          |             |
| #   | Item        | Detail                             |          |                  | Amount             | Amount                              |       |          |             |
| 1   | Photocopies | Copies of TURN's pleadings         |          |                  | \$21.40            |                                     |       | \$       | 21.40       |
| 2   | Postage     | Mailing of TURN's pleadings        |          |                  | \$3.15             |                                     |       | \$       | 3.15        |
| 3   | Consultant  | Mr. Woodruff's car trips to Folsom |          |                  | \$742.98           |                                     |       | --       |             |

|  |   |                    |  |
|--|---|--------------------|--|
| Travel & Lodging   | and San Francisco (twice) and hotel in SF solely for purposes of this proceeding. |                    |  |
| <b>Subtotal:</b>   |   | <b>\$767.53</b>    | <b>Subtotal:</b> <b>\$24.55</b>        |
| <b>TOTAL REQUEST:</b>  |   | <b>\$76,840.03</b> | <b>TOTAL AWARD:</b> <b>\$76,097.05</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. Claimant’s records should identify specific issues for which it requested 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>** Reasonable claim preparation time typically compensated at ½ of preparer’s normal hourly rate (the same applies to the travel time).</p> |   |                    |  |

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

| # | Claimant | CPUC | Description/Comment  |
|---|----------|------|--|
| 1 | X        |      | In accordance with our typical practice, TURN attempted to allocate the time of its attorneys and expert consultants among the issues addressed in the proceeding. However, since this was in essence a single issue proceeding regarding the determination of the PRM, the vast majority of the hours shown in the attached timesheets are coded “PRM”. TURN’s representatives also recorded a modest amount of time as General Preparation (“GP”), reflecting work that was not allocable by issue, primarily time devoted to procedural matters, including attendance at the PHC and the issue of access to confidential information. Mr. Florio’s work on compensation-related pleadings (“Comp”) was separately recorded as well.   |
| 2 | X        |      | Michel Peter Florio was TURN’s lead attorney in this proceeding, as reflected in the attached timesheets. Nina Suetake substituted for Mr. Florio at the PHC, as he was required to participate in a conflicting proceeding at that same time. The bulk of TURN’s participation came via Kevin Woodruff of Woodruff Expert Services in Sacramento, who acted as TURN’s expert consultant in the workshops and working group process. Mr. Woodruff brought his extensive past experience with system modeling and reliability metrics to this proceeding and reviewed data and modeling conventions for key aspects of the reliability modeling process. Mr. Woodruff also undertook significant efforts to assist the CAISO and Energy Division in their data collection process by making use of his extensive knowledge of California generation resources to review the study’s proposed classification of such units for purposes of estimating their forced outage rates. Bill Marcus of JBS Energy, Inc. in West Sacramento, who typically serves as TURN’s expert on load forecasting issues, devoted a small amount of time to consulting with Mr. Woodruff regarding the load forecasting issues involved in the modeling process. All of the hours claimed in this request were reasonable and necessary to the achievement of TURN’s substantial contributions, and no unnecessary duplication of effort is reflected in the attached timesheets. |

|   |   |   |
|---|---|---|
| 3 | X | <p>The issue of the appropriate PRM was originally included in the scope of Phase 2, Track 2 of R.05-12-013, but was removed from that proceeding by ruling of President Peevey dated 11/19/07, which indicated that a new rulemaking would be instituted to address PRM issues. TURN's Request for Compensation filed August 4, 2010 in R.05-12-013 therefore excluded all of the hours that TURN's representatives devoted to the PRM issue after October of 2007 and indicated that compensation for such work would be requested in this docket instead (TURN Request, p.6). The attached timesheets therefore include 25.0 hours of Mr. Woodruff's time and 0.50 hours of Mr. Florio's time devoted to PRM issues during the latter part of 2007, work that was originally recorded to R.05-12-013 but subsequently transferred to this docket. That work primarily involved review of the initial stages of the CAISO's Planning Reserve Requirements Study (PRRS) process that was ultimately incorporated into this proceeding. While undertaken prior to the issuance of R.08-04-012, that work was directly related to the subject matter of this proceeding and should be included in TURN's compensation award.</p>   |
| 4 | X | <p>TURN is seeking reimbursement for the actual travel expenses of \$742.98 incurred by its consultant, Mr. Woodruff, solely as a result of his participation in this proceeding. These expenses include car travel at standard IRS mileage rates for one roundtrip to Folsom to participate in a CAISO meeting on the subject of the PRM and two roundtrips to San Francisco to participate in CPUC workshops in this proceeding, along with associated tolls and parking expenses. In addition, Mr. Woodruff was required to spend three nights total at a hotel in San Francisco in order to participate in the workshops. None of these expenses constitute routine commuting costs under any reasonable definition, as Mr. Woodruff lives and works in Sacramento and only travels to Folsom or San Francisco when required to effectively participate in proceedings. While this Commission has sometimes disallowed such travel costs, and has recently announced a unilateral determination that travel of less than 120 miles one-way is "routine" commuting that will not be reimbursed, TURN respectfully submits that these expenses, which have already been reimbursed to Mr. Woodruff by TURN, represent reasonable and necessary costs of participation in this proceeding and should be compensated in full. TURN notes that the listing of expenses in Attachment 2 includes meal expenses and the cost of obtaining internet access while staying overnight in San Francisco which have also been reimbursed to Mr. Woodruff by TURN, but those costs are not requested for compensation in the claim set forth above. Mr. Woodruff's hotel and parking receipts are included as part of Attachment 2.</p> |

**D. CPUC's Reasonableness Analysis.**

| # | Analysis   |
|---|--|
| 1 | <p>TURN claims it contributed by assisting California Independent System Operator's (CAISO) and the Energy Division's efforts to develop the input data and modeling conventions needed to run the CAISO's GE MARS model using California system data. This assistance and the corresponding coordination of the modeling process were specifically authorized in the September 30, 2008 Scoping Memo and Ruling.<sup>1</sup> That ruling also approved as an integral part of that process working groups and workshops. Roughly 80% of TURN's time was devoted to these efforts, since</p> |

<sup>1</sup> Scoping Memo and Ruling at 6-7.

|   |   |
|---|---|
|   | TURN was actively involved in workshops, prehearing conference, and working group sessions. In our reasonableness analysis we, normally, question a large number of the hours spent, like here, reviewing materials and discussing them with other parties. In this case, however, we can reasonably assume that these activities occurred within the Commission-approved informal framework and were necessary to that informal process. We, therefore, approve all of TURN's hours devoted to the modeling process as reasonable. |
| 2 | TURN recommended keeping the existing Planning Reserve Margin (PRM) in place and closing the proceeding. Approximately 2.5% of TURN's time was devoted to this analysis. We find that hours spent on TURN's efforts to keep the PRM at its current level and recommendations to close the proceeding were reasonable.   |
| 3 | TURN warned against the potential need for a "feedback loop" if the results obtained in Phase 2 fall outside the range of reasonable expectations. A few hours spent on this matter was a reasonable amount of time for this issue.   |
| 4 | TURN helped to resolve complicated confidentiality and model access issues, spending on these matters approximately 9% of its time, which we find very reasonable.  |

**E. Disallowances & Adjustments:**

| # | Reason   |
|---|--|
| 1 | TURN requests costs of its consultant Woodruff's travels from his offices in Sacramento to Folsom, to participate in CAISO meeting, and to San Francisco to attend workshops. In accordance with our practice, <sup>2</sup> we consider these travels routine and disallow \$742.98 in the travel costs for these travels. |

**PART IV: OPPOSITIONS AND COMMENTS**

|   |    |
|---|----|
| <b>A. Opposition: Did any party oppose the claim?</b> | No |
|---|----|

|   |     |
|---|-----|
| <b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?</b> | Yes |
|---|-----|

**FINDINGS OF FACT**

1. Claimant has made a substantial contribution to Decision (D.)10-09-024.
2. The claimed fees and costs, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

<sup>2</sup> See, for example, D.10-10-014 at 8: "TURN requests ... travel expenses for its consultant Woodruff. We disallow these expenses as they relate to 'routine travel'... Woodruff's office is located in Sacramento. We consider his travel to Folsom to attend meetings at the CAISO offices and to San Francisco to attend workshops in San Francisco as 'routine'."

3. The total of reasonable contribution is \$76,097.05.

**CONCLUSION OF LAW**

1. The claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Claimant is awarded \$76,097.05.
2. Within 30 days of the effective date of this decision, the Commission Intervenor Compensation Fund shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 6, 2011, the 75<sup>th</sup> day after the filing of claimant'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 July 14, 2011, at San Francisco, California.

MICHAEL R. PEEVEY  
President  
TIMOTHY ALAN SIMON  
CATHERINE J.K. SANDOVAL  
MARK J. FERRON  
Commissioners

I abstain.

/s/ MICHEL PETER FLORIO  
Commissioner

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

|                                  |                                   |                              |
|----------------------------------|-----------------------------------|------------------------------|
| <b>Compensation Decision:</b>    | D1107027                          | <b>Modifies Decision?</b> No |
| <b>Contribution Decision(s):</b> | D1009024                          |                              |
| <b>Proceeding(s):</b>            | R0804012                          |                              |
| <b>Author:</b>                   | ALJ David Gamson                  |                              |
| <b>Payer(s):</b>                 | CPUC Intervenor Compensation Fund |                              |

**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 | 11/23/10          | \$76,840.03             | \$76,097.05           | No                 | Non-compensable costs (routine travel) |

**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> |
|-------------------|------------------|-------------|----------------------------|-----------------------------|----------------------------------|---------------------------|
| Michel            | Florio           | Attorney    | The Utility Reform Network | \$520                       | 2007                             |                           |
| Michel            | Florio           | Attorney    | The Utility Reform Network | \$535                       | 2008                             |                           |
| Michel            | Florio           | Attorney    | The Utility Reform Network | \$535                       | 2009                             |                           |
| Michel            | Florio           | Attorney    | The Utility Reform Network | \$535                       | 2010                             |                           |
| Nina              | Suetake          | Attorney    | The Utility Reform Network | \$225                       | 2008                             |                           |
| Kevin             | Woodruff         | Expert      | The Utility Reform Network | \$225                       | 2007                             |                           |
| Kevin             | Woodruff         | Expert      | The Utility Reform Network | \$225                       | 2008                             |                           |
| Kevin             | Woodruff         | Expert      | The Utility Reform Network | \$225                       | 2009                             |                           |
| Kevin             | Woodruff         | Expert      | The Utility Reform Network | \$225                       | 2010                             |                           |
| Bill              | Marcus           | Expert      | The Utility Reform Network | \$250                       | 2008                             |                           |

**(END OF APPENDIX)**