



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

01/25/23

04:59 PM

Application of Pacific Gas and Electric Company
For Approval of the Retirement of Diablo Canyon
Power Plant, Implementation of the Joint Proposal
And Recovery of Associated Costs Through
Proposed Ratemaking Mechanisms. (U 39 E)

A1608006
Application 16-08-006
(Filed August 11, 2016)

**INTERVENOR COMPENSATION CLAIM OF ALLIANCE FOR NUCLEAR RESPONSIBILITY
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF
ALLIANCE FOR NUCLEAR RESPONSIBILITY (“A4NR”)**

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 lcompcoordinator@cpuc.ca.gov.

Intervenor: ALLIANCE FOR NUCLEAR RESPONSIBILITY	For contribution to Decision (D.) 22-12-005
Claimed: \$227,192.55	Awarded: \$
Assigned Commissioner: Alice Reynolds	Assigned ALJ: Ehren D. Seybert
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/Rochelle Becker
Date: January 23, 2023	Printed Name: Rochelle Becker, Executive Director

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

A. Brief description of Decision:	D. 22-12-005 implements Sections 712.8(c)(1)(A) and 712.8(e) of the Public Utilities Code requiring the Commission to direct and authorize Pacific Gas and Electric Company to take “all actions that would be necessary” so as to preserve the option of extended operations at Diablo Canyon nuclear power plant beyond the current expiration dates, and to track all costs associated with continued and extended operations.
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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:	October 6, 2016	
2. Other specified date for NOI:		
3. Date NOI filed:	October 31, 2016	
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:	A.16-03-006	
6. Date of ALJ ruling:	July 26, 2016	
7. Based on another CPUC determination (specify):	N/A	
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:	A.16-03-006	
10. Date of ALJ ruling:	July 26, 2016	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.22-12-005	
14. Date of issuance of Final Order or Decision:	December 6, 2022	
15. File date of compensation request:	January 23, 2023	
16. Was the request for compensation timely?		

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

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

#	Intervenor’s Comment(s)	CPUC Discussion
3	<p>The September 23, 2022 Amended Scoping Memo and Ruling indicated at pp. 5 – 6, “Parties that have already been found eligible in A.16-08-006 do not need to file notices of intent. A party already found eligible, however, must file an amended notice of intent within 15 days after the issuance of this Amended Scoping Memo if there have been material changes to their customer status and/or showing of significant financial hardship.” [footnotes omitted] A4NR was found eligible for compensation earlier in A.16-08-006 by D.18-10-050, and there have been no subsequent material changes to its customer status or showing of significant financial hardship.</p>	

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

Revised August 2021

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>1. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission that PG&E’s vague and ambiguous descriptions of the DCTRMA and DCEOBA contradicted SB 846 and would unlawfully shift costs to ratepayers. (Reply Comments, pp. 1 – 6) In addition, A4NR’s PD Opening Comments pointed out that, pursuant to SB 846, transition costs to prepare for extended operations at Diablo Canyon, including the \$7 per megawatt-hour performance-based disbursement fee, are not eligible for recovery from utility ratepayers. (PD Opening Comments, pp. 2 – 5) A4NR’s PD Opening Comments also expressed concern that some of the words used in the PD could inadvertently enable leakage from the DCTRMA into the DCEOBA, and imply an unintended delegation of Commission authority to DWR. (PD Opening Comments, pp. 6 – 7) A4NR’s PD Opening Comments also made semantic recommendations to clarify what it believed to be the Commission’s intent. (PD Opening Comments, pp. iii – iv, 1, 8)</p>	<p>D. 22-12-005, pp. 13 – 14, 17.</p> <p>COL 18: “Pub. Util. Code Section 712.8(c)(1)(C) prohibits utility ratepayer funding for actions to preserve the option of extended operations at Diablo Canyon.”</p> <p>D.22-12-005 adopted revisions to FOF 11, COL 17, and dicta on pp. 16 – 17 identical to or consistent with the A4NR PD Opening Comments recommendations.</p>	

<p>2. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission to the difficulties faced by non-PG&E parties in detecting cost shifts without access to the underlying financial documents that formed the basis for PG&E’s cost-tracking proposals, identifying the \$1.4 billion SB 846 loan agreement with DWR, the \$75 million AB 180 agreement with DWR, and the application to the DOE Civil Nuclear Credit Program. (Reply Comments, pp. 1, 3)</p>	<p>D.22-12-005, p. 23.</p> <p>D.22-12-005, pp. 24 – 25, stated that “to the extent PG&E has executed agreements with DWR under AB 180 and SB 846, and/or PG&E’s application to the DOE Civil Nuclear Credit program has been approved, we find these finalized documents will assist parties in their review of the final accounting structures for the DCTRMA and DCEOBA.” PG&E was ordered to share copies upon request by any party to A.16-08-006, subject to the appropriate non-disclosure agreement, and forewarned, “Production of additional documents may become relevant and necessary through the course of the new SB 846 rulemaking.”</p> <p>FOF 16: “The following information is relevant to the establishment of a final cost accounting structure for the DCTRMA and DCEOBA: the executed AB 180 agreement; any executed agreements pursuant to SB 846; DOE’s final decision regarding PG&E’s September 2, 2022 Certification Application to the Civil Nuclear Credit program.”</p> <p>COL 29: “PG&E should be directed to share copies of the following documents with any party in this proceeding that has or obtains the appropriate non-disclosure agreement, if such documents are requested and the documents exist: the executed AB 180 agreement between PG&E and DWR; any executed agreements pursuant to SB 846; DOE’s final decision regarding PG&E’s September</p>	
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	<p>2, 2022 Certification Application to the Civil Nuclear Credit program.”</p> <p>OP 7: “Pacific Gas and Electric Company (PG&E) is directed to share copies of the following documents with any party to this proceeding that has or obtains the appropriate non-disclosure agreement, if such documents are requested by the party and the document(s) exist: the executed Assembly Bill 180 agreement between PG&E and the Department of Water Resources; any executed agreements signed by PG&E pursuant to Senate Bill 846; and the United States Department of Energy’s final decision regarding PG&E’s September 2, 2022 Certification Application to the Civil Nuclear Credit program.”</p>	
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<p>3. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission that PG&E’s opaque discussion of what costs will be funded by the DOE Civil Nuclear Credit program blurred the distinction between transition costs and extended operations costs, potentially shifting cost liabilities to ratepayers. (Reply Comments, pp. 5 – 6)</p>	<p>D.22-12-005, p. 17, states, “PG&E should attempt to recover the following transition and extended operations costs using government funding to the greatest extent possible: all costs associated with preserving the option of extended operations at Diablo Canyon (See Section 2); all plant and equipment improvement and investment costs; fuel purchases; spent fuel storage capacity costs; and any related taxes or other revenue requirements. [footnote citing A4NR omitted] In the event PG&E seeks to transfer any of these costs from the DCTRMA to the DCEOBA, or records any of these costs directly to the DCEOBA without seeking government funding, PG&E should be prepared to explain why it did not seek government funding, or was otherwise unable to anticipate the need for the investments and activities at the time government funding was being requested.”</p> <p>FOF 9: “As currently designed, the DCTRMA would be funded entirely through government funding streams, including amounts allocated by AB 180 and SB 846, as well as any funding made available through DOE’s Civil Nuclear Credit program.”</p> <p>COL 17: “PG&E should attempt to recover the following transition and extended operations costs using government funding to the greatest extent possible: all costs associated with preserving the option of extended operations at Diablo Canyon; all plant and equipment improvement and investment costs; spent fuel storage</p>	
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	<p>capacity costs; and any related taxes or other revenue requirements.”</p>	
<p>4. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission that PG&E’s failure to explain how it will address any shortfalls in cumulative awards from the Civil Nuclear Credit program, or any other government funds, prevents proper analysis of whether the DCEOBA provides adequate utility ratepayer protections. (Reply Comments, pp. 7 – 8)</p>	<p>D.22-12-005, p. 23.</p> <p>D.22-12-005, p. 24, explicitly identifies for potential consideration in the Commission’s contemplated new SB 846 rulemaking “whether additional ratepayer protections are needed in the event there are any shortfalls in government funding.”</p>	
<p>5. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission that PG&E contemplates applying for 20-year operating license extensions despite the 5-year limitation in SB 846, with likely accounting impacts if such variance were allowed by the Commission. (Reply Comments, pp. 9 – 11)</p>	<p>D. 22-12-005, p. 14.</p> <p>D.22-12-005, p. 18, stated that “SB 846 is clear that any extension of operations will be limited” to 5 years, and that “All costs and benefits recorded in the DCTRMA and DCEOBA must adhere to these timeframes and requirements.”</p> <p>COL 21: SB 846 limits any extension of operations at Diablo Canyon to October 2029 (Unit 1) and October 2030 (Unit 2).</p> <p>COL 22: All costs and benefits recorded in the DCTRMA and DCEOBA must adhere to the timeframes and requirements set forth in SB 846.</p>	

<p>6. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling alerted the Commission to the problems likely to result from PG&E’s proposal to unilaterally impose a DCEOBA accounting structure on other LSEs, and recommended instead that PG&E’s proposed Tier 2 Advice Letter process be upgraded to Tier 3, and be preceded by a mandatory meet-and-confer process with all affected LSEs to attempt to develop a consensual proposal for the design and administration of the proposed cost-tracking. (Reply Comments, pp. 11 – 13)</p>	<p>D. 22-12-005, p. 20.</p> <p>D.22-12-005, p. 21 and OP 4, adopted a Tier 3 Advice Letter process and required PG&E to hold at least one meet-and-confer session with representatives of all LSEs, “which will provide the opportunity to work through any differences before the Advice Letter is filed.”</p> <p>COL 25: “Prior to filing the Tier 3 Advice Letter, PG&E should hold at least one meet and confer session where all LSEs and parties to A.16-08-006 are invited to participate.”</p>	
<p>7. A4NR’s Reply Comments on the Amended Scoping Memo and Ruling recommended a schedule that would require PG&E to: meet and confer with all LSE representatives within 30 days of the final Commission decision; file an update on the status of these efforts within 60 days of the final Commission decision; and file a Tier 3 Advice Letter containing a detailed and complete accounting structure of the DCTRMA and DCEOBA within 90 days of the final Commission decision. (Reply Comments, pp. 13 – 14)</p>	<p>D. 22-12-005, p. 20.</p> <p>D.22-12-005, p. 21 and OP 4, adopted the 90-day schedule, replacing the status update at 60 days with a requirement that PG&E’s Advice Letter filing “identify the main issues discussed during the meet and confer session(s) and explain whether and how each issue is addressed.”</p> <p>COL 24. “PG&E should be directed to file a Tier 3 Advice Letter within 90 days after the issuance date of this decision to provide a detailed and complete accounting structure of the associated costs and recovery of the DCTRMA and DCEOBA.”</p>	

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?	Yes	
c. If so, provide name of other parties: Cal Advocates, Womens Energy Matters, Green Power Institute		
d. Intervenor’s claim of non-duplication: This expedited proceeding did not involve hearings or other formal evidence-gathering that would have encouraged a more structured coordination between parties. Over the course of seven months of effort by A4NR preceding D.22-12-005, repeated consultations took place with SLOMFP, WEM, FOE, NRDC, Sierra Club, and TURN. The written comments filed by the parties identified in c. above each had one position similar to those expressed by A4NR, but these were a small subset of the topics addressed by A4NR and not all of the A.16-08-006 parties with whom A4NR communicated chose to participate in the SB 846 Implementation phase of the reopened proceeding. The one party with whom A4NR most actively communicated, SLOMFP, adopted a different approach (in conjunction with FOE) to the proceeding entirely.		

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)

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.

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>Notably, TURN (a frequent ally of A4NR on Diablo Canyon matters) chose not to participate in the SB 846 Implementation phase of A.16-08-006, and consequently A4NR performed a proportionately larger share of the ratepayer advocacy role than it ordinarily does in the Commission’s nuclear proceedings. This is reflected in D.22-12-005’s repeated references to A4NR contributions described in Part II.A. above. The cost-tracking and procedural safeguards advocated by A4NR are prophylactic in nature, complicating the projection of likely ratepayer savings attributable to the Commission’s embrace of A4NR positions. Nevertheless, given the large amounts associated with the DWR loan (\$1.4 billion), the DOE Civil Nuclear Credit (\$1.1 billion), and the AB 180 DWR agreement (\$75 million), the increased procedural assurance of a proper accounting of costs that may prove eligible for pass-through to PG&E ratepayers (and other Load Serving Entities’ customers) will likely result in savings that easily exceed the 227,192.55 cost of A4NR’s intervention.</p>	
<p>c. Allocation of hours by issue:</p> <p>SB 846-protected potential ratepayer liabilities, 133.46 hours, 32.91%; state taxpayer funding obligations, 133.4hours, 32.89%; potential DOE Civil Nuclear Credit funds, 111.01 hours, 27.37%; general (including claim preparation), 27.68 hours, 6.83%.</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman	2022	271.42	715	D.22-12-020, ALJ-393 escalation and first 5% step increase	194,065.30			

CLAIMED						CPUC AWARD		
Rochelle Becker	2022	46.21	305	D.22-12-020, ALJ-393 escalation and first 5% step increase	14,094.05			
David Weisman	2022	78.92	210	D.22-07-020, ALJ-393 escalation and first 5% step increase	16,573.20			
<i>Subtotal: \$224,732.55</i>						<i>Subtotal: \$</i>		
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 \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman	2022	6	357.50	D.22-07-020, ALJ-393 escalation and first 5% step increase	2,145.00			
David Weisman	2023	3	105	D.22-07-020, ALJ-393 escalation and first 5% step increase	315.00			
<i>Subtotal: \$2,460.00</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								

CLAIMED		CPUC AWARD	
<i>Subtotal: \$</i>		<i>Subtotal: \$</i>	
<i>TOTAL REQUEST: \$227,192.55</i>		<i>TOTAL AWARD: \$</i>	
<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
John Geesman	June 28, 1977	74448	No

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records of John Geesman
3	Time Records of Rochelle Becker
4	Time Records of David Weisman
5	Spreadsheet Verification of Calculations
Comment #1	A4NR requests that any COLA adopted by the Commission be applied to Mr. Weisman's 2023 hours.

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

Item	Reason

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

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 (see 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. **Alliance for Nuclear Responsibility** [has/has not] made a substantial contribution to **D.22-12-005**.
2. The requested hourly rates for **Alliance for Nuclear Responsibility**'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. **Alliance for Nuclear Responsibility** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **Alliance for Nuclear Responsibility** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **Alliance for Nuclear Responsibility** 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 **Alliance for Nuclear Responsibility**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.22-12-005		
Proceeding(s):	A.16-08-006		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Alliance for Nuclear Responsibility	January 23, 2023	\$227,192.55		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
John	Geesman	Attorney	715	2022	
Rochelle	Becker	Advocate	305	2022	
David	Weisman	Advocate	210	2022	
David	Weisman	Advocate	210 plus any COLA	2023	

Revised August 2021

(END OF APPENDIX)

A.16-08-006 (SB 846 implementation) time records of John Geesman

<u>DATE</u>	<u>ACTIVITY</u>	<u>SB 846 RATEPAYER PROTECTIONS</u>	<u>FUNDING FROM STATE TAXPAYERS</u>	<u>FUNDING FROM DOE GRANT</u>	<u>GENERAL</u>	<u>TOTAL</u>
12/30/2022	claim prep <i>at one-half of hourly rate</i>				2	2
12/29/2022	claim prep <i>at one-half of hourly rate</i>				4	4
11/21/2022	correspondence w. clients re: PD Reply Comments, DWR \$75 million DWR agreement, timing of General Fund repayment, conditional award from DOE	0.05	0.08	0.05		0.18
11/21/2022	edit Reply Comments to reflect conditional DOE award			0.25		0.25
11/20/2022	draft PD Reply Comments	0.36	0.36	0.36		1.08
11/19/2022	draft PD Reply Comments	2.45	2.44	2.44		7.33
11/19/2022	correspondence w. clients re: Palisades ineligibility			0.1		0.1
11/18/2022	review video of Assembly budget subcommittee hearing on SB 846 reliability/DCNPP issues	1.57	1.58			3.15
11/18/2022	review other parties' Opening Comments on PD	0.3	0.3	0.3		0.9
11/18/2022	correspondence w. clients re: state budget impact on DWR loan		0.05			0.05
11/17/2022	correspondence w. clients re: state budget impact on DWR loan, SLOMFP letter to NRC	0.1	0.46			0.56
11/17/2022	review SLOMFP letter to NRC	0.33				0.33
11/17/2022	strategy call w. client	0.36	0.36	0.36		1.08
11/16/2022	correspondence w. clients re: state budget impact on DWR loan, DWR documents	0.07	0.07			0.14
11/16/2022	correspondence w. SLOMFP counsel re: DWR documents	0.01	0.01			0.02
11/15/2022	correspondence w. TURN counsel re: DWR documents	0.06	0.06			0.12
11/14/2022	review DWR AB 180 agreement and SB 846 loan agreement	0.94	0.93			1.87
11/14/2022	correspondence w. clients re: DWR powerpoint slides on reliability reserve	0.05	0.05			0.1
11/12/2022	draft Opening Comments on PD	1.76	1.76	1.75		5.27
11/11/2022	draft Opening Comments on PD	1.9	1.89	1.89		5.68
11/11/2022	correspondence w. clients re: PG&E written comments to CEC	0.03	0.02	0.02		0.07
11/10/2022	correspondence w. clients re: enhanced oversight, Dana Williamson	0.09	0.09			0.18
11/8/2022	correspondence w. clients re: CEC comments	0.01	0.01			0.02
11/7/2022	correspondence w. clients re: draft comments on 10/28/22 joint CEC/CPUC/CAISO workshop	0.07	0.07			0.14
11/6/2022	draft comments on 10/28/22 joint CEC/CPUC/CAISO workshop	2.32	2.31			4.63
11/5/2022	correspondence w. clients re: committee analyses of SB 846	0.01	0.01	0.01		0.03
11/5/2022	research locational aspects of reliability needs, Path 26					

	constraints	2.78	2.77		5.55
11/4/2022	draft Motion to Compel Discovery	1.99	1.98	1.98	5.95
11/3/2022	correspondence w. clients re: meet-and-confer results, 10/28 transcripts, County of SLO & CSAC view on enhanced oversight	0.07	0.06	0.06	0.19
11/3/2022	meet-and-confer call w. PG&E re: discovery dispute	0.08	0.08	0.07	0.23
11/3/2022	prepare for meet-and-confer re: discovery dispute	0.25	0.25	0.25	0.75
11/3/2022	correspondence w. WEM re: PG&E outage cost insurance	0.03	0.02		0.05
11/2/2022	correspondence w. PG&E counsel re: meet-and-confer	0.02	0.02	0.01	0.05
11/1/2022	correspondence w. clients re: PG&E license extension, data response attachment,	0.08	0.08	0.08	0.24
11/1/2022	review PG&E data responses and attachment	0.16	0.16	0.16	0.48
11/1/2022	correspondence w. PG&E re; missing data response attachment	0.01	0.01	0.01	0.03
10/31/2022	correspondence w. clients re: PD, data requests, Matosantos on loan repayment & grant eligibility, DWR-PG&E confidentiality agreement, NRC Fitness for Duty reports	0.16	0.15	0.15	0.46
10/31/2022	research Matosantos transcripts re: loan repayment, eligibility		0.38	0.37	0.75
10/31/2022	review DWR-PG&E confidentiality agreement	0.2	0.2		0.4
10/29/2022	correspondence w. clients re: 5yr vs. 20yr license extension	0.02			0.02
10/28/2022	correspondence w. DWR re: CPRA response	0.05	0.05		0.1
10/28/2022	attend CEC/CPUC/CAISO webinar	2.59	2.59		5.18
10/28/2022	review PD	0.38	0.38	0.37	1.13
10/28/2022	review prepared materials for CEC/CPUC/CAISO workshop	0.29	0.29		0.58
10/25/2022	correspondence w. clients re: CEC/CPUC/CAISO workshop	0.03	0.02		0.05
10/21/2022	correspondence w. clients re: analyzing software replacement needs	0.05	0.05	0.05	0.15
10/20/2022	correspondence w. clients re: SSC replacements, Matosantos transcripts	0.03	0.03	0.03	0.09
10/18/2022	correspondence w. clients re: timeline for DOE response, CPRA request to DWR	0.02	0.01	0.05	0.08
10/16/2022	draft data requests to PG&E	0.56	0.56	0.55	1.67
10/14/2022	review Reply Comments filed by other parties	0.25	0.24	0.24	0.73
10/13/2022	draft Reply Comments on Amended Scoping Order & Ruling	0.79	0.79	0.79	2.37
10/12/2022	correspondence w. clients re: Draft Reply Comments	0.02	0.02	0.01	0.05
10/12/2022	draft Reply Comments on Amended Scoping Order & Ruling	1.11	1.1	1.1	3.31
10/11/2022	draft Reply Comments on Amended Scoping Order & Ruling	0.92	0.92	0.91	2.75
10/11/2022	correspondence w. clients re: Woodruff IPRP concern				0.08
10/10/2022	draft Reply Comments on Amended Scoping Order & Ruling	1.8	1.8	1.8	5.4
10/9/2022	draft Reply Comments on Amended Scoping Order & Ruling	1.42	1.42	1.41	4.25
10/8/2022	review DOE Guidance for CNC grant first round			0.85	0.85
10/8/2022	line item comparison between SB 846 requirements and PG&E Opening Comments	0.64	0.63	0.63	1.9

10/7/2022	review PG&E Opening Comments on Amended Scoping Memo & Ruling	0.39	0.39	0.39	1.17
10/7/2022	review DOE Guidance for CNC grant second round			1.62	1.62
10/7/2022	correspondence w. WEM re: PUC 454.52(g) and PRC 25524.2	0.09	0.08		0.17
10/7/2022	correspondence w. clients re: Peterson & Kadak remarks, polling support for DCNPP	0.03		0.08	0.11
10/6/2022	attend and participate in IPRP meeting	1.08	1.07		2.15
10/6/2022	prepare for IPRP meeting	0.41	0.41		0.82
10/6/2022	correspondence w. clients re: DCNPP extension cost comparison w. mandatory kindergarten		0.03		0.03
10/5/2022	phone calls w. client re: seismic update	0.11	0.11		0.22
10/4/2022	correspondence w. Donna Gilmore re: PG&E spinoff of non-nuclear generation			0.05	0.05
10/2/2022	review NRC DPO on seismic standards for buildings, Stanford Seismic Design Standards	2.19	2.18		4.37
10/1/2022	review PG&E Application for spinoff of non-nuclear generation			2.34	2.34
9/30/2022	review PG&E Application for spinoff of non-nuclear generation			1.2	1.2
9/30/2022	correspondence w. clients re: YTT as purchaser, nuclear bros			0.06	0.06
9/29/2022	correspondence w. clients re: PG&E errors/omissions insurance	0.08			0.08
9/29/2022	conf. call w. Calif. Community Energy Assoc. re: DCNPP extended operations issues	0.35	0.35	0.35	1.05
9/29/2022	attend and participate in DCISC meeting	1.5	1.5		3
9/28/2022	attend and participate in DCISC meeting	4.11	4.11		8.22
9/28/2022	correspondence w. clients re: PG&E spinoff of non-nuclear generation, SLO Board of Supervisors discussion	0.03	0.02	0.05	0.1
9/28/2022	phone call w. client re: SLOMFP	0.1	0.1	0.1	0.3
9/27/2022	phone call w. SLOMFP counsel re: Amended Scoping Memo	0.1	0.09	0.09	0.28
9/26/2022	review DCISC 30th and 29th Annual Reports	1.67	1.66		3.33
9/26/2022	compare NRC response to PG&E SPRA w. Ed Lyman paper	0.69	0.69		1.38
9/26/2022	review NRC SRP for non-safety SSCs	0.89	0.88		1.77
9/26/2022	correspondence w. NRDC re: IPS study of SNF	0.02	0.01		0.03
9/26/2022	correspondence w. clients re: DCNPP extension cost comparison w. mandatory kindergarten		0.05		0.05
9/25/2022	review DCISC agenda packet, 31st Annual Report	4.12	4.11		8.23
9/24/2022	review DCISC archived materials	3.39	3.39		6.78
9/23/2022	correspondence w. clients re: Amended Scoping Memo & Ruling	0.08	0.08	0.07	0.23
9/23/2022	review DCISC archived materials	0.6	0.6		1.2
9/23/2022	review Amended Scoping Memo and Ruling	0.07	0.07	0.06	0.2
9/21/2022	correspondence w. clients re: DCISC strategy, Gilinsky article, DCNPP and renewable curtailments	0.14	0.13	0.1	0.37
9/20/2022	correspondence w. clients re: CSLC, BART parallel	0.04	0.04		0.08

9/19/2022	correspondence w. clients re: SACCWIS	0.02	0.01		0.03
9/19/2022	review DCISC 2019 and 2020 meeting records	1.38	1.37		2.75
9/18/2022	review NRC documents on PG&E application of Hosgri + LOCA to steam generators	1.28	1.27		2.55
9/17/2022	review CPUC staff white paper on new procurement program	0.75	0.75		1.5
9/17/2022	review Congalton/Weisman interview	0.24	0.23	0.23	0.7
9/17/2022	correspondence w. clients re: procurement	0.02	0.01		0.03
9/16/2022	phone call w. client re: seismic issues status	0.09	0.09		0.18
9/16/2022	review ALJ Ruling in R.20-05-003	0.17	0.16		0.33
9/15/2022	review Indian Point 5yr license extension docs from NRC	0.16	0.15		0.31
9/15/2022	zoom strategy session w. clients	0.66	0.66	0.66	1.98
9/15/2022	zoom strategy session w. NRDC, FOE, clients	0.36	0.36	0.36	1.08
9/14/2022	review NRC approval of change to DCNPP tech. specs for steam generator tube inspections	0.55	0.55	0.55	1.65
9/14/2022	correspondence w. clients re: past seismic filings, BofA financial analysis, Prop. 30 language parallels, NRDC/FOE call, discovery strategy	0.1	0.1	0.1	0.3
9/13/2022	correspondence w. clients re: GTCC site, DWR seismic letter, increase in uranium prices, Bruce Gibson inquiry, Newsom historical statements at CSLC	0.12	0.12	0.12	0.36
9/13/2022	review Matosantos statements to Senate, Assembly	0.7	0.7	0.69	2.09
9/12/2022	correspondence w. clients re: NRDC/FOE call, DWR seismic letter	0.04	0.04	0.03	0.11
9/12/2022	phone call w. clients re: strategy	0.07	0.07	0.06	0.2
9/11/2022	draft A4NR letter to DWR re: seismic assessment loan covenant	0.72	0.71		1.43
9/11/2022	research Design Class II SSC seismic issues	3.48	3.47		6.95
9/10/2022	listen to Dave Roberts interview of Katherine Blunt re: PG&E culture/history			0.88	0.88
9/10/2022	correspondence w. clients re: 5yr vs. 20yr license extension, Liane Randolph	0.04	0.03	0.03	0.1
9/10/2022	review A4NR testimony in A.12-11-009, A.15-02-023	0.73	0.72	0.72	2.17
9/10/2022	review PG&E SPRA, NRC Reg. Guidance for license basis changes	1.77	1.77	1.77	5.31
9/9/2022	review PG&E SPRA, MRW precursor paper to AB 1632 Report	2.31	2.31	2.3	6.92
9/9/2022	correspondence w. clients re: John Podesta, PG&E bill increases, state as lender & ratepayer as insurer	0.05	0.04	0.04	0.13
9/9/2022	phone call w. client re: Blakeslee testimony	0.13	0.12		0.25
9/8/2022	review AB 1632 Report, MRW precursor paper	2.22	2.22	2.21	6.65
9/8/2022	correspondence w. clients re: DCISC	0.03	0.02		0.05
9/8/2022	review PG&E Enercon report on Class II SSCs	0.84	0.83		1.67
9/7/2022	review PG&E Enercon report on Class II SSCs	3.75	3.74		7.49
9/6/2022	review NRC RAIs and PG&E responses on SAMA reports	1.45	1.44	1.44	4.33

9/6/2022	review Ed Lyman DCNPP seismic paper & supporting documents	1.36	1.36	1.36		4.08
9/5/2022	research Japanese procedures for nuclear plant restarts				2.75	2.75
9/5/2022	correspondence w. clients re: letter to President Reynolds	0.01	0.01			0.02
9/5/2022	draft A4NR letter to President Reynolds re: PG&E interaction w. IPRP	0.7	0.7			1.4
9/4/2022	review A.14-02-007 & A.15-02-023 dockets re: DCNPP seismic issues	2.59	2.58			5.17
9/3/2022	correspondence w. clients re: confidentiality issues, Jackson Browne	0.02	0.01		0.05	0.08
9/2/2022	zoom strategy session w. clients	0.48	0.47	0.47		1.42
9/2/2022	review text of SB 846	0.44	0.43	0.43		1.3
9/2/2022	correspondence w. clients re: reserve margins	0.03	0.02			0.05
9/1/2022	correspondence w. clients re: IBEW comments, PG&E focus, Matosantos transcripts, state vs. federal forum, SLOMFP, need for strategy session	0.07	0.07	0.07		0.21
8/30/2022	correspondence w. clients re: TURN analysis, SCE/SDG&E concerns, solar tax, transmission issues, Matosantos scorecard for ratepayers, PG&E 2020 comments on locational aspects of system reliability, 5yrs vs. 20 yrs	0.15	0.15	0.14		0.44
8/29/2022	correspondence w. Lorretta Lynch re: past ratepayer spending seismic studies, relicensing	0.1	0.1	0.1		0.3
8/29/2022	correspondence w. clients re: fitness for duty stats, BofA financial analysis	0.04	0.04	0.03		0.11
8/26/2022	correspondence w. clients re: Ed Smeloff	0.03	0.02			0.05
8/26/2022	attend Assembly video hearing on DCNPP extension	1.16	1.16	1.15		3.47
8/26/2022	correspondence w. clients re: legislative hearing	0.01	0.01			0.02
8/25/2022	attend Senate video hearing on DCNPP extension	1.19	1.18	1.18		3.55
8/25/2022	correspondence w. clients re: John Laird comments	0.03	0.02			0.05
8/25/2022	review draft Newsom legislation for DCNPP extension	0.49	0.48	0.48		1.45
8/24/2022	correspondence w. clients re: legislative hearing, TURN analysis, 1988 settlement	0.03	0.02	0.02		0.07
8/24/2022	review TURN analysis	0.09	0.08	0.08		0.25
8/23/2022	correspondence w. clients re: Newsom proposal	0.02	0.02	0.01		0.05
8/16/2022	correspondence w. clients re: IPRP, Al Pak	0.02	0.02			0.04
8/15/2022	review Ed Lyman BAS seismic paper	0.55	0.55			1.1
8/12/2022	attend CEC/CAISO video workshop on DCNPP extension	1.55	1.55	1.54		4.64
8/12/2022	correspondence w. clients re: CEC/CAISO workshop, forgivable loan w. performance fee, tribal issues, SLO mtg. w. Gov's staff	0.09	0.09	0.08		0.26
8/12/2022	review draft Newsom proposal for DCNPP extension	0.5	0.5	0.5		1.5
8/11/2022	correspondence w. clients re: OTC numbers	0.01	0.01			0.02
8/10/2022	correspondence w. clients re: Senate hearing	0.02	0.02	0.01		0.05

8/10/2022	review video of Senate EUC hearing on midterm reliability	0.49	0.48	0.48		1.45
8/9/2022	research issues for CEC/CAISO reliability workshop	0.38	0.38	0.37		1.13
8/8/2022	correspondence w. SLOMFP re: transmission expert				0.05	0.05
8/8/2022	draft comments/questions for CEC/CAISO workshop	0.27	0.27	0.26		0.8
8/8/2022	correspondence w. clients re: Oliver Stone				0.02	0.02
8/8/2022	correspondence w. David Zizmor re: DCNPP production costs	0.02	0.02	0.01		0.05
8/7/2022	correspondence w. clients re: CEC/CAISO reliability workshop	0.01	0.01	0.01		0.03
8/6/2022	correspondence w. clients re: CEC/CAISO reliability workshop, NRDC and FOE, Patti Poppe, ocean cooling	0.06	0.06	0.05		0.17
8/5/2022	correspondence w. clients re: Sierra Club, DCNPP fuel source	0.04	0.03	0.03		0.1
8/5/2022	review ANS video of DCNPP presentations by CGNP, YTT, IBEW, SLO County, and others	0.55	0.55	0.55		1.65
8/4/2022	correspondence w. clients, NRDC, FOE re: Civil Nuclear Credit			0.2		0.2
8/4/2022	zoom strategy session w. clients	0.29	0.28	0.28		0.85
8/3/2022	correspondence w. clients re: Per Peterson 2007 DCNPP-like-car-without-seatbelts remark	0.03	0.03	0.02		0.08
8/3/2022	attend Alice Reynold zoom presentation to PANC	0.11	0.11	0.11		0.33
8/3/2022	review transcript of Patti Poppe Commonwealth Club interview	0.11	0.11	0.11		0.33
8/1/2022	correspondence w. clients re: DCNPP fitness for duty rankings, DCNPP 500-kv system capacity, Al Pak	0.11	0.11	0.11		0.33
8/1/2022	research CEC AB 525 Report, CAISO Transmission Plan re: future capacity of DCNPP 500-kv substation	1.06	1.06	1.06		3.18
7/29/2022	correspondence w. clients re: PG&E lobbyists	0.12	0.12	0.11		0.35
7/28/2022	correspondence w. clients re: \$75 million state grant to PG&E, SWRCB, unsuitability of baseload, earnings call transcript, DCNPP 500-kv system, DCNPP incentives in Manchin-Schumer bill	0.28	0.27	0.27		0.82
7/28/2022	research PG&E 10-Q and earnings call transcript	0.4	0.4	0.39		1.19
7/25/2022	correspondence w. clients re: Cavanagh request				0.02	0.02
7/25/2022	correspondence w. Ralph Cavanagh re: enforceability of Joint Proposal				0.25	0.25
7/23/2022	correspondence w/ clients re: Cavanagh statement, Alice Reynolds presentation				0.04	0.04
7/22/2022	review NRDC, FOE, Blakeslee statements re: extension vs. decommissioning				0.44	0.44
7/22/2022	correspondence w. clients re: zoom				0.02	0.02
7/21/2022	correspondence w. clients re: Freehling supply/demand balance, DCNPP fitness-for-duty rankings,	0.08	0.08	0.07		0.23
7/19/2022	correspondence w. clients re: German precedent				0.05	0.05
7/18/2022	correspondence w. clients re: Lam/McWhorter fact-finding visit	0.01	0.01			0.02
7/17/2022	correspondence w. clients re: Hosn statement	0.02	0.02	0.01		0.05
7/15/2022	correspondence w. clients re: NRC relicensing deadline issues	0.02	0.02	0.01		0.05

7/15/2022	research NRC deadlines for relicensing application	0.09	0.08	0.08	0.25
7/11/2022	correspondence w. clients re: Sam Blakeslee	0.02	0.01		0.03
7/9/2022	correspondence w. clients re: Matosantos departure	0.02	0.01	0.01	0.04
7/7/2022	correspondence w. clients re: Bob Rathie call, PG&E seeking funds from DOE	0.04	0.04	0.04	0.12
7/7/2022	phone call w. Bob Rathie re: what goes on DCISC checklist	0.09	0.09	0.09	0.27
7/2/2022	correspondence w. clients re: IBEW 1245 retention pay, DOE deadline estension, national interest in case	0.04	0.04	0.03	0.11
7/2/2022	research IBEW 1245 retention pay	0.4	0.4	0.4	1.2
7/1/2022	correspondence w. clients re: DOE comments file			0.02	0.02
7/1/2022	review DOE comments file			1.58	1.58
6/30/2022	correspondence w. clients re: Palisades parallel			0.02	0.02
6/29/2022	correspondence w. clients re: PG&E-DOE letter, Matosantos-DOE letter, Ileana Wachtel, Michael Colvin, Feinstein			0.23	0.23
6/29/2022	phone call w. client re: extension of DCNPP operations			0.4	0.4
6/28/2022	correspondence w. clients re: PG&E-DOE letter, David Zizmor, Newsom position			0.08	0.08
6/24/2022	correspondence w. clients re: DCISC, DCNPP checklist			0.15	0.15
6/23/2022	attend and participate by zoom in DCISC meeting			4.83	4.83
6/22/2022	attend and participate by zoom in DCISC meeting			8.74	8.74
6/22/2022	correspondence w. clients re: Hosn comments			0.03	0.03
6/21/2022	strategy call w. clients re: prospective impacts from extensions of DCNPP operating licenses			1.68	1.68
6/20/2022	correspondence w. clients re: CPRA decision				0.07
6/19/2022	review SLOMFP videos on plant closure probabilities, issues				1.41
6/18/2022	correspondence w. clients re: NEI, DOE process and timing			0.18	0.18
6/18/2022	research DOE process re: DCNPP extended operation			4.78	4.78
6/15/2022	correspondence w. clients re: Feinstein			0.02	0.02
6/9/2022	correspondence w. clients re: Zawalick statements, A.16-08-006 Settlement Agreement			0.08	0.08
6/7/2022	correspondence w. clients re: 500-kv substation				0.05
6/5/2022	correspondence w. clients re: poll on DCNPP shutdown				0.1
5/31/2022	correspondence w. clients re: Entergy				0.03
5/29/2022	correspondence w. clients re: Holtec				0.1
5/28/2022	correspondence w. clients re: Matosantos letter, state bailout		0.1	0.13	0.23
5/27/2022	correspondence w. clients re: Breakthrough Institute statement, Bob Dean statement, infrastructure bill				0.32
5/21/2022	correspondence w. clients re: relicensing prospects, Palisades				0.2
5/20/2022	correspondence w. clients re: SNF, relicensing prospects				0.13
5/19/2022	correspondence w. clients re: PTC vs CNC, seismic			0.1	0.22
5/18/2022	correspondence w. clients re: CSLC video archives				0.05

5/12/2022	correspondence w. clients re: Michael Peck problems		0.2	0.2
5/7/2022	correspondence w. clients re: DCNPP economics, state agencies and blackout predictions	0.15	0.2	0.35
5/4/2022	correspondence w. clients re: DCNPP revenue from CAISO	0.05		0.05
5/3/2022	correspondence w. clients re: DOE guidelines, SLOMFP statements, Monning statement, Zawalick statement	0.1	0.08	0.18
5/3/2022	review video of Zawalick statement to DCDEP	0.1		0.1
5/2/2022	correspondence w. SLOMFP re: followup to call	0.05		0.05
5/2/2022	phone call w. SLOMFP re: DOE CNC prospects	0.33		0.33
5/2/2022	correspondence w. clients re: PG&E ineligibility for CNC, clawback potential, Monning statement, BofA assessment, Newsom statements	0.15	0.14	0.29
5/2/2022	strategy call w. clients re: early closure scenarios	0.71	0.71	1.42
5/1/2022	correspondence w. clients re: Governor's emergency authority		0.1	0.1
4/30/2022	research DCNPP SNF storage capacity		0.5	0.5
4/30/2022	correspondence w. clients re: PG&E quarterly earnings call, Poseidon precedent, Carbajal & Laird statements, fuel fabrication constraints		0.25	0.25
4/30/2022	review transcript of PG&E quarterly earnings call		0.73	0.73
4/29/2022	correspondence w. clients re: SNF storage relicensing constraint		0.1	0.1
4/28/2022	correspondence w. clients re: DOE guidelines	0.02		0.02
4/28/2022	research DOE plant extension grants	0.1		0.1
4/15/2022	correspondence w. clients re: Hunter Stern comments on DCNPP closure		0.1	0.1
	<u>TOTAL</u>	<u>93.09</u>	<u>93.04</u>	<u>71.07</u>
			<u>20.22</u>	<u>277.42</u>

A.16-08-006 (SB 846 implementation) Time Records of ROCHELLE BECKER									
		SB 846 RATEPAYER		FUNDING FROM		FUNDING FROM			
		PROTECTION		STATE TAXPAYERS	DOE GRANT		GENERAL		TOTAL
12/1/2022	Review final CPUC decision	0.05		0.05	0.05				0.15
11/29/2022	Review Draft Decision to be heard 12/1 w/ A4NR recommendations	0.06		0.07	0.07				0.20
11/22/2022	Review CFBF Reply tracking and transparency issues	0.05		0.05					0.10
11/21/22	email attorney + staff re: reply comments to PD; loan agreement + repayment from DOE	0.02		0.01	0.01				0.04
11/20/22	Review and approve A4NR Reply comments loans and tariff	0.05		0.05	0.05				0.15
11/19/22	email attorney + staff re: Palisades reactor and DOE grant program				0.01				0.01
11/18/22	email attorney + staff re: impacts of DWR loan on state budget			0.02					0.02
11/17/22	email attorney + staff re: budget impacts of DWR loan, M4P letter to NRC	0.17		0.18					0.35
11/17/22	strategy call w/Geesman	0.36		0.36	0.36				1.08
11/16/22	email attorney + staff re: budget impacts to state of DWR loan	0.03		0.03					0.06
11/14/22	email attorney + staff re: DWR presentation deck on reserve reliability	0.01		0.01					0.02
11/13/22	Review draft A4NR Opening Brief suggested edits	0.07		0.07	0.06				0.20
11/11/22	email attorney + staff re: PGE written response to CEC	0.01		0.01	0.01				0.03
11/10/22	email attorney + staff re: enhance oversight	0.02		0.02					0.04
11/8/22	email attorney + staff re: comments to CEC	0.01		0.01					0.02
11/7/22	email attorney + staff re: draft comments on 10/28 agency workshop	0.03		0.03					0.06
11/5/22	email attorney + staff re: committee analysis of SB 846	0.01		0.01	0.01				0.03
11/3/22	email attorney + staff re: outcome of meet-and-confer, transcripts, SLO view of oversight	0.02		0.02	0.02				0.06
11/1/22	email attorney + staff re: PGE license extension, data responses	0.02		0.02	0.02				0.06
10/31/22	email attorney + staff re: proposed Decision; data requests; Matosantos claims; NRC FFD	0.05		0.03	0.03				0.11
10/29/22	email attorney + staff re: 5 vs 20 year license extension ramifications	0.01							0.01
10/28/22	view + attend SB 846 presentations of CEC-CPUC-CAISO remote workshop webinar	2.59		2.59					5.18
10/21/22	email attorney + staff re: CEC-CPUC-CAISO remote workshop	0.01		0.01					0.02
10/21/22	email attorney + staff re: Diablo software replacement needs and analysis	0.02		0.02	0.01				0.05
10/20/22	email attorney + staff re: SSC replacements; Matosantos hearing transcripts	0.01		0.01	0.01				0.03
10/20/22	Review PG&E supplemental comments - re:A4NR acct questions	0.08		0.08	0.09				0.25
10/18/22	email attorney + staff re: DOE timelines; CPRA requests to DWR	0.01		0.01	0.01				0.03
10/17/22	Review A4NR data req to PG&E re: DWR, Nuclear Cred Prog	0.04		0.04	0.02				0.10
10/14/22	Review Reply of CGNp to PG&E Comments re: cost studies	0.15		0.15					0.30
10/14/22	Review Farm Bureau comments re: acct tracking	0.05		0.05	0.05				0.15
10/14/22	Review Public Advocates Reply and attachments	0.10		0.10	0.10				0.30
10/14/22	Review MFP/FOE Reply comments	0.04		0.03	0.03				0.10
10/14/22	Review WEM Reply	0.07		0.07	0.06				0.20
10/14/22	Review GPI Reply	0.05		0.05	0.05				0.15
10/14/22	Review SLO County reply to PGE comments and amended scope	0.01		0.01					0.02
10/13/22	Review A4NR comments on Amended scoping memo&ruling	0.07		0.07	0.06				0.20
10/12/22	email attorney + staff re: draft reply comments	0.02		0.02	0.01				0.05

10/11/22	Review FarmBureau Motion for Party status							0.02		0.02
10/11/22	email attorney + staff re: Kara Woodruff concerns over IPRP role							0.05		0.05
10/7/22	email attorney + staff re: Peterson + Kadak comments; polls supporting Diablo	0.02						0.02		0.04
10/7/22	Review PG&E Comments on Comm amend scope&ruling	0.12		0.12		0.14		0.02		0.40
10/6/22	attend remote IPRP Meeting	1.08		1.07						2.15
10/6/22	email attorney + staff re: Diablo extension costs vs. veto of mandatory kindergarten			0.03						0.03
10/5/22	phone conference w/Geesman re: seismic issues update	0.11		0.11						0.22
9/30/22	email attorney + staff re: YTT and and land purchase							0.02		0.02
9/29/22	email attorney + staff re: PGE insurance	0.03								0.03
9/28/22	email attorney + staff re: SLO Board of Supervisors; PGE sale of non-nuke generations	0.01		0.01				0.01		0.03
9/28/22	phone conference w/staff + Geesman re SLO Mothers for Peace role	0.10		0.10		0.10				0.30
9/26/22	email attorney + staff re: Diablo extension cost compared to kindergarten plan veto			0.03						0.03
9/23/22	Review CPUC amended scope & ruling of 2016 Settlement Agreement	0.08		0.09		0.08				0.25
9/21/22	email attorney + staff re: DCISC, Victor Gilinsky, Diablo affects renewable curtailments	0.05		0.05		0.02				0.12
9/20/22	email w/Gessman re: CLSC and also BART parallel issues	0.01		0.01						0.02
9/19/22	email attorney + staff re: SACWIS water issues	0.01		0.01						0.02
9/16/22	phone conference w/Geesman re: seismic issues update	0.09		0.09						0.18
9/15/22	ZOOM strategy session w/Geesman + staff	0.66		0.66		0.66				1.98
9/15/22	Zoom strategy session with NRDC and FOE	0.36		0.36		0.36				1.08
9/14/22	email attorney + staff re: seismic ERRA filings; NRDC/FOE call; discovery requests; Bof A	0.03		0.02		0.02				0.07
9/13/22	email attorney + staff re: GTCC waste site, DWR letter, Gibson, CSLC transcript of Newsom	0.08		0.08		0.07				0.23
9/12/22	email attorney + staff re: NRDC/FOE zoom call; DWR letter on seismic needs	0.02		0.02		0.02				0.06
9/12/22	review letter to DWR re: requirement for seismic studies	0.02		0.03						0.05
9/12/22	phone conference w/staff + Geesman re: strategy plans	0.07		0.07		0.06				0.20
9/10/22	email attorney + staff re: 5 vs 20 year extension scenario and Liane Randolph	0.02		0.02		0.01				0.05
9/9/22	email attorney + staff re: Podesta, PGE billing increase; state + ratepayer rolls in loan	0.02		0.02		0.02				0.06
9/9/22	phone conference w/Geesman re: Blakeslee ERRA Testimony 2014	0.13		0.12						0.25
9/8/22	email attorney + staff re: DCISC	0.01		0.01						0.02
9/5/22	email attorney + staff re: text of letter to CPUC president Reynolds	0.01		0.01						0.02
9/3/22	email attorney + staff re: Jackson Browne; confidentiality concerns	0.01		0.01						0.02
9/2/22	ZOOM strategy session w/Geesman + staff	0.48		0.47		0.47				1.42
9/2/22	email attorney + staff re: reserve margins	0.01		0.01						0.02
9/1/22	email attorney + staff re: IBEW statement; Matosantos transcripts; M4P + strategy plan	0.03		0.03		0.03				0.09
8/30/22	email attorney + staff re: TURN, SCE/SDGE issues; Matosantos + ratepayers; 5 vs 20 years	0.08		0.09		0.08				0.25
8/29/22	email attorney + staff re: Fitness for Duty and B of America analysis	0.02		0.02		0.01				0.05
8/26/22	email attorney + staff re: Ed Smeloff testimony before hearing	0.01		0.01						0.02
8/26/22	view + attend remote Assembly Hearing on Diablo Extension	1.25		1.25		1.25				3.75
8/26/22	email attorney + staff re: legislative hearings	0.01		0.01						0.02
8/25/22	view + attend remote Senate hearing on Diablo extension	1.25		1.25		1.25				3.75
8/25/22	email attorney + staff re: John Laird statements	0.01		0.01						0.02
8/24/22	attend + view meeting of Diablo Canyon Decommissioning Engagement Panel	1.50		1.50						3.00
8/24/22	email attorney + staff re: legislative hearings, TURN position; 1988 Settlement	0.01		0.01		0.01				0.03
8/23/22	email attorney + staff re: Newsom proposal	0.01		0.01		0.01				0.03
8/16/22	email attorney + staff re: IPRP and attorney Al Pak involvement	0.01		0.01						0.02
8/12/22	view + attend remote Zoom of CEC/CAISO workshop on Diablo extension	1.55		1.55		1.54				4.64

8/12/22	email attorney + staff re: CEC + CAISO workshops; loan deal; SLO meeting with Gov Staff	0.05		0.05		0.03				0.13
8/10/22	email attorney + staff re: OTC statistics	0.01		0.01						0.02
8/11/22	attend in-person invitation only meeting on Diablo extension w/Matosantos + Douglas	0.75		0.75		0.75				2.25
8/11/22	phone conference w/staff re: preparation for Diablo meeting w/Laird+Newsom staff	0.15		0.10		0.10				0.35
8/10/22	email attorney + staff re: Senate EUC hearing	0.01		0.01		0.01				0.03
8/9/22	View, download + transcribe Senate EUC committee hearing on reliability	0.50		0.50		0.50				1.50
8/8/22	phone conference w/staff re: IPRP meeting schedule + call from David Zizmor CPUC	0.05		0.08		0.08				0.21
8/8/22	phone conference w/staff re: meeting strategy for 8/12/22 Zoom panel	0.02		0.03		0.03				0.08
8/7/22	email attorney + staff re: CEC + CAISO workshops	0.01		0.01		0.01				0.03
8/6/22	email attorney + staff re: CEC + CAISO workshops, NRDC + FOE positions, OTC	0.03		0.03		0.02				0.08
8/5/22	email attorney + staff re: Sierra Club allies; Diablo fuel sources	0.01		0.01		0.01				0.03
8/4/22	email attorney + staff re: NRDC, FOE - CNC program?					0.05				0.05
8/4/22	ZOOM strategy session w/Geesman + staff	0.29		0.29		0.28				0.86
8/3/22	email attorney + staff re: Per Petersen DICSC 2007 comments	0.01		0.02		0.01				0.04
8/1/22	email attorney + staff re: fitness for duty rankings; 500Kv system, AI Pak attorney	0.05		0.03		0.05				0.13
7/29/22	email attorney + staff re: PGE lobbying	0.05		0.03		0.03				0.11
7/28/22	email attorney + staff re: \$75M grant to PGE; SWRCB, baseload deficiency; PGE earnings	0.08		0.08		0.07				0.23
7/25/22	email attorney + staff re: Cavanagh request							0.01		0.01
7/23/22	email attorney + staff re: NRDC/Cavanagh position; Alice Reynolds presentation							0.02		0.02
7/21/22	email attorney + staff re: Robert Freehling analysis; Diablo fitness for duty rank	0.03		0.03		0.02				0.08
7/19/22	email attorney + staff re: precedents in Germany							0.02		0.02
7/18/22	email attorney + staff re: DCISC McWhorter fact-finding visit	0.01		0.01						0.02
7/17/22	email attorney + staff re: PGE Suzanne Hosn statements	0.01		0.01		0.01				0.03
7/15/22	email attorney + staff re: NRC relicensing timelines	0.01		0.01		0.01				0.03
7/11/22	email attorney + staff re: Dr. Blakeslee	0.01		0.01						0.02
7/9/22	email attorney + staff re: Matosantos	0.01		0.01		0.01				0.03
7/2/22	email attorney + staff re: Union retention pay, DOE deadlines, national stories	0.02		0.02		0.02				0.06
6/30/22	email attorney + staff re: Michigan Palisades plant comparisons					0.02				0.02
6/29/22	email attorney + staff re: PGE-DOE letter; DOE-Matosantos letters; Feinstein position					0.08				0.08
6/28/22	email attorney + staff re: PGE-DOE Ltr; Zizmor at CPUC					0.03				0.03
6/24/22	email attorney + staff re: DCISC and Diablo open items checklists					0.07				0.07
6/22/22	email attorney + staff re: Suzanne Hosn statement					0.02				0.02
6/21/22	conference call w/Geesman re: strategy for impacts of Diablo extended operations					1.68				1.68
6/18/22	email attorney + staff re: NEI, DOE processes and scheduling					0.07				0.07
6/15/22	email attorney + staff re: Feinstein position					0.02				0.02
6/9/22	email attorney + staff re: Joint Proposal Settlement Agreement					0.03				0.03
6/7/22	email attorney + staff re: use of 500kv substation							0.02		0.02
6/5/22	email attorney + staff re: polling on Diablo shutdown							0.03		0.03
5/31/22	email attorney + staff re: Entergy							0.02		0.02
5/29/22	email attorney + staff re: Holtec							0.05		0.05
5/28/22	email attorney + staff re: Matosantos letter + State bailout plan			0.07		0.07				0.14
5/27/22	email attorney + staff re: Breakthrough Institute, IRA bill + Bob Dean							0.08		0.08
5/21/22	email attorney + staff re: relicensing possibility + Michigan Palisades competition?							0.07		0.07
5/20/22	email attorney + staff re: relicensing possibilities, spent fuel							0.07		0.07
5/19/22	email attorney + staff re: production tax credit vs. Civilian Nuclear loans					0.05		0.05		0.10

10/6/22	email w/Geesman re: Diablo extension costs vs. veto of mandatory kindergarten			0.03					0.03
10/5/22	phone conference w/Geesman re: seismic issues update	0.11		0.11					0.22
9/30/22	email w/Geesman re: YTT and land purchase						0.02		0.02
9/29/22	download, edit + transcribe relevant statements from DCISC meeting; send to Geesman	0.33		0.33					0.66
9/29/22	email w/Geesman re: PGE insurance	0.03							0.03
9/28/22	attend and participate in person at DCISC meeting in Avila Beach	4.20		4.20					8.40
9/28/22	email w/Geesman re: SLO Board of Supervisors; PGE sale of non-nuke generations	0.01		0.01			0.01		0.03
9/28/22	phone conference w/Becker + Geesman re SLO Mothers for Peace role	0.10		0.10		0.10			0.30
9/26/22	email w/Geesman re: Diablo extension cost compared to kindergarten plan veto			0.03					0.03
9/21/22	email w/Geesman re: DCISC, Victor Gilinsky, Diablo affects renewable curtailments	0.05		0.05		0.02			0.12
9/20/22	email w/Gessman re: CLSC and also BART parallel issues	0.01		0.01					0.02
9/19/22	email w/Geesman re: SACWIS water issues	0.01		0.01					0.02
9/16/22	phone conference w/Geesman re: seismic issues update	0.09		0.09					0.18
9/15/22	locate Indian Point relicensing documents + forward to Geesman	0.05		0.05					0.10
9/15/22	ZOOM strategy session w/Geesman + Becker	0.66		0.66		0.66			1.98
9/15/22	Zoom strategy session with NRDC and FOE	0.36		0.36		0.36			1.08
9/14/22	email w/Geesman re: seismic ERRA filings; NRDC/FOE call; discovery requests; Bof A	0.03		0.02		0.02			0.07
9/13/22	email w/Geesman re: GTCC waste site, DWR letter, Gibson, CSLC transcript of Newsom	0.08		0.08		0.07			0.23
9/12/22	email w/Geesman re: NRDC/FOE zoom call; DWR letter on seismic needs	0.02		0.02		0.02			0.06
9/12/22	phone conference w/Becker + Geesman re: strategy plans	0.07		0.07		0.06			0.20
9/10/22	email w/Geesman re: 5 vs 20 year extension scenario and Liane Randolph	0.02		0.02		0.01			0.05
9/9/22	email w/Geesman re: Podesta, PGE billing increase; state + ratepayer rolls in loan	0.02		0.02		0.02			0.06
9/9/22	phone conference w/Geesman re: Blakeslee ERRA Testimony 2014	0.13		0.12					0.25
9/8/22	email w/Geesman re: DCISC	0.01		0.01					0.02
9/7/22	locate Enercon report on non-safety SSC seismic evaluations (2010) + review	0.40		0.40					0.80
9/5/22	email w/Geesman re: text of letter to CPUC president Reynolds	0.01		0.01					0.02
9/3/22	email w/Geesman re: Jackson Browne; confidentiality concerns	0.01		0.01					0.02
9/2/22	ZOOM strategy session w/Geesman + Becker	0.48		0.47		0.47			1.42
9/2/22	review SB 846 final legislative language	0.20		0.20		0.20			0.60
9/2/22	email w/Geesman re: reserve margins	0.01		0.01					0.02
9/1/22	email w/Geesman re: IBEW statement; Matosantos transcripts; M4P + strategy plan	0.03		0.03		0.03			0.09
8/30/22	email w/Geesman re: TURN, SCE/SDGE issues; Matosantos + ratepayers; 5 vs 20 years	0.08		0.09		0.08			0.25
8/29/22	email w/Geesman re: Fitness for Duty and B of America analysis	0.02		0.02		0.01			0.05
8/26/22	email w/Geesman re: Ed Smeloff testimony before hearing	0.01		0.01					0.02
8/26/22	view + attend remote Assembly Hearing on Diablo Extension; download + transcribe	1.25		1.25		1.25			3.75
8/26/22	email w/Geesman re: legislative hearings	0.01		0.01					0.02
8/25/22	view + attend remote Senate hearing on Diablo extension; download + transcribe	1.25		1.25		1.25			3.75
8/25/22	email w/Geesman re: John Laird statements	0.01		0.01					0.02
8/24/22	attend + view meeting of Diablo Canyon Decommissioning Engagement Panel	1.50		1.50					3.00
8/24/22	email w/Geesman re: legislative hearings, TURN position; 1988 Settlement	0.01		0.01		0.01			0.03
8/23/22	email w/Geesman re: Newsom proposal	0.01		0.01		0.01			0.03
8/16/22	email w/Geesman re: IPRP and attorney Al Pak involvement	0.01		0.01					0.02
8/12/22	view + attend remote Zoom of CEC/CAISO workshop on Diablo extension	1.55		1.55		1.54			4.64
8/12/22	email w/Geesman re: CEC + CAISO workshops; loan deal; SLO meeting with Gov Staff	0.05		0.05		0.03			0.13
8/12/22	review draft proposed legislation for Diablo extension	0.40		0.40		0.30			1.10

8/10/22	email w/Geesman re: OTC statistics	0.01		0.01					0.02
8/11/22	attend in-person invitation only meeting on Diablo extension w/Matosantos + Douglas	0.75		0.75		0.75			2.25
8/11/22	phone conference w/Becker re: preparation for Diablo meeting w/Laird+Newsom staff	0.15		0.10		0.10			0.35
8/10/22	email w/Geesman re: Senate EUC hearing	0.01		0.01		0.01			0.03
8/9/22	View, download + transcribe Senate EUC committee hearing on reliability	0.50		0.50		0.50			1.50
8/8/22	phone conference w/Becker re: IPRP meeting schedule + call from David Zizmor CPUC	0.05		0.08		0.08			0.21
8/8/22	phone conference w/Becker re: meeting strategy for 8/12/22 Zoom panel	0.02		0.03		0.03			0.08
8/8/22	email w/Bob Rathie DCISC re: DCISC participation in 8/12/22 State Zoom panel	0.02		0.03		0.03			0.08
8/7/22	email w/Geesman re: CEC + CAISO workshops	0.01		0.01		0.01			0.03
8/6/22	email w/Geesman re: CEC + CAISO workshops, NRDC + FOE positions, OTC	0.03		0.03		0.02			0.08
8/5/22	email w/Geesman re: Sierra Club allies; Diablo fuel sources	0.01		0.01		0.01			0.03
8/5/22	View ANS webinar of Diablo presentations by CGNP, IBEW, SLO Cty; YTT	0.50		0.50		0.50			1.50
8/5/22	research Fitness for Duty statistics nationwide, report analysis to Geesman	0.33		0.33					0.66
8/4/22	email w/Geesman re: NRDC, FOE - CNC program?					0.05			0.05
8/4/22	ZOOM strategy session w/Geesman + Becker	0.29		0.29		0.28			0.86
8/3/22	email w/Geesman re: Per Petersen DICSC 2007 comments	0.01		0.02		0.01			0.04
8/1/22	email w/Geesman re: fitness for duty rankings; 500Kv system, Al Pak attorney	0.05		0.03		0.05			0.13
8/1/22	review Lochbaum analysis on Fitness For Duty reports; forward to Geesman	0.15		0.10					0.25
7/29/22	email w/Geesman re: PGE lobbying	0.05		0.03		0.03			0.11
7/28/22	email w/Dave Lochbaum for his evaluation of fitness for duty failings affecting Diablo	0.05		0.05					0.10
7/28/22	email w/Geesman re: \$75M grant to PGE; SWRCB, baseload deficiency; PGE earnings	0.08		0.08		0.07			0.23
7/26/22	review comments of Dr. Sam Blakeslee on seismic concerns	0.20		0.20					0.40
7/25/22	email w/Geesman re: Cavanagh request							0.01	0.01
7/23/22	email w/Geesman re: NRDC/Cavanagh position; Alice Reynolds presentation							0.02	0.02
7/21/22	email w/Geesman re: Robert Freehling analysis; Diablo fitness for duty rank	0.03		0.03		0.02			0.08
7/19/22	email w/Geesman re: precedents in Germany							0.02	0.02
7/18/22	email w/Geesman re: DCISC McWhorter fact-finding visit	0.01		0.01					0.02
7/17/22	email w/Geesman re: PGE Suzanne Hosn statements	0.01		0.01		0.01			0.03
7/15/22	email w/Geesman re: NRC relicensing timelines	0.01		0.01		0.01			0.03
7/11/22	email w/Geesman re: Dr. Blakeslee	0.01		0.01					0.02
7/9/22	email w/Geesman re: Matosantos	0.01		0.01		0.01			0.03
7/7/22	email w/ Geesman re: DCISC attorney; PGE + DOE funding request	0.02		0.02		0.02			0.06
7/2/22	email w/Geesman re: Union retention pay, DOE deadlines, national stories	0.02		0.02		0.02			0.06
6/30/22	email w/Geesman re: Michigan Palisades plant comparisons					0.02			0.02
6/29/22	email w/Geesman re: PGE-DOE letter; DOE-Matosantos letters; Feinstein position					0.08			0.08
6/28/22	email w/Geesman re: PGE-DOE Ltr; Zizmor at CPUC					0.03			0.03
6/24/22	email w/Geesman re: DCISC and Diablo open items checklists					0.07			0.07
6/24/22	download, edit, transcribe Budnitz+ McWhorter statements from DCISC re: needs					1.30			1.30
6/23/22	attend and participate at DCISC meeting in Avila Beach					4.00			4.00
6/22/22	attend and participate at DCISC meeting in Avila Beach					8.00			8.00
6/22/22	email w/Geesman re: Suzanne Hosn statement					0.02			0.02
6/21/22	conference call w/Geesman re: strategy for impacts of Diablo extended operations					1.68			1.68
6/18/22	view Mothers for Peace press briefing video on proposed relicensing extension							1.00	1.00
6/18/22	email w/Geesman re: NEI, DOE processes and scheduling					0.07			0.07
6/15/22	email w/Geesman re: Feinstein position					0.02			0.02

6/9/22	email w/Geesman re: Joint Proposal Settlement Agreement					0.03				0.03
6/7/22	email w/Geesman re: use of 500kv substation							0.02		0.02
6/5/22	email w/Geesman re: polling on Diablo shutdown							0.03		0.03
5/31/22	email w/Geesman re: Entergy							0.02		0.02
5/29/22	email w/Geesman re: Holtec							0.05		0.05
5/28/22	email w/Geesman re: Matosantos letter + State bailout plan			0.07		0.07				0.14
5/27/22	email w/Geesman re: Breakthrough Institute, IRA bill + Bob Dean							0.08		0.08
5/21/22	email w/Geesman re: relicensing possibility + Michigan Palisades competition?							0.07		0.07
5/20/22	email w/Geesman re: relicensing possibilities, spent fuel							0.07		0.07
5/19/22	email w/Geesman re: production tax credit vs. Civilian Nuclear loans					0.05		0.05		0.10
5/18/22	email w/Geesman re: State Land Commission video archive search							0.03		0.03
5/12/22	email w/Geesman re: Dr. Peck concerns							0.07		0.07
5/7/22	email w/Geesman re: Diablo economic outlook, agency response + blackouts?					0.08		0.08		0.16
5/4/22	email w/Geesman re: DCNPP revenue stream					0.02				0.02
5/3/22	email w/Geesman re: DOE rules, Mothers for Peace, Monning + Zawalick					0.05		0.05		0.10
5/3/22	edit + excerpt Zawalick statement from DCDEP meeting video					0.17				0.17
5/2/22	email w/Geesman re: PGE vs CNC; Monning + Newsom statements, Bof A					0.07		0.07		0.14
5/2/22	strategy call w/Geesman re: early closure options					0.71		0.71		1.42
5/1/22	email w/Geesman re: Newsom emergency provisions							0.03		0.03
4/30/22	email w/Geesman re: PGE earnings; Carbajal + Laird statement; nuclear fuel							0.08		0.08
4/29/22	email w/Geesman re: spent nuclear fuel relicensing constraints							0.02		0.02
4/28/22	email w/Geesman re: DOE guidelines					0.02				0.02
4/15/22	email w/Geesman re: Hunter Stern Union comments on Diablo							0.03		0.03
										0.00
	TOTALS		24.45		24.42		27.34		5.71	81.92

Spreadsheet Verification of Calculations

Issue Allocation:	#1	#2	#3	#4	TOTAL
Geesman	93.09	93.04	71.07	20.22	277.42
Becker	15.92	15.94	12.6	1.75	46.21
Weisman	24.45	24.42	27.34	5.71	81.92
TOTAL	133.46	133.4	111.01	27.68	405.55

Attorney/Advocate Fees Requested:

Geesman	\$194,065.30
Becker	\$14,094.05
Weisman	\$16,573.20
TOTAL	\$224,732.55

Claim Prep. Fees Requested:

Geesman	\$2,145.00
Weisman	\$315.00
TOTAL	\$2,460.00

TOTAL CLAIM:

\$227,192.55