

Decision 08-10-011 October 2, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 06-02-013 (Filed February 16, 2006)
Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning.	Rulemaking 04-04-003 ¹ (Filed April 1, 2004) (QF Issues)

**DECISION GRANTING INTERVENOR COMPENSATION TO THE
NATURAL RESOURCES DEFENSE COUNCIL FOR SUBSTANTIAL
CONTRIBUTION TO DECISION 07-12-052**

This decision awards the Natural Resources Defense Council \$20,859.52 in compensation for its substantial contributions to Decision 07-12-052.

1. Background

Decision (D.) 07-12-052 (the Decision) reviewed Long-Term Procurement Plans (LTPPs) that were submitted by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E). The Commission found all three LTPPs to be deficient in terms of planning for filling net short positions with preferred resources from the Energy Action Plan's (EAP) loading order. In addition, the submitted LTPPs

¹ These proceedings are not consolidated; however, since this decision resolves related intervenor compensation matters in both proceedings, both proceedings' captions are included.

were “substantially inadequate in accounting for [greenhouse gas (GHG)] GHG emission reductions.”² Therefore, the LTPPs were modified by the Decision, prior to adoption. The revised LTPPs will apply for a ten-year period from 2007 through 2016.

The Decision further ensured that the LTPPs would sufficiently reduce GHG emissions in the production and delivery of electric resources by the utilities. The modified LTPPs were also required to meet renewable portfolio standard targets, provide for sufficiently robust demand response mechanisms, allow for energy efficiency (EE) savings, minimize environmental impacts, and provide for sufficient reliability at a reasonable cost to ratepayers.

To ensure compliance with GHG emission reduction efforts, the Decision implemented a number of mechanisms. It adjusted the resource load plans to reflect GHG emission standards and by providing more explicit directions for the investor-owned utilities (IOUs) to take in planning to reduce carbon emissions goals. In approving the modified LTPPs, the Decision also established a framework upon which future LTPPs are to be built. Going forward, the Decision requires the IOUs to use modern planning and analytical techniques and to create robust LTPPs that explicitly address uncertainty in the energy market, including in the amount of EE embedded into demand forecasts. In addition, LTPPs will be required to analyze the GHG implications of different resources that could be utilized to fill the net short positions, and to forecast the absolute GHG emissions of their plans instead of only the emission rates and in addition to cost implications.

² D.07-12-052, p. 3.

2. Requirements for Awards of Compensation

The intervenor compensation program, which is set forth in Pub. Util. Code §§ 1801-1812,³ requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation if that party 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.

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 (PHC), pursuant to Rule 17.1 of the Commission's Rules of Practice and Procedure (Rules), or at another appropriate time 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 must 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) and 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 or as otherwise found by the Commission. (§§ 1802(i) and 1803(a).)

³ All subsequent statutory references are to the Public Utilities Code unless otherwise indicated.

6. The claimed fees and costs must be reasonable (§ 1801), necessary for and related to the substantial contribution (D.98-04-059), comparable to the market rates paid to others with comparable training and experience (§ 1806), and productive (D.98-04-059).

In the discussion below, the procedural issues in Items 1-4 above are combined and a separate discussion of Items 5-6 follows.

2.1. Preliminary Procedural Issues

Under § 1804(a)(1) and Rule 17.1(a)(1), a customer who intends to seek an award of intervenor compensation must file an NOI before certain dates.

The Assigned Commissioner's Ruling (ACR) dated March 14, 2005, in Rulemaking (R.) 04-04-003 provided for a limited extension of the Commissioner's intervenor compensation program to participants in the California Energy Commission (CEC's) 2005 Integrated Energy Policy Report (IEPR) process. The exception allowed "intervenors who participate in the 2005 CEC IEPR process ... to request and receive compensation for that participation if they (1) also participate in the subsequent, coordinated Commission procurement proceeding; (2) make a substantial contribution in that procurement proceeding; and (3) otherwise meet the statutory requirements for compensation."⁴ In R.04-04-003, the NRDC filed a supplemental NOI on March 25, 2005, and a request for intervenor compensation on January 20, 2006. We find it appropriate to resolve that request now because R.06-02-013 is the "subsequent, coordinated Commission procurement proceeding."

⁴ Assigned Commissioner's Ruling Detailing How the California Energy Commission 2005 Integrated Energy Policy Report Process will be Used in the California Public Utilities Commission's 2006 Procurement Proceedings and Addressing Related Procedural Details" (ACR), dated March 14, 2005 in R.04-04-003 at 9.

In its supplemental NOI, the Natural Resources Defense Council (NRDC) asserted financial hardship. NRDC meets the financial hardship condition pursuant to § 1804(b)(1) through a rebuttable presumption of eligibility because the Commission found NRDC met this requirement in another proceeding within one year of the commencement of this proceeding (Administrative Law Judge (ALJ) Ruling dated November 10, 2005, in Application 05-06-004 et al.)

Section 1802(b)(1) defines a “customer” as: (A) a participant representing consumers, customers or subscribers of a utility; (B) a representative who has been authorized by a customer; or (C) a representative of a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential or small business customers. (§ 1802(b)(1)(A) through (C).)

NRDC meets this requirement as an organization authorized by its by laws to represent the interests of residential or small commercial customers, as defined in § 1802(b)(1)(C). In addition, NRDC has made a showing that its participation or intervention would impose a significant financial hardship, pursuant to § 1804(a)(2)(B). “[S]ignificant financial hardship,” in the case of a group or organization, is defined by § 1804(g) as meaning that the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. NRDC has made this showing based on a rebuttable presumption of eligibility pursuant to § 1804(b)(1), and was found eligible in another proceeding that commenced within one year of this proceeding (D.06-11-038, dated September 1, 2006). If any party attempts to rebut this presumption, NRDC is granted leave to furnish evidence of significant financial hardship within 10 days of the rebuttal’s filing.

Although D.07-12-052 is not the final decision in this proceeding and the docket remains open, the Commission has held that requests for award of compensation may be filed prior to the issuance of a final decision.⁵

Regarding the timeliness of the request for compensation, NRDC filed its request for compensation on February 19, 2008, within 60 days of D.07-12-052 being issued. No party opposed the request. In view of the above, we find that NRDC has satisfied all the procedural requirements necessary to make its request for compensation in this proceeding.

3. Substantial Contribution

In evaluating whether a customer made a substantial contribution to a proceeding, we look at several things. First, we look at whether the Commission adopted one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer. (§ 1802(i).) Second, we look at if the customer's contentions or recommendations paralleled those of another party, whether the customer's participation unnecessarily duplicated or materially supplemented, complemented, or contributed to the presentation of the other party. (§§ 1801.3(f) 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

⁵ D.04-02-016, pp. 2-3.

whether the customer's presentation substantially assisted the Commission.⁶

With this guidance in mind, we turn to the claimed contributions NRDC made to the proceeding.

NRDC contends that it substantially contributed to D.07-12-052 and to the CEC's 2005 IEPR process. In support of its contention,

NRDC cites a letter to President Peevey in which the CEC found that NRDC's contribution to the 2005 IEPR process was substantial. In deference to the CEC's findings that NRDC substantially contributed to its 2005 IEPR process, we restrict our inquiry primarily to NRDC's contributions to D.07-12-052. However, we note that NRDC, *inter alia*, argued various issues associated with load forecasting, resource assessment, and scenario analysis. These issues were found to qualify for intervenor compensation in the March 14, 2005 ACR in R.04-04-003. NRDC also stressed the need for portfolio analysis of resource fuel and technology types to help IOUs adequately analyze the associated costs, risks, and environmental impacts of their future portfolio of expected fuel types.

In terms of D.07-12-052, NRDC contends that its contributions were a substantial factor in the Commission's final determinations. In support of this claim, NRDC cites its participation in all aspects of the proceeding, including formal proceedings and related workshops. NRDC also filed testimony and briefs, and commented on the Proposed Decision related to the utilities LTPPs. Throughout the proceedings, NRDC argues that it focused on ensuring that the utilities' LTPPs were compliant with Commission and state policy, including the

⁶ D.98-04-059, 79 CPUC2d 628 at 653.

Energy Action Plan (EAP) loading order and planning for the statewide cap on GHG emissions required by AB 32, of the Global Warming Solutions Act of 2006.

Several of NRDC's positions and recommendations were specifically incorporated into D.07-12-052. NRDC emphasized the need to clarify and quantify the amount of EE embedded into the CEC's load forecast for each utility in order to properly understand the resource need for each utility. The Decision explicitly cited NRDC's testimony and opening brief against SCE in concluding "that SCE has not provided sufficient justification for not planning to achieve its EE goals."⁷ The Decision, furthermore, adopted NRDC's position with regards to an 80% overlap factor until a more accurate method could be developed for estimating future EE savings in the CEC forecast.

With respect to renewable energy, the Decision acknowledged NRDC's argument that the utilities did not provide sufficient evidence that their plans would put them on track for achieving 33% renewables by 2020, as required by the Scoping Memo. The Commission's finding that "all three LTPPs could have provided more detailed information such that the Commission could more accurately assess how or if the IOUs could achieve a 33% renewables target by 2020"⁸ is part of NRDC's contribution to D.07-12-052.

The Commission explicitly acknowledged NRDC in its finding "that the analyses presented by the IOUs should be detailed enough to enable adequate analysis of fuel mix under various scenarios, overall cost to customers, risks faced by customers and environmental impact."⁹ NRDC's argument that

⁷ D.07-12-052 at 51.

⁸ *Id.*, Finding of Fact 107.

⁹ *Id.*, at 245.

analysis of specific resource types is necessary to develop accurate GHG emissions was also favorably received by the Commission. The Commission also adopted NRDC's position in requiring IOUs to forecast the absolute GHG emissions of their plants, rather than emission rates, in their LTPPs. NRDC contends that providing this guidance to the utilities going forward was part of its contribution to the Decision. The Decision also cited "NRDC's suggestion that all three IOUs be required to provide absolute GHG emissions, with cost implications of those emission levels at various price points for CO2 allowances, under various scenarios in their future LTPP filings."¹⁰

We find that the above contributions were substantial, and that NRDC is entitled to full compensation for the work it performed during the proceedings.

With regards to contributions made by other parties, Section 1801.3(f) requires an intervenor to avoid participation that unnecessarily duplicates that of similar interests otherwise adequately represented by another party, or participation unnecessary for a fair determination of the proceeding. Section 1802.5, however, allows an intervenor to be eligible for full compensation if its participation materially supplements, complements, or contributes to that of another party if that participation makes a substantial contribution to the Commission order.

While NRDC's contributions were not completely unique during the proceedings, NRDC also contends that it "made a concerted effort to avoid duplication with other parties with similar interests ... by focusing on issues

¹⁰ *Id.*, Finding of Fact 106.

unique to NRDC among environmental groups.”¹¹ We agree that NRDC’s participation was productive and not unreasonably duplicative of the efforts of other parties. NRDC assisted the Commission in enforcing GHG legislation under AB 32 and in working with the IOUs to better evaluate the utilities’ EE portfolios. We deem NRDC’s participation and assistance in these proceedings to have constituted a substantial contribution that is sufficient to qualify it for intervenor compensation under Chapter 9 Article 5 of the Public Utilities Code.

4. Reasonableness of Requested Compensation

NRDC requests \$20,859.52 for its participation in this proceeding. \$9,952.02 is for work in the CEC’s 2005 IEPR process, and the remaining \$10,907.50 is for work in R.06-02-013 contributing to D.07-012-052. The cost breakdown is as follows:

Work on 2005 IEPR Summary

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2005	53	\$110.00	\$5,830.00
Devra Wang	2004	8	\$100	\$800.00
Devra Wang	2005	21.5	\$120.00	\$2,580.00
Subtotal:				\$9,210.00

Preparation of NOI and Compensation Request

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2005	7	\$55.00	\$385.00
Subtotal Hourly Compensation:				\$385.00
Expenses				\$357.02
Total Requested Compensation				\$9,952.02

Work on R.06-02-013 Contributing to D.07-12-052

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2006	16.5	\$115.00	\$1,897.50

¹¹ Request for Award of Intervenor Compensation by the NRDC for Substantial Contributions to D.07-12-052, p. 7.

Audrey Chang	2007	46.5	\$150.00	\$6,975.00
Devra Wang	2007	8.5	\$160.00	\$1,360.00
Subtotal:				\$10,232.50

Preparation of NOI and Compensation Request

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2008	9	\$75	\$675
Subtotal Hourly Compensation:				\$675
Expenses				\$0
Total Requested Compensation				\$10,907.50

4.1. Hours and Costs Related to and Necessary for Substantial Contribution

We first assess whether the hours claimed for the customer’s efforts that resulted in substantial contributions to Commission decisions are reasonable by determining to what degree the hours and costs are related to the work performed and necessary for the substantial contribution.

NRDC documented its claimed hours by presenting detailed timesheets showing the hours of its attorneys, accompanied by a brief description of each activity. The timesheets reasonably support the claim for total hours.

4.2. Intervenor Hourly Rates

We next take into consideration whether 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.

NRDC seeks an hourly rate of \$115 for Audrey Chang, for work performed in 2006. We had previously approved an hourly rate of \$110 for Chang in both 2005 and 2006 in D.07-04-008, but NRDC notes that this rate did not reflect the 3% cost of living adjustment adopted by D.07-01-009. NRDC also notes that, even with the additional 4.5% requested by NRDC, Chang’s hourly rate would still be at the low end of the 2006 adopted range for experts. We

concur with NRDC's analysis and find that \$115 per hour is a reasonable increase and adopt the proposed hourly rate of \$115 for Chang's work in 2006.

NRDC also seeks an hourly rate of \$150 for Chang's work in 2007. This is a substantial increase over the requested 2006 rate, but NRDC argues that this is consistent with D.07-01-009 in that it falls at the lowest end of the 2007 range for experts with 7-12 years of experience. NRDC also explains that it is in the process of adjusting its rates to be consistent with D.07-01-009, and that it has historically requested much more modest hourly rates for experts than those awarded to other intervenors. Furthermore, since Chang began working with NRDC, she has increased in both skills and experience, and this improvement has been recognized internally by two promotions since she joined NRDC. Therefore, NRDC considers the increased rate reasonable. While we are hesitant to approve of such large annual increases, we cannot disagree with NRDC's assessment of the value of Chang's expertise. Moreover, the requested rate is within the range we have previously approved for experts with similar qualifications and of similar talent. We, therefore, approve of Chang's requested hourly rate of \$150 for work performed in 2007.

NRDC further seeks an hourly rate of \$100 per hour for Devra Wang, for work performed in 2004, and an hourly rate of \$120 per hour for work performed in 2005. We had previously approved these rates in D.05-06-027¹² and D.07-04-008, and adopt them herein.

For work performed in 2007 by Wang, NRDC requests that the Commission adopt a rate of \$160 per hour. In support of the higher rate, NRDC

¹² Devra Wang is referred to in that decision by her earlier name, Devra Bachrach.

notes that, from 2002 to 2004, the Commission awarded Wang a rate of only \$100 per hour, which fell below the \$110 lower limit of expert rates adopted for D.05-11-031. Moreover, since 2002 Wang has increased in skills and experience. Like Chang, she has been promoted twice during this period in recognition of her increased abilities. Wang currently has eight years of experience working on energy and environmental policy, and the requested \$160 per hour rate is consistent with the Commission's approved rate for experts with 7 to 12 years of experience.¹³ We approve of the requested hourly rate of \$160 for work performed in 2007.

4.3. Direct Expenses

The itemized direct expenses submitted by NRDC including the following, relating to their participation in the 2005 CEC IEPR Process:

Lodging	\$159.98
Travel	\$166.54
Parking	\$30.50
Total Expenses	\$357.02

The cost breakdown included with the request shows the miscellaneous expenses to be commensurate with the work performed. We find these costs reasonable.

5. Productivity

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 relationship to the

¹³ D.07-01-009.

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

NRDC contends that during the course of these proceedings it advanced policies designed to ensure a reliable, affordable and environmentally sustainable energy resource portfolio. While NRDC concedes that it would be difficult to quantify the benefits to the ratepayers stemming from its contributions, it argues that such policies will provide lasting benefits to ratepayers. We agree that to the extent that energy usage is lowered ratepayers benefit monetarily by avoiding energy costs. We also agree that to the extent GHG emissions are reduced, ratepayers benefit monetarily by avoiding costs associated with the resultant environmental damage. We find that NRDC's efforts have been sufficiently productive to warrant full compensation for their demonstrated expenses.

6. Award

As set forth in the tables below, we award NRDC \$20,859.52.

Work on CEC 2005 IEPR (R.04-04-003)

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2005	53	\$110	\$5,830.00
Devra Wang	2004	8	\$100	\$800.00
Devra Wang	2005	21.5	\$120	\$2,580.00
Work on Proceeding Total:				\$9,210.00

Preparation of NOI and Compensation Request

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2005	7	\$55	\$385.00
NOI and Compensation Request Total:				\$385.00

CALCULATION OF FINAL AWARD (R.04-04-003)

Work on CEC 2005 IEPR

Work on Proceeding	\$9,210.00
NOI and Compensation Request Preparation	\$385.00
Expenses	\$357.02

TOTAL AWARD **\$9,952.02**

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2006	16.5	\$115	\$1,897.50
Audrey Chang	2007	46.5	\$150	\$6,975.00
Devra Wang	2007	8.5	\$160	\$1,360.00
Work on Proceeding Total:				\$10,232.50

Preparation of NOI and Compensation Request

Attorney/Staff	Year	Hours	Hourly Rate	Total
Audrey Chang	2008	9	\$75	\$675.00
NOI and Compensation Request Total:			\$	\$675.00

CALCULATION OF FINAL AWARD

Work on Proceeding	\$10,232.50
NOI and Compensation Request Preparation	\$675.00
Expenses	\$0
TOTAL AWARD	\$10,907.50

We direct PG&E, SDG&E, and SoCal Edison to allocate payment responsibility among themselves based upon their California-jurisdictional gas and electric revenues for the 2005 calendar year, to reflect the year in which the work was primarily performed.

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. NRDC’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.

7. Waiver of Comment Period

This is an intervenor compensation matter. Accordingly, as provided by Rule 14.6(c)(6) of the Commission’s Rules of Practice and Procedure, we waive the otherwise applicable 30-day public review and comment period for this decision.

8. Assignment of Proceeding

Michael R. Peevey is the assigned Commissioner and Carol A. Brown is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. NRDC has satisfied all the procedural requirements necessary to claim compensation in this proceeding.
2. NRDC made a substantial contribution to both the CEC 2005 IEPR process and D.07-12-052 as described herein.
3. NRDC requested hourly rates for its representatives that are reasonable when compared to the market rates for persons with similar training and experience.
4. NRDC requested related expenses that are reasonable and commensurate with the work performed.
5. The total of the reasonable compensation is \$20,859.52.
6. The appendix to this decision summarizes today's award.

Conclusions of Law

1. NRDC has fulfilled the requirements of §§ 1801-1812, which govern awards of intervenor compensation, and is entitled to intervenor compensation for its claimed expenses incurred in making substantial contributions to the CEC 2005 IEPR process and to D.07-12-052.
2. NRDC should be awarded \$20,859.52 for its contribution to D.07-12-052 and to the CEC 2005 IEPR Process.
3. This order should be effective today so that NRDC may be compensated without further delay.

O R D E R

IT IS ORDERED that:

1. Natural Resources Defense Council (NRDC) is awarded \$20,859.52 as compensation for its substantial contributions to Decision 07-12-052.

2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), and Southern California Edison Company (SCE) shall pay NRDC their respective shares of the award. We direct PG&E, SDG&E, and SoCal Edison to allocate payment responsibility among themselves, based on their California-jurisdictional electric revenues for the 2005 calendar year, to reflect the year in which the work was primarily performed. 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 April 5, 2006, the 75th day after the filing date of NRDC's request for compensation of January 20, 2006, in Rulemaking (R.) 04-04-003, for the amount of \$9,952.02, and beginning May 4, 2008, the 75th day after the filing date of NRDC's request for compensation of February 19, 2008, in R.06-02-013, for the amount of \$10,907.50, and continuing until full payment is made.

This order is effective today.

Dated October 2, 2008, at San Francisco, California.

MICHAEL R. PEEVEY
President
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D0810011	Modifies Decision? No
Contribution Decision(s):	D0712052	
Proceeding(s):	R0602013	
Author:	ALJ Brown	
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Natural Resources Defense Council	1/20/06	\$9,952.02	\$9,952.02	No	
Natural Resources Defense Council	2/19/08	\$10,907.50	\$10,907.50	No	

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Audrey	Chang	Policy Expert	Natural Resources Defense Council	\$110	2005	\$110
Audrey	Chang	Policy Expert	Natural Resources Defense Council	\$115	2006	\$115
Audrey	Chang	Policy Expert	Natural Resources Defense Council	\$150	2007	\$150
Devra	Wang	Policy Expert	Natural Resources Defense Council	\$100	2004	\$100
Devra	Wang	Policy Expert	Natural Resources Defense Council	\$120	2005	\$120
Devra	Wang	Policy Expert	Natural Resources Defense Council	\$160	2007	\$160

(END OF APPENDIX)