Decision 05-08-014 August 25, 2005

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SOUTHERN CALIFORNIA GAS COMPANY for authority to update its gas revenue requirement and base rates. (U 904 G)	Application 02-12-027 (Filed December 20, 2002)
Application of SAN DIEGO GAS & ELECTRIC COMPANY for authority to update its gas and electric revenue requirement and base rates. (U 902-M)	Application 02-12-028 (Filed December 20, 2002)
Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Service and Facilities of Southern California Gas Company and San Diego Gas & Electric Company.	Investigation 03-03-016 (Filed March 13, 2003)

OPINION GRANTING INTERVENOR COMPENSATION TO THE UTILITY CONSUMERS' ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 04-12-015

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OPINION GRANTING INTERVENOR COMPENSATION TO THE UTILITY CONSUMERS' ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 04-12-015

1. Summary

This decision awards the Utility Consumers' Action Network (UCAN) $575,491.00 in compensation for its substantial contributions to Decision (D.) 04-12-015. This is $36,381.00 less than the amount requested.

2. Background

In D.04-12-015 the Commission adopted base electric and gas revenue requirements for Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) in the consolidated applications for Test Year 2004 Cost of Service. The critical issue in these proceedings was to ensure that the companies receive a reasonable level of revenue for monopoly distribution services. SoCalGas filed Application (A.) 02-12-027 and SDG&E filed A.02-12-028 on December 20, 2002, respectively, for authority to update their gas and electric revenue requirements and base rates. SoCalGas requested an approximate $130 million increase in natural gas distribution revenues for Test Year 2004 and SDG&E requested an approximate $58.9 million increase in electric distribution revenues[1] and $21.6 million increase in natural gas distribution revenues for Test Year 2004. In adopting a settlement agreement, with modifications, the Commission authorized $1.457 billion in natural gas distribution revenues for Test Year 2004 for SoCalGas. The Commission authorized SDG&E $754.763 million in electric distribution revenues and $204.721 million in natural gas distribution revenues for Test Year 2004.

These applications were not filed in conformance with the Commission's rate case plan, but instead with specific exemptions from the plans granted as a part of previously adopted incentive ratemaking mechanisms. Prehearing conferences (PHCs) were held on February 19, 2003, March 7, 2003, and September 26, 2003. Public participation hearings were held in August and September 2003, in SoCalGas' service territory in Van Nuys, El Monte, Carson, and San Bernardino, and in SDG&E's service territory in San Diego and San Clemente. Twenty days of evidentiary hearings on Phase One distribution service revenue requirements were held, beginning October 7, 2003. Testimony was received in the evidentiary hearings from numerous witnesses, and over 300 exhibits were received in evidence.[2] D.03-12-057 granted interim rate relief to SoCalGas and SDG&E[3] by establishing memorandum accounts to track any eventual difference in current rates and any increase or decrease adopted by this decision for Test Year 2004.

Settling parties filed opening briefs on January 20, 2004. On February 4, 2004, non-settling parties filed opening briefs, and all parties filed reply briefs on February 19, 2004. UCAN was an opponent of the SDG&E Settlement and filed its opposition on January 20, 2004.

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[1] This included the effects of nuclear costs after the termination of the Incremental Cost Incentive Plan (ICIP).

[2] Without separately counting errata, SoCalGas and SDG&E sponsored 150 exhibits of direct and rebuttal testimony; Office of Ratepayer Advocates (ORA), 33 direct and cross-examination exhibits; The Utility Reform Network (TURN), 60 direct and cross-examination exhibits; and UCAN, 47 direct and cross-examination exhibits.

[3] On April 18, 2003, SoCalGas and SDG&E filed a Motion seeking reconsideration of the April 2, 2003 Scoping Memo. The May 22, 2003 Ruling clarified the Scoping Memo as appropriate, and D.03-12-057 was necessary to grant the interim relief request.

3. Requirements for Awards of Compensation

The intervenor compensation program, enacted in Pub. Util. Code §§ 1801-1812, requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation if the intervenor makes a substantial contribution to the Commission's proceedings. The statute provides that the utility may adjust its rates to collect the amount awarded from its ratepayers. (Subsequent statutory references are to the Public Utilities Code unless otherwise indicated.)

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

1. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent (NOI) to claim compensation within 30 days of the prehearing conference (or in special circumstances, at other appropriate times that we specify). (§ 1804(a).)
2. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)
3. The intervenor should file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)
4. The intervenor must demonstrate "significant financial hardship." (§§ 1802(g), 1804(b)(1).)
5. The intervenor's presentation must have made a "substantial contribution" to the proceeding, through the adoption, in whole or in part, of the intervenor's contention or recommendations by a Commission order or decision. (§§ 1801(1), 1803(a).)
6. The claimed fees and costs are comparable to the market rates paid to experts and advocates having comparable training and experience and offering similar services. (§ 1806.)

For discussion here, the procedural issues in Items 1-4 above are combined, followed by separate discussions on Items 5 and 6.

4. Procedural Issues

The first prehearing conference in this matter was held on February 19, 2003. UCAN filed its timely NOI on March 24, 2003, asserting financial hardship. On April 2, 2003, Administrative Law Judge (ALJ) Long ruled that UCAN is a customer under the Public Utilities Code and meets the financial hardship condition. UCAN filed its request for compensation on December 30, 2004, within 60 days of D.04-12-015. No party opposes this request. UCAN has satisfied all the procedural requirements necessary to make its request for compensation.

5. Substantial Contribution

In evaluating whether a customer made a substantial contribution to a proceeding we look at several things. First, did the ALJ or Commission adopt one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer? (*See* §1802(i).) Second, if the customer's contentions or recommendations paralleled those of another party, did the customer's participation materially supplement, complement, or contribute to the presentation of the other party or to the development of a fuller record that assisted the Commission in making its decision? (*See* §§1802(i) and 1802.5.) As described in §1802(i), the assessment of whether the customer made a substantial contribution requires the exercise of judgment.

> "In assessing whether the customer meets this standard, the Commission typically reviews the record, composed in part of pleadings of the customer and, in litigated matters, the hearing transcripts, and compares it to the findings, conclusions, and orders in the decision to which the customer asserts it contributed. It is then a matter of judgment as to

> whether the customer's presentation substantially assisted the Commission." (D.98-04-059, 79 CPUC2d, 628 at 653.)

Should the Commission not adopt any of the customer's recommendations, compensation may be awarded if, in the judgment of the Commission, the customer's participation substantially contributed to the decision or order. With this guidance in mind, we turn to the claimed contributions UCAN made to the proceeding.

UCAN aggressively opposed the proposed settlement for SDG&E:

> "ORA and SDG&E have entered into a Settlement that awards SDG&E (an) excessive increase that is not justified by the evidentiary record and cannot be afforded by a community hit hard by rate increases since the 2000-2001 Energy Crisis. Moreover, the failure of the Settlement to incorporate the many efficiencies that should have been brought by a merger, a reorganization and technology-driven productivity is a fatal flaw that undermines the very foundation of the Settlement.
>
> "One of the primary obstacles presented by the Settlement Agreement is its lack of specificity. Judging from the Settlement and its accompanying exhibits, UCAN is unable to establish the basis for the proposed revenue requirement agreed to by the two primary parties." (UCAN Comments,[4] p. 2.)

UCAN also objected that the proposed settlement increases SDG&E's distribution revenues by 27.3% over the base of 2001-recorded costs that were used to forecast the test year. The total proposed increase would equate to an annual increase in electric operations costs of almost 7%.

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[4] Comments of UCAN in Opposition to the Partial Settlement of the SDG&E Cost of Service Application dated January 20, 2004.

UCAN identified five basic deficiencies with the SDG&E proposed settlement:

1. Annual revenue requirement was not supported by the record;
2. Failed to incorporate productivity gains that were ordered by the Commission and/or could be reasonably imputed;
3. Failed to address controversy over corporate center costs allocated to SDG&E by Sempra Energy;
4. Did not adequately address the specific adjustments proposed by UCAN and FEA; and,
5. Imposed costs on ratepayers contrary to Commission policy.

The Commission adopted the SDG&E Settlement over UCAN's objections, but in doing so the Commission found:

> "…the SDG&E Settlement makes specific adjustments in the consideration of a number of issues raised by UCAN. These adjustments include $2.337 million in Customer Accounts, $3.651 million in benefits related to issues raised by UCAN among others, a $14.6 million working cash rate base reduction incremental to ORA's position, and $1.8 million in Corporate Center expenses in addition to substantial end-of-hearing concessions by SDG&E." (D.04-12-015, *mimeo*, p. 46.)

Additionally, UCAN made numerous significant recommendations that were all considered, in the two proposed decisions of ALJ Long and of the original assigned Commissioner, Carl Wood. While not all of UCAN's recommendations were adopted or included in the SDG&E Settlement, it is clear that the Settling Parties believed it was necessary to demonstrate that UCAN's concerns were adequately addressed. As shown above, UCAN's positions were substantially different from ORA, with sizeable adjustments exceeding ORA's

positions. Thus, we find that UCAN made a substantial contribution to this proceeding and directly affected the Settlement.

6. Reasonableness of Requested Compensation

UCAN requests $611,872[5] for its participation in this proceeding. Included in the request[6] was the following breakdown:

Request Summary	
General Participation	$153,928
Legal Representation	33,650
SDG&E Operations Review	87,281
Shared Services	207,883
Pension & Salaries	28,661
Policy Issues	90,705
Subtotal	$602,108
Depositions	2,548
Copying & Postage	2,598
Travel (Shames)	4,618
Total Request	**$611,872**

The components of this request must constitute reasonable fees and costs of the customer's preparation for and participation in a proceeding that resulted in a substantial contribution. Thus, only those fees and costs associated with the customer's work that the Commission concludes made a substantial contribution are reasonable and eligible for compensation.

To assist us in determining the reasonableness of the requested compensation, D.98-04-059 directed customers to demonstrate productivity by assigning a reasonable dollar value to the benefits of their participation to ratepayers. The costs of a customer's participation should bear a reasonable

[5] Before adjusting for math errors, UCAN's request incorrectly tallied to $612,614.87.

[6] Request, p. 8, and Attachment D.

relationship to the benefits realized through their participation. This showing assists us in determining the overall reasonableness of the request.

D.04-12-015 identified four specific allowances within the Settlement that, according to the Settling Parties, are based on UCAN's specific litigation positions and intended to incorporate an allowance for UCAN's litigation positions within the development of the Settlement. Specifically, the Settlement includes a $2.337 million reduction in the test year forecast for Customer Accounts not otherwise based on the Settling Parties' litigation positions. The Settlement includes a $3.651 million reduction in the forecast for employee benefits not otherwise based on the Settling Parties' positions. The Settlement's forecast of working cash includes a $14.6 million reduction based on UCAN's litigation position that far exceeds ORA's proposal; use of the lower forecast results in a significant reduction in revenue requirement for test year 2004. Finally, the Settlement identified a $1.8 million reduction to the forecast of Corporate Center costs not otherwise based on the Settling Parties' litigation positions.

By contrast, UCAN spent a relatively modest amount on its analysis to develop these recommendations. UCAN assigns $87,000 in costs to reviewing SDG&E's Customer Accounts, $29,000 on its analysis of employee benefits and $208,000 on its review of working cash. When considered in conjunction with the $154,000 claimed for general participation and $90,000 on policy analysis, UCAN's participation was cost effective. These examples show that UCAN's costs were significantly less than the ratemaking value achieved through UCAN's participation.

For witness Navarro, UCAN seeks 66% of the billed costs[7] because UCAN cannot cite definite impacts from his testimony in the adopted Settlement. Navarro's testimony on economic impacts was not adopted in D.04-12-015 or in either proposed decision. This one-third reduction is reasonable.

Next, we must assess whether the hours claimed for UCAN's efforts that resulted in substantial contributions to Commission decisions are reasonable. UCAN documented its claimed hours by presenting a daily breakdown of the hours of its attorneys and analysts, accompanied by a brief description of each activity. The detailed explanation of the hours UCAN spent on the proceeding is thorough and consistent with both the scope and the complexity of the issues considered in the proceeding. Therefore, the hourly breakdown reasonably supports the claim for total hours.[8] Since we found that UCAN's efforts made a substantial contribution to the decision, we need not exclude from UCAN's award compensation for certain issues. However, we note that UCAN broke down its efforts by issue and had we needed to eliminate certain issues from the award this breakdown would have facilitated the process.

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[7] Request, p. 11.

[8] UCAN separated the hours associated with travel and preparation of this compensation request and requests compensation at half the usual hourly rate for this time.

Finally, in determining compensation, we take into consideration the market rates for similar services from comparably qualified persons. Several of the experts and the attorney for UCAN have existing rates approved by the Commission for work performed in 2003 and 2004. We use those rates without further discussion.

Rates as Requested by UCAN			
Name	**Year**	**Rate (a)**	**Cites in Request**
Shames	2003	$250	D.04-09-024
	2004	$250	D.04-09-024
Mittendorf	2003	$75	
Welchlin	2003	$175	
	2004	$175	
Miller	2003	$130	
	2004	$130	
Owens	2003	$110	
Marcus	2003	$185	
	2004	$195	
Nahigian	2003	$125	
	2004	$140	
Schilberg	2003	$128	
Woychik	2003	$185	
Navarro	2003	$300	D.04-12-054
(a) Data Response to ALJ on January 4, 2005.			

In calculating compensation, we consider the approved rates for comparably qualified intervenors. Rates for specific consultants that have not been previously approved are discussed below.

The most recent rates for paralegals or law clerks range from $75 to $125 over the last several years. We will authorize $75 per hour for Mittendorff for non-attorney support staff duties.

Welchin, Miller, and Owens, of Overland Consulting, have not previously been included in a request for intervenor compensation; however, they have

previously been engaged under contract to ORA. We will not rely on ORA's contract terms as proposed by UCAN.[9] Overland Consulting provided expert testimony on ratemaking accounting and analysis, comparable to the nature of the work performed by JBS Energy, another consultant to UCAN.

Welchin holds a Master of Business Administration from St. Edwards University (1986), holds licenses as a Certified Public Accountant (CPA) in Kansas and Illinois, and has worked in the utility accounting arena since 1980 with utilities or consulting firms.[10] By comparison, JBS Energy's Marcus holds a Masters in Economics, 1975, from the University of Toronto, and has worked in the utility sector since 1978.

Owens holds two Degrees from the University of Missouri – Kansas City including a Bachelors of Science Degree in Accounting and a Bachelors of Liberal Arts Degree. He has worked in public accounting or consulting for 10 years. The requested rates are comparable to those approved for JBS Energy's Nahigian and Schilberg.

Miller has a Master of Professional Accountancy, University of Nebraska – Lincoln, and is a licensed CPA in Missouri. He has worked in public accounting or consulting since 1999. The requested rate of $130/hour is in a range we have recently approved for other less experienced analysts. The requested rates for Overland Consulting are consistent with those approved for JBS Energy and their testimony in Phase 1 demonstrated qualifications and experience appropriate to justify these rates.

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[9] Request, p. 11.

[10] Data response, January 5, 2005.

An hourly rate of $160 for Woychik was last adopted in D.03-05-065 for work performed in 2002. Using Resolution ALJ-184 as a guide, we will adjust the 2002 rate by approximately 8% to $175. We are not obliged to apply the ALJ-184 guideline to 2003, but the outcome is both a substantial increase, and less than the $185 rate (a 16% increase) sought by UCAN. The application of ALJ-184 in this instance does not preclude finding a different rate to be appropriate in some other application provided there is sufficient justification in that proceeding's record.

We will adopt the rates shown in the table below. Except for Overland Consulting and Strategic Integration, these rates have been previously approved by the Commission.

Adopted Compensation Rates and Allowances					
Name	**Year**	**Hours**	**Rate**	**Allowance**	**Cite**
Shames	2003	832.9	$195	$162,415.50	D.03-12-014
	2004	213.6	$250	$53,400.00	D.04-12-054
Mittendorff	2003	219.5	$75	$16,462.50	D.05-02-005
Welchin[(a)]	2003	607	$175	$106,225.00	n.a.
	2004	9	$175	$1,575.00	n.a.
Miller[(a)]	2003	483	$130	$62,790.00	n.a.
	2004	7	$130	$910.00	n.a.
Owens[(a)]	2003	117	$110	$12,870.00	n.a.
Marcus[(b)]	2003	161.7	$185	$29,914.50	D.03-10-011
	2004	15.9	$195	$3,100.50	D.05-03-016
Nahigian[(b)]	2003	227	$125	$28,375.00	D.03-10-011
	2004	12.5	$135	$1,687.50	D.05-04-041
Schilberg[(b)]	2003	13.8	$130	$1,794.00	D.04-10-031
Woychik[(c)]	2003	356.9	$175	$62,457.50	ALJ-184
Navarro[(d)]	2003	72.5	$300	$21,750.00	D.04-12-054
Total				**$565,727.00**	

(a) Overland Consulting (b) JBS Energy (c) Strategic Integration (d) Professor Peter Navarro

The itemized direct expenses submitted by UCAN include costs for: travel, photocopying, postage, etc., and total $9,763. The cost breakdown included with the request shows the miscellaneous expenses to be commensurate with the work performed. We find these costs reasonable.

7. Cost-Sharing With TURN

UCAN and TURN cooperated closely in the consolidated proceedings. UCAN focused on SDG&E (A.0212-028) while TURN focused on SoCalGas (A.02-12-027). Because SoCalGas and SDG&E have common ownership and share Corporate Center management functions, these two applications were a good candidate for this type of cooperation. UCAN and TURN shared the engagement of Overland Consulting, whose work was applicable to both applications. UCAN filed its request for compensation before TURN, who filed a request for compensation on February 7, 2005. UCAN had already included the full invoiced amount for Overland Consulting without an allocation to TURN's work on SoCalGas' separate application. TURN indicated[11] that its share of Overland Consulting's costs is $82,500. TURN and UCAN have agreed[12] that the full costs should be recovered for Overland Consulting by UCAN and these costs need not be reconsidered in TURN's request for compensation.

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[11] TURN Request, p. 22, footnote 11.

[12] February 9, 2005 letter to ALJ Long.

We agree that the Overland Consulting costs need only one review and so we will include the full cost for Overland Consulting in this decision. We will allocate the SoCalGas-related $82,500 portion to SoCalGas and not to SDG&E. As discussed above, we authorized the recovery of costs for Overland Consulting at the rates requested by UCAN.

8. Award

As set forth in the table below, we award UCAN $575,491.00. We will allocate $82,500 of the award to SoCalGas and the balance of $492,991.00 to SDG&E.

Adopted Compensation Summary	
Professional Fees	$565,727.00
Depositions	2,548.00
Copying & Postage	2,598.00
Travel (Shames)	4,618.00
Total	**$575,491.00**

Consistent with previous Commission decisions, we order that interest be paid on the award amount (at the rate earned on prime, three-month commercial paper, as reported in Federal Reserve Statistical Release H.15) commencing the 75th day after UCAN filed its compensation request and continuing until full payment of the award is made.

We remind all intervenors that Commission staff may audit their records related to this award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. UCAN's records should identify specific issues for which it requested compensation, the actual time spent by each employee or consultant, the applicable hourly rate, fees paid to consultants, and any other costs for which compensation was claimed.

9. Waiver of Comment Period

This is an intervenor compensation matter. Accordingly, as provided by Rule 77.7(f)(6) of our Rules of Practice and Procedure, we waive the otherwise applicable 30-day comment period for this decision.

10. Assignment of Proceeding

Geoffrey F. Brown is the Assigned Commissioner and Douglas M. Long is the assigned ALJ in this proceeding.

Findings of Fact

1. UCAN made a substantial contribution to SDG&E's 2004 test year cost of service application as described herein.

2. UCAN requested hourly rates for attorneys and experts that, as adjusted herein, are reasonable when compared to the market rates for persons with similar training and experience.

3. The total of the reasonable compensation is $575,491.00. The Appendix to the opinion summarizes today's award.

Conclusions of Law

1. UCAN has fulfilled the requirements of Pub. Util. Code §§ 1801-1812, which govern awards of intervenor compensation, and is entitled to for its claimed compensation, as adjusted herein, incurred in making substantial contributions to D.04-12-015.

2. UCAN should be awarded $575,491.00 for its contribution to D.04-12-015.

3. Per Rule 77.7(f)(6), the comment period for this compensation decision may be waived.

4. This order should be effective today so that UCAN may be compensated without further delay.

O R D E R

IT IS ORDERED that:

1. The Utility Consumers' Action Network (UCAN) is awarded $575,570.50 as compensation for its substantial contributions to Decision (D.) 04-12-015.

2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay UCAN $492,991.00 and Southern California Gas Company shall pay UCAN $82,500.

3. 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 on the 75th day after the filing date of UCAN's request for compensation, and continuing until full payment is made.

4. The comment period for today's decision is waived.

5. This proceeding remains open for phase 2 and other requests for compensation.

This order is effective today.

Dated August 25, 2005, at San Francisco, California.

MICHAEL R. PEEVEY
President
GEOFFREY F. BROWN
SUSAN P. KENNEDY
DIAN M. GRUENEICH
JOHN A. BOHN
Commissioners

Compensation Decision Summary Information

Compensation Decision:	D0508014	**Modifies Decision?** No
Contribution Decision(s):	D0412015	
Proceeding(s):	A0212027 et al	
Author:	ALJ Long	
Payer(s):	San Diego Gas & Electric Company and Southern California Gas Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Consumer Action Network	12/30/04	$611,872	$575,491.00	No	failure to justify hourly rates; arithmetic errors; increase in hourly rate

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Michael	Shames	Attorney	Utility Consumer Action Network	$250	2003	$195
Michael	Shames	Attorney	Utility Consumer Action Network	$250	2004	$250
Christina	Mittendorff	Support	Utility Consumer Action Network	$75	2003	$75
Robert	Welchlin	CPA	Utility Consumer Action Network	$175	2003	$175
Robert	Welchlin	CPA	Utility Consumer Action Network	$175	2004	$175
Andrew	Miller	CPA	Utility Consumer Action Network	$130	2003	$130
Andrew	Miller	CPA	Utility Consumer Action Network	$130	2004	$130
Bryan	Owen	Accountant	Utility Consumer Action Network	$110	2003	$110
William	Marcus	Economist	Utility Consumer Action Network	$185	2003	$185
William	Marcus	Economist	Utility Consumer Action Network	$195	2004	$195
Jeffrey	Nahigian	Economist	Utility Consumer Action Network	$140	2003	$125
Jeffrey	Nahigian	Economist	Utility Consumer Action Network	$140	2004	$135
Gayatri	Schilberg	Economist	Utility Consumer Action Network	$128	2003	$130
Eric	Woychik	Policy Analyst	Utility Consumer Action Network	$185	2003	$175
Peter	Navarro	Economist	Utility Consumer Action Network	$300	2003	$300