

Decision _____



FILED
11/23/21
04:59 PM

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

Application of Pacific Gas and Electric Company to Recover Insurance Costs Recorded in the Wildfire Expense Memorandum Account. U 39 M	Application 20-02-004 (Filed February 7, 2020)
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**INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
THE UTILITY REFORM NETWORK**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 21-10-022	
Claimed: \$101,410.63	Awarded: \$	
Assigned Commissioner: Marybel Batjer	Assigned ALJ: Carolyn Sisto	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		/s/
Date: 11/23/21	Printed Name: Robert Finkelstein, General Counsel	

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	Decision (D.) 21-02-022 adopted a settlement agreement reached among the active parties regarding the reasonableness review of the above-authorized wildfire liability insurance costs Pacific Gas and Electric Company (PG&E) incurred in 2017-2019. The amount approved for rate recovery was \$445.4 million, approximately \$53.3 million below the amount PG&E recorded during that period.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	4/2/20	
2. Other specified date for NOI:		
3. Date NOI filed:	4/29/20	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.19-11-001	
6. Date of ALJ ruling:	7/26/19	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.19-11-001	
10. Date of ALJ ruling:	7/26/19	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.21-10-022	
14. Date of issuance of Final Order or Decision:	October 22, 2021	
15. File date of compensation request:	November 23, 2021	
16. Was the request for compensation timely?		

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

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

#	Intervenor’s Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>Overview: PG&E’s application sought to recover \$498.7 million in revenue requirement related to the incremental wildfire liability insurance costs in excess of the amount authorized for the 2017-18, 2018-19, and 2019-20 policy years, as well as a “reinstatement” from 2017. TURN’s review of PG&E’s request focused on identifying the extent to which the requested costs were attributable to the utility’s own loss history tied to prior wildfires and a gas line explosion. TURN, Cal Advocates and PG&E successfully negotiated a proposed settlement resolving all disputed issues that the Commission adopted in D.21-10-022.</p>	<p>TURN Testimony of February 28, 2021; Joint Motion for Adoption of Settlement Agreement of June 29, 2021.</p>	
<p>1. Reasonableness of Incremental Wildfire Liability Insurance Costs: TURN’s testimony reviewed the relationship between PG&E’s recorded insurance renewal and reinstatement costs, and the utility’s loss history associated with wildfires and other events for which the utility was held responsible. TURN recommended that the Commission find reasonable only the portion of PG&E’s recorded costs that was</p>	<p>TURN Testimony (TURN-01); Settlement Agreement, Section 3.4. D.21-10-022, pp. 8-9 and Conclusions of Law 1 and 3.</p>	

<p>not tied to that loss history, and proposed a disallowance of \$140 million for insurance renewal costs, and \$134 million for the 2017 reinstatement.</p> <p>The settlement reached by TURN, Cal Advocates and PG&E agreed to a reduction of \$6.6 million to account for updated cost allocation factors between CPUC and FERC jurisdictional operations, and an additional \$46.7 million disallowance.</p> <p>The Commission found reasonable the proposed disallowance proposed in the all-party settlement.</p>		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	No	
c. If so, provide name of other parties: The active parties throughout the proceeding were PG&E, TURN, and Cal Advocates. All of the active parties joined the proposed settlement. Early in the proceeding, Thomas Del Monte obtained party status, but he did not serve testimony or actively participate in the proceeding after the prehearing conference.		
d. Intervenor’s claim of non-duplication: TURN and Cal Advocates both addressed the reasonableness of PG&E’s request for rate recovery of above-authorized insurance costs, but focused on different aspects of the utility’s request. Cal Advocates recommended a disallowance of \$40 million, based on application of the Z factor deductible of \$10 million for each of the four insurance periods covered in this application. TURN’s testimony recommended a more substantial disallowance, based on the impact that PG&E’s history of igniting catastrophic wildfires resulting in substantial damage claims had on the insurance premiums incurred during the periods in question. TURN and Cal Advocates relied on different analyses in support of their recommendations, and each took distinct		

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>approaches in negotiating and reaching the final settlement reached among the active parties, which resulted in a disallowance in excess of Cal Advocates' litigation position. Furthermore, throughout the proceeding TURN coordinated its efforts with those of Cal Advocates in order to ensure a more robust showing on behalf of ratepayer interests was achieved.</p> <p>The Commission should find that TURN's participation was efficiently coordinated with the participation of Cal Advocates wherever possible so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.</p>	
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C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

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

	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness: TURN's request for intervenor compensation seeks an award of approximately \$100,000 as the reasonable cost of our participation in the proceeding. The Commission should conclude that the amount requested is reasonable. PG&E's application sought review and approval of nearly \$500 million of wildfire excess liability insurance costs that was incremental to the amount the utility had been authorized in its previous general rate case. TURN's participation in the proceeding was largely responsible for a disallowance of approximately \$53.3 million, and TURN can take full credit to the extent the agreed-upon disallowance substantially exceeded the litigation position of Cal Advocates (a \$40 million disallowance). While TURN shares credit for the overall outcome with Cal Advocates, viewed in isolation the \$13.3 million disallowance that is incremental to the staff's litigation position is approximately 130 times more than the costs for which TURN seeks recovery here.</p> <p>In sum, the Commission should conclude that the requested amount of compensation is reasonable in light of the magnitude of the request and the scope of the potential ratepayer impacts of the proposals put forward by the utility.</p>	
b. Reasonableness of hours claimed:	

TURN seeks compensation for approximately 140 hours of time devoted to the substantive issues of this proceeding by our staff attorneys. The total of attorney time is the equivalent of just over one month of full time work for a single individual representing TURN. TURN's efforts covered the initial review and analysis of PG&E's application, preparing several rounds of discovery and analyzing the additional data provided by the utility, development of prepared testimony, and participation in the process of developing joint filings such as the case management statement required of the parties. In addition, TURN actively participated in the efforts that produced the proposed settlement, as well as several modifications thereto to incorporate identified needs for modification. This cumulative total should be found reasonable under the circumstances.

The vast majority of the requested hours represent the work of Robert Finkelstein, TURN's General Counsel, who served as the organization's lead attorney and expert witness in this proceeding, as well as TURN's representative during the settlement process. Hayley Goodson and Thomas Long, two of TURN's more experienced attorneys, provided limited but key assistance and support at the proceeding's outset as well as during the settlement negotiation process.

Intervenor Compensation-Related Time

TURN is requesting compensation for 7.75 hours devoted to compensation-related matters, the largest share of which is the 7.25 hours associated with Mr. Finkelstein's preparation of this request for compensation. Given his knowledge of all aspects of TURN's participation in this proceeding and experience with preparing such requests, Mr. Finkelstein was the most efficient choice to prepare this request for this proceeding under the circumstances.

c. Allocation of hours by issue:

TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN in this proceeding, as well as general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, pursuing discovery, and general hearing preparation activities.

Here, TURN's efforts in the proceeding focused on a single category of substantive issues, that is, the reasonableness of PG&E's recorded insurance costs. Therefore, no further allocation among substantive issue categories was feasible. TURN's allocation utilizes the typical categories such as "General Participation," "Discovery," "Coordination," and other categories that cover activities essential for successful work in the proceeding.

Code	Stands for:
Reas	Reasonableness – Issues associated with reviewing and challenging the reasonableness PG&E's above-authorized wildfire insurance expenditures during the periods in question, which included extensive time reviewing material produced during discovery.
GP	General Participation -- work that is essential to TURN's participation but would not vary with the number of issues that TURN addresses, for

	the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the application and testimony, the initial inquiry into issue areas that TURN opted not to pursue, and other tasks throughout the course of the proceeding that are of a more general nature.	
Disc	Discovery-related efforts, including preparing data requests; review of responses and responding to PG&E requests of TURN	
Coord	Coordination with other parties – here, e-mails and phone calls w/ Cal Advocates and, for the early stages of the proceeding, Thomas Del Monte.	
Proc	Procedural matters, such as developing joint statements with the other active parties in preparation for the PHC, and in response to ALJ requests for similar materials during the proceeding.	
PD	Proposed Decision – Review of the Proposed Decision and associated efforts regarding preparation of comments	
Settle	Settlement-related activities, including negotiations, analysis of positions, and development of settlement-related pleadings	
Comp	Time devoted to compensation-related pleadings	
<p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>		

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein, General Counsel	2020	48.75	\$555	D.20-11-042	\$27,056.25			
R. Finkelstein	2021	88.50	\$785	New 2021 rate	\$69,472.50			
Hayley Goodson, Managing Attorney	2020	0.75	\$455	D.20-09-032	\$341.25			
Thomas Long, Legal Director	2020	0.5	\$630	D.21-01-016	\$315.00			
T. Long	2021	1.25	\$785	New 2021 rate	\$981.25			
Subtotal: \$98,166.25						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Stephen Green, Legal Assistant	2021	2.0	\$130	New 2021 rate	\$260.00			
Subtotal: \$260.00						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Robert Finkelstein	2020	0.5	\$277.50	50% of 2020 rate	\$138.75			
Robert Finkelstein	2021	7.25	\$392.50	50% of 2021 rate	\$2,845.63			
Subtotal: \$2,984.38						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
Subtotal: \$0.00						Subtotal: \$		
TOTAL REQUEST: \$101,410.63						TOTAL AWARD: \$		
<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. Intervenors' 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>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Robert Finkelstein		June 1990		146391		No		
Hayley Goodson		December 2003		227535		No		
Thomas Long		December 1986		124776		No		

C. Attachments Documenting Specific Claim and Comments on Part III:

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Attorney Time Sheet Detail
Attachment 3	TURN Hours allocated by issue
Comment 1	<p>2021 Hourly Rates for TURN Staff Members</p> <p><u>Robert Finkelstein</u>: TURN filed an intervenor compensation claim in A.21-02-020 on August 23, 2021, that included a request that the Commission adopt an hourly rate of \$785 for Robert Finkelstein’s work in 2021, based on the Market Rate Study and guidance adopted in Res. ALJ-393. The Commission has yet to act upon that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Finkelstein, TURN refers the Commission to the showing presented in A.21-02-020.</p> <p><u>Thomas Long</u>: TURN filed an intervenor compensation claim in I.15-08-019 on October 1, 2021, that included a request that the Commission adopt an hourly rate of \$785 for Thomas Long’s work in 2021, based on the Market Rate Study and guidance adopted in Res. ALJ-393. The Commission has yet to act upon that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Long, TURN refers the Commission to the showing presented in I.15-08-019.</p> <p><u>Stephen Green</u>: TURN filed an intervenor compensation claim in R.11-11-007 on August 6, 2021, that included a request that the Commission adopt an hourly rate of \$130 for Mr. Green’s work in 2021, based on the Market Rate Study and guidance adopted in Res. ALJ-393. The Commission has yet to act upon that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Green, TURN refers the Commission to the showing presented in R.11-11-007.</p>

D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

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))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. The Utility Reform Network [has/has not] made a substantial contribution to D.21-10-022.
2. The requested hourly rates for The Utility Reform Network’s representatives [, as adjusted herein,] 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 \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay The Utility Reform Network the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] 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 [date], the 75th day after the filing of The Utility Reform Network’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.21-10-022		
Proceeding(s):	A.20-02-004 (PG&E WEMA Wildfire Insurance Reasonableness Review)		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	11/23/21	\$101,410.63		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	\$555	2020	
Robert	Finkelstein	Attorney	\$785	2021	
Hayley	Goodson	Attorney	\$455	2020	
Thomas	Long	Attorney	\$630	2020	
Thomas	Long	Attorney	\$785	2021	
Stephen	Green	Advocate	\$130	2021	

(END OF APPENDIX)

Attachment 1

Certificate of Service

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

Attachment 2

Attorney Time Sheet Detail

**A.20-02-004 (PGE WF Insurance) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Robert Finkelstein, TURN General Counsel					
Robert Finkelstein	A20-02-004	GP	Discuss w/ TURN attys and MToney re: potential response, strategiesw	2/13/20	0.25
Robert Finkelstein	A20-02-004	GP	P/c w/ TLong and MHawiger re: strategies for application	3/5/20	0.25
Robert Finkelstein	A20-02-004	Proc	E-mail to ALJ and service list re: plan to participate in upcoming PHC; e-mail to CRucker for PAO re: schedule proposal questions	3/27/20	0.75
Robert Finkelstein	A20-02-004	Coord	Review PG&E proposed schedule, develop spreadsheet with options; provide spreadsheet to CRucker for PAO along with cover e-mail	3/28/20	0.75
Robert Finkelstein	A20-02-004	Coord	E-mails w/ CRucker of PAO re: potential schedules; w/ Del Monte and PG&E re: coordination on schedule	3/30/20	0.50
Robert Finkelstein	A20-02-004	GP	E-mails w/ MKlotz re: scheduling matters; TDel Monte re: TURN positions on issues;	3/31/20	0.50
Robert Finkelstein	A20-02-004	Proc	E-mails, work with schedule spreadsheet, p/c w/ PG&E and intervenors re: scheduling issues; review ALJ e-mail re: telephonic PHC ground rules	4/1/20	1.50
Robert Finkelstein	A20-02-004	GP	Prep for and participate in telephonic PHC; draft e-mails to TLong and MHawiger re: same	4/2/20	1.00
Robert Finkelstein	A20-02-004	GP	Review application and testimony; e-mail to BMarcus re: D&O insurance coverage and Annual Report's discussion of derivative actions against PG&E Board for WFs	4/16/20	2.25
Robert Finkelstein	A20-02-004	GP	Review PG&E testimony, supporting materials; research 2019 Annual Report, related materials; draft e-mail to TLong and HGoodson re potential intersection with GRC issues	4/17/20	5.00
Robert Finkelstein	A20-02-004	Reas	Review materials, begin drafting DRs; p/c w/ TDel Monte re: case issues, strategies	4/20/20	2.75
Robert Finkelstein	A20-02-004	Reas	Further review of testimony; research PG&E Annual Reports, testimony in 2017 GRC; draft e-mail to DCheng re: self-insured strategies, etc.	4/21/20	4.25
Robert Finkelstein	A20-02-004	Disc	Review testimony draft first set of DRs; draft e-mail to PG&E re: potential workshop	4/22/20	5.50
Robert Finkelstein	A20-02-004	Coord	Review PAO DR-1	4/23/20	0.25
Robert Finkelstein	A20-02-004	Comp	Prepare NOI	4/28/20	0.50
Robert Finkelstein	A20-02-004	Disc	P/c w/ MKlotz re: DR response date, NDA, alternative approach to providing all policies	4/29/20	0.25
Robert Finkelstein	A20-02-004	GP	Review PG&E 8-k; draft e-mail to MToney and TLong re: unusual treatment of Kincade Fire, available insurance coverage	5/6/20	0.75
Robert Finkelstein	A20-02-004	GP	Review PG&E Annual Reports generally for WF insurance and risk discussion; draft f/u e-mail re: insurance issues to MToney and TLong	5/7/20	1.50
Robert Finkelstein	A20-02-004	Disc	Provide feedback to PG&E on proposed NDA	5/15/20	0.25
Robert Finkelstein	A20-02-004	Disc	E-mail exchange w/ MKlotz re: DR responses	5/27/20	0.25
Robert Finkelstein	A20-02-004	GP	Further testimony and material review; begin preparing DR Set 2	5/28/20	2.50
Robert Finkelstein	A20-02-004	Disc	Continue preparing DR Set 2	5/29/20	2.75
Robert Finkelstein	A20-02-004	Disc	Continue reviewing file materials, PG&E testimony, drafting DR-2	6/1/20	2.50
Robert Finkelstein	A20-02-004	Disc	Complete drafting and edit DR-2; draft cover e-mail to PG&E	6/2/20	1.50
Robert Finkelstein	A20-02-004	Coord	E-mails w/ parties re: positions on ALJ request for waivers; e-mails w/ DCheng re: same; draft e-mail to ALJ seeking guidance	6/8/20	1.75
Robert Finkelstein	A20-02-004	Coord	E-mails w/ parties and w/ ALJ re: proceeding schedule, necessary waivers	6/9/20	1.00
Robert Finkelstein	A20-02-004	Coord	E-mails w/ TDelMonte and CRucker re: potential testimony due dates	6/19/20	0.25
Robert Finkelstein	A20-02-004	Disc	E-mails re: PG&E responses to DRs, access through PG&E system	6/22/20	0.25
Robert Finkelstein	A20-02-004	Reas	Review WEMA file materials; draft e-mails to JDowdell re: assumptions to be drawn from insurance cost trajectory of recent years	8/5/20	1.75
Robert Finkelstein	A20-02-004	Reas	Begin review of DR responses to TURN-01, related materials	8/7/20	3.50
Robert Finkelstein	A20-02-004	Reas	Finish initial review of DR responses to TURN-01, notes for f/u DRs	8/8/20	2.50
Robert Finkelstein	A20-02-004	Reas	Review PG&E responses to DR-2, other file materials	1/11/21	1.50
Robert Finkelstein	A20-02-004	Reas	Finish reviewing responses to DR-2, other file materials; draft memo to MToney and TLong re: strategies for proceeding	1/12/21	3.00
Robert Finkelstein	A20-02-004	GP	Review MToney feedback; draft further material in response to feedback on strategies and tactics	1/15/21	1.25
Robert Finkelstein	A20-02-004	Disc	Review file materials and DR responses; draft further DRs	1/19/21	2.00
Robert Finkelstein	A20-02-004	Proc	Complete next set of DRs; draft e-mail to PAO and Del Monte re: procedural schedule, potential to request more time for testimony	1/20/21	1.75
Robert Finkelstein	A20-02-004	Proc	Draft e-mail to PG&E re: testimony due date extn request; draft e-mail to ALJ Sisto and service list re: same	1/22/21	0.50
Robert Finkelstein	A20-02-004	Disc	Quick review of DR 3, respond to PG&E request for extension	2/3/21	0.25
Robert Finkelstein	A20-02-004	Reas	Begin review of responses to DR 3	2/16/21	3.50
Robert Finkelstein	A20-02-004	Reas	Begin review of DR response materials; research related materials for testimony	2/20/21	5.00
Robert Finkelstein	A20-02-004	Reas	Complete review of DR response materials; devise and develop testimony strategy; draft DR 4 on limited f/u info for testimony	2/21/21	3.50
Robert Finkelstein	A20-02-004	Reas	Further work on testimony outline, material review; e-mails w/ PG&E re: confidentiality claims; p/c w/ JDowdell re: PG&E matters	2/22/21	6.50
Robert Finkelstein	A20-02-004	Coord	E-mails w/ CRucker and TDelMonte re: testimony issue coverage, other coordination issues	2/22/21	0.50
Robert Finkelstein	A20-02-004	Reas	Draft opening testimony	2/23/21	7.50
Robert Finkelstein	A20-02-004	Reas	Continue drafting opening testimony; review PG&E responses to DRs; work with Stephen on testimony graphic	2/24/21	4.50

**A.20-02-004 (PGE WF Insurance) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Robert Finkelstein	A20-02-004	Reas	Draft opening testimony	2/25/21	2.00
Robert Finkelstein	A20-02-004	Reas	E-mails re: redacted materials; draft and edit testimony; work with materials for attachments	2/26/21	7.50
Robert Finkelstein	A20-02-004	Reas	Prep workpapers for calcs in testimony	2/27/21	0.50
Robert Finkelstein	A20-02-004	Reas	Complete workpapers for calcs	2/28/21	0.75
Robert Finkelstein	A20-02-004	Disc	Review materials from briefing; draft DR #5	3/7/21	2.50
Robert Finkelstein	A20-02-004	Disc	Finish drafting DR #5	3/8/21	0.50
Robert Finkelstein	A20-02-004	Reas	Modifications to WPs; draft cover e-mail to PG&E re: same	3/9/21	1.00
Robert Finkelstein	A20-02-004	Proc	Call w/ PG&E and Cal PA for Case Mngmt Stmt, other prehearing matters	3/29/21	0.50
Robert Finkelstein	A20-02-004	GP	E-mail exchange w/ T DelMonte re: plans for proceeding; review of PG&E rebuttal testimony, other materials cited therein	4/1/21	3.25
Robert Finkelstein	A20-02-004	Disc	Further review of rebuttal; draft DR Set 6	4/2/21	2.00
Robert Finkelstein	A20-02-004	Settle	Call w/ PG&E and Cal PA; draft e-mail to Cal PA re: same; draft e-mail to MToney and TLong re: settlement prospects, strategies	4/2/21	1.50
Robert Finkelstein	A20-02-004	Settle	Draft e-mail to PG&E and Cal PA re: settlement counter-offer; p/c w/ CRucker of PAO	4/7/21	0.75
Robert Finkelstein	A20-02-004	Settle	Call w/ PG&E and Cal PA	4/8/21	0.50
Robert Finkelstein	A20-02-004	Settle	E-mail exchange w/ PG&E and Cal PA re: next steps, informing other parties	4/9/21	0.25
Robert Finkelstein	A20-02-004	Settle	E-mails w/ PG&E and Cal PA re: next steps	4/13/21	0.25
Robert Finkelstein	A20-02-004	Coord	Review and edit PG&E draft of jt case mngmt stmt; draft cover e-mail to PG&E and Cal PA	4/14/21	1.00
Robert Finkelstein	A20-02-004	Settle	Review and edit PG&E draft settlement agreement; call w/ PG&E and Cal Advs, hear PG&E position on previous adjustment	4/29/21	0.75
Robert Finkelstein	A20-02-004	Settle	Prep for and call w/ PG&E and Cal PA; f/u e-mails on questions that arose during call, info needed from PG&E	5/11/21	1.50
Robert Finkelstein	A20-02-004	Settle	Call w/ Cal Advocates and PG&E; draft e-mails to TLong re: unanticipated development, options; draft e-mail to PG&E seeking additional information	5/13/21	1.50
Robert Finkelstein	A20-02-004	Settle	E-mails w/ PG&E and Cal PA re: next steps, add'l question on unanticipated development; p/c w/ TLong	5/14/21	1.25
Robert Finkelstein	A20-02-004	Settle	Draft e-mail to PG&E and Cal Advocates re: TURN position	5/17/21	0.50
Robert Finkelstein	A20-02-004	Settle	Call w/ PG&E and Cal Advs; f/u e-mail to MToney and TLong re: developments, TURN options	5/20/21	1.50
Robert Finkelstein	A20-02-004	Settle	Prep for and call w/ PG&E and Cal Advs re: TURN position, next steps	5/21/21	0.50
Robert Finkelstein	A20-02-004	Settle	Check-in call	5/24/21	0.50
Robert Finkelstein	A20-02-004	GP	Prep for and participate in status conf w/ ALJ	5/25/21	0.75
Robert Finkelstein	A20-02-004	Settle	Review updated draft settlement agreement, provide feedback to PG&E and Cal Advocates	5/27/21	0.25
Robert Finkelstein	A20-02-004	Settle	E-mail exchange w/ PG&E and Cal Advocates re doc review	6/1/21	0.25
Robert Finkelstein	A20-02-004	Settle	Review TURN testimony, attach and wps; respond to PG&E e-mail re: which to include in record by stipulation	6/22/21	0.50
Robert Finkelstein	A20-02-004	Settle	Telephonic settlement conference	6/24/21	0.50
Robert Finkelstein	A20-02-004	Settle	Review settlement and motion documents; draft cover e-mail	6/25/21	0.75
Robert Finkelstein	A20-02-004	Settle	Review changes to stlmt agmt and motion; draft e-mail re: same	6/27/21	0.50
Robert Finkelstein	A20-02-004	Settle	Further review of proposed tweaks to stlmt materials, associated e-mails	6/28/21	0.25
Robert Finkelstein	A20-02-004	Coord	E-mails w/ PG&E and Cal Adv re: ALJ ruling, possible approaches to getting clarification	8/6/21	0.25
Robert Finkelstein	A20-02-004	Settle	Review bill impact info; review draft e-mail to ALJ, propose changes	8/10/21	0.50
Robert Finkelstein	A20-02-004	PD	Review PD; call w/ PG&E and Cal Advocates re: PD as compared to settlement; research PG&E tariffs and draft follow-up e-mail to PG&E; draft e-mail to MToney and TLong re: strategy	9/24/21	1.00
Robert Finkelstein	A20-02-004	Settle	E-mail exchange w/ MKlotz re: clarification of PG&E position	9/28/21	0.25
Robert Finkelstein	A20-02-004	Settle	E-mail exchange w/ MKlotz re: next steps	9/30/21	0.50
Robert Finkelstein	A20-02-004	Settle	Review and edit PG&E Draft of opening comments; draft cover e-mail to PG&E and Cal Advs re: reasoning behind proposed changes	10/1/21	1.50
Robert Finkelstein	A20-02-004	Settle	Review revised opening comments, provide feedback	10/3/21	0.25
Robert Finkelstein	A20-02-004	Settle	Review Cal Advs proposed edits, e-mail to PG&E and Cal Advs	10/4/21	0.25
Robert Finkelstein	A20-02-004	Settle	E-mail exchange w/ PG&E and Cal Advs re: potential need for reply comments	10/7/21	0.25
Robert Finkelstein	A20-02-004	PD	Review SCE opening cmmts, begin drafting reply cmmts	10/8/21	2.00
Robert Finkelstein	A20-02-004	Settle	Call w/ PG&E re: additional costs and refunds, approach to including in record	10/8/21	0.50
Robert Finkelstein	A20-02-004	Settle	Review PG&E draft reply cmmts, provide feedback	10/9/21	0.25
Robert Finkelstein	A20-02-004	PD	Research and draft reply cmmts to SCE arguments in opening cmmts	10/11/21	2.50
Robert Finkelstein	A20-02-004	Settle	Review final version of reply comments; p/c w/ CRucker; e-mail exchange w/ CRucker re: same	10/11/21	0.75
Robert Finkelstein	A20-02-004	Comp	Review file materials; begin drafting comp request	11/12/21	1.25
Robert Finkelstein	A20-02-004	Comp	Continue drafting comp request	11/21/21	3.50
Robert Finkelstein	A20-02-004	Comp	Continue drafting comp request	11/22/21	2.50
Robert Finkelstein Total					145.00

**A.20-02-004 (PGE WF Insurance) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Hayley Goodson, TURN Staff Attorney					
Hayley Goodson	A20-02-004	GP	rsch, draft memo to Bob re impact of proposed PG&E GRC settlement on review of excess liability insurance costs in the 2020 GRC period	4/20/20	0.75
Hayley Goodson Total					0.75
Thomas Long, TURN Legal Director					
Thomas Long	A20-02-004	GP	Respond to BF question re burden of proof for excess insurance costs	4/17/20	0.50
Thomas Long	A20-02-004	Settle	Emails w/BF, Mark re settlement strategy	4/3/21	0.25
Thomas Long	A20-02-004	Settle	Emails, call w/BF re stlment strategy	5/14/21	1.00
Thomas Long Total					1.75
Stephen Green, TURN Legal Assistant					
Stephen Green	A20-02-004	Reas	Assemnble timeline figure for use in Testimony; report to B. Finkelstein.	2/23/21	0.75
Stephen Green	A20-02-004	Reas	Apply recommended changes of B. Finkelstein to timeline; follow up.	2/24/21	1.25
Stephen Green Total					2.00
Grand Total					149.50

Attachment 3

TURN Hours Allocated by Issue

A.20-02-004 (PGE WF Insurance) TURN Compensation Claim

TURN Hours Allocated by Issue

			GP	Reas	Coord	Settle	PD	Disc	Proc	Substantive Hours	Substantive \$	Comp	Compensation (iComp)
Billing Period	Hourly Rate	1/2 of hourly rate											
Robert Finkelstein	2020	\$555	14.00	14.75	4.50	-	-	13.25	2.25	48.75	\$ 27,056.25	0.50	\$ 138.75
Robert Finkelstein	2021	\$785	5.25	46.75	1.75	19.25	5.50	7.25	2.75	88.50	\$ 69,472.50	7.25	\$ 2,845.63
Hayley Goodson	2020	\$455	0.75	-	-	-	-	-	-	0.75	\$ 341.25	-	\$ -
Hayley Goodson	2021	\$640	-	-	-	-	-	-	-	-	\$ -	-	\$ -
Thomas Long	2020	\$630	0.50	-	-	-	-	-	-	0.50	\$ 315.00	-	\$ -
Thomas Long	2021	\$785	-	-	-	1.25	-	-	-	1.25	\$ 981.25	-	\$ -
Stephen Green	2021	\$130	-	2.00	-	-	-	-	-	2.00	\$ 260.00	-	\$ -
TOTAL			20.50	63.50	6.25	20.50	5.50	20.50	5.00	141.75	\$ 98,426.25	7.75	\$ 2,984.38
TOTAL % HOURS ALLOCATED			14.46%	44.80%	4.41%	14.46%	3.88%	14.46%	3.53%	100.00%			

Substantial Contribution	\$ 98,426.25
Intervenor iComp Compensation	\$ 2,984.38
Grand Total	\$ 101,410.63