

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

02/13/24

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Implementing Senate Bill 846 Concerning Potential
Extension of Diablo Canyon Power Plant Operations.R23-01-007
(Filed January 20, 2023)

R2301007

**INTERVENOR COMPENSATION CLAIM OF SAN LUIS OBISPO MOTHERS FOR
PEACE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF SAN LUIS OBISPO
MOTHERS FOR PEACE ("SLOMFP")**

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: SLOMFP	For contribution to Decision (D.) 23-12-036
Claimed: \$481,535.11	Awarded: \$
Assigned Commissioner: Karen Douglas	Assigned ALJ: Nilgun Atamturk
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/ Sabrina Venskus
Date: 2/13/2024	Printed Name: Sabrina Venskus, Esq.

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

A. Brief description of Decision:	Decision Conditionally Approving Extended Operations At Diablo Canyon Nuclear Power Plant Pursuant To Senate Bill 846
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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:	March 17, 2023	
2. Other specified date for NOI:		
3. Date NOI filed:	April 17, 2023	
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.23-01-007	
6. Date of ALJ ruling:	June 28, 2023	
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.23-01-007	
10. Date of ALJ ruling:	June 28, 2023	
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.23-12-036	
14. Date of issuance of Final Order or Decision:	December 15, 2023	
15. File date of compensation request:	February 13, 2024	
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

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
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<p>1. General: SLOMFP fully participated in this proceeding. SLOMFP: filed opening comments on the Order Instituting Rulemaking; joined in a jointly filed Prehearing Conference Statement; attended the Prehearing Conference: successfully compelled PG&E to provide additional data responses and documents; filed prepared opening comments and opening testimony of 7 highly qualified experts and top in their field; filed reply testimony supporting the testimony of WEM, UNCS/NRDC while rebutting testimony of GPI, CGNP, PG&E and CCUE; successfully motioned the ALJ for ordering an evidentiary hearing and briefing; attended the evidentiary hearing and cross-examined multiple witnesses leading to a more robust record and ferreting out vagueness and incorrect statements made by PG&E; prepared and filed opening and reply briefs; prepared and filed comments on the Draft CEC Cost Comparison Report; attended the Commission meeting on this proceeding and prepared and filed comments on the proposed decision, some of which were incorporated into the final decision. These actions contributed to a robust record and fully informed decision making of the Commission. The evidentiary record was made more robust and the Commission benefited</p>	<p><u>Legal Standard and Authorities</u> The Commission has held that if an intervenor has made a contribution to discussion, or if issues or recommendations were raised by the intervenor, but not addressed or adopted the Commission Decision, the Commission may still find the intervenor made a substantial contribution to the Decision. (D.15-11-035 [The actual Decision to which the intervenor contributed, D.1412082, addresses the intervenor’s arguments, but decides against its position, yet the Commission found the intervenor made a substantial contribution to the proceedings]; see also D.07-05-051 [“[the intervenor’s] participation informed the record and our decision-making and, in areas where we did not adopt its position, we benefited from its analysis and discussion.”]; see also D.08-04-004 at 4-6, D.19-10-019 at 3-4, D.03-03-031 at 6, and D.05-06-027 at 5 [Failure to adopt a party’s position on an issue does not mean the party has not made a substantial contribution. What matters is whether the party provided a unique perspective that enriched the Commission’s deliberations and the record or whether the party’s discussion of the issues allowed the Commission to understand the consequences of its decision.].)</p> <p><u>Citations to the Record:</u> (ALJ Seybert’s June 26, 2023 E-Mail Ruling Granting Motion to Compel; SLOMFP Testimony [Exhs. SLOMFP-01 through SLOMFP-08]; PG&E Data Request Responses to SLOMFP June 9, 2023 [Exh. SLOMFP-09]; SLOMFP’s Opening Comments on OIR; Joint Prehearing Conference Statement; SLOMFP’s Request for Evidentiary</p>	
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<p>from SLOMFP’s participation. SLOMFP provided unique perspectives that enriched the Commission’s deliberations and the record allowed the Commission to understand the consequences of its decision.</p>	<p>Hearing and Briefing; Reporter Transcripts from September 5-7 Evidentiary Hearing; SLOMFP Opening Brief dated September 18, 2023; SLOMFP Reply Brief dated September 29, 2023; Comments of SLOMFP on Draft CEC Cost Comparison Report dated October 6, 2023; SLOMFP Comments on Proposed Decision Dated November 15, 2023.)</p> <p>(SLOMFP’s Comment on OIR re: adjusting schedule re: evidentiary hearing and briefing)</p> <p><u>Citations to Decision:</u></p> <p>(E.g. Decision pp. 8-9 and Decision citations identified below.)</p>	
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<p>2. SLOMFP substantially contributed to this proceeding by being one of the only parties to substantively participate in the cross-examination of witnesses during the evidentiary hearing.</p> <p>Said cross-examinations by SLOMFP’s representatives led to additional facts becoming part of the record, and further ferreted out incorrect and vague written testimony submitted by PG&E (impeached PG&E witnesses and/or obtained PG&E witness testimony that supported SLOMFP’s witness testimony and factual and legal positions) which in turn contributed to the robustness of the record and the Commission benefited from the addition of this material to the record and SLOMFP’s analysis of the same.</p>	<p><u>Legal Standard and Authorities</u></p> <p>[See No. 1 above.]</p> <p><u>Citations to the Record, include, but are not limited to:</u></p> <p>(Reporter’s Transcript, Vol. 2, p. 210, lines 19 through 24 [Where Commissioner Douglas stated “I really want to express my appreciation to all of the parties for the work they have done in helping develop a comprehensive record under the expedited time frame of this proceeding, and I’m looking forward to hearing what all of you have to present to us over the course of these hearings.”].)</p> <p>(Reporter’s Transcript, Vol. 2, p. 218, lines 10 through 22 [Where PG&E admitted, on cross-examination by SLOMFP, that no study by any government agency in California between January 2018 and January 2022 concluded that California needs Diablo Canyon versus similar reliability].)</p> <p>(Reporter’s Transcript, Vol. 3, at pp. 287, line 16 through p. 292, line 5 [Where PG&E’s expert, on cross-examination by SLOMFP, would not refute that the estimate of the cost of Unit 1 pressure vessel repair/replacement by SLOMFP witness Dr. Macdonald was reasonable].)</p> <p>(Reporter’s Transcript, Vol. 3, at p. 317, lines 20 through 24 [Dr. Bird’s experience and credibility].)</p> <p>(Reporter’s Transcript, Vol. 3, at pp. 310, line 20 through p. 315, line 1; Vol. 3 Transcript at p. 308, line 20 through p. 310, line 19. [Need for SHHAC Seismic Assessment Studies].)</p>	
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	<p>(Reporter’s Transcript, Vol. 3, at pp. 296 through 300 [foundation for Unit 1 pressure vessel repair/replacement needs and related costs].)</p> <p>(Reporter’s Transcript, Vol 3., at pp. 323 through 325; [Where SLOMFP pressed PG&E on its refusal to admit that it has “deferred maintenance”].)</p> <p>(Reporter’s Transcript, Vol. 2, pp. 230 through 242 [energy reliability with inclusion of 4000MW].)</p> <p>(Reporter’s Transcript at Vol.2, p. 220, lines 7 through 23 [Discussing PG&E’s previous statements and admissions regarding the cost-effectiveness of Diablo Canyon].)</p> <p>(SLOMFP Opening Brief pp. 15, 22, 28 through 31, and 36.)</p> <p><u>Citations to Decision</u></p> <p>(Decision p. 52 and Decision citations identified below.)</p>	
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<p>3. SLOMFP substantially contributed to the issue of Burden of Proof and Standard of Proof to be utilized in this proceeding.</p> <p>In its Opening Brief, SLOMFP advocated that PG&E should have the burden of proof in this proceeding as the quasi-applicant.</p> <p>In its Reply Brief, SLOMFP rebutted PG&E’s position that the burden of proof was shared equally by the parties by providing additional detail, legal argument and authority in support of the position that PG&E carries the burden of proof and that the Commission had authority to alter the normal allocation of the burden of proof based on a number of factors set forth in prior commission decisions and the rules of evidence.</p> <p>In its Reply Brief, SLOMFP also advocated for a standard of proof under the Preponderance of Evidence Standard and criticized PG&E’s application of the standard to the evidence.</p> <p>SLOMFP then provided comment on the Proposed Decision (“PD”) pointing out that the PD did not articulate the standard of proof and burden, as it must, and recommending that the PD be revised to explicitly identify which party has the burden of proof and the applicable</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(SLOMFP Reply Brief pp. 8 through 10.)</p> <p>(SLOMFP Reply Brief pp. 20 through 21 [e.g. “SLOMFP strongly urges that, given the evidence weighing heavily against it, the March 2023 CEC Report cannot constitute “sufficient information,” nor a preponderance of the evidence in these proceedings. ...” and “PG&E implies that the March 2023 CEC Report alone constitutes a preponderance of the evidence. This cannot be so. Preponderance of the evidence means ‘in terms of probability of truth, e.g., such evidence as, when weighed with that opposed to it, has more convincing force and the greater probability of truth’.”].)</p> <p>(October 26, 2023, Proposed Decision [Failing to identify the party with the burden of proof or the applicable standard of proof.]</p> <p>(SLOMFP Comments on Proposed Decision pp. 1-3.)</p> <p><u>Citations to Decision:</u></p> <p>(Decision pp. 11-12, 125 [Conclusions of Law Nos. 1 and 2 – setting out the burden and standard of proof in this proceeding].)</p>	
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<p>standard of proof. The revised proposed decision adopted SLOMFP's recommendations.</p> <p>While the Decision failed to place the burden of proof on PG&E, it did adopt SLOMFP's definition of the preponderance of evidence standard and articulated which party has the burden of proof. Accordingly, the record was made more robust and informed by and the Commission benefited from SLOMFP's analysis and discussion of the issue.</p>		
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<p>4. SLOMFP made a substantial contribution on the issue of the proper legal interpretation of SB 846 and PUC Section 451.</p> <p>SLOMFP was one if not the only party to provide considerable authority on the applicable canons of statutory construction and the impact of Commission’s constitutional authority on how SB 846 must be interpreted. The Decision referenced and/or adopted some of these discussions and/or authority.</p> <p>For example, in its Opening Brief, SLOMFP provided a detailed discussion of the legal framework of SB 846 and its three “off-ramps” against the backdrop of the CPUC’s statutory authority as a constitutional agency. SLOMFP advocated for the position that Commission must not interpret SB 846 as limiting its constitutional authority - so as to avoid statutory repeal by implication.</p> <p>SLOMFP also explained, through the testimony of Peter Bradford - a former Commissioner for the New York and Maine Public Utilities Commissions, and a former Commissioner for the NRC – the proper interpretation of PUC Section 451 and its applicability in this proceeding in that analyzing prudence <i>before</i> approval of a utility’s acts was essential.</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record include, but are not limited to:</u></p> <p>SLOMFP’s Verified Opening Comments on Phase 1, Track 2 Issues. pp. 2 through 3 [Definition Of “Too High To Justify”].)</p> <p>(SLOMFP Opening Brief, pp. 5 through 9 [Legal Framework – e.g. “As such, in no way does the plain language of SB 846 constrain the CPUC’s discretion to make its own determination on reliability.”].)</p> <p>(Exh. SLOMFP-03 - Opening Testimony of Peter Bradford[e.g., Discussing PUC Section 451, the definition of prudence, predetermination of prudence and the importance of making timely prudence determinations early in the process].)</p> <p>(SLOMFP Reply Brief, pp. 5 through 8 [PG&E Mischaracterizes The Statutory Framework And CPUC’s Discretion Under SB 846]; see also <i>Id.</i> at p. 5, fn 2 [citing “Brief Of The State Of California As Amicus Curiae In Support Of Respondents, <i>San Luis Obispo Mothers For Peace v. United States Nuclear Regulatory Commission et. al.</i>, (9th Cir. No. 23-852) (September 5, 2023) (“Attorney General Amicus”), at pp. 15 and 19.”].)</p> <p>(SLOMFP Comments on Proposed Decision, pp. 4-6 [The PD Acknowledges the Commission’s Mandatory Review under P.U.C. § 451, But Does Not Make the Required Findings that Extended Operations Are Reasonable and Prudent.]; <i>Id.</i> at 6 through 7 [The PD Contains an</p>	
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<p>In its Reply Brief, SLOMFP rebutted PG&E’s position that SB 846 requires that the Commission <i>must</i> extend operations at DCP. SLOMFP introduced evidence that even the state Attorney General indicated that SB 846 <i>does not predetermine the outcome of any state agency decision</i> and SB 846 conferred upon the Commission express authority to shorten the extension of operations. SLOMFP also pointed out that the express language of SB 846 only requires the Commission to consider the <i>potential</i> of extension of operations and make a determination no later than December 31, 2023 on whether to authorize extended operations.</p> <p>Using principles of statutory interpretation, SLOMFP’s Reply Brief pushed back against PG&E’s mischaracterization that the CEC reporting provided a <i>statutory and thus the only basis</i> for the Commission’s decision on issues of cost and/or reliability. SLOMFP explained how the relevant portion of the statute only states the Commission shall <i>review</i> the reports of CEC in making its decision and that there is no language in SB846 mandating that the CPUC take any CEC determination as the basis of its decision and in fact, the language assumes a collaboration between the CPUC</p>	<p>Interpretation of S.B. 846 That Impermissibly Repeals By Implication the Commission’s Unique Constitutional Authority and Broad Statutory Authority].)</p> <p>(SLOMFP Comments on Draft CEC Cost Comparison Report dated September 26, 2023.)</p> <p><u>Citations to Decision</u></p> <p>(Decision. p. 35 [SLOMFP’s definition of “Too High To Justify”].)</p> <p>(Decision, p. 45 “SLOMFP and WEM highlight that this is a draft version of the report, and therefore should not be relied upon.”].)</p> <p>(Decision, p. 46 [Where Commission expressly agrees with SLOMFP’s definition of “too high to justify” and cites to the same authority proffered by SLOMFP in doing so.].)</p> <p>(Decision, pp. 46 through 53 [Discussion of interplay between PUC Section 451 and SB 846]; see also <i>Id.</i> at 47 [“In enacting SB 846, the Legislature affirmed the Commission’s broad statutory mandate in Section 451 by requiring the Commission to ensure extended DCP operations are cost-effective and prudent.”]; see also <i>Id.</i> at 48 [“Therefore, to ‘harmonize the [Legislature’s] enactment’ of the phrase ‘too high to justify’ in Section 712.8(c)(2)(B) with the statutory framework of the Public Utilities Code and SB 846 itself, the Commission interprets the phrase as requiring it to assess whether the specific types of costs identified in</p>	
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<p>and the CEC, with the CPUC’s final authority controlling. SLOMFP also pointed out the CEC report was in draft form and the CEC is not even mentioned in PUC Section 712(c)(2)(B) “Too High to Justify” but DCISC is.</p> <p>SLOMFP continued to advocate for the proper legal interpretation of the interplay between SB 846 and PUC Section 451 in its Comments on the Proposed Decision. SLOMFP argued that it would be legal error for the Commission to approve extended operations while simultaneously finding that the Commission does not have enough evidence to make a determination on whether any of the “off ramps” applied. SLOMFP explained, citing evidence and legal authority, that the Commission could not legally authorize extended operations at all without making a finding, supported by substantial evidence, that said extension was prudent.</p> <p>Additionally, in its Comments on the PD, SLOMFP continued to advocate that adoption of PG&E’s position that SB 846 directs the Commission to authorize extended operations would work a “repeal by implication” on the Commission’s constitutional powers and statutory authority.</p> <p>The Decision adopts several of SLOMFP’s positions on</p>	<p>Section 712.8(c)(2)(B) (<i>i.e.</i>, the cost of upgrades to address seismic safety or deferred maintenance concerns identified by the DCISC, or the cost of PG&E complying with NRC license renewal conditions for DCP), are justified, or reasonable, under the Commission’s established reasonableness and prudence review standard. In accordance with Pub. Res. Code Section 25548.3(c)(5)(C) and the Commission’s overarching responsibility to determine whether extended operations of DCP will result in just and reasonable rates, it follows that the Legislature intended for the Commission to apply the same, established prudence and reasonableness standard to the Commission’s review of the two specific types of costs identified in Section 712.8(c)(2)(B).”].)</p> <p>(Decision, p. 58 [Pub. Res. Code Section 25548.3(c)(5)(C) does not require the Commission to rely solely on the CEC’s Draft Cost Comparison Report].)</p> <p>(Decision, p. 59 [Referencing mandatory review under PUC Section 451 in a discussion of future costs and prudence review].)</p> <p>(Decision pp. 125 through 127, Conclusion of Law No. 5 [Conditional Approval of Operations subject to future cost and prudence review]; Conclusion of Law No. 11 [</p>	
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<p>statutory interpretation of SB 846 and PUC Section 451. The Decision contains discussion of the Commission’s mandatory review under PUC Section 451, implicitly based on SLOMFP’s advocacy and evidence. An inference that is supported by the Decision’s adoption of SLOMFP expert Peter Bradford’s standard of prudence under PUC Section 451 (as is detailed further below.) While, the Commission’s ultimate decision in this case was to <u>conditionally</u> approve extended operations subject to a further cost and prudency review, SLOMFP’s discussion of the legal framework and interpretation of SB 846 and its interplay between § 451 provided a unique perspective that enriched the Commission’s deliberations and the record and also allowed the Commission to understand the consequences of its decision, ultimately resulting in the Commission issuing a <u>conditional decision</u>, which is unique in and of itself. A reason able inference can be drawn that mandatory early and ongoing prudence review under §451 is one reason why the Decision conditionally approved operations subject to future cost and prudence review. The Commission also made a finding that SB 846 did not require the Commission to solely rely on CEC Reporting when making a determination under PRC Section</p>	<p>“The review required in Pub. Util. Code Section 712.8(c)(2)(B) and Pub. Res. Code Section 25548.3(c)(5)(C) is consistent with the Commission’s reasonableness and prudence standard.”]; Conclusion of Law No. 14 [“Pub. Res. Code Section 25548.3(c)(5)(C) does not require the Commission to rely solely on the CEC’s Draft Cost Comparison Report or make a cost-effectiveness determination by the end of 2023, while the Commission has broad authority to ensure just and reasonable rates under Pub. Util. Code Section 451.”]; Conclusion of Law No. 15 [“It is well within the Commission’s authority, and in ratepayers’ best interest, to continue to evaluate the prudence and cost-effectiveness of continued DCPD operations.”].)</p>	
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25548.3(c)(5)(C), which was SLOMFP's position.		
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<p>5. SLOMFP substantially contributed to the issue of cost-effectiveness by advocating that PG&E's statements and the CPUC's finding of fact in A16-08-006 that operating DCPD beyond 2025 would not be cost-effective still applied today.</p> <p>Through testimony of expert Dr. Cooper, SLOMFP introduced evidence of: the cost of regulatory compliance; providing \$/MWH as the standard measure cost-effectiveness; providing a cost-comparison between aging nuclear reactors such as Diablo and renewable and clean energy resources; total system costs of aging nuclear reactors such as Diablo, and alternative renewable and clean energy resources.</p> <p>SLOMFP also rebutted other parties' allegations of a lower \$/MWH for extended operations of DCPD.</p> <p>While the Decision did not ultimately adopt the \$/MWH figure of Dr. Cooper, SLOMFP's analysis contributed to the robustness of the evidentiary record and allowed the Commission to benefit from SLOMFP's analysis and discussion of the issue and the evidence provided. It should be noted that the Decision points out that SLOMFP was the only party to advance the position that there was a sufficient</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(SLOMFP Opening Brief, pp. 9-14)</p> <p>(Exh. SLOMFP-04 - Dr. Cooper Opening Testimony, [including, but not limited to ultimate conclusion of opinion at p. 1, line 23 through p. 2, line 10 and <i>Id.</i> at p. 29, lines 8-15, and attachment MNC 3-6. [Dr. Cooper found that the cost of operations of aging nuclear reactors like DCPD is effectively \$70/MWH, after laying comprehensive and detailed foundation for his expert opinion throughout the applicable chapter of testimony.]</p> <p>(Exh. SLOMFP-04 – Dr. Cooper Opening Testimony [after laying comprehensive and detailed foundation for his opinion throughout the applicable chapter of testimony, providing ultimate conclusion of expert opinion at p. 19, lines 21 through 27 and attachment MNC 2.4, 2.5, 2.11, 2.14 and 2.17. [Dr. Cooper testimony that three renewable energy and zero carbon alternatives had a price/MWH significantly lower than aging nuclear reactors like DCPD, namely efficiency, solar and wind with long duration storage and that three firm resources are competitive in terms of price/MWH with aging nuclear reactors like DCPD, namely efficiency.].)</p> <p>(Exh. SLOMFP-08 – Reply Testimony of Mark Cooper, [e.g. p. 16 where Cooper rebutted GPI's calculation of \$66/MWH and citing and explaining Cooper's prepared Attachment MNC-R-10].)</p>	
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evidence to decide the question of cost-effectiveness, thus acknowledging that SLOMFP provided a unique perspective on this central issue, which therefore demonstrates substantial contribution..	<p>(Exh. SLOMFP-08 – _Reply Testimony of Mark Cooper, pp. 5-8. [Failed Economics of DCPD].)</p> <p>Dr. Cooper estimated the total system costs of aging reactors like Diablo Canyon to be between \$110 and \$130/MWH as shown on Cooper Attachment MNC 2.17 This is similar to the \$141/MWH for post-2025 operations that PG&E calculated in the 2018 A.16-08-006 proceeding.</p> <p><u>Citations to Decision:</u></p> <p>(Decision pp. 43-44, and 49-50 [Where the Commission discussed Dr. Cooper’s Cost Comparison and its prior Decision in A16-08-006].)</p> <p>(Decision pp. 43 through 44, and 49 [“SLOMFP is the only party to argue there is sufficient evidentiary record demonstrating DCPD extended operations are not cost-effective.”].)</p>	
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<p>6. SLOMFP substantially contributed on the issue of cost of extended operations by addressing the issue of aging equipment and specifically the extraordinary problems with the Unit 1 reactor pressure vessel which nuclear expert Dr. MacDonald testified would likely need to be replaced at an estimated cost of hundreds of millions of dollars.</p> <p>While the Decision did not ultimately adopt SLOMFP’s position on this issue, SLOMFP’s expert testimony contributed to the robustness of the evidentiary record and legal argument assisted the Commission in evaluating cost-effectiveness points.</p> <p>It should be noted that the Decision explicitly acknowledges that SLOMFP was the only party to argue there was a sufficient record to decide the question of cost-effectiveness, which demonstrates substantial contribution.</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(SLOMFP Opening Brief pp. 14-15.)</p> <p>(Exh. SLOMFP-07 –Dr. MacDonald Testimony, e.g. pp.1-11 [Where Dr. Macdonald laid factual and evidentiary foundation for his opinion that there are significant embrittlement issues with the Unit 1 reactor pressure vessel and this key plant component is already past its fracture toughness limits and will likely need to be replaced if extended operations are authorized by the Commission. Dr. Macdonald provided a conservative cost estimate between \$250 and \$500 Million to replace the vessel and provided foundation for that estimate].)</p> <p>(SLOMFP Reply Brief, pp. 24-26 [rebutting CGNP’s mischaracterization of Dr. Macdonald’s testimony].)</p> <p><u>Citation to Decision:</u></p> <p>(Decision pp. 40, 43 and 49-50 [Where the Commission discussed Dr. Macdonald’s Unit 1 pressure vessel embrittlement analysis and opinions].)</p> <p>(Decision pp. 43-44, and 49 [“SLOMFP is the only party to argue there is a sufficient evidentiary record demonstrating DCPD extended operations are not cost-effective.”].)</p>	
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<p>7. SLOMFP substantially contributed to the issue of cost of extended operations by being the only party to describe the regulatory compliance procedures associated with NEPA, the Clean Water Act and State Water Board Once Through Cooling section 316(b) policy requiring mitigation and associated costs therewith, and Federal Consistency Review Under the California Coastal Act in the context of costs of extended operations.</p> <p>SLOMFP analysis was discussed in the Decision, made the record more robust and said analysis provided a unique perspective that enriched the Commission’s deliberations. SLOMFP’s discussion and evidence also allowed the Commission to understand the consequences of its decision.</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(Ex. SLOMFP-01 Verified Opening Comments of SLOMFP on Phase 1, Track 2 Issues, at pp. 3-7 [NEPA, CWA and Federal Coastal Act Consistency Analysis] .)</p> <p>(SLOMFP Opening Brief, pp. 31 through 32.)</p> <p>(SLOMFP Comments on PD, pp. 14 through 15.)</p> <p><u>Citations to the Decision:</u></p> <p>(Decision, p. 40, fn 107 [citing “Ex. SLOMFP-01 at 3-7; Ex. SLOMFP-02 at 5-19; Ex. SLOMFP-06 at 2-12; Ex. SLOMFP-07 at 3-12; Ex. A4NR-01 at 2-5.”].)</p> <p>(Decision, p. 43 through 44 [fn 122-124 citing Ex. SLOMFP-08 at 5-7 and 16-29, Ex. SLOMFP-07 at 11, Ex. SLOMFP-01 at 3-7.]</p> <p>(Decision p. 50.)</p>	
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<p>8. SLOMFP substantially contributed to the issue of costs of extended operations by advocating that costs should include the costs of a Level 3 SHHAC and by providing evidence of the cost of aging components and deferred maintenance.</p> <p>SLOMFP argued that if Commission was inclined to make a finding on “too high to justify” it should consider Dr. Bird’s testimony, including testimony that a proper seismic assessment would likely reveal higher seismic hazards and in turn higher upgrade costs, as well as evidence that existing deferred maintenance will result in additional significant costs of extended operations.</p> <p>SLOMFP argued that deferred maintenance raises the cost of extended operations.</p> <p>SLOMFP’s analysis and legal argument contributed to the robustness of the evidentiary record and said analysis provided a unique perspective that enriched the Commission’s deliberations. SLOMFP’s discussion and evidence also allowed the Commission to understand the consequences of its decision</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(SLOMFP Opening Brief. pp. 27 through 30 [Discussing evidence on need for and cost outcomes of a seismic upgrade assessment and the cost implications of deferred maintenance].)</p> <p>(Exh. SLOMFP-02, Opening Testimony of Dr. Peter Bird, e.g. pp. 4 through 6, 18].)</p> <p>Vol. 3 Transcript at p. 310, line 20 through p. 315, line 1.; Vol. 3 Transcript at p. 308, line 20 through p. 310, line 19.)</p> <p>Exh SLOMFP-06, Opening Testimony of Samuel Miranda, [laying foundation for opinion and expert conclusion at pp. 8 through 9 thatDeferred maintenance of DCPD raises costs of equipment repair and replacement; see also specifically p.3].)</p> <p><u>Citations to Decision</u></p> <p>(Decision, p. 40, fn 107 [citing “Ex. SLOMFP-01 at 3-7; Ex. SLOMFP-02 at 5-19; Ex. SLOMFP-06 at 2-12; Ex. SLOMFP-07 at 3-12; Ex. A4NR-01 at 2-5.”].)</p> <p>(Decision, pp. 35, 43-44, 46 through 50 [e.g. “SLOMFP urges the Commission to consider potential updates to the DCPD seismic assessment, additional maintenance activities identified by PG&E which SLOMFP argues should be considered “deferred maintenance,” as well as purported embrittlement</p>	
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	issues with Diablo Canyon’s Unit 1 pressure vesssel.”].)	
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<p>9. SLOMFP substantially contributed to the issue of prudence of extending operations by being the only party to substantively address the issue in-depth.</p> <p>Through expert testimony from Peter Bradford, a former Public Utilities Commissioner in two states and a former NRC Commissioner, SLOMFP advanced a specific standard to be used in a prudency analysis.</p> <p>The Decision adopted the prudence standard advanced by expert Bradford.</p> <p>SLOMFP was the only party to advocate for the inclusion of environmental, societal, and human life costs associated with a nuclear accident into the analysis of whether extending operations would be prudent – as was discussed by Expert Peter Bradford and briefed by SLOMFP.</p> <p>In its Comments on the Proposed Decision, SLOMFP successfully advocated that the scope of future prudency review should not be hamstrung by principles of res judicata or collateral estoppel after the Proposed Decision initially included a prohibition on arguments considered in this proceeding from being considered in future prudency review. This restriction was subsequently deleted from the adopted Decision.</p>	<p><u>Legal Standard and Authorities</u> [See above No. 1]</p> <p><u>Citations to the Record:</u></p> <p>(SLOMFP Opening Brief pp. 16 through 24 .)</p> <p>(Exh. SLOMFP-03 - Peter Bradford Opening Testimony; see also <i>Id.</i> at p. 7, lines 1 through 40 and <i>Id.</i> at p. 9, line 20 through p., 10, line 19.)</p> <p>(Exh. SLOMFP-05 – _Rao Konidena Opening testimony, pp. 32 through 37 [Showing how Nuclear crowds out renewables and going to the component of prudency review articulated by Bradford that analyzes whether the desired result will be achieved through approval.])</p> <p>(Exh. SLOMFP-04, Corrected Mark Cooper Opening Testimony at p. 17, line 19 through p., 18, line 22; see also <i>Id.</i> at p. 17 citing Cooper Attachment MNC 2.11. [Nuclear is not “green power” and going to the component of prudency review articulated by Bradford that analyzes whether the desired result will be achieved through approval.])</p> <p>(Opening Brief, p. 18 [the Desired result of this proceeding is providing adequate renewable and zero-carbon power supply at the lowest possible cost, not just to the ratepayer but to the taxpayer].)</p> <p>(SLOMFP’s Comments on the Proposed Decision, pp. 7 through 8.)</p> <p>(Exh. SLOMFP-03 – Opening Testimony of Peter Bradford, [for example, at p. 9, lines 11 through 17; see also Exh. SLOMFP 03 – Opening Testimony of Peter Bradford, Attachment A, Articles, <i>When the Unthinkable is Deemed Impossible</i>:</p>	
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<p>While the Decision ultimately <u>conditionally</u> approved extended operations subject to future cost and prudence review, ongoing prudence review was based in part on Bradford’s testimony that it is essential for prudency review under PUC Section 451 to be conducted and determined <i>before</i> the utility’s action is approved as well as on an <i>ongoing</i> basis. Furthermore, SLOMFP’s evidence contributed to the robustness of the record and SLOMFP’s analysis provided a unique perspective that enriched the Commission’s deliberations. SLOMFP’s discussion and evidence also allowed the Commission to understand the consequences of its decision.</p>	<p><i>Reflections on Fukushima</i>, Bulletin of the Atomic Scientists, March 20, 2016.].)</p> <p>(SLOMFP Reply Brief, pp. 15 through 18; see also <i>Id.</i> at 16 [“While health and safety risks are largely the province of the NRC, the economic manifestations of those risks are very much the responsibility of the CPUC. The CPUC can make reasonable assumptions about the costs of environmental clean-up. Similarly, the CPUC may make reasonable assumptions about the human costs of an accident such as life, well-being and displacement. The CPUC can take judicial notice of the fact that an accident at a nuclear power plant can have much graver consequences cost-wise than an accident at a solar power, hydro power, or wind power facility.”].)</p> <p><u>Citation to Decision</u></p> <p>(Decision p. 35 [“SLOMFP also provides a historic overview of how prudence has been considered in utility regulation, and highlights Pub. Res. Code Section 25548.3(c)(5)(C) as requiring early and continuing review by the Commission concerning the prudence of decisions relating to extending the operating life of Diablo Canyon.”].)</p> <p>(Decision, p. 44 [Where Decision acknowledges SLOMFP’s argument that the desired result of the proceeding is to “produce...renewable and zero-carbon power supply at the lowest possible cost”].)</p> <p>(Decision, p. 47, fn. 139 [“<i>See, e.g., Application of San Diego Gas & Elec. Co. (U902e) for Authorization to Recover Costs Related to the 2007 S. California Wildfires</i></p>	
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	<p><i>Recorded in the Wildfire Expense Memorandum Acct. (Wema), Order Denying Rehearing of Decision (D.) 17-11-033, D.18-07-025, at 4 (July 12, 2018); see also Ex. SLOMFP-03 at 9-10 (citations omitted) (summarizing Commission's Prudent Manager Standard)."])(Emphasis added.)</i></p> <p>(Decision, pp. 35, 44, 48, 128 [Conclusion of Law No. 21 [Any subsequent DCPD prudency review by the Commission should focus on updated information.].)</p>	
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<p>10. SLOMFP substantially contributed to the issue of reliability by proffering the testimony of expert witness Rao Konidena – having over 20 years of experience in the fields of energy transmission, storage and renewable energy, grid supply and grid demand – that by the end of 2023 the state has enough renewable and clean energy resources to be an adequate substitute for DCP.</p> <p>Based Mr. Konidena’s testimony, SLOMFP provided definitions for all applicable terms contained in PUC section 712.8(c)(2)(D) (SB 846) and raised novel points on the issue of reliability including but not limited to: shortages only during limited summer hours, nuclear plants crowding out renewable resources and identifying errors in the CEC reporting.</p> <p>Thus, as a result of SLOMFP’s advocacy, a more robust record on the issue of reliability was available for the decision makers to review and thus, informed their decision-making and indeed, allowed the Commission to understand the consequences of its decision.</p>	<p><u>Legal Standard and Authorities</u></p> <p>[See No. 1 above.]</p> <p><u>Citations to the Record</u></p> <p>(Opening Brief, pp. 33-40.)</p> <p>(Reply Brief, pp. 18-24.)</p> <p>(Exh. SLOMFP-05 – Rao Konidena Opening Testimony; [for example, see p. 6, lines 4-8 [reliability standard]; p. 5, lines 21-22; p. 26, lines 5-8; p. 27, lines 5 – 6 [New Zero-Carbon Resources]; pp.4-6, 27-30 [New Renewable Energy]; pp. 3-4, 24-26, 33-36 [numerous deficiencies in methodology and assumptions with respect to the March 2023 CEC Report]; pp. 6, 16-17 [California has operational reserves problem not a planning reserves problem]; pp. 18-19 [Recent examples of nuclear plant retirements in organized markets similar to CAISO demonstrate there should be no reliability concerns with retirement of DCP in 2024/2025].)</p> <p><u>Decision</u></p> <p>(Decision pp. 18-20, 22 - 23, 28, 30.)</p> <p>(Decision p. 18 [WEM and SLOMFP suggest 2016 or 2018 could serve as the point of demarcation, based on events that occurred in A.16-08-006].)</p> <p>(Decision, p. 20 [Cal Advocates, UCS/NRDC, and SLOMFP support use of the 0.1 loss-of-load expectation (LOLE) probabilistic metric for evaluating energy reliability, e.g. citing Ex. SLOMFP-05 at 6.)].)</p>	
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	<p>(Decision p. 23 [“SLOMFP argues California’s current capacity shortages occur in only a limited set of hours during the summer months, making it more of an operating reserves problem not addressable through continued operation of DCP.61 In addition, SLOMFP argues: (1) continued operation of Diablo Canyon impedes the development of other low or zero-carbon alternatives; (2) contingency reserves can address the capacity shortfalls in 2025-2026; (3) other technologies and policies are needed to support a 21st century electricity system; (4) there are several deficiencies in the CEC’s March 2023 Report including, among others, a purported failure to vet the operating reserve assumptions, as well as failure to include the 4,000 MW procurement order in D.23-02-040.”, citing Exh. SLOMFP -05 Opening Testimony of Rao Konidena].)</p> <p>(Decision p. 28 [Discussing SLOMFP’s evidence and analysis].)</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?	In part.	
c. If so, provide name of other parties: WEM, CARE, TURN and A4NR.		
d. Intervenor's claim of non-duplication: SLOMFP consulted and worked with other parties by communicating with parties such as WEM, TURN, CARE and A4NR to avoid duplication of efforts in developing strategy in this proceeding and as a result, SLOMFP chose to limit its advocacy to the three off ramps of SB846, specifically issues of energy reliability and resources, whether costs of DCNPP were "too high to justify," and cost-effectiveness and prudence of extending DCNPP operations. SLOMFP did not expend time on opening testimony concerning the establishment of new cost agreements/mechanisms or how to allocate the benefits of extended operations. SLOMFP was the only party to produce substantive evidence and significant legal argument with citation to legal authority on the issue of prudence, and advanced unique arguments not mentioned by other parties on the issue of DCNPP costs and reliability. SLOMFP's coordination with other parties to ensure non-duplication of efforts resulted in SLOMFP providing conceptually different unique perspectives on several nuances within the main issues of SB 846 off-ramps as articulated in the ALJ's scoping memo and OIR.. This resulted in, at most, efforts that supplemented, completed or contributed to the recommendations and positions of some other parties. If the Commission finds there was some form of duplication of efforts on the issues of costs or reliability, said duplication was slight and inevitable. Similarly, SLOMFP had to review the briefs filed by other intervenors in order to ensure that SLOMFP would not duplicate points and authorities		

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.

	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.	
<p>raised by those parties in further briefing (e.g., reviewing opening briefs to ensure reply brief does not duplicate efforts, and to determine if reply brief is even necessary.) This review of other parties pleadings and briefs are evidenced by the time entries from the Venskus firm and some discreet reviews by experts of briefing and testimony relevant to their expertise.</p> <p>See also comments in General Claim of Reasonableness sections (a) and (b).</p>		

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:</p> <p>SLOMFP fully participated in this proceeding [see section II.A.1 through 10, supra]. SLOMFP's participation was effective. (Ibid.) The actual costs of participation were \$481,535.11. The benefits achieved for the ratepayers through SLOMFP's participation are a robust ongoing and/or future cost-effectiveness and prudence review, which will be invaluable to California's rate-payers as it may ultimately result in deadlines for extended operations being moved forward to an earlier date, which in turn will clear the path for renewable energy and clean energy to provide low-cost energy to California's ratepayers. Thus, SLOMFP's participation is far exceeded by the potential savings to the rate payers. Alternatively, should the ongoing cost-effectiveness and prudence review result in the need for repair or</p>	

	CPUC Discussion
<p>replacement of the pressure vessel, aging equipment or addressing deferred maintenance, that too, will far exceed the cost of SLOMFP's participation.</p> <p>PUC Section 1801.3 and D.98-04-059.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>SLOMFP chose not to offer intervenor testimony on the issues of establishment of new cost agreements/mechanisms or how to allocate the benefits of extended operations as it was concluded that such testimony could be entirely duplicative of other parties' testimony.</p> <p>Attorney hours were delegated according to level of attorney's experience and abilities. Ms. Venskus, lead attorney in this case for SLOMFP, was responsible for delegating work. Venskus' time was mostly spent managing the litigation, formulating strategy with client and experts; communicating high-level aspects of the case with experts and client; briefing strategy and drafting; reviewing, evaluating and approving all substantive filings and testimony prior to issuance by SLOMFP. Venskus was also responsible for conducting the cross-examination at the evidentiary hearings and attending and presenting SLOMFP's position at ex parte meetings. All other attorney-level work was delegated to associate attorney Jason Sanders at a lesser cost, for tasks such as issuing and responding to discovery, drafting motions and responses to oppositions, assisting in legal research and drafting of briefs and comments, editing of briefs and comments, assisting in preparation for CPUC meetings and conferences, cross-examination exhibit identification and preparation; coordinating schedules with experts to ensure timely submittals; coordinating ex parte meetings; and some factual and legal direction to advocates. The following tasks and work were largely delegated to advocates Linda Seeley and Jill ZamEk: seek out and secure experts for this case; factual research for evidentiary record; obtaining necessary documents for evidentiary record in this case; responding to questions from attorneys regarding history of DCNPP and federal proceedings relevant to costs associated with DCNPP for purposes of expert testimony and briefing; keeping apprised of the CPUC's DCISC ongoing activities, proceedings and findings relative to this case (see discussion above regarding central role of DCISC in this proceeding) and report back to attorneys regarding same, and CEC ongoing activities, proceedings and findings relative to this case (see discussion above regarding central role of CEC joint reliability reports in this proceeding) and reporting back to attorneys re same. In lead attorney Venskus' professional opinion, this division of labor and delegation of tasks and responsibilities would result in the most efficient use of resources to produce the most effective product and result.</p>	

	CPUC Discussion
<p>Venskus & Associates spent some time reading briefs and testimony and ensuring the testimony from other parties was only provided to the appropriate SLOMFP expert. As noted above, this helped SLOMFP avoid duplication of efforts with other parties.</p> <p>Venskus & Associates minimized the time it spent reviewing briefing and testimony of other parties. However, as noted above, statutory interpretation was an issue that touched on all of SLOMFP's issues (including costs, prudence and reliability). Thus, it was imperative that this work be performed by the attorneys at Venskus & Associates and that the attorneys devote the time to properly inform the Commission of the correct interpretation of the interplay between SB 846 and PUC Section 451. In the opinion of the managing attorney Venskus, statutory interpretation cannot be segregated from the underlying issues and therefore, in Venskus' professional opinion, it is reasonable to utilize the percentage allocation frame work adopted by SLOMFP herein.</p> <p>Additionally, SLOMFP's representatives did not bill for all of their time spent in this matter, including time for various phone calls, drafting emails and attending expert and/or client meetings. Ms. Venskus and Mr. Sanders did not bill for all of their time spent reviewing filings by other intervenors. Ms. Venskus and Mr. Sanders did not bill for a large majority of their time communicating with each other regarding this case. Thus, the number of hours claimed by SLOMFP is estimated to be less than actually spent and otherwise compensable.</p> <p><u>PLEASE TAKE NOTE</u> that because the Rules of Professional Responsibility , e.g. Rule 1.6 and other California law prohibit attorneys from disclosing attorney-client communications, Venskus & Associates have redacted some substantive information from some of Venskus' and Sanders' time-records in order to maintain attorney-client confidentiality. Where advocates Seeley and ZamEk were involved in attorney-client communications, the detail of these time-entries have also been redacted where, in Ms. Venskus' professional opinion, the information is privileged and cannot be waived. This is especially important since the Commission's Decision in this phase of the proceeding is a <i>conditional</i> approval, and further proceedings in this case are to commence this year; some of the detail in the time-entries in this phase of the proceeding implicate further proceedings and must be shielded from opposing parties such as PG&E. as well as some Attorney Client Work Product Privilege (California Code of Civil Procedure Section 2018.030). NOTWITHSTANDING the legally-justified redactions, the Commission should compensate SLOMFP for all of this time, as it was reasonably and necessarily spent.</p>	

	CPUC Discussion
Some of SLOMFP's time was spent on ex parte-communications, which included arranging for the meetings, drafting the necessary papers and attending the meetings which should be deemed compensable. (PUC Sections 1802 and 1803.)	
<p>c. Allocation of hours by issue: Total Hours for all SLOMFP Representatives on substantive issues =</p> <p>Cost-Effectiveness/Prudence = 489.1 or 46%; Too High to Justify = 281.2 or 26% Whether New and Interconnected Renewable Energy and Zero-Carbon Resources are Sufficient to State's Needs and Standards for Energy Reliability ("Reliability") = 295.8 or 28%</p> <p>As noted above, this method of allocation time is based on SLOMFP's lead counsel Venskus's professional opinion and experience that it would be unreasonable and largely inaccurate to segregate attorney time spent on underlying legal research and interpretation; general case preparation and other foundational litigation work (pre-hearings; comments; delegation; communications; strategic planning and developing of the case; etc.) from the underlying issues to which all such attorney work pertains (i.e. the three SB 846 "off-ramps" of cost-effectiveness and prudence; costs of NRC relicensing, deferred maintenance, aging components and seismic hazards as too high to justify, and energy reliability and zero-carbon resources).</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour s	Rate \$	Total \$
Sabrina Venskus [Attorney]	2023	217.7	\$650.00	2/1/2023 Proposed Decision for Contribution to D. 22-12-005 and ALJ-393.	\$141,505.00			
Sabrina Venskus [Attorney]	2024	.8	\$685.00	2/1/2023 Proposed Decision for	\$548.00			

CLAIMED						CPUC AWARD		
				Contribution to D. 22-12-005 and ALJ-393 [Authorizing first of two 5% annual step increases in experience Level V rounded to nearest \$5 increment].				
Jason Sanders [Attorney]	2023	244.3	\$535.00	2/1/2023 Proposed Decision for Contribution to D. 22-12-005 and ALJ-393.	\$130,700.50			
Rachael Andrews [Kimball] [As Paralegal]	2023	6.6	\$180.00	2/1/2023 Proposed Decision for Contribution to D. 22-12-005 and ALJ-393.	\$1,188.00			
Dr. Digby Macdonald [Nuclear expert, Not Otherwise Classified]	2023	95	\$378.55	ALJ-393 and Attachment 2	\$35,962.25			
Peter Bradford [Expert - Former Chair of New York and Maine Regulatory Commission and	2023	93.8	\$378.55	ALJ-393 and Attachment 3	\$35,507.99			

CLAIMED						CPUC AWARD		
professor of Nuclear Law and Policy at Vermont Law School and Yale School of the Environment Prudency and Cost Effectiveness]								
Rao Konidena (Grid Reliability Expert: Energy supply and grid reliability needs)	2023	98.9	\$378.55	ALJ-393 and Attachment 4	\$37,438.59			
Samuel Miranda (Nuclear Engineer: and Costs Raised By Use of Aging Equipment)	2023	34	\$378.55	ALJ-393 and Attachment 5	\$12,870.70			
Mark Cooper (Utility Economics Expert: Costs of nuclear compared to renewables,	2023	121.5	\$378.55	ALJ-393 and Attachment 6	\$45,993.83			

CLAIMED						CPUC AWARD		
distribution differences that make renewables more reliable								
Dr. George Peter Bird [Seismology]	2023	30.4	\$378.55	ALJ-393 and Attachment 7	\$11,507.92			
Diane Curran [Compliance with Federal NRC Regulatory Process With Respect to Costs]	2023	2.5	\$378.55	ALJ-393 and Attachment 8	\$946.38			
Jill Zamek [Advocate]	2023	28.2	\$125.00	D1810017; ALJ 393 and Attachment 9	\$3,525.00			
Linda Seeley [Advocate]	2023	92.4	\$125.00	D1810017; ALJ 393 and Attachment 10	\$11,550.00			
Subtotal: \$469,244.16						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 \$
Subtotal: \$						Subtotal: \$		

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour s	Rate \$	Total \$
Sabrina Venskus [Attorney]	2023	1.6	\$325.00	½ of 2023 rate of \$650.00 [2/1/2023 Proposed Decision for Contribution to D. 22-12-005 awarding 2023 rate of \$535.00] and ALJ-393.	\$520.00			
Sabrina Venskus [Attorney]	2024	9.3	\$342.50	½ of 2024 rate of \$685. [2/1/2023 Proposed Decision for Contribution to D. 22-12-005 awarding 2023 rate of \$535.00] and ALJ-393 [Authorizing first of two 5% annual step increases in experience Level V rounded to nearest \$5 increment].	\$3,185.25			
Jason Sanders [Attorney]	2023	10.2	\$267.50	½ of 2023 rate of \$535.00 [2/1/2023 Proposed Decision for Contribution to D. 22-12-005 awarding 2023 rate of	\$2,728.50			

CLAIMED						CPUC AWARD		
				\$535.00] and ALJ-393.				
Jason Sanders [Attorney]	2024	20.7	\$280.00	½ of 2024 rate of \$560.00 [2/1/2023 Proposed Decision for Contribution to D. 22-12-005 awarding 2023 rate of \$535.00] and ALJ-393 [Authorizing first of two 5% annual step increases in experience Level V rounded to nearest \$5 increment].	\$5,796.00			
Rachael Andrews [Kimball]	2023	.7	\$90.00	½ of 2023 rate of \$180.00 [2/1/2023 Proposed Decision for Contribution to D. 22-12-005 awarding 2023 rate of \$535.00] and ALJ-393.	\$63.00			
Subtotal: \$12,290.95						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
2.								
Subtotal: \$						Subtotal: \$		
TOTAL REQUEST: \$481,535.11						TOTAL AWARD: \$		
*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								

CLAIMED			CPUC AWARD
accounting and other documentation to support all claims for intervenor compensation. Intervenor's 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.			
**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Sabrina Venskus	2002	219153	No.
Jason Sanders	2008	257362	No.
Rachael Andrews [Kimball]	2012	310421	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	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. Digby Macdonald
3	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Peter Bradford
4	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Rao Konidena
5	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Samuel Miranda
6	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. Mark Cooper
7	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. George Peter Bird

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

Attachment or Comment #	Description/Comment
8	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Diane Curran
9	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Linda Seeley
10	Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Jill Zamek
11	Timesheets for All SLOMFP's representatives

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. [SAN LUIS OBISPO MOTHERS FOR PEACE] [has/has not] made a substantial contribution to D. 23-12-036.
2. The requested hourly rates for [SAN LUIS OBISPO MOTHERS FOR PEACE]'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. [SAN LUIS OBISPO MOTHERS FOR PEACE] is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay [SAN LUIS OBISPO MOTHERS FOR PEACE] the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay [SAN LUIS OBISPO MOTHERS FOR PEACE] 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 are 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 [SAN LUIS OBISPO MOTHERS FOR PEACE]'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):			
Proceeding(s):			
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
SAN LUIS OBISPO MOTHERS FOR PEACE	February 13, 2024	\$481,535.11		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Sabrina	Venskus	Attorney	\$650	2023	
Sabrina	Venskus	Attorney	\$685	2024	
Jason	Sanders	Attorney	\$535	2023	
Jason	Sanders	Attorney	\$560	2024	
Rachael	Andrews [Kimball]	Paralegal	\$180	2023	
Digby	Macdonald	Expert	\$378.55	2023	
Peter	Bradford	Expert	\$378.55	2023	
Rao	Konidena	Expert	\$378.55	2023	
Samuel	Miranda	Expert	\$378.55	2023	
Mark	Cooper	Expert	\$378.55	2023	
George Peter	Bird	Expert	\$378.55	2023	
Diane	Curran	Expert	\$378.55	2023	

Revised March 2023

Jill	ZamEk	Advocate	\$125	2023	
Linda	Seeley	Advocate	\$125	2023	

(END OF APPENDIX)

ATTACHMENT # 2

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. Digby Macdonald

Resume

The resume of Dr. Digby Macdonald is attached hereto as Exhibit A.

Justification for New Rate

SLOMFP is requesting that Dr. Digby Macdonald be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Dr. Digby Macdonald is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Dr. Macdonald because none of the other categories better suited his expertise and scope of testimony, as he opined on a variety of issues. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Here, Dr. Macdonald holds a bachelor's and master's of science in chemistry from the University of Auckland in New Zealand and a Ph.D. in chemistry that he earned from the University of Calgary - Canada in 1969. He has over 50 plus years of combined experience in academia and the nuclear field. His first position after earning his Ph.D. was with Atomic Energy of Canada Ltd. at their Whiteshell Nuclear Research Establishment in Pinawa, Manitoba, Canada - where he worked on solving the activity transport problem in the primary coolant circuit of the prototype CANDU (Canadian Deuterium moderated, natural Uranium) reactor at Douglass Point, Ontario. He was instrumental in solving that problem by proposing a redox shock strategy and that removed the activated CRUD (Chalk River Unidentified Deposits). In 1995, when the matter finally became public knowledge, he was honored to give the 6th W. B. Lewis Memorial Lecture in Fredrickton, NB. Four of the previous awardees were Nobel Laureates.

After a hiatus from the nuclear industry from 1971 to 1977, while he was a lecturer in Chemistry at Victoria University in Wellington, NZ, and a Research Associate at the Alberta Sulfur Research laboratories in Calgary, Canada, he moved to the US in 1977 and was employed as a Metallurgist at SRI International (Stanford Research Institute) until 1979. During that time, he began a long relationship with the Electric Power Research Institute (EPRI) in Palo Alto, CA working on nuclear reactor coolant and materials issues. In 1979, he accepted a Professorship in the Department of Metallurgical Engineering and Directorship of the Fontana Corrosion Center at the Ohio State University and managed a large EPRI-sponsored research program on stress corrosion cracking and corrosion fatigue in reactor materials. In 1984, he returned to SRI as Director of the Chemistry Laboratory and later as Director of the Materials Laboratory. In 1991, he accepted a Professorship in Materials Science and Engineering at the Pennsylvania State University (PSU) to direct the Advanced Materials Center. He was later (1998) promoted to

Distinguished Professor but in 1997 he took a leave of absence to become the Vice President of the Physical Sciences Division at SRI International. He returned to PSU in 1998 and continued his work on nuclear materials and coolant issues until he retired from PSU in December 2012. Shortly thereafter, UC Berkeley invited him to join the Departments of Nuclear Engineering and Materials Science and Engineering as a Professor in Residence.

Thus, he meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Dr. Macdonald be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Dr. Macdonald is reasonable. Dr. MacDonald provided consulting services in this proceeding and also expert testimony on the issue of the costs related to aging components and deferred maintenance, most importantly with respect to the Unit 1 Reactor Pressure Vessel and demonstrated embrittlement implicating the reasonableness, cost-effectiveness and prudence of extending DCP operations.

EXHIBIT A

DIGBY D. MACDONALD

Professor in Residence, Departments of Nuclear Engineering
and Materials Science and Engineering
University of California at Berkeley
4151 Etcheverry Hall
Berkeley, CA 94720
(814) 360-3858, macdonald@berkeley.edu

EDUCATIONAL BACKGROUND

B.Sc. (1965) and M.Sc. (1966) in Chemistry, University of Auckland (New Zealand);
Ph.D. in Chemistry (1969), University of Calgary (Canada).

PROFESSIONAL EXPERIENCE (partial list over the past 52 years)

- Professor in Residence, Departments of Nuclear Engineering and Materials Science and Engineering, University of California at Berkeley, 1/2013 – present.
- Distinguished Professor of Materials Science and Engineering, Penn. State Univ., 6/2003 – 12/2012.
- Chair, Metals Program, Penn. State Univ., 6/2001 – 6/2003
- Director, Center for Electrochemical Sci. & Tech., Penn. State Univ., 7/99 – 12/2012.
- Vice President, Physical Sciences Division, SRI International, Menlo Park, CA, 1/98 – 7/99
- Director, Center for Advanced Materials, Penn. State Univ., 7/91-3/2000
- Professor, Materials Science and Engineering, Penn. State Univ., 7/91 – 6/03.
- Deputy Director, Physical Sciences Division, SRI International, Menlo Park, CA, 4/87 - 7/91
- Laboratory Director, Mat. Research Lab., SRI International, Menlo Park, CA, 4/87 – 7/91
- Laboratory Director, Chemistry Laboratory, SRI International, Menlo Park, CA, 3/84 – 4/87
- Director and Professor, Fontana Corrosion Center, Ohio State University, 3/79 – 3/84
- Sr. Metallurgist, SRI International, Menlo Park, CA, 3/77 – 3/79.
- Sr. Research Associate, Alberta Research Ltd/University of Calgary, Canada, 3/75 – 3/77.
- Lecturer in Chemistry, Victoria University of Wellington, New Zealand, 4/72 – 3/75.
- Assist. Research Officer, Whiteshell Nuclear Research Establishment, Atomic Energy of Canada Ltd., Pinawa, Manitoba, Canada, 9/69 – 4/72.

AREAS OF TECHNICAL EXPERTISE

- Electrochemical systems.
 - Lithium-Ion batteries, structure and design, cycling studies, capacity fade, and failure analysis.
 - Solid Polymer Electrolyte Fuel Cells.
 - Electrolytic Hydrogen Production.
 - Electrocatalysis.
 - Chemistry of high temperature aqueous, including supercritical, aqueous systems.

- Corrosion.
 - General corrosion, localized corrosion, theory, and practice.
 - Failure analysis
 - Passivity and passivity breakdown
 - Damage Function Analysis and the deterministic prediction of damage.
- Nuclear Power Technology.
 - Electrochemistry of reactor primary coolant circuits.
 - Primary coolant radiolysis.
 - Modeling the corrosion potential in operating reactors (14 reactors modeled to date).
 - Prediction of general corrosion, pitting corrosion, stress corrosion cracking, corrosion fatigue, flow-assisted corrosion, and hydrogen embrittlement is a deterministic manner in operating BWRs and PWRs.
 - Neutron irradiation of reactor coolant circuit materials, irradiation embrittlement, modeling component failure.
 - Fluence and dpa calculations.
 - Molten salt reactors, electrochemistry and corrosion phenomena.
 - Corrosion of metals and alloys in contact with liquid metal (e.g., sodium, lead-bismuth) coolants.

CONSULTING ACTIVITIES (Partial list for the last twenty years).

OLI Systems

Electric Power Research Institute

SRI International

Stone & Webster Engineering Co.

Canadian Auto Preservation, Inc.

Numerous oil and gas companies.

SSM, Sweden.

General Motors Corp.

Australian Nuclear Organization Mo isotope production facility failure analysis.

Numerous expert witness assignments in litigation.

PATENTS

1. D. D. Macdonald and A. C. Scott, "Pressure Balanced External Reference Electrode Assembly and Method", US Patent 4,273,637 (1981).
2. D. D. Macdonald, "Apparatus for Measuring the pH of a Liquid", US Patent 4,406,766 (1983).
3. S. C. Narang and D. D. Macdonald, "Novel Solid Polymer Electrolytes", US Patent 5,061,581 (1991).
4. S. Hettiarachchi, S. C. Narang, and D. D. Macdonald, "Synergistic Corrosion Inhibitors Based on Substituted Pyridinium Compounds", US Patent 5,132,093 (1992).

5. S. Hettiarachchi, S. C. Narang, and D. D. Macdonald, "Reference Electrode Assembly and Process for Constructing", US Patent, 5,238,553 (1993).
6. D. D. Macdonald, et al, "Conducting Polymer for Lithium/Aqueous Syst.", US Prov. Pat. 60/119,360 (1998).
7. D. D. Macdonald, et al, "Polyphosphazenes as Proton Conducting Membranes", US Pat. Appl. 09/590,985 (1999).
8. D. D. Macdonald, et al, "Impedance/Artificial Neural Network Method...", US Prov. Pat. 60/241,871 (1999)
9. D. D. Macdonald, "Electrochemical Conditioning of Wine", US Prov. Pat. 60/295,080 (2001).
10. D. D. Macdonald, et.al., "Silicon Air Battery", Int. Patent WO2011/061728A1, May 26, 2011.
11. D. D. Macdonald, et.al., "Silicon Air Battery", US Patent, 8,835,060 B2, Sept. 16, 2014.

RELEVANT PUBLICATIONS (from a total of ≈ 1015 of which > 400 are in the nuclear field).

1. D. D. Macdonald and G. R. Engelhardt, "Predictive Modeling of Corrosion". In: Richardson J A et al. (eds.), *Shrier's Corrosion*, 2, 1630-1679 (2010). Amsterdam: Elsevier.
2. J. Qiu, A. Wu, J. Yao, Y. Xu, Y. Li, R. Scarlat, D.D. Macdonald, "Kinetic study of hydrogen transport in graphite under molten fluoride salt environment". *Electrochim. Acta*, 2020, 136459 (2020).
3. J. Yao, J. Qiu, F. Carotti, R. Scarlat, D.D. Macdonald, Kinetic study of the hydrogen charging reaction on the graphite in aqueous solution and in room temperature ionic liquid (RTIL), *Electrochimica Acta*, 330, 135291 (2000).
4. D Kovalov, B Fekete, G R Engelhardt, D D Macdonald, Prediction of corrosion fatigue crack growth rate in alloys. Part I: General corrosion fatigue model for aero-space aluminum alloys, *Corrosion Science*, 141, 22-29 (2018).
5. D Kovalov, B Fekete, G. R Engelhardt, D. D Macdonald, Prediction of Corrosion Fatigue Crack Growth Rate in Alloys. Part II: Effect of Electrochemical Potential, NaCl Concentration, and Temperature on Crack Propagation in AA2024-T351, *Corrosion Science*, 152. 130-139 (2019).
6. P. C. Lu, D. D. Macdonald, M. Urquidi-Macdonald and T. K. Yeh. "Theoretical Estimation of Crack Growth Rates in Type 304 Stainless Steel in BWR Coolant Environments". *Corrosion*, 52(10), 768-785 (1996).
7. G. R. Engelhardt, M. Urquidi-Macdonald, and D. D. Macdonald. "A Simplified Method for Estimating Corrosion Cavity Growth Rates". *Corros. Sci.*, 39(3), 419-441 (1997).
8. S.-K. Lee, P. Lv, and D. D. Macdonald, "Customization of the CEFM for Predicting Stress Corrosion Cracking in Lightly Sensitized Al-Mg alloys in Marine Applications", *J. Solid State Electrochem.*, 17(8), 2319-2332 (2013).
9. J Shi, J Wang, D D Macdonald, Prediction of crack growth rate in Type 304 stainless steel using artificial neural networks and the coupled environment fracture model, *Corrosion Science*, 89, 69-80 (2014).
10. J Shi, J Wang, D D Macdonald, Prediction of primary water stress corrosion crack growth rates in Alloy 600 using artificial neural networks, *Corrosion Science*, 92, 217-227 (2015).

11. G. R. Engelhardt and D.D. Macdonald. "Modeling the Crack Propagation Rate for Corrosion Fatigue at High Frequency of Applied Stress", *Corros. Sci.*, 52(4), 1115-1122 (2010).
12. M. P. Manahan, D. D. Macdonald, and A. J. Peterson, Jr. "Determination of the Fate of the Current in the Stress-Corrosion Cracking of Sensitized Type 304SS in High Temperature Aqueous Systems". *Corros. Sci.*, 37(1), 189-208 (1995).
13. G. R. Engelhardt, and D. D. Macdonald, "Deterministic Prediction of Pit Depth Distribution", *Corrosion*, **54**, 469-479 (1998).
14. D. Macdonald, "Stress Corrosion Cracking in Reactor Coolant Circuits – An Electrochemist's Viewpoint," *Power Plant Chemistry*, **6**, 731-747 (2004).
15. D. D. Macdonald, "Internal/External Environment Coupling in Stress Corrosion Cracking", *J. Corr. Sci. Eng.*, **6**, Paper C065 (2005).
16. S K Lee, D D Macdonald, Theoretical aspects of stress corrosion cracking of Alloy 22, *J. Nucl. Mat.*, 503, 124-139 (2018).
17. E. Huttunen-Saarivirta, E. Ghanbari, F. Mao, P. Rajala, L. Carpen, and D. D. Macdonald, (2019). Erratum: Kinetic properties of the passive film on copper in the presence of sulfate-reducing bacteria (Journal of the Electrochemical Society (2018) 165 (C450)
18. J. Qiu, D. D. Macdonald, Y. Xu, L. Sun, "General corrosion of carbon steel in a synthetic concrete pore solution", *Mat. Corros.*, 72(1-2), 107-119 (2021).
19. Y Zhu, DD Macdonald, J Yang, J Qiu, GR Engelhardt, The Corrosion of Carbon Steel in Concrete. Part II: Literature Survey and Analysis of Existing Data on Chloride Threshold, *Corros. Sci.*, 109439 (2021).
20. F Carotti, E Liu, DD Macdonald, RO Scarlat, An electrochemical study of hydrogen in molten 2LiF-BeF₂ (FLiBe) with addition of LiH, *Electrochim. Acta*, 367, 137114 (2021).
21. DD. Macdonald, "The Role of Determinism in the Prediction of Corrosion Damage.", *Corros. Mater. Degrad.* 2023, 4, 212–273.
22. DD Macdonald, GR Engelhardt, A Critical Review of Radiolysis Issues in Water-Cooled Fission and Fusion Reactors: Part II, Prediction of Corrosion Damage in Operating Reactors, *Corrosion and Materials Degradation* 3 (2022), 694-758.
23. **1000**. M. Hong, A. Lopez Morales, H. Lun Chan, D D Macdonald, M. Balooch, Y. Xie, E. Romanovskaia, J. R. Scully, D. Kaoumi, P. Hosemann, Effect of thermal oxidation on helium implanted 316L stainless steel, *Journal of Applied Physics* 132 (18) (2022) 185104.
24. W. Bogearls, D.D. Macdonald, J.H. Zheng, and A.S. Jovanovic, "Hydrogen and NPP Life Management: Doel 3 and Tihange 2.", Technical Report · February 2022, KU Leuven, Belgium, 2022.
25. **995**. D. D. Macdonald, G. R. Engelhardt, and A. Petrov, "Physics and Technology of ITER", E Scholarly Community Encyclopedia, MDPI, Switzerland, 2022.
26. DD Macdonald, GR Engelhardt, A Petrov, A Critical Review of Radiolysis Issues in Water-Cooled Fission and Fusion Reactors: Part I, Assessment of Radiolysis Models, *Corrosion and Materials Degradation* 3, 470-535 (2022).
27. Y Zhu, DD Macdonald, J Yang, J Qiu, GR Engelhardt, The Corrosion of Carbon Steel in Concrete. Part II: Literature Survey and Analysis of Existing Data on Chloride Threshold, *Corrosion Science*, 109439 (2021).
28. **973**. DD Macdonald, Y Zhu, J Yang, J Qiu, GR Engelhardt, A Sagüés, L Sun, Z Xiong, Corrosion of rebar in concrete. Part IV. On the theoretical basis of the chloride threshold, *Corrosion Science* 185, 109460 (2021).

29. **974.** Y Zhu, DD Macdonald, J Qiu, M Urquidi-Macdonald, Corrosion of rebar in concrete. Part III: Artificial Neural Network analysis of chloride threshold data, *Corrosion Science* 185, 109438 (2021).
30. J Qiu, DD Macdonald, R Schoell, J Han, S Mastromarino, JR Scully, D Kaoumi, P Hosemann, Electrochemical study of the dissolution of oxide films grown on Type 316 L stainless steel in molten fluoride salt, *Corrosion Science*, 109457 (2021).
31. G. R. Engelhardt, D. D Macdonald, "Monte-Carlo Simulation of Pitting Corrosion with a Deterministic Model for Repassivation", *J. Electrochem. Soc.* 167(1), 013540 (2020).
32. J. Qiu, A. Wu, Y. Li, Y. Xu, R. Scarlat, D. D. Macdonald, "Galvanic corrosion of Type 316L stainless steel and Graphite in molten fluoride salt", *Corros. Sci.*, 170, 108677 (2020).
33. J. Qiu, D. D. Macdonald, N. Li, R. Schoell, D. Kaoumi, P. Hosemann, "An Electrochemical Impedance Spectroscopic Study of Oxide Films in Liquid Metal", *JOM*, 72, 2082-2088 (2020).
34. J. Qiu, A. Wu, J. Yao, Y. Xu, Y. Li, R. Scarlat, D. D. Macdonald, "Kinetic study of hydrogen transport in graphite under molten fluoride salt environment". *Electrochim. Acta*, 352, 136459 (2020).
35. J. Qiu, J. Han, R. Schoell, M. Popovic, E. Ghanbari, D. Kaoumi, J. R. Scully, D. D. Macdonald, P Hosemann, "Electrical properties of thermal oxide scales on pure iron in liquid lead-bismuth eutectic", *Corros. Sci.* 176, 109052 (2020).
36. I. Balachov, B. Fekete, D. D. Macdonald, B Spencer, "Lifetime estimation of a BWR core shroud in terms of IGSCC", *Nucl. Eng. Design*, 368, 110831 (2020).
37. S Guo, D Xu, Y Liang, Y Li, J Yang, G Chen, D. D. Macdonald, "Corrosion Characteristics of Typical Ni–Cr Alloys and Ni–Cr–Mo Alloys in Supercritical Water: A Review", *Ind. & Engin. Chem. Res.*, 59 (42), 18727-18739 (2020).
38. J. Qiu, Y. Li, Y. Xu, D. D. Macdonald, "Effect of temperature on corrosion of carbon steel in simulated concrete pore solution under anoxic conditions". *Corros. Sci.*, 175, 108886 (2020).
39. D. D. Macdonald, J. Qiu, Y. Zhu, J. Yang, G. R. Engelhardt, A Sagüés, "Corrosion of rebar in concrete. Part I: Calculation of the corrosion potential in the passive state", *Corros. Sci.* 177, 109018 (2020).
40. G. R. Engelhardt, B. Kursten, D. D. Macdonald, "Corrosion of carbon steel in physically constrained locations in High level nuclear waste isolation systems", *Corros. Sci.* 177, 108974 (2020).
41. J. Yang, Y. Li, D.D. Macdonald, Effects of temperature and pH on the electrochemical behaviour of alloy 600 in simulated pressurized water reactor primary water, *J. Nucl. Mat.*, 2020, 528: 151850 (2020).
42. A. Petrov, D. Macdonald, and G. Engelhardt. Assessment of Radiolysis in Tokamak Cooling Water System of ITER Fusion Reactor. Paper P18C. *Proceedings of the 21st International Conference on Water Chemistry in Nuclear Reactor Systems: San Francisco, September 2018*. EPRI, Palo Alto, CA: 2019. 3002016101 (2019).
43. D. D. Macdonald, J. Yang, B. Fekete, I. Balachov, and B. W. Spencer, "Development and Integration of Light Water Reactor (LWR) Materials Corrosion Degradation Codes into Grizzly", DOE/NEUP Report, Award DE-NE0008541, December 15, 2019.
44. J Yang, Y Li, A Xu, B Fekete, D. D Macdonald, The electrochemical properties of alloy 690 in simulated pressurized water reactor primary water: Part I, effect of temperature, *J. Nucl. Mat.*, 518, 305-315 (2019).

45. D.D. Macdonald, B. Fekete, The foundations of fracture impedance spectroscopy, *Engineering Failure Analysis* 102, 102-110 (2019).
46. J Shi, B Fekete, J Wang, D D Macdonald, Customization of the coupled environment fracture model for predicting stress corrosion cracking in Alloy 600 in PWR environment, *Corros. Sci.*, 139, 58-67 (2018).
47. B Fekete, J Ai, J Yang, J S Han, W Y Maeng, D D Macdonald, An advanced coupled environment fracture model for hydrogen-induced cracking in alloy 600 in PWR primary heat transport environment, *Theoretical and Applied Fracture Mechanics*, 95, 233-241 (2018).
48. J Qiu, B Leng, H Liu, D D Macdonald, A Wu, Y Jia, W Xue, G Yu, X Zhou, Effect of SO₂– on the corrosion of 316L stainless steel in molten FLiNaK salt, *Corros. Sci.*, 144, 224-229 (2018).
49. D. D. Macdonald and G. R. Engelhardt, “Review and Assessment of Radiolysis in the TCWS IBED PHTS.” Prepared by OLI Systems, Inc. Cedar Knolls, NJ, under contract No. 6400014199 with Oak Ridge National Laboratory, US ITER, Oak Ridge, TN (2017).
50. W. F. Bogaerts, D. D. Macdonald, A. S. Jovanovic, J. H. Zheng, K. Dockx, “Hydrogen Cracks in Belgian Nuclear Reactor Pressure Vessels: Five Years after Their Discovery—An Update”, *CORROSION*, 2017 (2017).

PROFESSIONAL ASSOCIATIONS AND HONORS

- Research Award, College of Engineering, Ohio State University, 1983.
- Selector of the Kuwait Prize for Applied Sciences, 1985.
- The 1991 Carl Wagner Memorial Award from The Electrochemical Society.
- The 1992 Willis Rodney Whitney Award from The National Association of Corrosion Engineers.
- Chair, Gordon Research Conference on Corrosion, New Hampshire, 1992.
- W.B. Lewis Memorial Lecture by Atomic Energy of Canada, Ltd., 1993, “in recognition of [his] contributions to the development of nuclear power in the service of mankind”.
- Elected Fellow, NACE-International, 1994.
- Member, USAF Scientific Advisory Board, Protocol Rank: DE-4 (Lieutenant General equivalent), 1993-1997
- Elected Fellow, The Electrochemical Society, 1995.
- Elected Fellow, Royal Society of Canada, 1996. (“National Academy” of Canada).
- Wilson Research Award, College of Earth and Minerals Sciences, Pennsylvania State University, 1996.
- Elected Fellow, Royal Society of New Zealand, 1997. (“National Academy” of New Zealand).
- H. H. Uhlig Award, Electrochemical Society, 2001.
- U. R. Evans Award, British Corrosion Institute, 2003.
- Elected Fellow, Institute of Corrosion (UK), 2003.
- Appointed Adjunct Professor, Massey University, New Zealand, 2003.
- Appointed Adjunct Professor, University of Nevada at Reno, 2003.
- Elected Fellow, World Innovation Foundation, 2004.

- Elected Fellow, ASM International, 2005.
- Elected Fellow, International Society of Electrochemistry, 2006.
- Khwarizmi International Award Laureate in Fundamental Science, Feb. 2007.
- Trustee, ASM International, 2007-2010.
- Appointed SABIC Visiting Chair Professor, King Fahd University of Petroleum and Minerals, Dhahran, Saudi Arabia, 2010.
- Recipient, Lee Hsun Research Award, Chinese Academy of Sciences, China, 2010.
- Inducted Doctuer Honoris Causa by INSA-Lyon, Lyon, France, 2011.
- Nominated for the 2011 Nobel Prize in Chemistry for work on passivity.
- Awarded the Faraday Memorial Trust Gold Medal, 2012.
- Awarded the Gibbs Award in Thermodynamics by IAPWS, 2013
- Awarded Frumkin Medal, ISE, 2014.
- Awarded the OLIN Palladium Medal by the Electrochemical Society, 2015.
- Received the Ad Augusta Award from Auckland Grammar School, 2016.
- Plenary Lecturer, Corrosion2019, Nashville, TN, 2019.
- Plenary Lecturer, Mexican Electrochemical Society, 2019.
- Elected Member of the EU Academy of Science, 2019.
- FLOGEN Fray International Sustainability Award for his distinguished work in corrosion sciences



Signed. Digby D. Macdonald.

ATTACHMENT # 3

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Peter Bradford

Resume

The resume of Peter Bradford is attached hereto as Exhibit A.

Justification for New Rate

SLOMFP is requesting that Peter Bradford be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Peter Bradford is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Mr. Bradford because none of the other categories better suited his expertise and scope of testimony. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Here, Mr. Bradford holds undergraduate and law degree from Yale. Mr. Bradford has over 40 years of combined experience in academia and the nuclear energy regulation field. Mr. Bradford chaired the NY Public Utilities Commission from June, 1987 to January 1995, chaired the Maine PUC from June, 1982 to June, 1987 and was a Commissioner of the Maine PUC, from December 1971 to August, 1977. During these years, New York resolved its stalemate over operating the Shoreham nuclear power plant and Maine resolved its involvement in Seabrook nuclear power plant, both on favorable economic terms. He was Maine's Public Advocate in 1982 and was President of the National Association of Regulatory Utility Commissioners during 1987. He served as a Commissioner on the U.S. Nuclear Regulatory Commission from 1977 until 1982. During his term, the NRC undertook major upgrading of its regulatory and enforcement processes in the wake of the 1979 Three Mile Island accident.

Until 2018 he was an adjunct professor at Vermont Law School, where he taught "Nuclear Power and Public Policy" and "The Law of Electric Utility Restructuring". He also advises and teaches on utility regulation, restructuring, nuclear power, and energy policy in the U.S. and abroad. He was a member and chair of the Public Oversight Panel for the Comprehensive Vertical Assessment of Vermont Yankee Nuclear Power Plant and has served as an expert witness on investment in new nuclear power plants in several states. He is one of Vermont's two representatives on the Texas/Vermont Low Level Radioactive Waste Disposal Compact Commission and served on the advisory panel for the Bipartisan Policy Center project on nuclear waste. He has been a visiting lecturer in energy policy and environmental protection at Yale University and served on New York State's 2012-13 Moreland Commission on Utility Storm Response.

He advised the Vermont Legislature on issues relating to spent fuel storage at Vermont Yankee and the Town of Wiscasset, Maine, on issues related to the storage of spent nuclear fuel at the site of the former Maine Yankee nuclear power plant. He has advised on electric restructuring issues and has testified on aspects of nuclear power, electricity and telecommunications restructuring in many U.S. states.

Thus, he meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Mr. Bradford be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Mr. Bradford is reasonable. Mr. Bradford consulted with SLOMFP throughout this proceeding and provided expert testimony on the issues of prudence, costs and regulatory oversight.

Attachment A

PETER A. BRADFORD
P.O. BOX 497
PERU, VERMONT 05152
(802) 430-4085

PROFESSIONAL EXPERIENCE:

Peter Bradford chaired the New York State Public Service Commission from 1987 until 1995 and the Maine Public Utilities Commission from 1982 until 1987. During these years, New York resolved its stalemate over operating the Shoreham nuclear power plant and Maine resolved its involvement in Seabrook, both on favorable economic terms. He was Maine's Public Advocate in 1982 and was President of the National Association of Regulatory Utility Commissioners during 1987.

He served on the U.S. Nuclear Regulatory Commission from 1977 until 1982. During his term, the NRC undertook major upgrading of its regulatory and enforcement processes in the wake of the 1979 Three Mile Island accident.

Prior to becoming a member of the NRC, he had served on the Maine Public Utilities Commission (1971-1977) and was Chairman in 1974-1975.

Until 2018 he was an adjunct professor at Vermont Law School, where he taught “Nuclear Power and Public Policy” and “The Law of Electric Utility Restructuring”. He also advises and teaches on utility regulation, restructuring, nuclear power and energy policy in the U.S. and abroad. He was a member and chair of the Public Oversight Panel for the Comprehensive Vertical Assessment of Vermont Yankee Nuclear Power Plant and has served as an expert witness on investment in new nuclear power plants in several states. He is one of Vermont’s two representatives on the Texas/Vermont Low Level Radioactive Waste Disposal Compact Commission and served on the advisory panel for the Bipartisan Policy Center project on nuclear waste. He has been a visiting lecturer in energy policy and environmental protection at Yale University and served on New York State’s 2012-13 Moreland Commission on Utility Storm Response.

One prominent regulatory scholar termed him “generally regarded as the nation’s brightest and most thoughtful regulator” (Irwin Stelzer, New York Post, 07/14/1994). Another called him a “regulatory legend” (<https://www.scotthemplinglaw.com/essays/the-decisive-regulator>).

He served on the 2007 Keystone Center fact finding collaboration on nuclear power and the 2006 National Academy of Sciences panel evaluating the alternatives to continued operation of the Indian Point Nuclear Power Plants in New York. He is also on the board of the Regulatory Assistance Project, which provides assistance to state and federal energy regulatory commissions regarding economic regulatory policy and environmental protection.

He served on a panel advising the European Bank for Reconstruction and Development on how best to replace the remaining Chernobyl nuclear plants in Ukraine and also on an expert panel advising the Austrian Institute for Risk Reduction on regulatory agency issues associated with the opening of the Mochovce nuclear power plant in Slovakia. He advised the Vermont Legislature on issues relating to spent fuel storage at Vermont Yankee and the Town of Wiscasset, Maine, on issues related to the storage of spent nuclear fuel at the site of the former Maine Yankee nuclear power plant.

He has advised on electric restructuring issues and has testified on aspects of nuclear power, electricity and telecommunications restructuring in many U.S. states.

He has also advised on energy, telecommunications and water utility restructuring issues in China, Armenia, Azerbaijan, Canada, Georgia, India, Indonesia, Kazakhstan, Kyrgyzstan, Mongolia, Russia, Samoa, South Africa, St. Lucia, Trinidad and Tobago and Turkey. He was a member of the Policy Advisory Committee of the China Sustainable Energy Program, a joint project of the David and Lucille Packard Foundation and the Energy Foundation from 1999 until 2014.

Mr. Bradford was an advisor to Maine Governor Kenneth Curtis from 1968 to 1971, with responsibilities for oil, power and environmental matters. He assisted in preparing landmark Maine laws relating to oil pollution and industrial site selection and was Staff Director of the Governor's Task Force on Energy, Heavy Industry and the Coast of Maine.

Mr. Bradford is the author of Fragile Structures: A Story of Oil Refineries, National Security and the Coast of Maine, a book published by Harper's Magazine

Press in 1975. (“In a number of respects a rare book...The presentation is a balanced one”, New York Times, 11/30/1975; “If sanity is ever declared illegal, Peter Bradford ought to be one of the first people arrested...A work of political education that transcends partisanship”, Kirkus Reviews, May, 1975).

His articles on utility regulation and nuclear power have appeared in many publications, including The New York Times, The Washington Post, The Los Angeles Times, The Boston Globe, The Atlanta Journal Constitution, The Bulletin of the Atomic Scientists, and The Electricity Journal.

He is a 1964 graduate of Yale University and received his law degree from the Yale Law School in 1968.

He and his wife Susan live in Peru, Vermont.

PROFESSIONAL AFFILIATIONS:

2011-present – Commissioner, Texas/Vermont Low Level Radioactive Waste Compact Commission

1998-present, Board of Directors, Union of Concerned Scientists

2020-present – Board of Directors, the Regulatory Assistance Project

2017-present - Board of Directors, the Nonproliferation Education Center

2013-2015 – Member Bipartisan Policy Center panel on disposal of high-level nuclear waste.

1999-2015 - Member, Policy Advisory Committee, China Sustainable Energy Project (funded by the David and Lucille Packard Foundation and the Energy Foundation).

2012-13 – Commissioner, New York State Moreland Commission on Utility Storm Response

2007 – Member, Keystone Center project on the future of nuclear power

2006 – Member of the National Research Council Center on Alternatives to the Continued Operation of the Indian Point Nuclear Power Plants

1998-2002 - Member, Advisory Council, New England Independent System Operator

Nov. 1986-Nov. 1987 - President, National Association of Regulatory Utility Commissioners

1977-1995 NARUC positions, Member, Executive Committee; Member, Electricity Committee (1977-1989); Member, Gas Committee (1989-1993); Member, Communications Committee (1975-1977); Board of Directors, National Regulatory Research Institute (1985-1987).

1975-1977, 1982-1986. Advisory Council, Electric Power Research Institute

1987-1995, Member of New York State Energy Planning Board

1987-1995, Member, Board of Directors, New York State Energy Research and Development Administration

1987-1995, Member, New York State Environmental Board;

1987-1995, Chair, New York State Energy Facilities Siting Board

1992-1994, State co-chair, New York State Task Force on Telecommunications Policy

EDUCATION:

1964 *B.A.* History, Yale University, New Haven, CT

1968 *L.L.B.*, Yale University School of Law, New Haven, CT

AWARDS:

Honorary Degree, Unity College, 1981.

Environmental Award, Natural Resources Council of Maine, 1979.

PUBLICATIONS

Books

Fragile Structures: A Story of Oil Refineries, National Security and the Coast of Maine, 1975, Harpers Magazine Press.

Law Review

Maine's Oil Spill Legislation, Texas International Law Journal, Vol.7, No.1, Summer 1971, pp.29-43.

Articles

“Nuclear Power History Offers Diablo Canyon Warning”, San Jose Mercury News, August 31, 2022, <https://www.mercurynews.com/2022/08/31/opinion-condemned-to-repeat-it-diablo-canyons-place-in-nuclear-history/>;

“Utah May Be Doomed to Repeat Nuclear History”, Deseret News, April 23, 2019, <https://www.deseretnews.com/article/900067279/guest-opinion-utah-may-be-doomed-to-repeat-nuclear-history-idaho-facility-reactors.html>

“Plant Vogtle: Crown Jewel or Sow’s Ear”, Bryan County News and other Georgia publications, April, 2018.

“Wasting Time: Subsidies, Operating Reactors and Melting Ice”, Bulletin of the Atomic Scientists, January, 2017, <http://www.tandfonline.com/doi/full/10.1080/00963402.2016.1264207?scroll=top&needAccess=true>

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“Delivering the Nuclear Promise: TVA’s Sale of the Bellefonte Nuclear Power Plant Site”, Bulletin of the Atomic Scientists, June 1, 2016, <http://thebulletin.org/delivering-nuclear-promise-tvas-sale-bellefonte-nuclear-power-plant-site9524>

“When the Unthinkable is Deemed Impossible: Reflections on Fukushima”, Bulletin of the Atomic Scientists, March 20, 2016, <http://thebulletin.org/commentary/when-unthinkable-deemed-impossible-reflecting-fukushima9268>

“What the EPA’s Clean Power Plan Means for Nuclear Energy”, Bulletin of the Atomic Scientists, September, 2015

“Why GOP Support for Subsidized Nuclear Energy is Confounding”, Bangor Daily News, July 11, 2015;
 “Playing Chicken with Illinois Electric Rates Won’t Improve the Climate”, Crain’s Chicago Business, January 7, 2015;
 “Foreword, World Nuclear Industry Status Report”, July 2013, WNISR, pp. 4-5, <http://www.worldnuclearreport.org/IMG/pdf/20130716msc-worldnuclearreport2013-lr-v4.pdf>;
 “How to Close the U.S. Nuclear Industry: Do Nothing”, Bulletin of the Atomic Scientists, March, 2013, pp. 12-21;
 “Transparency and Nuclear Regulation: A U.S. Perspective”, prepared for International Right to Know Day, Tokyo, September 2012;
 “The Nuclear Landscape”, Nature, March 8, 2012, p. 151, <http://www.nature.com/nature/journal/v483/n7388/full/483151a.html>;
 “Taxpayer Funding for Nuclear Power: Issues and Consequences”, Chapter 5 of *Nuclear Power's Global Expansion: Weighing Its Risks*, Henry Sokolski, ed. http://www.npolicy.org/userfiles/image/Taxpayer%20Financing%20for%20Nuclear%20Power,%20Precedents%20and%20Consequences_pdf.pdf;
 Book review, *The End of Energy*, The Wall Street Journal, May, 2011, <http://online.wsj.com/news/articles/SB10001424052748703421204576327370005700428>;
 “Nuclear Power’s Search for the Taxpayer’s Wallet”, Blue Ridge Press, November, 2010.

 “Honey, I Shrunk the Renaissance: Nuclear Revival, Climate Change and Reality”, Electricity Policy.com, October, 2010, <http://www.electricitypolicy.com/bradford-5-18-11-final-edit.pdf>;
 “Nuclear Loan Guarantees and Governmental Secrecy”, The Atlanta Journal-Constitution, June 22, 2010, <http://www.ajc.com/opinion/we-may-be-on-555182.html>;
 “Minnesota’s Nuclear Moratorium”, Twin Cities Pioneer Press, March 3, 2010, http://www.twincities.com/alllistings/ci_14506848?source=rss;
 “The Nuclear Renaissance Meets Economic Reality”, Bulletin of the Atomic Scientists, November-December 2009, www.vermontlaw.edu/Documents/IEE/20100109_bradfordArticle.pdf;
 “Massive Nuclear Subsidies Won’t Solve Climate Change”, *Madison Capitol Times*, November 3, 2009, http://host.madison.com/ct/news/opinion/column/guest/article_37b3c6b1-dff6-5ef1-a21c-8a511e278961.html;

“Nuclear Agency Needs Independent Appointees”, Atlanta Journal Constitution, September 17, 2009, <http://www.ajc.com/opinion/nuclear-agency-needs-independent-140954.html>

Contribution to New York Times Forum “*Choking on Growth: China and the Environment*”, New York Times Online, November 20, 2007, <http://china.blogs.nytimes.com/2007/11/20/answers-from-peter-bradford/#more-24>
Contributions to the Bulletin of the Atomic Scientists online forum on *Nuclear Power and Climate Change*, (with Amory Lovins and Stephen Berry), <http://www.thebulletin.org/roundtable/nuclear-power-climate-change/>, March-August, 2007

The Economics of Nuclear Power (with Steven Thomas, Antony Froggatt, and David Millbrow) for Greenpeace International, May, 2007

Nuclear Power’s Prospects in the Power Markets of the 21st Century, for the Nonproliferation Education Center, February, 2005;

China’s National Energy Plan: Some Energy Strategy Considerations, (with Thomas Johansson) The Sinosphere Journal, Spring 2004;

Some Environmental Lessons from Electric Restructuring, IUCN Colloquium on Energy Law for Sustainable Development, Winter 2004;

Where Have All the Safeguards Gone? Foreword to “Financial Insecurity: The Increasing Use of Limited Liability Companies and Multi-Tiered Holding Companies to Own Nuclear Power Plants” The Star Foundation August 7, 2002

Nuclear Power after September 11, OnEarth, December 2001.

The Unfulfilled Promises of Electric Restructuring, Nor’easter, summer 2001.

Considerations Regarding Recovery of Strandable Investment, PUR Utility Quarterly, December, 1997.

Ships at a Distance: Energy Choice and Economic Challenge, The National Regulatory Research Institute Quarterly Bulletin, Volume 18, Number 3, Fall, 1997, p. 287 (Originally the 1997 George Aiken Lecture at the University of Vermont).

Book Review: *The British Electricity Experiment - Privatization: the Record, the Issues, the Lessons*, Amicus Journal, June, 1997; Regulatory Assistance Project *Gorillas in the Mist: Electric Utility Mergers in Light of State Restructuring Goals*, The National Regulatory Research Institute Quarterly Bulletin, Spring, 1997.

Til Death Do Us Part or the Emperor’s New Suit: Does a Regulatory Compact Compel Strandable Investment Recovery?, PUR Utility Quarterly, October, 1996;

Electric Bargain’s Cost Is Dirty Air, Newsday, L.A. Times Features Syndicate, 4/18/96.

Implications for Nuclear Power of Full Competition in the Electric Business, Regulatory Assistance Project volume on Perspective in Electric Utility Restructuring, February, 1996.

A Regulatory Compact Worthy of the Name, The Electricity Journal, November, 1995, pp.12-15;

Paved with Good Intentions: Reflections on FERC's Decisions Reversing State Power Procurement Processes, (with David Moskovitz), The Electricity Journal, August/September, 1995, pp.62-68;

That Memorial Needs Some Soldiers and Other Governmental Approaches to Increased Electric Utility Competition, The Electric Industry in Transition, Public Utility Reports & NYSERDA, 1994, pp.7-13;

Market-Based Speech, The Electricity Journal, September, 1994, p.85;

In Search of an Energy Strategy, Public Utilities Fortnightly, 1/15/92;

Parables of Modern Regulation, The Electricity Journal, November 1992, p.73;

Foreword to: *Regulatory Incentives for Demand Side Management*, Nickel, Reid, David Woolcott, American Council for Energy-Efficient Economy, 1992, pp. ix-xi;

Boats Against the Current: Energy Strategy in Theory and Practice, The Electricity Journal, October, 1991, p.64;

The Shoreham War Has Got to End Now, Newsday, 5/9/89;

Parallel to the Nuclear Age, Yale University 25th Reunion book, 1989;

Book Review: *Safety Second, A Critical Evaluation of the Nuclear Regulatory Commission's First Decade* IEEE Spectrum, February, 1988, p.14;

Somewhere Between Ecstasy, Euphoria and the Shredder: Reflections on the Term 'Pronuclear', Journal of the Washington Academy of Sciences, Vol.78, no.2, June 1988, pp. 139-142;

Book Review: *Power Struggle: The Hundred Year War Over Electricity*, Amicus Journal, Winter 1987, pp. 46-47;

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Paradox and Farce: Trends in Federal Nuclear Energy Policy Los Angeles Times, June 6, 1982;

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Regulation or Reassurance, Washington Post, August 16, 1979;

Report of the Governor's Task Force on Energy, Heavy Industry and the Maine Coast, 1972;

A Measured Response to Oil Port Proposals, Maine Times, July, 1971.

Testimony Before Courts, State Utility Regulatory Commissions and the NRC Concerning Nuclear Energy

Declaration before the U.S. Nuclear Regulatory Commission on the Petition of Exelon Corporation to Transfer Facility Licenses, June 2021

Declaration before the U.S. Bankruptcy Court, Northern District of Ohio, In Re First Energy Solutions, Debtor, August 2019

Declaration before the U.S. Nuclear Regulatory Commission on the Adequacy of the FirstEnergy Solutions nuclear units' decommissioning trust funds and other assurances, June 2018;

Affidavit regarding utility promotional and political expenditures for NC WARN and Friends of the Earth before the North Carolina PUC, November, 2018;

Testimony Before the Georgia Public Service Commission in Docket 29849 Regarding the forecasting of costs and schedule for continuation of construction of Plant Vogtle, December 2017. For The Southern Alliance for Clean Energy, December 2017;

Testimony and Surrebuttal in the Matter of the Merger of Exelon Corporation and Pepco Holdings before the Maryland and Public Utility Commission, January, 2015 for the MidAtlantic Renewable Energy Coalition; Similar testimony in Delaware.

Testimony before the Maine Public Utilities Commission on its Investigation Into the Parameters for Exercising Authority Pursuant to the Maine Energy Cost Reduction Act, on behalf of Tennessee Gas Pipeline Company, July, 2014

Declaration regarding operation of the Diablo Canyon Nuclear Power Plants in the California power markets, prepared for Friends of the Earth, September, 2014

In Re: License Renewal Application Submitted by Entergy Nuclear Indian Point 2 and 3 LLCs, NRC Docket Nos. 50-247-LR and 50-286-LR, declarations in November 2007 and February, 2011, testimony December 2012;

Entergy Nuclear Vermont Yankee v. Peter Shumlin et al, U.S. District Court for the District of Vermont, September 2011;

In the Matter of Revised Application of Duke Energy Carolinas for Approval of Decision to Incur Nuclear Generation Project Development Costs, North Carolina Utilities Commission, March, 2011;

In re: Nuclear Cost Recovery Clause, Docket No. 090009-EI, Florida Public Service Commission, July 2009;

In re: Petition for Determination of Need for Levy Units 1 and 2 Nuclear Power Plants, Docket No. 080148-EI, Florida Public Service Commission, April, 2008;

Application of Duke Energy Carolinas, LLC for Approval of Decision to Incur Nuclear Generation Pre-Construction Costs, Docket No. 2007-440-E, Public Service Commission of South Carolina, March 2008;

In the Matter of Application of Duke Energy Carolinas to Recover Necessary Nuclear Generation Expenses, North Carolina Utilities Commission, March, 2008;

Report for the Town of Wiscasset, Maine on "The Value of Sites Capable of Extended Storage of High Level Nuclear Waste", December 2004;

Investigation into General Order 45 Notice filed by Vermont Yankee Nuclear Power Corporation re: proposed sale of Vermont Yankee Nuclear Power Station and Related Transactions, Testimony Regarding Proposed Paragraph 15 of the Memorandum of Understanding, Docket 6545, Vermont Public Service Board, April, 2002;

Reports for the Internal Revenue Service on “The Regulatory Jurisdictions Affecting Maine Yankee and the Tax Treatment of Certain of Its Expenditures”, (Maine Yankee v. Commissioner, Docket No. 15446-98), January, 2000, August, 2001;

Selected Other Presentations Concerning Nuclear Energy

Did Nuclear Power Jump or Was It Pushed: Some Impacts of the Accident at Three Mile Island; Presentation at Dartmouth College symposium on 35th Anniversary of TMI, March 2014;

Nuclear Power and Market Reform: Some Lessons from the U.S. and Europe; Presentation to the Japan Renewable Energy Foundation, Tokyo, February, 2014;
Early Cost Recovery for New Nuclear Reactors: The Downside, Presentation to the Southeastern Conference of Utility Regulatory Commissioners, April 15, 2013;
Don't Try This at Home: Japanese Nuclear Power Dilemmas, Nonproliferation Education Center, November 28, 2012;

Prices, Prophecies, Principles and the Future of Nuclear Energy, 4th Japan-U.S. Joint Public Policy Forum, Tokyo, October 31, 2012;

The Economics of New Nuclear Reactors, St. Petersburg, Russia and Astana, Kazakhstan,, October 2012;

Transparency and Nuclear Regulation, International Right to Know Day Presentation, Tokyo, Japan, September 22, 2012;

SMR Update: Are We Getting Closer to a Renaissance?, Presentation to MidAmerican Regulatory Conference, June, 2012;

Leadership in Nuclear Decisionmaking: ASAN Plenum, Seoul, South Korea, April, 2012;

New Nuclear Reactors Are to Climate Change What Caviar is to World Hunger, Presentation to Yale Alumni in Energy, March 23, 2012

Schrodinger's Renaissance: Anatomy of a Public Policy Fiasco, presentation to Princeton Program on Science and Global Security, December, 2011

After-Math: TMI, Fukushima and Nuclear Power's U.S. Prospects, presentation to the American Bar association, October 2011;

How Many Renaissances Will It Take to Build a New U.S. Nuclear Power Plant?, presentation at the Aspen Institute, July 2011;

Aside From That, Ms. Lincoln, How Do You Like Nuclear Risk?, presentation to the New York Society of Security Analysts, March 2011;

Nuclear Power Is to Fighting Climate Change as Caviar Is to Fighting World Hunger, presentation at Columbia Law School Debate on Nuclear Energy, November, 2010.

It's Not A Renaissance Until You've Seen a Masterpiece: Nuclear Power and Climate Change in 2010, Speech, Hannover, Germany, September 2010

Better Never Than Late: Nuclear Power, Energy Policy and Climate Change, Vermont Law School Hot Topics Lecture, June 2010

Nuclear Regulatory Commission Oversight Hearing, Senate Committee on Environment and Public Works, Subcommittee on Clean Air and Nuclear Safety, May, 2010;

Testimony on Nuclear Loan Guarantees Before the Domestic Policy Subcommittee of the U.S. House Oversight and Government Reform Committee;

Nuclear Renaissance Myths and Realities, Testimony before the Michigan Senate Energy Committee, Lansing Michigan, April 23, 2009;

"Three Mile Island: Thirty Years of Lessons Learned", Testimony before the U.S. Senate Committee on Environment and Public Works, Subcommittee on Clean Air and Nuclear Safety, March 24, 2009;

Don't Call It A Renaissance Until They've Shown You a Masterpiece; Italian Embassy/Brookings Institution Forum on "The Rise In Demand for Civil Nuclear Power", Italian Embassy, December 9, 2008;

Subsidies Without Borders: The Case of Nuclear Power, Nonproliferation Policy Education Center and Marshall Institute forum, Washington, D.C., June 13, 2008;

Nuclear Power: Are the \$tar\$ Aligned? Harvard Electricity Policy Group; May 29, 2008;

Nuclear Power As "Federal Infrastructure", Nonproliferation Policy Education Center, Prague, Czech Republic, March 18, 2008;

Nuclear Power, Energy Security, and Climate Change, Center for Energy and Environmental Security, University of Colorado Law School, Boulder, Colorado, February 1, 2008;

Of Risks, Resources, Renaissances and Reality, Institute of Public Utilities, Charleston, South Carolina, December 4, 2007;

Nuclear Power and Climate Change; Chicago Humanities Festival; November 10, 2007

Risks, Rewards, Resources, Reality; Briefing on the Loan Guarantee Provisions of the 2007 Energy Legislation; Environmental and Energy Study Institute; Washington, D.C., October 30, 2007

Fool Me Twice? Rules for an Unruly Renaissance; Carnegie International Nonproliferation Conference, Washington D.C., June 26, 2007

Regulation, Reality and the Rule of Law: Issues for a Nuclear Renaissance: Washington and Lee University, June 23, 2007.

The Future of Nuclear Energy, Bulletin of the Atomic Scientists Conference; University of Chicago, November 1, 2006

Nuclear Power and Climate Change, Society of Environmental Journalists, Burlington, Vermont, October 27, 2006

Nuclear Power, Climate Change and Public Policy, National Conference of State Legislatures, April, 2006.

Electric Restructuring after Ten Years: Surprises, Shocks and Lessons, State Legislative Leaders' Foundation, November, 2005;

Nuclear Power's American Prospects, Presentation to the California Energy Commission Nuclear Issues Workshop, August, 2005;

Decommissioning Financing: Alternatives and Policies, Conference on the Future of the Medsamor Nuclear Power Plant, Yerevan, Armenia, June 2005;

The Value of Sites Capable of Extended Storage of High Level Nuclear Waste, report for the Town of Wiscasset, Maine, December, 2004.

Nuclear Power's Prospects, NPEC/FRS/CAP/CEA Workshop, Paris, October 2004;

Did the Butler Really Do It? The Role of Nuclear Regulation in Raising the Cost of Nuclear Power, Cato Institute, Washington D.C. March 2004;

China's Energy Regulatory Framework China Development Forum, Beijing, November 17, 2003;

China's National Energy Plan (with Thomas Johansson) Background Reports to "China's National Energy Strategy and Reform", Development Research Center of the State Council, China Development Forum, November, 2003;

Repeating History: Nuclear Power's Prospects in a Carbon-Conscious World Yale School of Forestry and Environmental Studies, Leadership Council Meeting, October 24, 2003;

What Nuclear Power Can Learn from Electric Restructuring, and Vice Versa, Aspen Institute, July 5, 2003;

Renewal of the Price Anderson Act Testimony before the United States Senate Committee on Environment and Public Works Subcommittee on Transportation, Infrastructure and Nuclear Safety, January 23, 2002;

Events Now Long Past: The 20-Year Road from Three Mile Island to Electric Utility Restructuring TMI 20th Anniversary Commemoration, National Press Club, Washington D.C., March 22, 1999;

Preparing Nuclear Power for Competition NARUC Conference on "Nuclear Power in a Competitive Era: Asset or Liability?" January 23, 1997;

Call Me Ishmael: Reflections on the Role of Obsession in Nuclear Energy Policy, NARUC annual meeting, November 13, 1989;

Nuclear Power and Climate Change; Harvard Energy and Environmental Policy Center, January 13, 1989;

Somewhere between Ecstasy, Euphoria and the Shredder: Reflections on the Term Pro-Nuclear Symposium on Nuclear Radiation and Public Health Practices and Policies in the Post-Chernobyl World, Georgetown University, September 18, 1987;

Searching the Foreseeable Past: Nuclear Power, Investor Confidence and Reality Public Utilities Institute, East Lansing Michigan, July 30, 1987;

Where Ignorant Armies Clash by Night: Relationships Among Nuclear Regulators and Regulated NARUC/INPO Seminar on Nuclear Power Plant Safety and Reliability, January 22, 1987;

Why Do We Have a Nuclear Waste Problem Conference on Nuclear Waste, Naples, Maine, March 22, 1986;

With Friends Like These: Reflections on the Implications of Nuclear Regulation Institute of Public Utilities, Williamsburg, Virginia, December 13, 1982;

A Framework for Considering the Economic Regulatory Implications of the Accident at Three Mile Island Iowa State Regulatory Conference, May 20, 1982;

The Man/Machine Interface Public Citizen Forum, March 8, 1982;

A Perspective on Nuclear Power The Groton School, January 15, 1982;

Reasonable Assurance, Regulation and Reality ALI-ABA Course of Study on Atomic Energy Licensing and Regulation, September 24, 1980;

Misdefining the National Security in Energy Policy from Machiasport to Three Mile Island Environmental Law Institute, University of Maine, May 1, 1980

Condemned to Repeat It? Haste, Distraction, Rasmussen and Rogovin Risks of Generating Electricity, Seventh Annual National Engineers' Week Energy Conference, February 21, 1980;

Lightening the Nuclear Sled; Some Uses and Misuses of the Accident at Three Mile Island Seminar on the Problems of Energy Policy, New York University, November 21, 1979;

The Nuclear Option: Did It Jump or Was It Pushed? NARUC Regulatory Studies Program, August 2, 1979;

How a Regulatory View of Nuclear Waste Management is Like a Horse's Eye View of the Cart 90th NARUC Annual Convention, November 15, 1978;

Sentence First: Verdict Later: Some Thoughts on the Level of Acclaim Thus Far Afforded the Nuclear Siting and Licensing Act of 1978 ALI-ABA Course of Study, September 28, 1978;

Some Observations on Recent and Proposed Changes in Nuclear Regulatory Commission Jurisdiction, Atomic Industrial Forum Workshop on Reactor Licensing and Safety, April 5, 1978;

Other Papers

The Nexus between Energy Sector Reform and Democracy & Governance (co-lead author), for USAID, February, 2005;

Public Interaction in the Georgian Energy Regulatory Process: Case Study for the USAID Project on the Nexus between Democratic Governance and Energy Sector Reform, April, 2004;

Report on the Establishment of the State Energy Regulatory Commission of China (with David Moskovitz, Richard Weston and Wayne Shirley) for the Energy Foundation and the World Bank, January, 2003;

A Plan of Action for a Multisector Regulatory Commission in Armenia, for USAID, February 2003.

Economic Regulatory Issues in the Armenian Water Supply and Wastewater Treatment Sectors, for USAID, January 2003;

Some Potential Approaches to the Enforcement of License Conditions and Regulatory Orders in Armenia, for USAID, June 2002

The Process of Auditing Utilities: A Primer for the Energy Regulatory Commission of Armenia, for USAID, June 2002

Some Potential Approaches to the Difficulties of Enforcement of License Conditions and Regulatory Orders in Georgia and Other NIS Countries, for USAID, December 2000.

Public Interaction in the Georgian Energy Regulatory Process, for USAID, September 2000.

Regulatory Policy and Energy Efficiency: Considerations for Tariff Setting and Licensing, for USAID, April 2000.

Public Interaction in the Armenian Regulatory Process, for USAID, July 1999.

The License as an Instrument for Regulation and the Furtherance of Competition in the N.I.S., for USAID, September, 1998.

Applicability of U.S. Administrative Law Concepts to Regulatory Systems in the Newly Independent States, for USAID, June 1998.

Performance-Based Regulation in a Restructured Electric Industry, (with Bruce Biewald, Paul Chernick, Susan Geller, Jerrold Oppenheim and Tim Woolf) for the National Association of Regulatory Utility Commissioners, November 1997.

ATTACHMENT # 4

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Rao Konidena

Resume

The resume of Rao Konidena is attached hereto as Exhibit A.

Justification for New Rate

SLOMFP is requesting that Rao Konidena be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Rao Konidena is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Mr. Konidena because none of the other categories better suited his expertise and scope of testimony. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Here, Mr. Konidena holds a Master of Business Administration from the University of Minnesota and Master of Science in electrical engineering from the University of Texas at Arlington. He has over 20 years of experience in the fields of energy transmission, storage and renewable energy, grid supply and grid demand. He was an integral part of Midcontinent Independent System Operator in Minnesota from 2001 to 2018, where he worked on issues pertaining to all things energy storage and distributed energy resources from an economic transmission planning perspective, including but not limited to: long term independent load forecasts; demand response/energy efficiency/distributed generation potential studies; chairing the Economic Modeling Framework Working Group of international Grid operators GO-15; directing the Demand Response & Energy Efficiency potential study for MISO, with the support of Global Energy Partners consultants; and preparing analytical assessments that meet MISO's Federal Energy regulatory compliance obligations as well as our Transmission Owners (e.g., FERC Market-based rates).

Since 2018, Mr. Konidena has served as the president and Chief Executive Officer of Rakon Energy LLC, where he provides consulting services related to Federal and state energy policies focusing on energy storage and distributed energy resources. Thus, he meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Mr. Konidena be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Mr. Konidena is reasonable. Mr. Konidena provided consultation to SLOMFP throughout this proceeding and also provided expert testimony in this proceeding on issues related whether new renewable energy and zero-carbon resources that are adequate to substitute for the Diablo Canyon powerplant and that meet the state's planning standards for energy reliability have already been constructed and interconnected by the time of the CPUC's decision.

Attachment A

RAO KONIDENA

ENERGY MARKET EXPERTISE IN DISTRIBUTED ENERGY RESOURCES

Roseville, MN 55113 Cell: 612-594-9257 · rkonidena76@gmail.com

Rao Konidena is an independent energy consultant. He worked at the Midcontinent Independent System Operator (MISO) for 15 years. Before he left MISO, he was the Principal Advisor for Policy Studies, working on energy storage and distributed energy resources. At MISO, Rao worked in management and non-management roles around resource adequacy, economic planning, business management, and policy functions.

Rao is the President of the Finnish American Chamber of Commerce – Minnesota (FACC-MN) and sits on the Board of Ever Green Energy and Minnesota Solar Energy Industries Association (MnSEIA).

EXPERIENCE

RAKON ENERGY LLC, Roseville, MN
President & Chief Executive Officer (CEO)

May 2018 – Present

Providing consulting services related to Federal and state energy policies focusing on energy storage and distributed energy resources

- Consumer advocates and non-profit organizations have engaged the expertise of Rakon Energy to provide an opinion on whether Non-Transmission Alternatives were sufficiently modeled in transmission line Certificate of Need proceedings.
- A renewable energy developer engaged Rakon Energy to provide MISO expertise for their renewable energy project portfolio in various stages and study cycles of the Generator Interconnection Queue and the capacity credit impact from MISO's seasonal capacity construct.
- An Independent Power Producer engaged Rakon's services to understand MISO's seasonal resource adequacy construct and its impact on Power Purchase Agreement negotiations with a MISO utility.
- An aggregator engaged Rakon Energy as part of the team to represent their interests at RTO stakeholder committees on FERC Order 2222.
- Rakon Energy was part of the team engaged by a technology company to represent their interests at the PJM RTO. Another similar company hired Rao to navigate MISO's market rules for data center interconnection.
- Advanced Energy Economy and the Natural Resources Defense Council's Sustainable FERC Project engaged Rakon to monitor MISO's FERC Order 2222 implementation process.
- The Commonwealth of Pennsylvania's Office of Consumer Advocate engaged Rakon Energy LLC to support OCA's response to the questions posed by the Pennsylvania Public Utility Commission's Secretary in the policy proceeding - Utilization of Storage Resources as Electric Distribution Assets.
- A prominent solar advocacy group currently engaged Rao for expert testimony work in Nevada and Minnesota IOUs IRP filing.
- He submitted comments to Minnesota and Colorado Public Utilities Commission on Integrated Distribution Planning dockets.
- He has provided expert testimony support for Environmental Law and Policy Center (ELPC) at the Public Service Commission of Wisconsin (PSCW) on the MISO Multi-Value Project (MVP) line in Wisconsin.
- He provided affidavit support for the Office of the People's Counsel of the District of Columbia (OPC-DC) at the Federal Energy Regulatory Commission (FERC) on PJM's Reserves Pricing Proposal and municipal utilities in Wisconsin and Missouri at FERC on MISO's Resource Adequacy construct.
- He provided advocacy support for Energy Storage Association (ESA) at MISO on FERC Order 841 Compliance.
- He provided training as part of the Tuatara team on DERs to Colombia's grid operator XM and the ESTA International team on energy storage benefits to Mexican regulator CRE.

Advisor, Volunteer, Pro-Bono assignments

<https://rakonenergy.com/>

- Rao presented on Distributed Energy Resources (DER) and peer-reviewed Demand Side Management and DER plans for Central American regulators, as part of NARUC International Peer Review.
- Rao presented and shared best practices around the impact of provisioning ancillary services. At an Eastern Africa regional workshop organized by the United States Energy Agency (USEA), the United States Agency for International Development (USAID) and the Power Africa initiative.

MIDCONTINENT INDEPENDENT SYSTEM OPERATOR (MISO), Eagan, MN

Principal Advisor, Policy Studies

Aug 2015 – May 2018

- Recognized as an expert on all things energy storage and distributed energy resources from an economic transmission planning perspective
- Project manager for long term independent load forecast and demand response/energy efficiency/distributed generation potential study.
- MISO representative on Department of Energy (DOE) US DRIVE Grid Interaction Technical Team

Senior Manager, Transmission Asset Management Operations

Feb 2013 – July 2015

- He engaged the division lead in the development of strategic initiatives and operating plans.
- Rao chaired the Economic Modeling Framework Working Group of international Grid operators GO-15.

Manager, Resource Forecasting (started at Engineer II)

Sep 2003 – Jan 2013

Main Accomplishments

- In this role, I directed the Demand Response & Energy Efficiency potential study for MISO, with the support of Global Energy Partners consultants.
- Directed the MISO Energy Storage Study identifying the economic potential for grid-scale energy storage in MISO footprint, providing strategic consulting services to investor-owned utilities, public power utilities, asset owners, and investors.

Regulatory Experience

- Responsible for analytical assessments that meet MISO's Federal Energy regulatory compliance obligations as well as our Transmission Owners (e.g., FERC Market-based rates).
- Responsible for supporting state regulators and MISO Board of Directors with technical analysis related to policy drivers.

PWRSOLUTIONS, Inc., Dallas, TX (Consulting)

May 2001 – August 2003

Student Intern and Electrical Engineer

- Rao executed generator interconnection studies for Independent Power Producers (IPPs) clients.
- Analyzed future generator and transmission needs in the Eastern Interconnection.

EDUCATION

THE UNIVERSITY OF MINNESOTA, Minneapolis, Minnesota

Carlson School of Management

Master of Business Administration, Global Executive Program

May 2011

Emphases: Strategic Management, International Business

- Responsible for all financial aspects of marketing mobile charging services for Electric vehicles in the Singapore market.

UNIVERSITY OF TEXAS AT ARLINGTON, Arlington, Texas

Energy Systems Research Center (ESRC)

Master of Science in **Electrical Engineering**

May 2002

- Master's Thesis in Economic Analysis of Distributed Generation (Photovoltaics (P.V.) and Fuel Cells)

BLOG POSTING, PUBLICATIONS & PRESENTATIONS

1. Co-Author for a graduate level textbook titled "Modern Electricity Systems: Engineering, Operations, and Policy to address Human and Environmental Needs". Release date - August 2022 with Wiley.
2. **He has authored multiple publications in Electricity Journal, Renewable Energy World (blog), and other peer-reviewed industry journals.**

<https://rakonenergy.com/>

BOARD & VOLUNTEER ACTIVITIES

- Board of Directors, Ever Green Energy. Sep 2019 – present
- Board of Directors, Minnesota Solar Energy Industries Association. Sep 2020 – Sep 2023.
- President, Finnish American Chamber of Commerce – Minnesota (FACC-MN). Jan 2016 - present

ATTACHMENT # 5

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Samuel Miranda

Resume

Mr. Miranda holds both a bachelor and master of science degrees in nuclear engineering from Columbia University, and a PE license in mechanical engineering in the Commonwealth of Pennsylvania. He also holds masters degrees in business and public administration and in international affairs from the University of Pittsburgh.

Mr. Miranda worked at Westinghouse for 25 years in their Nuclear Safety Department, where he performed nuclear safety analyses of Westinghouse plants, and other PWR plants, including Soviet-designed plants to resolve reactor safety questions. He improved nuclear power plant operability, and supported the licensing of nuclear plant modifications, core reloads, and changes in operating procedures.

He also developed standards and methods for use in nuclear safety analysis, and automatic reactor protection systems design. His work in reactor protection systems design included the preparation of functional requirements, component sizing, and determination of setpoints, time response limits, and technical specification revisions. In the 1980s, he managed a program for more than 30 utilities in the Westinghouse Owners Group to develop and patent a system to improve power plant availability and safety by reducing the frequency of unnecessary automatic reactor trips. The system was approved by the NRC and required as a condition of restart for at least one plant.

As an independent contractor, he worked at the Salem plants, where he prepared a license amendment request, and its associated technical specification revisions, to win NRC approval of an upgrade of the plants' power-operated relief valves to safety-grade status, with water relief capability (the industry's first).

He also consulted with the Brazilian navy, in São Paulo, in a review of the automatic protection system logic and performance requirements for a proposed submarine propulsion reactor design.

Mr. Miranda also worked for the NRC for 14 years in the Office of Nuclear Reactor Regulation, where he reviewed license amendment requests for license renewals, power upratings, and modifications of protection systems in PWR and BWR reactor systems.

This included presenting and defending review results before the Advisory Committee on Reactor Safeguards (ACRS). He also revised several sections of the Standard Review Plan (NUREG-0800) and presented the revisions to the ACRS.

Justification for New Rate

SLOMFP is requesting that Samuel Miranda be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Samuel Miranda is well-qualified to be classified as a Level V “expert-not otherwise classified”. This expert category is appropriate for Mr. Miranda because none of the other categories better suited his expertise and scope of testimony. Experts under the Level V “expert-not otherwise classified” category are required to hold at least a bachelor’s degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

He has more than four decades of experience in reactor safety analysis and licensing: at Westinghouse, the NRC, and as an independent contractor. Thus, he meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Mr. Miranda be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Mr. Miranda is reasonable. Mr. Miranda consulted with SLOMFP throughout this proceeding and submitted expert testimony in this proceeding on the issues of costs of deferred maintenance and aging components of Diablo Canyon, as well as NRC relicensing issues.

ATTACHMENT # 6

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. Mark Cooper

Resume

Dr. Mark Cooper's resume is attached hereto as Exhibit A.

Justification for New Rate

SLOMFP is requesting that Dr. Mark Cooper be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Dr. Mark Cooper is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Dr. Cooper because none of the other categories better suited his expertise and scope of testimony. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Dr. Cooper received his Ph.D. from Yale in 1979. He has over 40 years experience in academia (including lecturer at Washington College of Law, American University, Seminar in Public Utility Regulation; University of Maryland in Energy and the Consumer; and American University in Energy Policy Analysis) as well as professional activities, including as a Senior Fellow for Economic Analysis, Institute for Energy and the Environment at Vermont Law School; a Principle Investigator, Consumer Energy Council of America, Electricity Forum; Director of Energy, Consumer Federation of America, and a Director of Research, Consumer Energy Council of America and serving as fellow and/or member on various economic policy and energy efficiency councils.

He has also testified almost 500 times before state and federal regulators on energy, communications and technology issues in virtually every state in the United States.

Thus, he meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Dr. Cooper be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Dr. Cooper is reasonable. Dr. Cooper consulted with SLOMFP throughout this proceeding and submitted expert testimony in this proceeding regarding cost-effectiveness and California's energy reliability.

ATTACHMENT A

MARK N. COOPER
504 HIGHGATE TERRACE
SILVER SPRING, MD 20904
(301) 384-2204
markcooper@aol.com

EDUCATION:

Yale University, Ph.D., 1979, Sociology
University of Maryland, M.A., 1973, Sociology
City College of New York, B.A., 1968, English

PROFESSIONAL EXPERIENCE:

President, Citizens Research, 1983 - present
Research Director, Consumer Federation of America, 1983-present
Senior Fellow for Economic Analysis, Institute for Energy and the Environment, Vermont Law School 2009-present
Associated Fellow, Columbia Institute on Tele-Information, 2003-2016
Fellow, Donald McGannon Communications Research Center, Fordham University, 2005-2015
Fellow, Silicon Flatirons, University of Colorado, 2009-2014
Fellow, Stanford Center on Internet and Society, 2000-2010
Principle Investigator, Consumer Energy Council of America, Electricity Forum, 1985-1994
Director of Energy, Consumer Federation of America, 1984-1986
Director of Research, Consumer Energy Council of America, 1980-1983
Consultant, Office of Policy Planning and Evaluation, Food and Nutrition Service, United States Department of Agriculture, 1981-1984
Consultant, Advanced Technology, Inc., 1981
Technical Manager, Economic Analysis and Social Experimentation Division, Applied Management Sciences, 1979
Research Associate, American Research Center in Egypt, 1976-1977
Research Fellow, American University in Cairo, 1976
Staff Associate, Checchi and Company, Washington, D.C., 1974-1976
Consultant, Division of Architectural Research, National Bureau of Standards, 1974
Consultant, Voice of America, 1974
Research Assistant, University of Maryland, 1972-1974

TEACHING EXPERIENCE:

Lecturer, Washington College of Law, American University, Spring, 1984 - 1986, Seminar in Public Utility Regulation
Guest Lecturer, University of Maryland, 1981-82, Energy and the Consumer, American University, 1982, Energy Policy Analysis
Assistant Professor, Northeastern University, Department of Sociology, 1978-1979, Sociology of Business and Industry, Political Economy of Underdevelopment, Introductory Sociology, Contemporary Sociological Theory; College of Business Administration, 1979, Business and Society
Assistant Instructor, Yale University, Department of Sociology, 1977, Class, Status and Power
Teaching Assistant, Yale University, Department of Sociology, 1975-1976, Methods of Sociological Research, The Individual and Society
Instructor, University of Maryland, Department of Sociology, 1974, Social Change and Modernization, Ethnic Minorities

Instructor, U.S. Army Interrogator/Linguist Training School, Fort Hood, Texas, 1970-1971

PROFESSIONAL ACTIVITIES:

Member, Advisory Committee on Appliance Efficiency Standards, U.S. Department of Energy, 1996 - 1998
Member, Energy Conservation Advisory Panel, Office of Technology Assessment, 1990-1991
Fellow, Council on Economic Regulation, 1989-1990
Member, Increased Competition in the Electric Power Industry Advisory Panel, Office of Technology Assessment, 1989
Participant, National Regulatory Conference, The Duty to Serve in a Changing Regulatory Environment, William and Mary, May 26, 1988
Member, Subcommittee on Finance, Tennessee Valley Authority Advisory Panel of the Southern States Energy Board, 1986-1987
Member, Electric Utility Generation Technology Advisory Panel, Office of Technology Assessment, 1984 - 1985
Member, Natural Gas Availability Advisor Panel, Office of Technology Assessment, 1983-1984
Participant, Workshop on Energy and the Consumer, University of Virginia, November 1983
Participant, Workshop on Unconventional Natural Gas, Office of Technology Assessment, July 1983
Participant, Seminar on Alaskan Oil Exports, Congressional Research Service, June 1983
Member, Thermal Insulation Subcommittee, National Institute of Building Sciences, 1981-1982
Round Table Discussion Leader, The Energy Situation: An Open Field For Sociological Analysis, 51st Annual Meeting of the Eastern Sociological Society, New York, March, 1981
Member, Building Energy Performance Standards Project Committee, Implementation Regulations Subcommittee, National Institute of Building Sciences, 1980-1981
Participant, Summer Study on Energy Efficient Buildings, American Council for an Energy Efficient Economy, August 1980
Member, University Committee on International Student Policy, Northeastern University, 1978-1979
Chairman, Session on Dissent and Societal Reaction, 45th Annual Meeting of the Eastern Sociological Society, April, 1975
Member, Papers Committee, 45th Annual Meeting of the Eastern Sociological Society, 1975
Student Representative, Programs, Curricula and Courses Committee, Division of Behavioral and Social Sciences, University of Maryland, 1973-1974
President, Graduate Student Organization, Department of Sociology, University of Maryland, 1973-1974

HONORS AND AWARDS:

Ester Peterson Award for Consumer Service, 2010
American Sociological Association, Travel Grant, Uppsala, Sweden, 1978
Fulbright-Hayes Doctoral Research Abroad Fellowship, Egypt, 1976-1977
Council on West European Studies Fellowship, University of Grenoble, France, 1975
Yale University Fellowship, 1974-1978
Alpha Kappa Delta, Sociological Honorary Society, 1973
Phi Delta Kappa, International Honorary Society, 1973
Graduate Student Paper Award, District of Columbia Sociological Society, 1973
Science Fiction Short Story Award, University of Maryland, 1973
Maxwell D. Taylor Award for Academic Excellence, Arabic, United States Defense Language Institute, 1971
Theodore Goodman Memorial Award for Creative Writing, City College of New York, 1968
New York State Regents Scholarship, 1963-1968
National Merit Scholarship, Honorable Mention, 1963

PUBLICATIONS:

ENERGY

Books and Chapters

The Political Economy of Electricity: Progressive Capitalism and the Struggle to Build a Sustainable Power Sector (Praeger, 2017)

"Energy Justice in Theory and Practice: Building a Pragmatic, Progressive Road Map," in Thijs de Graf, Benjamin K. Sovacool, Arunabha Gosh, Florian Kern, and Michael T. Klare (Eds.) *The Palgrave Handbook of the International Political Economy of Energy*, (PALGRAVE, Macmillan, 2016)

"Recognizing the Limits of Markets, Rediscovering Public Interest in Utilities," in Robert E. Willett (ed), *Electric and Natural Gas Business: Understanding It! (2003 and Beyond)* (Houston: Financial Communications: 2003)

"Protecting the Public Interest in the Transition to Competition in Network Industries," The Electric Utility Industry in Transition (Public Utilities Reports, Inc. & the New York State Energy Research and Development Authority, 1994)

"The Seven Percent Solution: Energy Prices, Energy Policy and the Economic Collapse of the 1970s," in *Energy Concerns and American Families in the 1980s* (Washington, D.C.: The American Association of University Women Educational Foundation, 1983)

"Natural Gas Policy Analysis," in Edward Mitchell (Ed.), Natural Gas Pricing Policy (Washington, D.C.: American Enterprise Institute, 1983)

Equity and Energy: Rising Energy Prices and the Living Standard of Lower Income Americans (Boulder, Colorado: Westview Press, 1983)

Articles and Papers:

"Governing the Global Climate Commons: The Political Economy of State and Local Action, After the U.S. Flip-Flop on the Paris Agreement," *Energy Policy*, 2018.

"Renewable and distributed resources in a post-Paris low carbon future: The key role and political economy of sustainable electricity," *Energy Research & Social Science*, 19 (2016) 66-93.

"The Unavoidable Economics of Nuclear Power." *Corporate Knights*, January 22, 2014.

Energy Efficiency Performance Standards: Driving Consumer and Energy Savings in California. Presentation at the California Energy Commission's Energy Academy, February 20, 2014.

"Small modular reactors and the future of nuclear power in the United States," *Energy Research & Social Science*, 2014.

"The EPA carbon plan: Coal loses, but nuclear doesn't win," *Bulletin of the Atomic Scientists*, 70, 2014

"Multi-Criteria Portfolio Analysis of Electricity Resources: An Empirical Framework For Valuing Resource In An Increasingly Complex Decision-Making Environment", *Expert Workshop: System Approach to Assessing the Value of Wind Energy to Society*, European Commission Joint Research Centre, Institute for Energy and Transport, Petten, The Netherlands, November 13-14, 2013

"Nuclear aging: Not so gracefully," *Bulletin of the Atomic Scientists*, 69, 2013

"Nuclear Safety and Affordable Reactors: Can We Have Both?," *Bulletin of the Atomic Scientists*, 68, 2012

"Nuclear Safety and Nuclear Economics, Fukushima Reignites the Never-ending Debate: Is Nuclear Power not worth the risk at any price?," *Symposium on the Future of Nuclear Power*, University of Pittsburgh, March 27-28, 2012

"Nuclear liability: the post-Fukushima case for ending Price-Anderson," *Bulletin of the Atomic Scientists*, October, 67, 2011.

"Prudent Resource Acquisition in a Complex Decision-Making Environment: Multidimensional Analysis Highlights the Superiority of Efficiency," *Current Approaches to Integrated Resource Planning, 2011 ACEEE National Conference on Energy Efficiency as a Resource*, Denver, September 26, 2011

"The Implications of Fukushima: The US perspective," *Bulletin of the Atomic Scientists*, July/August 2011 67: 8-13
Least Cost Planning for 21st Century Electricity Supply: Meeting the Challenges of Complexity and Ambiguity in Decision Making, MACRUC Annual Conference, June 5, 2011

- "Risk, Uncertainty and Ignorance: Analytic Tools for Least-Cost Strategies to Meet Electricity Needs in a Complex Age," *Variable Renewable Energy and Natural Gas: Two Great Things that Go Together, or Best Not to Mix Them*. NARUC Winter Committee Meetings, Energy Resources, Environment and Gas Committee, February 15, 2011
- "The Failure of Federal Authorities to Protect American Energy Consumers From Market Power and Other Abusive Practices," *Loyola Consumer Law Review*, 19:4 (2007)
- "Too Much Deregulation or Not Enough," *Natural Gas and Electricity*, June 2005
- "Real Energy Crisis is \$200 Billion Natural Gas Price Increase," *Natural Gas and Electricity*, August 2004
- "Regulators Should Regain Control to Prevent Abuses During Scarcity," *Natural Gas*, August 2003
- "Economics of Power: Heading for the Exits, Deregulated Electricity Markets Not Working Well," *Natural Gas*, 19:5, December 2002
- "Let's Go Back," *Public Power*, November-December 2002
- "Conceptualizing and Measuring the Burden of High Energy Prices," in Hans Landsberg (Ed.), *High Energy Costs: Assessing the Burden* (Washington, D.C.: Resources For the Future, 1982)
- "Energy Efficiency Investments in Single Family Residences: A Conceptualization of Market Inhibitors," in Jeffrey Harris and Jack Hollander (Eds.), *Improving Energy Efficiency in Buildings: Progress and Problems* (American Council for An Energy Efficient Economy, 1982)
- "Policy Packaging for Energy Conservation: Creating and Assessing Policy Packages," in Jeffrey Harris and Jack Hollander (Eds.), *Improving Energy Efficiency in Buildings: Progress and Problems* (American Council for An Energy Efficient Economy, 1982)
- "The Role of Consumer Assurance in the Adoption of Solar Technologies," *International Conference on Consumer Behavior and Energy Policy*, August, 1982
- "Energy and the Poor," *Third International Forum on the Human Side of Energy*, August, 1982
- "Energy Price Policy and the Elderly," *Annual Conference, National Council on the Aging*, April, 1982
- "Energy and Jobs: The Conservation Path to Fuller Employment," *Conference on Energy and Jobs conducted by the Industrial Union Department of the AFL-CIO*, May 1980

Research Reports

- Building A Least Cost, Low-Carbon, Electricity System With Efficiency, Wind, Solar & Intelligent Grid Management: Why Nuclear Subsidies Are An Unnecessary Threat To The Transformation (Friends of the Earth, July 15, 2021)
- Building A 21st Century Electricity Sector With Efficiency, Distributed Resources And Dynamic Management:: The Consumer, Economic, Public Health And Environmental Benefit, (with Mel Hall-Crawford (Consumer Federation of America) April 22, 2021.
- The Green New Deal Can Build a Progressive, Capitalist, Low Cost, Low Carbon, Electricity Sector, If it Avoids the Nuclear Power and Fossil Fuel Potholes Along the Way, April 2019. *Institute for Energy and the Environment*, Vt Law School.
- Avoiding Nuclear and Fossil Fuel Potholes, A Green New Deal Has a Clear Path to a Clean, Low Cost, Low Carbon, Progressive, Capitalist Electricity Sector, Institute for Energy and the Environment, April 2019
- A Clean Slate for Vogtle, Clean Energy for Georgia: The Case for Ending Construction at the Vogtle Nuclear Power Plant and Reorienting Policy to Least-Cost, Clean Alternatives, for the Sierra Club of Georgia, February 2018
- The Failure of The Nuclear Gamble In South Carolina: Regulators can Save Consumers Billions by Pulling the Plug on Summer 2 & 3 Already Years behind Schedule and Billions Over Budget Things are Likely to Get Much Worse if the Project Continues, for the Sierra Club of South Carolina, July 2017
- Power Shift, The Nuclear War Against the Future: How Nuclear Advocates Are Thwarting the Deployment of a 21st Century Electricity Sector. Institute for Energy and the Environment, Vermont Law School, May, 2015.
- The Economic Feasibility, Impact on Public Welfare and Financial Prospects for New Nuclear Construction, For Utah Heal, July 2013.
- Advanced Cost Recovery;Institute for Energy and the Environment, Vermont Law School, September 2013
- Renaissance In Reverse: Competition Pushes Aging U.S. Nuclear Reactors To The Brink Of Economic Abandonment, Institute For Energy And The Environment, Vermont Law School, July 2013.

Energy Efficiency Performance Standards: The Cornerstone of Consumer-Friendly Energy Policy, October 2013

The Zero Emissions Vehicle Program: Clean Cars States Lead in Innovation, October 24, 2013

Renaissance in Reverse: Competition Pushes Aging U.S. Nuclear Reactors to the Brink of Economic Abandonment, July 2013.

The Economic Feasibility, Impact On Public Welfare And Financial Prospects For New Nuclear Construction, For Utah Heal, July 2013

Public Risk, Private Profit, Ratepayer Cost, Utility Imprudence: Advanced Cost Recovery for Reactor Construction Creates another Nuclear Fiasco, Not a Renaissance, March 2013

Fundamental Flaws In SCE&G's Comparative Economic Analysis, October 1, 2012

Capturing The Value Of Offshore Wind. Mainstream Renewable Power, October 2012.

Policy Challenges of Nuclear Reactor Construction: Cost Escalation and Crowding Out Alternatives, Institute for Energy and the Environment, Vermont Law School, September, 2010

U.S. Oil Market Fundamentals and Public Opinion, Consumer Federation of America, May 2010

Building on the Success of Energy Efficiency Programs to Ensure an Affordable Energy Future, Consumer Federation of America, February 2010

The Impact of Maximizing Energy Efficiency on Residential Electricity and Natural Gas Utility Bills in a Carbon-Constrained Environment: Estimates of National and State-By-State Consumer Savings, Consumer Federation of America November 2009

Shifting Fuel Economy Standards into High Gear, Consumer Federation of America, November 24, 2009

A Consumer Analysis of Energy Efficiency and Renewable Energy Standards: The Cornerstone of Consumer-Friendly Energy/Environmental Policy, Consumer Federation of America, May 2009

All Risk; No Reward, Institute for Energy and the Environment, Vermont Law School, Dec 2009.

The Economics of Nuclear Reactors: Renaissance of Relapse, Institute for Energy and the Environment, Vermont Law School, June 2009.

A Consumer Analysis of the Adoption of the California Clean Cars Program in Other States: Florida, Consumer Federation of America, November 2008

A Boom for Big Oil – A Bust for Consumers: Ana analysis of Policies to Meet American Energy Needs, Consumer Federation of America, September 2008

Climate Change and the Electricity Consumer: Background Analysis to Support a Policy Dialogue, Consumer Federation of America, June 2008

Ending America's Oil Addiction: A Quarterly Report on Consumption, Prices and Imports, Consumer Federation of America, April 2008

A Consumer Analysis of the Adoption of the California Clean Cars Program in Other States: Arizona, Consumer Federation of America, March 2008

A Step Toward A Brighter Energy Future, Consumer Federation of America, December 2007

A Consumer Analysis of the Adoption of the California Clean Cars Program in Other States: New Mexico, Consumer Federation of America, November 2007

Not Time to Waste: America's Energy Situation Is Dangerous, But Congress Can Adopt New Policies to Secure Our Future, Consumer Federation of America, October 2007

Technology, Cost and Timing, Consumer Federation of America, July 2007

Florida's Stake in the Fuel Economy Battle, July 2007

Big Oil v. Ethanol, Consumer Federation of America, July 2007

Too Little, Too Late: Why the Auto Industry Proposal To Go Low and Slow on Fuel Economy Improvements Is Not in the Consumer or National Interest, Consumer Federation of America, July 2007

The Senate Commerce Committee Bill Is Much Better For Consumers and The Nation Than the Automobile Industry Proposal, Consumer Federation of America, June 2007

Rural Households Benefit More From Increases In Fuel Economy, Consumer Federation of America, June 2007

A Consumer Pocketbook And National Cost-Benefit Analysis of "10 in10", Consumer Federation of America, June 2007

Time to Change the Record on Oil Policy, Consumer Federation of America, August 2006

50 by 2030: Why \$3.00 Gasoline Makes the 50-Miles Per Gallon Car Feasible, Affordable and Economic, Consumer Federation of America, (May 2006)

The Role of Supply, Demand, Industry Behavior and Financial Markets in the Gasoline Price Spiral (Prepared for Wisconsin Attorney General Peggy A. Lautenslager, May 2006)

Debunking Oil Industry Myths and Deception: The \$100 Billion Consumer Rip-Off (Consumer Federation of America and Consumers Union, May 3, 2006)

The Role of Supply, Demand and Financial Markets in the Natural Gas Price Spiral (prepared for the Midwest Attorneys General Natural Gas Working Group: Illinois, Iowa, Missouri, Wisconsin, March 2006)

The Impact of Rising Prices on Household Gasoline Expenditures (Consumer Federation of America, September 2005)

Responding to Turmoil in Natural Gas Markets: The Consumer Case for Aggressive Policies to Balance Supply and Demand (consumer Federation of America, December 2004)

Record Prices, Record Oil Company Profits: The Failure Of Antitrust Enforcement To Protect American Energy Consumers (Consumer Federation of America, Consumers Union, September 2004)

Fueling Profits: Industry Consolidation, Excess Profits, & Federal Neglect: Domestic Causes of Recent Gasoline and Natural Gas Price Shocks (Consumer Federation of America and Consumers Union, May 2004)

Spring Break in the U.S. Oil Industry: Price Spikes, Excess Profits and Excuses (Consumer Federation of America, October 2003)

How Electricity Deregulation Puts Pressure On The Transmission Network And Increases It's Cost (Consumer Federation of America, Consumers Union and U.S. PIRG, August 2003)

A Discouraging Word (or Two, or Three, or Four) About Electricity Restructuring in Texas, Pennsylvania, New England and Elsewhere Consumer Federation of America, U.S. Public Interest Research Group and Consumers Union, March 2003)

All Pain, No Gain: Restructuring and Deregulation in the Interstate Electricity Market (Consumer Federation of America, September 2002)

U.S. Capitalism and the Public Interest: Restoring the Balance in Electricity and Telecommunications Markets (Consumer Federation of America, August 2002)

Electricity Deregulation and Consumers: Lesson from a Hot Spring and a Cool Summer (Consumer Federation of America, August 30, 2001)

Ending the Gasoline Price Spiral: Market Fundamentals for Consumer-Friendly Policies to Stop the Wild Ride (Consumer Federation of America, July 2001)

Analysis of Economic Justifications and Implications of Taxing Windfall Profits in the California Wholesale Electricity Market (Consumer Federation of America and Consumers Union, June 13, 2001)

Behind The Headlines Of Electricity Restructuring A Story Of Greed, Irresponsibility And Mismanagement Of A Vital Service In A Vulnerable Market (Consumer Federation of America, March 20, 2001)

Reconsidering Electricity Restructuring: Do Market Problems Indicate a Short Circuit or a Total Blackout? (Consumer Federation of America, November 30, 2000)

Mergers and Open Access to Transmission in the Restructuring Electric Industry (Consumer Federation of America, April 2000)

Electricity Restructuring and the Price Spikes of 1998 (Consumer Federation of America and Consumers Union, June 1999)

The Residential Ratepayer Economics of Electric Utility Restructuring (Consumer Federation of America, July 1998)

Consumer Issues in Electric Utility Restructuring (Consumer Federation of America, February 12, 1998)

A Consumer Issue Paper on Electric Utility Restructuring (American Association of Retired Persons and the Consumer Federation of America, January, 1997)

Transportation, Energy, and the Environment: Balancing Goals and Identifying Policies, August 1995

A Residential Consumer View of Bypass of Natural Gas Local Distribution Companies, February 1988

The National Energy Security Policy Debate After the Collapse of Cartel Pricing: A Consumer Perspective, January 1987

The Energy, Economic and Tax Effects of Oil Import Fees, October 25, 1985

The Bigger the Better: The Public Interest in Building a Larger Strategic Petroleum Reserve, June 12, 1984

The Consumer Economics of CWIP: A Short Circuit for American Pocketbooks, April, 1984

Public Preference in Hydro Power Relicensing: The Consumer Interest in Competition, April 1984

Concept Paper for a Non-profit, Community-based, Energy Services Company, November 1983

The Consumer and Energy Impacts of Oil Exports, April 1983

Up Against the Consumption Wall: The Impact of Rising Energy Prices on Lower Income Consumers, March 1983

A Decade of Despair: Rising Energy Prices and the Living Standards of Lower Income Americans, September 1982

The Impact of Rising Energy Prices on the Delivery of Public Service by Local Governments, August 1982

The Impact of Rising Energy Prices on the Low-Income Population of the Nation, the South, and the Gulf Coast Region, July, 1982

A Comprehensive Analysis of the Impact of a Crude Oil Import Fee: Dismantling a Trojan Horse, April 1982

The Past as Prologue II: The Macroeconomic Impacts of Rising Energy prices, A Comparison of Crude Oil Decontrol and Natural Gas Deregulation, March, 1982

The Past as Prologue I: The Underestimation of Price Increases in the Decontrol Debate, A Comparison of Oil and Natural Gas, February 1982

Oil Price Decontrol and the Poor: A Social Policy Failure, February 1982

Natural Gas Decontrol: A Case of Trickle-Up Economics, January 1982

A Comprehensive Analysis of the Costs and Benefits of Low-Income Weatherization and Its Potential Relationship to Low Income Energy Assistance, June 1981

Summary of Market Inhibitors, February 1981

Program Models and Program Management Procedures for the Department of Energy's Solar Consumer Assurance Network Project: A Rapid Feedback Evaluation, February 1981

An Analysis of the Economics of Fuel Switching Versus Conservation for the Residential Heating Oil Consumer, October 1980

Energy Conservation in New Buildings: A Critique and Alternative Approach to the Department of Energy's Building Energy Performance Standards, April, 1980

The Basics of BEPS: A Descriptive Summary of the Major Elements of the Department of Energy's Building Energy Performance Standards, February, 1980

COMMUNICATIONS AND MEDIA

Books and Chapters

“The Future of Journalism: Addressing Pervasive Market Failure with Public Policy,” in R.W. McChesney and Victor Picard (eds.), *Will the Last Reporter Turn out the Lights* (New York: New Press, 2011)

“Broadband in America: A Policy of Neglect is not Benign,” in Enrico Ferro, Yogesh K. Dwivedi, J. Ramon Gil-Garcia, and Michael D. Williams, Eds., *Overcoming Digital Divides: Constructing an Equitable and Competitive Information Society*, IGI Global Press, 2009.

“Political Action and Internet Organization: An Internet-Based Engagement Model,” in Todd Davies and Seeta Pena Gangaharian, Eds., *Online Deliberation: Design, Research and Practice*, CSLI press.

“When Counting Counts: Marrying Advocacy and Academics in the Media Ownership Research Wars at the FCC,” forthcoming in Lynn M. Harter, Mohan J. Dutta, and Courtney Cole, Eds., *Communicating for Social Impact: Engaging Communication Theory, Research, and Pedagogy*, Hampton Press.

The Case Against Media Consolidation (Donald McGannon Communications Research Center, 2007)

Open Architecture as Communications Policy (Stanford Law School, Center for Internet and Society: 2004)

Media Ownership and Democracy in the Digital Information Age: Promoting Diversity with First Amendment Principles and Rigorous Market Structure Analysis (Stanford Law School, Center for Internet and Society: 2003)

Cable Mergers and Monopolies: Market Power In Digital Media and Communications Networks (Washington, D.C.: Economic Policy Institute, 2002)

“When Law and Social Science Go Hand in Glove: Usage and Importance of Local and National News Sources, Critical Questions and Answers for Media Market Analysis,” forthcoming in, Philip Napoli, Ed. *Media Diversity and Localism: Meaning and Metrics*, (Lawrence Erlbaum, 2007)

“The Importance of Open Networks in Sustaining the Digital Revolution,” in Thomas M. Lenard and Randolph J. May (Eds.) *Net Neutrality or Net Neutering* (New York, Springer, 2006)

“Reclaiming The First Amendment: Legal, Factual And Analytic Support For Limits On Media Ownership,” Robert McChesney and Benn Scott (Eds.), *The Future of Media* (Seven Stories Press, 2005)

“Building A Progressive Media And Communications Sector,” Elliot Cohen (Ed.), *News Incorporated: Corporate Media Ownership And Its Threat To Democracy* (Prometheus Books, 2005)

“Hyper-Commercialism In The Media: The Threat To Journalism And Democratic Discourse,” Snyder-Gasher-Compton-(Eds), *Converging Media, Diverging Politics: A Political Economy Of News In The United States And Canada* (Lexington Books, 2005)

“The Digital Divide Confronts the Telecommunications Act of 1996: Economic Reality versus Public Policy,” in Benjamin M. Compaine (Ed.), *The Digital Divide: Facing a Crisis or Creating a Myth?* (Cambridge: MIT Press, 2001)

Articles and Papers:

“Business Data Services after the 1996 Act: Structure, Conduct, Performance in the Core of the Digital Communications Network The Failure of Potential Competition to Prevent Abuse of Market Power,” Telecommunications Policy Research Conference, September, 2016.

with Gene Kimmelman, “Antitrust and Economic Regulation: Essential and Complementary Tools to Maximize Consumer Welfare and Freedom of Expression in the Digital Age,” *Harvard Law & Policy Review* 9-2 (2015)

“The ICT Revolution in Historical Perspective: Progressive Capitalism as a Response to Free Market Fanaticism and Marxist Complaints in the Deployment Phase of the Digital Mode of Production.” *Telecommunication Policy Research Conference Session on Innovation*, September 28, 2015.

“The Long History and Increasing Importance of Public Service Principles For 21st Century Public Digital Communications Networks,” *Journal on Telecommunications and High Technology Law*, 2014

“From the Public Switched Telephone Network to the Public Digital Communications Network: Interconnection, Interoperability, Universal Service & Innovation at the Edge,” *Interconnection Policy for the Internet Age, The Digital Broadband Migration: The Future of Internet-Enabled Innovation, Silicon Flatirons*, February 10-11, 2013

“Why Growing Up is Hard to Do: Institutional Challenges for Internet Governance in the “Quarter Life Crisis of the of the Digital Revolution,” *Journal on Telecommunications and High Technology Law*, 2013. 11(1).

“Structured Viral Communications: The Political Economy and Social Organization of Digital Disintermediation,” *Journal on High Telecommunications and High Technology Law*, 9:1, 2011.

“Crowd Sourcing Enforcement: Building a Platform for Participatory Regulation in the Digital Information Age,” presentation at *The Digital Broadband Migration: The Dynamics of Disruptive Innovation, Silicon Flatirons Ctr.* Feb. 12, 2011

“The Central Role of Wireless in the 21st Century Communications Ecology: Adapting Spectrum and Universal Service Policy to the New Reality,” *Telecommunications Policy Research Conference*, September 2011

“Round #1 in the Digital Intellectual Property Wars: Economic Fundamentals, Not Piracy, Explain How Consumers and Artists Won in the Music Sector,” *Telecommunications Policy Research Conference*, September 2008.

“When The Market Does Not Reign Supreme: Localism And Diversity In U.S. Media Policy,” *International Communications Association*, forthcoming, May 2008

“Minority Programming: Still at The Back of the Bus,” *International Communications Association*, May 2008, with Adam Lynn

“Traditional Content Is Still King as the Source of Local News and Information,” *International Communications Association*, forthcoming, May 2008

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- “Direct Testimony of Dr. Mark N. Cooper Submitted on behalf of The American Association of Retired Persons, before the Public Service Commission, State of New York, In the Matter of Competitive Opportunities Case 94-E-0952 New York State Electric and Gas Co. 96-E-0891; Rochester Gas and Electric Corp. 96-E-0898 Consolidated Edison Company of New York, Inc. 96-E-0897
- “Direct Testimony of Dr. Mark N. Cooper on Behalf of Office of Consumer Advocate,” before the Pennsylvania Public Utility Commission, Pennsylvania Public Utility Commission Bureau of Consumer Services v. Operator Communications, Inc. D/b/a Oncor Communications, Docket No. C-00946417, May 2, 1997
- “Direct Testimony of Dr. Mark N. Cooper, on Behalf of New York Citizens Utility Board, the Consumer Federation of America, the American Association of Retired Persons, Consumers Union, Mr. Mark Green, Ms. Catherine Abate, the Long Island Consumer Energy Project,” before the Public Service Commission, State of New York, Proceeding on Motion of the Commission as the Rates, Charges, Rules and Regulations of New York Telephone Company, NYNEX Corporation and Bell Atlantic Corporation for a Declaratory Ruling that the Commission Lacks Jurisdiction to Investigate and Approve a Proposed Merger Between NYNEX and a Subsidiary of Bell Atlantic, or, in the Alternative, for Approval of the Merger, Case 96-c-603, November 25, 1996
- “Consumer Protection Under Price Cap Regulation: A Comparison of U.S. Practices and Canadian Company Proposals,” before the CRTC, Price Cap Regulation and Related Matters, Telecom Public Notice CRTC, 96-8, on behalf of Federation Nationale des Associations de Consommateurs du Quebec and the National Anti-Poverty Organization, August 19, 1996
- “Responses of Dr. Mark N. Cooper on Behalf of the Attorney General of Oklahoma,” In the Matter of the Rulemaking by the Oklahoma Corporation Commission to Establish Rules and Regulations Concerning Universal Service, Cause NO. RM 96000015, May 29, 1996
- “Statement of Dr. Mark N. Cooper on Behalf of the Attorney General of Oklahoma,” In the Matter of the Oklahoma Corporation Commission to Establish Rules and Regulations Concerning Pay Telephones, Cause NO. RM 96000013, May 1996
- “Statement of Dr. Mark N. Cooper on Behalf of the Attorney General of Oklahoma,” In the Matter of An Inquiry by the Oklahoma Corporation Commission into Alternative Forms of Regulation Concerning Telecommunications Service, Cause NO. RM 950000404
- “Statement of Dr. Mark N. Cooper to the System Benefits Workshop,” Project on Industry Restructuring, Project No. 15000, before the Public Utility Commission of Texas, May 28, 1996
- “Remarks of Dr. Mark N. Cooper, Panel on Service Quality from the Consumer Perspective,” NARUC Winter Meetings, Washington, D.C., February 26, 1996
- "Attorney General's Comments," Before the Arkansas Public Service Commission, In the Matter of the Non-Traffic Sensitive Elements of Intrastate Access Charges and Carrier Common Line and Universal Service Fund Tariffs of the Local Exchange Companies, Docket NO. 86-159-U, November 14, 1995
- "Reply Comments and Proposed Rules of the Oklahoma Attorney General," Before the Corporation Commission of the State of Oklahoma, In the Matter of the Rulemaking of the Oklahoma Corporation Commission to Establish Rules and Regulations for Local Competition in the Telecommunications Market, Cause No. RM 950000019, October 25, 1995
- "Remarks of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons to the Members of the Executive Committee," Indiana Utility Regulatory Commission, in the Matter of the Investigation on the Commission's Own Motion into Any and All Matters Relating to Local Telephone Exchange Competition Within the State of Indiana, Cause No. 39983, September 28, 1995
- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the Office of Public Utility Counsel," before the Public Utility Commission of Texas, Petition of MCI Telecommunications Corporation for an Investigation of the Practices of Southwestern Bell Telephone Company Regarding the 713 Numbering Plan Area and Request for a Cease and Desist Order Against Southwestern Bell Telephone Company, SOAH Docket No. 473-95-1003, September 22, 1995
- "Rebuttal Testimony of Dr. Mark N. Cooper on Behalf of the Office of the Attorney General State of Arkansas," Before the Arkansas Public Service Commission, In the Matter of an Earnings Review of GTE Arkansas Incorporated, Docket NO. 94-301-U, August 29, 1995

- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the Office of Public Utility Counsel," before the Public Utility Commission of Texas, Petition of MCI Telecommunications Corporation for an Investigation of the Practices of Southwestern Bell Telephone Company Regarding the 214 Numbering Plan Area and Request for a Cease and Desist Order Against Southwestern Bell Telephone Company, Docket NO. 14447, August 28, 1995
- "Direct Testimony of Mark N. Cooper On Behalf of the Office of the People's Counsel of the District of Columbia," Before the Public Service Commission of the District of Columbia, In the Matter of Investigation Into the Impact of the AT&T Divestiture and Decisions of the Federal Communications Commission on the Chesapeake and Potomac Telephone Company's Jurisdictional Rates, July 14, 1995
- "Comments of Consumer Action and the Consumer Federation of America," Before the Public Utilities Commission of California, Order Instituting Rulemaking on the Commission's Own Motion into competition for Local Exchange Service, Docket Nos. R. 95-04-043 and I. 95-04-044, May 23, 1995
- "Testimony of Dr. Mark N. Cooper on Behalf of the Arkansas Attorney General," before the Arkansas Public Service Commission, In the Matter of an Earnings Review of Southwestern Bell Telephone Company, Docket NO. 92-260-U, April 21, 1995
- "Promoting Competition and Ensuring Consumer Protection on the Information Superhighway, Testimony of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons and the Consumer Federation of America on Proposed Revisions of Chapter 364," Committee on Commerce and Economic Opportunities, Florida Senate, April 4, 1995
- "Direct Testimony and Exhibits of Dr. Mark N. cooper on Behalf of the Division of consumer Advocacy," In the Matter of Public Utilities Commission Instituting a Proceeding on Communications, Including an Investigation of the Communications Infrastructure in Hawaii, docket No. 7701, March 24, 1995
- "Promoting Competition and Ensuring Consumer Protection on the Information Superhighway, Testimony of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons and the Consumer Federation of America on Proposed Revisions of Chapter 364," Florida House of Representative, March 22, 1995
- "Prepared Testimony of Dr. Mark N. Cooper on Behalf of the Office of the Attorney General State of Arkansas," Before the Arkansas Public Service Commission, In the Matter of an Earnings Review of GTE Arkansas Incorporated, Docket NO. 94-301-U, March 17, 1995
- "Statement of Dr. Mark N. Cooper," DPUC Investigation into The Southern New England Cost of Providing Service, Docket No. 94-10-01, January 31, 1995
- "Statement of Dr. Mark N. Cooper," DPUC Exploration of Universal Service Policy Options, Docket No. 94-07-08, November 30, 1994
- "Statement of Dr. Mark N. Cooper," DPUC Investigation of Local Service Options, including Basic Telecommunications Service Policy Issues and the Definition of Basic Telecommunications Service, Docket No. 94-07-07, November 15, 1994
- "Testimony of Dr. Mark N. Cooper on Behalf of Attorney General of the Commonwealth of Kentucky, Utility and Rate Intervention Division, before the Public Service Commission, Commonwealth of Kentucky, Case No. 94-121, August 29, 1994
- "Testimony of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons," before the Public Utilities Commission of Ohio, In the Matter of the Application of the Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation and In the Matter of the Complaint of the Office of Consumers' Counsel, v. Ohio Bell Telephone Company, Relative to the Alleged Unjust and Unreasonable Rates and Charges, Case Nos. 93-487-TP-ALT, 93-576-TP-CSS, May 5, 1994
- "Reply Testimony of Dr. Mark N. Cooper on Behalf of the Attorney General of Arkansas," before the Arkansas Public Service Commission, in the Matter of the Consideration of Expanded Calling Scopes and the Appropriate NTS Allocation and Return on Investments for the Arkansas Carrier Common Line Pool, Docket No. 93125-U, May 4, 1994
- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the Attorney General of Arkansas," before the Arkansas Public Service Commission, in the Matter of the Consideration of Expanded Calling Scopes and the Appropriate NTS Allocation and Return on Investments for the Arkansas Carrier Common Line Pool, Docket No. 93125-U, April 22, 1994

- "Comments of Dr. Mark N. Cooper on Behalf of Consumers Union, Southwest Regional Office, before the Public Utility Commission of Texas, Request for Comments on the Method by which Local Exchange Services are Priced, Project No. 12771, April 18, 1994
- "Comments of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons," Before the Tennessee Public Service Commission, Inquiry for Telecommunications Rule making Regarding Competition in the Local Exchange, Docket No. 94-00184, March 15, 1994
- "Rebuttal Testimony of Dr. Mark N. Cooper on Behalf of the Virginia Citizens Consumer Council, Inc., before the State Corporation Commission at Richmond, Commonwealth of Virginia, In the Matter of Evaluating Investigating the Telephone Regulatory Case No. PUC930036 Methods Pursuant to Virginia Code S 56-235.5, March 15, 1994
- "Testimony of Dr. Mark N. Cooper on Behalf of the Virginia Citizens Consumer Council, Inc., before the State Corporation Commission at Richmond, Commonwealth of Virginia, In the Matter of Evaluating Investigating the Telephone Regulatory Case No. PUC930036 Methods Pursuant to Virginia Code S 56-235.5, February 8, 1994
- "Testimony of Dr. Mark N. Cooper on Behalf of The American Association of Retired Persons, Citizen Action Coalition, Indiana Retired Teachers Association, and United Senior Action, before the Indiana Utility Regulatory Commission, Cause No. 39705, December 17, 1993
- "Testimony of Dr. Mark N. Cooper on Behalf of the Virginia Citizens Consumer Council, Inc.," before the State Corporation Commission at Richmond, Commonwealth of Virginia, In the Matter of Evaluating the Experimental Plan for Alternative Regulation of Virginia Telephone Companies, Case No. PUC920029, October 22, 1993
- "Testimony of Dr. Mark N. Cooper on Behalf of the Attorney General," before the Arkansas Public Service Commission, In the Matter of An Earnings Review of Southwestern Bell Telephone Company, Docket No. 92-260-U, 93-114-C, August 5, 1993
- "Rebuttal Testimony of Dr. Mark N. Cooper on Behalf of the Attorney General," before the Public Service Commission of the State of Missouri, The Staff of the Missouri Public Service Commission vs. Southwestern Bell Telephone and Telegraph Company, Case No. TO-93-192, April 30, 1993
- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the Office of Consumer Counsel," before the Public Utilities Commission of the State of Colorado, In the Matter of the Investigatory Docket Concerning Integrated Service Digital Network, Docket No. 92I-592T
- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the People's Counsel," before the Florida Public Service Commission, Comprehensive Review of the Revenue Requirement and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company, Docket No. 900960-TL, November 16, 1992
- "Direct Testimony of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons," before the Florida Public Service Commission, Comprehensive Review of the Revenue Requirement and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company, Docket No. 900960-TL, November 16, 1992
- "Testimony of Dr. Mark N. Cooper" before the Regulatory Flexibility Committee, General Assembly, State of Indiana, August 17, 1992
- "Testimony of Dr. Mark N. Cooper On Behalf of the Consumer Advocate," before the Public Service Commission of South Carolina, Petition of the Consumer Advocate for the State of South Carolina to Modify Southern Bell's Call Trace Offering, Docket No. 92-018-C, August 5, 1992
- "Telecommunications Infrastructure Hoax," before the Public Service Commission of Colorado, Conference on ISDN for the Rest of Us, April 23, 1992
- "Testimony of Dr. Mark N. Cooper on Behalf of the Consumer Federation of America," before the Corporation Commission of the State of Oklahoma, In the Matter of the Corporation Commission's Notice of Inquiry Regarding Telecommunications Standards in Oklahoma, Cause No. PUD 1185, February 28, 1992
- "Testimony of Dr. Mark N. Cooper on Behalf of the Consumer Federation of America," before the Georgia Public Service Commission, In the Matter of A Southern Bell Telephone and Telegraph Company Cross-subsidy, Docket No. 3987-U, February 12, 1992

"Testimony of Dr. Mark N. Cooper on Behalf of the Consumer Federation of America," before the Arkansas Public Service Commission, in the Matter of an Inquiry into Alternative Rate of Return Regulation for Local Exchange Companies, Docket No. 91-204-U, February 10, 1992

"Statement on Behalf of the Consumer Federation of America on HB 1076," before the Missouri General Assembly, January 29, 1992

"Testimony on behalf of the American Association of Retired Persons and the Consumer Federation of America," before the Legislative P.C. 391 Study Committee of the Public Service Commission of Tennessee, January 13, 1992

"Direct Testimony on Behalf of the "Consumer Advocate," Public Service Commission State of South Carolina, In the Matter of the Application of Southern Bell Telephone and Telegraph Company for Approval of Revision to its General Subscribers Service Tariff (Caller ID), Docket No. 89-638-C, December 23, 1991

"Comments of the Consumer Federation of America on Proposed Telecommunications Regulation in New Jersey (S36-17/A-5063)," New Jersey State Senate, December 10, 1991

"Comments of the Consumer Federation of America," Before the Public Service Commission, State of Maryland, In the Matter of a Generic Inquiry by the Commission Into the Plans of the Chesapeake and Potomac Telephone Company of Maryland to Modernize the Telecommunications Infrastructure, Case No. 8388, November 7, 1991

"On Behalf of the Office of Consumers Counsel," before the Public Utilities Commission of Ohio, In the Matter of the Application of the Ohio Bell Telephone Company to Revise its Exchange and Network Services Tariff, P.U.C.O. No. 1, to Establish Regulations, Rates, and Charges for Advanced Customer Calling Services in Section 8. The New Feature Associated with the New Service is Caller ID, Case No. 90-467-TP-ATA; In the Matter of the Application of the Ohio Bell Telephone Company to Revise its Exchange and Network Service Tariff, P.U.C.O. No 1, to Establish Regulations, Rates and Charges for Advanced Customer Calling Services in Section 8., The New Feature Associated with the New Service is Automatic Callback, Case No. 90-471-TP-ATA, September 3, 1991

"On Behalf of the American Association of Retired Persons," Before the Senate Select Telecommunications Infrastructure and Technology Committee, 119th Ohio General Assembly, July 3, 1991

"On Behalf of the Cook County State's Attorney," before the Illinois Commerce Commission, In Re: Proposed Establishment of a Custom Calling Service Referred to as Caller ID and Related Custom Service, Docket Nos. 90-0465 and 90-0466, March 29, 1991

"On Behalf of the Vermont Public Interest Research Group," before the Public Service Board In Re: Investigation of New England Telephone and Telegraph Company's Phonesmart Call Management Services, Docket No. 54-04, December 13, 1990

"On Behalf of the Office of Consumer Advocate," before the State of Iowa, Department of Commerce, Utilities Division, In Re: Caller ID and Related Custom Service, Docket No. INU-90-2, December 3, 1990

"On Behalf of the Office of Public Counsel," before the Florida Public Service Commission, In Re: Proposed Tariff Filings by Southern Bell Telephone and Telegraph Company When a Nonpublished Number Can be Disclosed and Introducing Caller ID to Touchstar Service, Docket No. 891194-TI, September 26, 1990

"On Behalf of the Office of Public Advocate," before the Public Service Commission, State of Delaware, In the Matter of: The Application of the Diamond State Telephone Company for Approval of Rules and Rates for a New Service Known as Caller*ID, PSC Docket No. 90-6T, September 17, 1990

"On Behalf of the Maryland People's Counsel," before The Public Service Commission of Maryland, In the Matter of Provision of Caller Identification Service by the Chesapeake and Potomac Company of Maryland, Case No. 8283, August 31, 1990

"On Behalf of the Office of Attorney General," before the Commonwealth of Kentucky, Public Service Commission, In the Matter of the Tariff Filing of GTE South Incorporated to Establish Custom Local Area Signaling Service, Case No. 90-096, August 14, 1990

"On Behalf of the Consumers' Utility Counsel," before the Georgia Public Service Commission Re: Southern Bell Telephone Company's Proposed Tariff Revisions for Authority to Introduce Caller ID, Docket No. 3924-U, May 7, 1990

"Testimony of Dr. Mark N. Cooper on Caller Identification" before the Committee on Constitutional and Administrative Law, House of Delegates, Annapolis, Maryland, February 22, 1990

- "On Behalf of the Office of People's Counsel of the District of Columbia," before the Public Service Commission of the District of Columbia in the Matter of the Application of the Chesapeake and Potomac Telephone Company to Offer Return Call and Caller ID within the District of Columbia, Case No. 891, February 9, 1990
- "On Behalf of the Office of Consumer Advocate" before the Pennsylvania Public Utility Commission in the Matter of Pennsylvania Public Utility Commission v. The Bell Telephone Company of Pennsylvania, Docket NO. R-891200, May 1989.
- "Statement of Dr. Mark N. Cooper, Joint Hearing on the Public Utility Holding Company Act of 1935," Committees on Finance and Technology and Electricity, National Association of Regulatory Utility Commissioners, February 28, 1989
- "On Behalf of Manitoba Anti-poverty Organization, the Manitoba Society of Seniors and the Consumers Association of Canada (Manitoba)" before the Public Utilities Board in the Matter of the Request of Manitoba Telephone System for a General Rate Review, February 16, 1989
- "On Behalf of the Ohio Consumers Counsel, In the Matter of the Application of GTE MTO Inc. for Authority to Increase and Adjust its Rates and Charges and to Change Regulations and Practices Affecting the Same, Case No. 87-1307-TP- Air," before the Public Utility Commission of Ohio, May 8, 1988
- "On Behalf of the Evelyn Soloman, Proceeding on Motion of the Commission as to the Rates, Charges and Regulations of Niagara Mohawk Power Corporation, Case Nos. 29670 and 29671," before the State of New York Public Service Commission, February 16, 1988
- "An Economic Perspective - The Status of Competition in the Telecommunications Industry and Its Impact on Taxation Policy," Before the Joint Subcommittee on the Taxation of The Telecommunications Industry, December 8, 1987
- "On Behalf of the Office of Consumer Counsel, State of Washington," In the Matter of the Petition of AT&T Communications of Pacific Northwest, Inc. for Classification as a Competitive Telecommunications Company, March 24, 1987
- "On Behalf of Manitoba Anti-poverty Organization and the Manitoba Society of Seniors," before the Public Utilities Board in the Matter of the Request of Manitoba Telephone System for a General Rate Review, March 16, 1987
- "On Behalf of the Office of Consumers' Counsel, State of Ohio," In the Matter of the Application of the Ohio Bell Telephone Company for Authority to Amend Certain of its Intrastate Tariffs to Increase and Adjust the Rates and Charges and to Change its Regulations and Practices Affecting the Same, Case No. 84-1435-TP-AIR, April 6, 1986
- "On Behalf of Manitoba Anti-poverty Organization and Manitoba Society of Seniors," before the Public Utilities Board in the Matter of the Request of Manitoba Telephone System for a General Rate Review, February 6, 1986
- "On Behalf of Mississippi Legal Services Coalition, in the Matter of Notice by Mississippi Power and Light of Intent to Change Rates" Before the Mississippi Public Service Commission, April 15, 1985
- "On Behalf of the Universal Service Alliance, in the Matter of the Application of New York Telephone Company for Changes in it Rates, Rules, and Regulations for Telephone Service, State of New York Public Service Commission, Case No. 28961, April 1, 1985
- "On Behalf of North Carolina Legal Services, in the Matter of Application of Continental Telephone Company of North Carolina for an Adjustment of its Rates and Charges, Before the North Carolina Utilities Commission, Docket No. P-128, Sub 7, February 20, 1985
- "On Behalf of the Consumer Advocate in re: Application of Southern Bell Telephone and Telegraph Company for Approval Increases in Certain of Its Intrastate Rates and Charges," Before the South Carolina Public Service Commission, Docket No. 84-308-c, October 25, 1984
- "On Behalf of the Office of the Consumers' Counsel in the Matter of the Commission Investigation into the Implementation of Lifeline Telephone Service by Local Exchange Companies," Before the Public Utilities Commission of Ohio, Case No. 84-734-TP-COI, September 10, 1984
- "On Behalf of North Carolina Legal Services Resource Center in the Matter of Application Southern Bell Telephone and Telegraph Company for an Adjustment in its Rates and Charges Applicable to Intra-state Telephone

Service in North Carolina," Before the North Carolina Utilities Commission, Docket No. P-55, Sub 834, September 4, 1984

"On Behalf of Mississippi Legal Services Coalition in the Matter of the Citation to Show Cause Why the Mississippi Power and Light Company and Middle South Energy Should not Adhere to the Representation Relied Upon by the Mississippi Public Service Commission in Determining the Need and Economic Justification for Additional Generating Capacity in the Form of A Rehearing on Certification of the Grand Gulf Nuclear Project," Before the Mississippi Public Service Commission, Docket No. U-4387, August 13, 1984

"On Behalf of the Mississippi Legal Services Corporation Re: Notice of Intent to Change Rates of South Central Bell Telephone Company for Its Intrastate Telephone Service in Mississippi Effective January 1, 1984," before the Mississippi Public Service Commission, Docket No. U-4415, January 24, 1984

"The Impact of Rising Energy Prices on the Low Income Population of the Nation, the South, and the Gulf Coast Region," before the Mississippi Public Service Commission, Docket No. U4224, November 1982

"In the Matter of the Joint Investigation of the Public Service Commission and the Maryland Energy Office of the Implementation by Public Utility Companies Serving Maryland Residents of the Residential Conservation Service Plan," before the Public Service Commission of the State of Maryland, October 12, 1982

"The Impact of Rising Utility Rates on the Budgets of Low Income Households in the Region of the United States Served by the Mississippi Power Company and South Central Bell Telephone Company," before the Chancery Court of Forrest County, Mississippi, October 6, 1982

"The Impact of Rising Energy Prices on the Low Income Population of the Nation, the South and the Gulf Coast Region," before the Mississippi Public Service Commission, Docket No. U-4190, August 1982

ATTACHMENT # 7

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Dr. George Peter Bird

Resume

Dr. George Peter ("Peter") Bird is a Professor of Geophysics and Geology, Emeritus, at the University of California at Los Angeles. He has a Ph.D. in Earth and Planetary Sciences from the Massachusetts Institute of Technology (1976) and a B.A. in Geological Sciences from Harvard College (1972). For over 46 years, he has been a Professor of Geophysics and Geology at UCLA. He has published 76 academic papers, mostly about tectonics and seismicity, including the tectonics and seismicity of California. He has also been a member or officer of several professional organizations in the field of geology, including the Geological Society of America, the American Geophysical Union and the Southern California Earthquake Center. The former two organizations have recognized his work with two fellowships and an award.

Dr. Bird has broad expertise in the fields of geology and geophysics, with a focus on plate motion and plate deformation. Over the past 48 years, he has authored or contributed to a number of academic papers on computer modeling methods and applications, including studies of the ongoing (neotectonic) deformation in California.

In 2012, Dr. Bird participated in a Senior Seismic Hazards Analysis Committee (SSHAC) workshop sponsored by PG&E and run by Lettis Consultants International, regarding seismic hazards at the Diablo Canyon Power Plant. He presented results on both strike-slip and compressional deformation rates affecting the region, which were derived from his latest computer models of neotectonics (prepared for the Southern California Earthquake Center's project Unified California Earthquake Rupture Forecast version 3, and also for the US Geological Survey's 2013 Update to the National Seismic Hazard Model).

Justification for New Rate

SLOMFP is requesting that Dr. Bird be awarded a rate of \$378.55 for his work in this proceeding during the 2023 calendar year. Dr. Bird is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Dr. Bird because none of the other categories better suited his expertise and scope of testimony. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.) Thus, Dr. Bird meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Dr. Bird be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Dr. Bird is reasonable. Dr. Bird consulted with SLOMFP through this proceeding and submitted expert testimony on the issue of costs of seismic upgrades and analysis of DCISC reports incorporated into the record by ALJ rulings in this proceeding.

ATTACHMENT # 8

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Diane Curran

Resume

Ms. Curran received her bachelor of science from Yale University and her juris doctorate from the University of Maryland. As an attorney, her practice area has included environmental law and nuclear regulation and policy. She is a partner at a Washington D.C. based law firm Harmon Curran.

As one of the country's leading environmental and nuclear safety advocates, Ms. Curran has stopped unsafe nuclear projects and won significant safety and environmental protection measures before the U.S. Nuclear Regulatory Commission (NRC) and federal courts, on behalf of state and local governments, citizen groups, and individuals. Ms. Curran's areas of legal expertise include the Atomic Energy Act, the National Environmental Policy Act, the Nuclear Waste Policy Act, the Safe Drinking Water Act, and the National Historic Preservation Act.

Ms. Curran's court victories include two ground-breaking cases establishing new environmental requirements for nuclear reactor licensing. In *New York v. NRC*, 681 F.3d 471 (D.C. Cir. 2012), the U.S. Court of Appeals ordered the NRC to prepare, for the first time, an Environmental Impact Statement (EIS) regarding the long-term environmental effects of storing spent nuclear reactor fuel. In a follow-up petition to the NRC, Ms. Curran forced the agency to suspend all reactor licensing for two years while it prepared the EIS. And in 2006, in *San Luis Obispo Mothers for Peace v. NRC*, 449 F.3d 1016 (9th Cir. 2006), Ms. Curran won a precedent-setting court order requiring the NRC to evaluate the environmental and safety impacts of an attack on a proposed spent fuel storage facility at the Diablo Canyon nuclear power plant. As a result, the NRC now routinely examines the environmental impacts of attacks in its licensing decisions.

Ms. Curran has also represented many citizen groups in cases before the NRC. Highlights include — In 2017, Ms. Curran represented Riverkeeper in the historic settlement of the Indian Point license renewal case that provides for early shutdown of the twin nuclear reactors. Following the 2011 Fukushima accident, she represented a broad group of environmental groups in pressing NRC to consider the lessons learned from the accident in its licensing decisions. In 1997, working with Earthjustice Legal Defense Fund, Ms. Curran won one of the first environmental justice victories in the U.S., resulting in cancellation of a uranium enrichment project in the heart of an African-American community in rural Louisiana. In 1995, Ms. Curran's litigation against re-licensing of a grossly contaminated uranium processing plant in Oklahoma was a key factor forcing the shutdown of the facility. And in 1991, the aging Yankee Rowe reactor closed after a petition by Ms. Curran, on behalf of the Union of Concerned Scientists, showed the reactor vessel failed to meet NRC safety standards.

Ms. Curran's work has been honored by Trial Lawyers for Public Justice (1997 finalist for Trial Lawyer of the Year), Alliance for Nuclear Accountability (2013 Certificate of Honor), and Georgia Women's Action for New Directions (2013 Mothers' Day for Peace award).

Ms. Curran has represented state and local governments including the Commonwealth of Massachusetts; the State of Utah; Eureka County, Nevada; and Orange County, North Carolina. She has also represented many civic and environmental organizations in proceedings involving nuclear power plants.

Justification for New Rate

SLOMFP is requesting that Diane Curran be awarded a rate of \$378.55 for her work in this proceeding during the 2023 calendar year. Diane Curran is well-qualified to be classified as a Level V "expert-not otherwise classified". This expert category is appropriate for Ms. Curran because none of the other categories better suited her expertise. Experts under the Level V "expert-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Ms. Curran has over 40 years experience as an attorney in the practice area of environmental and nuclear regulatory policy. Thus, she meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Ms. Curran be awarded a rate of \$378.55. As of March 2023, the highest rate for an Expert Level V is \$378.55. Thus, the rate requested for Ms. Curran is reasonable. Ms. Curran consulted with SLOMFP on the issues of federal regulatory compliance procedure and costs for extended operations of Diablo Canyon in this proceeding.

ATTACHMENT # 9

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Linda Seeley

Resume

Linda Seeley has over 30 years experience as an advocate and has been a spokesperson for and member of the Board of Directors of SLOMFP since 2008. She has been a member of SLOMFP since 1982. SLOMFP, by and through Ms. Seeley, has been involved in litigation and public participation hearings involving the following issues: initial and subsequent licenses, seismic safety, County Emergency Response Plan, high level radioactive waste storage, rate structure and deregulation, degradation of coastal waters and plant security.

Justification for New Rate

SLOMFP is requesting that Linda Seeley be awarded a rate of \$125.00 for her work in this proceeding during the 2023 calendar year. Ms. Seeley is well-qualified to be classified as a Level V "Advocate-not otherwise classified". This advocate category is appropriate for Ms. Seeley because none of the other categories better suited her expertise and involvement in the proceeding. Advocates under the Level V "Advocate-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Ms. Seeley has over forty years of experience as an advocate for SLOMFP. Ms. Seeley received her bachelor's of arts from Kent State University and her master's of science in Nurse-Midwifery at San Jose State. Thus, she meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Ms. Seeley be awarded a rate of \$125.00. As of March 2023, the highest rate for an Expert Level V is \$221.13 Thus, the rate requested for Ms. Seeley is reasonable. Ms. Seeley participated as an advocate in this proceeding performing tasks delegated by attorneys of record Venskus & Associates, A.P.C.

ATTACHMENT # 10

Information Justifying San Luis Obispo Mothers for Peace's Request to Set New Rate for Expert Jill Zamek

Justification for New Rate

SLOMFP is requesting that Jill Zamek be awarded a rate of \$125.00 for her work in this proceeding during the 2023 calendar year. Ms. Zamek is well-qualified to be classified as a Level V "Advocate-not otherwise classified". This advocate category is appropriate for Ms. Zamek because none of the other categories better suited her expertise and involvement in the proceeding. Advocates under the Level V "Advocate-not otherwise classified" category are required to hold at least a bachelor's degree and 15 years of experience. (See Post-2021 Hourly Rate Chart.)

Ms. Zamek has over forty years of experience as an advocate for SLOMFP. Ms. Zamek received her Bachelor of Arts and teaching credential from UC Berkeley. Thus, she meets the qualifications for an Expert Level V at the highest rate level. SLOMFP requests that Ms. Zamek be awarded a rate of \$125.00. As of March 2023, the highest rate for an Expert Level V is \$221.13. Thus, the rate requested for Ms. Zamek is reasonable. Ms. Zamek was an advocate in this proceeding performing tasks delegated to her by attorneys of record Venskutis & Associates, A.P.C.

Attachment # 11 Time Sheets for SLOMFP Representatives**TIME RECORDS OF ATTORNEY SABRINA VENKSUS**

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
2/6/23	1.2	zoom meeting with client re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$780.00	C/P, T, R
2/6/23	0.9	discussion with Jason Sanders [REDACTED for Attorney-Client Privilege]	\$650.00	\$585.00	C/P, T, R
2/10/23	1.6	attend CNRA public hearing on Diablo Regulatory requirements	\$650.00	\$1,040.00	C/P, T, R
2/14/23	0.5	Call with A4NR re coordinating efforts to avoid duplication	\$650.00	\$325.00	C/P, T, R
2/19/23	0.4	draft email to client [REDACTED for Attorney-Client Privilege]	\$650.00	\$260.00	C/P, T, R
2/27/23	0.5	mtg with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
2/28/23	0.1	Analyze and comment on PHC meet and confer schedule and draft email to client [REDACTED for Attorney-Client Privilege]	\$650.00	\$65.00	C/P, T, R
3/2/23	0.7	Analyze opening comments and evaluate whether to file a reply comment	\$650.00	\$455.00	C/P, T, R
3/3/23	0.2	draft email to client [REDACTED for Attorney-Client Privilege]	\$650.00	\$130.00	C/P, T, R
3/6/23	1	meeting with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$650.00	C/P, T, R
3/9/23	1	PHC joint statement meet and confer	\$650.00	\$650.00	C/P, T, R
3/9/23	0.1	R&R emails with other intervenors re common interest and in furtherance of non-duplication of efforts	\$650.00	\$65.00	C/P, T, R
3/10/23	0.5	r&r emails re PHC conf statement; coordinating efforts	\$650.00	\$325.00	C/P, T, R

3/11/23	0.9	Analyze and respond to emails; party's edits to PHC; draft PHC	\$650.00	\$585.00	C/P, T, R
3/11/23	2.2	Analyze and respond to emails; party's edits to PHC; draft PHC	\$650.00	\$1,430.00	C/P, T, R
3/13/23	0.3	Analyze pre-final PHC joint statement and PG&E email regarding same; draft email to client [REDACTED for Attorney-Client Privilege]	\$650.00	\$195.00	C/P, T, R
3/13/23	0.6	zoom meeting with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$390.00	C/P, T, R
3/20/23	0.2	Analyze and respond to email from client [REDACTED for Attorney-Client Privilege]	\$650.00	\$130.00	C/P, T, R
3/21/23	0.1	reach out to NRDC; Analyze protest; respond to client [REDACTED for Attorney-Client Privilege]	\$650.00	\$65.00	C/P, T, R
3/24/23	0.9	Strategy call with co-counsel [Attorney-Client and work product Privilege]	\$650.00	\$585.00	C/P, T, R
3/27/23	0.5	strategy meeting with client re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
3/31/23	0.2	R&R emails with associate attorney re: PHC and strategy of case going forward	\$650.00	\$130.00	C/P, T, R
4/2/23	0.1	draft email to Samuel Miranda re expert services	\$650.00	\$65.00	C/P, T, R
4/3/23	0.8	call with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$520.00	C/P, T, R
4/3/23	0.2	Analyze expert emails and documentation	\$650.00	\$130.00	C/P, T, R
4/7/23	1.3	mtg with co-counsel and expert Bradford re position framework and experts	\$650.00	\$845.00	C/P, T, R
4/11/23	0.8	Draft strategy, timing, expert delegation, time estimate vis a vis scoping ruling and schedule	\$650.00	\$520.00	C/P, T, R

4/12/23	0.8	work on outline for case strategy; draft email to client and expert re same	\$650.00	\$520.00	C/P, T, R
4/20/23	0.8	call with Jason Sanders re OIR and interpretation thereof	\$650.00	\$520.00	C/P, T, R
4/20/23	0.2	Analyze 4/20/23 OIR and draft email to client and experts re same	\$650.00	\$130.00	C/P, T, R
4/22/23	0.4	Analyze and respond to emails re experts; same with respect to other parties re coordinating efforts	\$650.00	\$260.00	C/P, T, R
4/24/23	0.1	reach out to other parties re coordinaing efforts;	\$650.00	\$65.00	C/P, T, R
4/25/23	0.5	call with J Merrigan of WEM to discuss how to coordinate efforts	\$650.00	\$325.00	C/P, T, R
4/28/23	0.4	call with J Geesman re coordinating efforts with A4NR	\$650.00	\$260.00	C/P, T, R
5/2/23	0.1	r&r emails from client re OIR	\$650.00	\$65.00	C/P, T, R
5/3/23	0.6	call with Matt at TURN re coordinating and not duplicating efforts	\$650.00	\$390.00	C/P, T, R
5/3/23	0.5	Analyze ALJ ruling of May 3, 2023; draft email to client re same	\$650.00	\$325.00	C/P, T, R
5/4/23	0.4	draft email to experts re meeting	\$650.00	\$260.00	C/P, T, R
5/5/23	0.3	r&r emails from experts re timing and process of testimony	\$650.00	\$195.00	C/P, T, R
5/8/23	0.8	call with Sam Miranda re testimony	\$650.00	\$520.00	C/P, T, R
5/10/23	0.6	call with Rao K re testimony	\$650.00	\$390.00	C/P, T, R

5/10/23	0.8	R&R emails w/experts: to Rao K re documents needed; draft email to expert Peter Bird; email to Cooper; email to Bradford; Analyze draft data requests and respond substantively	\$650.00	\$520.00	C/P, T, R
5/15/23	1	Analyze Peter Bird draft testimony; call with Peter Bird	\$650.00	\$650.00	C/P, T, R
5/17/23	0.3	Analyze Mark Cooper draft testimony in preparation for call	\$650.00	\$195.00	C/P, T, R
5/17/23	0.5	strategy call with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
5/18/23	0.7	call with expert Mark Cooper re draft testimony	\$650.00	\$455.00	C/P, T, R
5/18/23	0.2	call with expert Peter Bradford re draft testimony	\$650.00	\$130.00	C/P, T, R
5/24/23	0.3	evaluate, edit and approve data request	\$650.00	\$195.00	C/P, T, R
5/24/23	0.5	R&R ruling on workshop and proposals; docs from parties re same	\$650.00	\$325.00	C/P, T, R
5/26/23	0.1	R&R emails from Diane Curran and Peter Bradford re testimony; draft email to Sam Miranda re testimony	\$650.00	\$65.00	C/P, T, R
5/31/23	0.6	R&R emails with experts re testimony	\$650.00	\$390.00	C/P, T, R
6/1/23	1.3	Analyze Sam Miranda emails; call with Sam Miranda and Diane Curran	\$650.00	\$845.00	C/P, T, R
6/1/23	0.1	call with Diane Curran re testimony	\$650.00	\$65.00	C/P, T, R
6/2/23	0.5	call with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
6/5/23	0.1	Analyze memo re: [REDACTED for Attorney Work Product Privilege] to expert and comment	\$650.00	\$65.00	C/P, T, R

6/6/23	0.6	Analyze and comment on Sam Miranda draft; draft email to Diane Curran re same	\$650.00	\$390.00	C/P, T, R
6/12/23	0.8	call with JS re:[REDACTED for Attorney Work Product Privilege]	\$650.00	\$520.00	C/P, T, R
6/12/23	0.2	assist experts with information for testimony	\$650.00	\$130.00	C/P, T, R
6/15/23	0.4	evaluate draft motion to compel responses to data requests and approve	\$650.00	\$260.00	C/P, T, R
6/20/23	0.2	draft email to Diane Curran and Peter Bradford re: status of expert testimony; next steps and timeline and request for telephonic meeting	\$650.00	\$130.00	C/P, T, R
6/22/23	0.5	telephonic meeting with Jason Sanders re [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
6/23/23	0.6	call with Diane Curran and Peter Bradford re testimony and timeline	\$650.00	\$390.00	C/P, T, R
6/23/23	0.2	Analyze, comment and approve draft reply to PG&E opposition to motion to compel discovery	\$650.00	\$130.00	C/P, T, R
6/25/23	1.3	Evaluate and comment on Sam Miranda testimony	\$650.00	\$845.00	C/P, T, R
6/25/23	0.2	Evaluate and comment on Cooper testimony	\$650.00	\$130.00	C/P, T, R
6/27/23	0.4	Evaluate and comment on Sam testimony; email to Diane Curran re same; call with Sam Miranda re testimony and updated CV	\$650.00	\$260.00	C/P, T, R
6/27/23	0.2	email to client re [REDACTED for Attorney-Client Privilege]; call with Mark Cooper re testimony	\$650.00	\$130.00	C/P, T, R
6/27/23	0.1	draft email to D Curran re additional regulatory requirements for relicensing	\$650.00	\$65.00	C/P, T, R
6/27/23	1	Evaluate and comment on draft testimony of Peter Bradford	\$650.00	\$650.00	C/P, T, R

6/27/23	0.2	call to Jean Merrigan of WEM re costs of deferred maintenance issue	\$650.00	\$130.00	C/P, T, R
6/27/23	0.7	meeting with client [REDACTED for Attorney-Client Privilege]; draft follow up emails [REDACTED for Attorney Work Product Privilege]	\$650.00	\$455.00	C/P, T, R
6/28/23	0.5	R&R email to Peter Bradford re testimony	\$650.00	\$325.00	C/P, T, R
6/28/23	0.2	Analyze and comment on new draft of Rao Konedina testimony	\$650.00	\$130.00	C/P, T, R
6/28/23	0.1	evaluate and determine cost components of Coastal Act federal consistency analysis for Venskus & Associates in this proceeding	\$650.00	\$65.00	C/P, T, R
6/28/23	0.3	call with Jason re: requirements of Coastal Act and regulatory costs associated therewith for purposes of DCPD extension costs	\$650.00	\$195.00	C/P, T, R
6/28/23	0.2	call with Mark Cooper re testimony; follow up email to Mark Cooper re same	\$650.00	\$130.00	C/P, T, R
6/28/23	0.2	draft email to Sam Miranda re testimony	\$650.00	\$130.00	C/P, T, R
6/29/23	0.3	call with CCC expert re CZMA process for regulatory costs testimony	\$650.00	\$195.00	C/P, T, R
6/29/23	0.5	Analyze advocate Jill's memo on deferred maintenance; draft email to Sam Miranda re same; r&r email with jill re same; call with jill re responses	\$650.00	\$325.00	C/P, T, R
6/29/23	0.4	Evaluate and comment on new draft of Rao K testimony; draft email to Rao re same	\$650.00	\$260.00	C/P, T, R
6/29/23	1	Review Peter Bird final testimony and comment; draft email to Bird re same	\$650.00	\$650.00	C/P, T, R
6/29/23	0.2	Review and comment on final Peter Bradford testimony; draft email regarding same	\$650.00	\$130.00	C/P, T, R
6/29/23	0.1	draft email to Jason re preparing filing of testimony	\$650.00	\$65.00	C/P, T, R

6/29/23	0.1	Analyze Mark Cooper updated draft testimony and comment	\$650.00	\$65.00	C/P, T, R
6/29/23	0.2	Analyze and comment on draft of V&A testimony	\$650.00	\$130.00	C/P, T, R
6/29/23	0.1	call with Jason Sanders re: data responses [REDACTED for Attorney-Client Privilege]	\$650.00	\$65.00	C/P, T, R
6/30/23	0.2	Review and approve Peter Bird testimony for filing	\$650.00	\$130.00	C/P, T, R
6/30/23	0.2	Review and approve Rao testimony for filing and draft email to Rao re same	\$650.00	\$130.00	C/P, T, R
6/30/23	0.2	Review and evaluate updated version of Miranda testimony and draft email re same	\$650.00	\$130.00	C/P, T, R
6/30/23	2.6	Review and edit V&A testimony	\$650.00	\$1,690.00	C/P, T, R
6/30/23	3	Review all final testimony for completeness and proper filing form prior to pdf-a by paralegal	\$650.00	\$1,950.00	C/P, T, R
7/3/23	0.3	call with Mark Cooper re opening and supplemental testimony	\$650.00	\$195.00	C/P, T, R
7/5/23	0.2	call with Jason re division of labor on reviewing opening testimony of other parties	\$650.00	\$130.00	C/P, T, R
7/5/23	0.3	R&R emails re expert on embrittlement and NRC requirements for testimony	\$650.00	\$195.00	C/P, T, R
7/5/23	0.3	Analyze A4NR opening testimony for SLOMFP experts	\$650.00	\$195.00	C/P, T, R
7/6/23	0.9	call with Miranda, MacDonald, re supplemental testimony	\$650.00	\$585.00	C/P, T, R
7/6/23	0.7	call with expert MacDonald and advocate Seely re supplemental opening testimony resulting from PG&E new data responses	\$650.00	\$455.00	C/P, T, R

7/6/23	0.7	call with client re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$455.00	C/P, T, R
7/6/23	0.2	call with Jason Sanders re late-submitted data responses by PG&E	\$650.00	\$130.00	C/P, T, R
7/6/23	0.6	draft responses to Diane Curran questions re various issues, including level of timekeeping detail, experts, non-duplication of efforts with A4NR	\$650.00	\$390.00	C/P, T, R
7/6/23	1.1	Analyze A4NR Opening testimony and notate for purposes of forwarding to relevant experts for Analysis and consideration for reply testimony	\$650.00	\$715.00	C/P, T, R
7/7/23	0.6	Analyze opening testimony; call with JS regarding what distribution of what parties' opening testimony should be reviewed by which expert	\$650.00	\$390.00	C/P, T, R
7/8/23	0.2	R&R emails with Dr. MacDonald re supplemental testimony	\$650.00	\$130.00	C/P, T, R
7/8/23	0.6	Analyze draft of Miranda supp testimony and comment	\$650.00	\$390.00	C/P, T, R
7/8/23	0.2	r&r emails from experts re reply testimony	\$650.00	\$130.00	C/P, T, R
7/9/23	4	r&r emails re supp testimony and reply testimony issues; call with Peter Bradford re supp testimony; call to Sam Miranda re same; call to Diane Curran re NRC relicensing questions for purposes of costs of DCPP	\$650.00	\$2,600.00	C/P, T, R
7/9/23	0.4	continue evaluation and comment on Digby supp testimony	\$650.00	\$260.00	C/P, T, R
7/10/23	0.8	Analyze and comment on supplemental testimony -- clarifying questions	\$650.00	\$520.00	C/P, T, R
7/10/23	1.2	receive and Analyze further edits of supplemental testimony by Dr. MacDonald; call with MacDonald	\$650.00	\$780.00	C/P, T, R
7/12/23	0.3	call with Bruce Severence re DCISC report	\$650.00	\$195.00	C/P, T, R
7/12/23	0.3	meeting with client reps re Digby MacDonald supplemental testimony	\$650.00	\$195.00	C/P, T, R

7/13/23	0.3	call with Jason re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$195.00	C/P, T, R
7/13/23	0.1	draft email to Rao re reply testimony	\$650.00	\$65.00	C/P, T, R
7/13/23	0.1	Analyze and amend data request and email to Sam Miranda for finalization and approval	\$650.00	\$65.00	C/P, T, R
7/13/23	0.3	draft email to all experts regarding timing of reply testimony and schedule of drafts, comments, final testimony, etc.	\$650.00	\$195.00	C/P, T, R
7/13/23	0.8	Analyze Mark Cooper reply testimony; comment; draft email to cooper re same	\$650.00	\$520.00	C/P, T, R
7/17/23	0.5	strategy meeting on PWR re new information and reports	\$650.00	\$325.00	C/P, T, R
7/18/23	0.2	r&r to Sam Miranda email re reply testimony	\$650.00	\$130.00	C/P, T, R
7/18/23	0.1	R&R emails with client re experts costs	\$650.00	\$65.00	C/P, T, R
7/18/23	0.6	R&R emails with Mark Cooper re reply testimony; evaluate, analyze and comment on updated draft	\$650.00	\$390.00	C/P, T, R
7/18/23	0.1	R&R emails with Peter Bradford and Diane Curran re meeting regarding reply testimony and coordinating experts	\$650.00	\$65.00	C/P, T, R
7/24/23	0.7	meeting with Jason [REDACTED for Attorney Work Product Privilege]	\$650.00	\$455.00	C/P, T, R
7/24/23	1.2	mtg with Jason [REDACTED for Attorney Work Product and Attorney-Client Privilege]	\$650.00	\$780.00	C/P, T, R
7/26/23	0.2	call with Linda Seely re obtaining data for reply testimony	\$650.00	\$130.00	C/P, T, R
7/26/23	0.1	call with M Freedman of TURN re rebuttal testimony and coordination of efforts	\$650.00	\$65.00	C/P, T, R

7/26/23	0.2	call with J Geesman of A4NR re rebuttal testimony and coordination of efforts	\$650.00	\$130.00	C/P, T, R
7/27/23	0.1	call with Jason Sanders	\$650.00	\$65.00	C/P, T, R
7/27/23	0.2	Analyze and comment on reply comments by V&A	\$650.00	\$130.00	C/P, T, R
7/28/23	3.7	Analyze, comment, question and discuss pre-final draft of Cooper reply testimony; evaluate and pose clarification questions on attachments thereto	\$650.00	\$2,405.00	C/P, T, R
8/7/23	1	Rule 13.9 M&C meeting with all parties	\$650.00	\$650.00	C/P, T, R
8/7/23	0.1	Analyze M&C statement per PG&E request and draft response	\$650.00	\$65.00	C/P, T, R
8/9/23	0.2	Analyze, edit and comment on motion for evidentiary hearings and briefing	\$650.00	\$130.00	C/P, T, R
8/10/23	0.4	Analyze A4NR testimony on DSISC recommendations; draft email to JS re: [REDACTED for Attorney Work Product Privilege] and Analyze response and respond	\$650.00	\$260.00	C/P, T, R
8/10/23	0.1	Analyze consultant questions re Unit 1 and draft email re data requests re same	\$650.00	\$65.00	C/P, T, R
8/15/23	0.3	call with Jason re data requests	\$650.00	\$195.00	C/P, T, R
8/22/23	1	conf call with client and experts re cross-examination and evidentiary hearings regarding which experts to cross-examine and topics of same	\$650.00	\$650.00	C/P, T, R
8/22/23	0.8	mtg with Jason re prep of cross exam based upon reply testimony of PG&E	\$650.00	\$520.00	C/P, T, R
8/23/23	0.9	meet and confer with parties to proceeding re ALJ ruling re evidentiary hearings	\$650.00	\$585.00	C/P, T, R
8/23/23	0.3	call with WEM re coordinating efforts on cross exam for evidentiary hearing	\$650.00	\$195.00	C/P, T, R

8/23/23	0.4	call with J Geesman of A4NR re coordination of efforts for evidentiary hearings	\$650.00	\$260.00	C/P, T, R
8/23/23	0.3	mtg with JS re cross examinaiton of PG&E	\$650.00	\$195.00	C/P, T, R
8/24/23	0.2	call with JS re cross examination of GPI and CGNP	\$650.00	\$130.00	C/P, T, R
8/30/23	3.9	work on cross exam evaluation; call with Peter Bradford re same; call with Jason Sanders re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$2,535.00	C/P, T, R
8/31/23	2.1	work on cross exam questions	\$650.00	\$1,365.00	C/P, T, R
8/31/23	1	work on cross exam questions; call with Rao K re issues for cross exam	\$650.00	\$650.00	C/P, T, R
8/31/23	0.4	call with Jean Merrigan re cross exam related to WEM rebuttal of PG&E	\$650.00	\$260.00	C/P, T, R
9/3/23	1.1	work on cross examination: Analyze evidentiary record; call with Peter Bird to prep for cross examination.	\$650.00	\$715.00	C/P, T, R
9/3/23	1	call with Robert Frehling of WEM to coordinate efforts on cross examination	\$650.00	\$650.00	C/P, T, R
9/3/23	0.7	Analyze testimony for evidentiary hearings; review and evaluate CARE motion to dismiss to determine whether to file response	\$650.00	\$455.00	C/P, T, R
9/4/23	1.4	prepare for cross examination and Analyze exhibits	\$650.00	\$910.00	C/P, T, R
9/4/23	1.9	prepare for evidentiary hearings and make notes and annotate testimony for opening brief	\$650.00	\$1,235.00	C/P, T, R
9/5/23	4.4	work on cross exam and exhibits for next day hearing	\$650.00	\$2,860.00	C/P, T, R
9/5/23	2.1	work on cross exam and exhibits; calls with experts Peter Bird and call with Diane Curran re cross exam of PV and embrittlement issues and costs due to lead counsel Venskuis unavailability	\$650.00	\$1,365.00	C/P, T, R

9/6/23	3.1	attend hearing and cross examine PG&E witness Soenen; call with JS re exhibits; prepare for tomorrow's hearing	\$650.00	\$2,015.00	C/P, T, R
9/6/23	2.2	Review and evaluate A4NR opp to motion to admit conf; note to file and determine whether to file responsive pleading; mtg with Jason [REDACTED for Attorney-Client Privilege]	\$650.00	\$1,430.00	C/P, T, R
9/11/23	1.3	strategy call and debrief with client re: [REDACTED for Attorney-Client Privilege]	\$650.00	\$845.00	C/P, T, R
9/11/23	1.1	meeting with JS to discuss division of labor and work on opening brief outline and arguments and deadlines; motion to extend deadline to brief case	\$650.00	\$715.00	C/P, T, R
9/11/23	0.1	Review and approve draft motion for extension of time to brief case	\$650.00	\$65.00	C/P, T, R
9/14/23	1.6	Analyze hearing testimony, continue to draft opening brief outline, Analyze legislative history and cases, discuss with JS	\$650.00	\$1,040.00	C/P, T, R
9/14/23	1.6	work on opening brief	\$650.00	\$1,040.00	C/P, T, R
9/15/23	0.3	research [Attorney-Work Product Privilege]	\$650.00	\$195.00	C/P, T, R
9/15/23	1.6	draft email to Peter Bradford re testimony conclusions; call to Diane Curran re NRC process questions for opening brief	\$650.00	\$1,040.00	C/P, T, R
9/15/23	0.3	call with John Geesman of A4NR re coordination of efforts	\$650.00	\$195.00	C/P, T, R
9/15/23	1.9	work on reliability section of opening brief	\$650.00	\$1,235.00	C/P, T, R
9/16/23	5.6	work on opening brief reliability section; Analyze record; draft email to Rao K re arguments	\$650.00	\$3,640.00	C/P, T, R
9/17/23	1.3	work on openig brief: legal background section, constitutional argument and deferred mainteance evdience evaluation argument	\$650.00	\$845.00	C/P, T, R
9/17/23	9.8	work on opening brief - Analyze draft sections from Jason Sanders and comment; draft PV and Seismic costs section for SB846 offramp 1 and 2	\$650.00	\$6,370.00	C/P, T, R

9/17/23	3.4	legal research on [REDACTED for Attorney Work Product Privilege]; draft arguments	\$650.00	\$2,210.00	C/P, T, R
9/18/23	5.5	work on opening brief: legal interpretation of SB 846; CPUC statutory and constitutional authority	\$650.00	\$3,575.00	C/P, T, R
9/18/23	2.4	legal research on [REDACTED for Attorney Work Product Privilege]; draft arguments	\$650.00	\$1,560.00	C/P, T, R
9/19/23	0.5	meeting with JS re status of opening brief and continued division of labor	\$650.00	\$325.00	C/P, T, R
9/20/23	2	Analyze other parties' opening briefs and annotate for purposes of reply brief outline and strategy	\$650.00	\$1,300.00	C/P, T, R
9/20/23	0.5	Meeting with JS to discuss PG&E Opening Brief and evaluation	\$650.00	\$325.00	C/P, T, R
9/23/23	1	work on reply brief reliability section -- draft email to Rao K	\$650.00	\$650.00	C/P, T, R
9/23/23	0.8	work on reply brief cost effectiveness - draft email to Mark Cooper	\$650.00	\$520.00	C/P, T, R
9/23/23	1.5	Analyze CGNP opening brief and annotate; draft rebuttal to CGNP; Analyze GPI opening brief and draft rebuttal to same	\$650.00	\$975.00	C/P, T, R
9/23/23	2.2	work on reply brief-- NRC and Unit 1 pressure vessel foundation and costs, Analyze transcript for evidentiary citations; review PG&E testimony for citations for reply brief	\$650.00	\$1,430.00	C/P, T, R
9/23/23	3.3	legal research [REDACTED for Attorney Work Product Privilege] draft arguments on standard of proof and burden of production	\$650.00	\$2,145.00	C/P, T, R
9/24/23	1.8	draft reply brief on legal interpretation of PUC	\$650.00	\$1,170.00	C/P, T, R
9/25/23	2.8	draft reply brief on background	\$650.00	\$1,820.00	C/P, T, R
9/25/23	1.8	Strategy discussion with Jason Sanders regarding Reply Brief	\$650.00	\$1,170.00	C/P, T, R

9/26/23	0.5	call with Diane Curran re NRC relicensing issue for reply brief	\$650.00	\$325.00	C/P, T, R
9/26/23	0.6	work on reply brief; call with WEM expert Freehling on non duplication of efforts	\$650.00	\$390.00	C/P, T, R
9/26/23	6	analyze evidentiary record for continuing draft and edit reply brief; legal research [Attorney Work Product Privilege]	\$650.00	\$3,900.00	C/P, T, R
9/27/23	1	call with Diane Curran re evidence and analysis for purposes of Reply brief parties' arguments with respect to NRC relicensing and safety Analyze	\$650.00	\$650.00	C/P, T, R
9/27/23	0.3	call with Linda Seeley re factual information needed	\$650.00	\$195.00	C/P, T, R
9/27/23	1.2	work on reply brief legal standard argument	\$650.00	\$780.00	C/P, T, R
9/27/23	2.7	Analyze Rao comments; draft reply on reliability issues; Analyze JS draft section and comment	\$650.00	\$1,755.00	C/P, T, R
9/27/23	0.5	Analyze email and attached docs from Diane Curran re NRC	\$650.00	\$325.00	C/P, T, R
9/27/23	2.9	draft and edit reply brief; legal research; Analyze evidence;	\$650.00	\$1,885.00	C/P, T, R
9/28/23	7.4	review and evaluate JS updated draft and incorporate into master brief; Analyze DCISC reports for incorporation into reply brief; integrate reply brief sections	\$650.00	\$4,810.00	C/P, T, R
9/28/23	4.8	work on integration and editing for space reply brief;	\$650.00	\$3,120.00	C/P, T, R
9/29/23	3.5	edit reply brief all sections	\$650.00	\$2,275.00	C/P, T, R
9/29/23	0.3	Analyze, edit Request for Official Notice; draft email with direction for filing to RA	\$650.00	\$195.00	C/P, T, R
9/29/23	1.5	work on reply brief; revise	\$650.00	\$975.00	C/P, T, R

10/2/23	1.1	strategy meeting with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$715.00	C/P, T, R
10/3/23	0.1	Analyze expert comments on CEC Cost-effectiveness report	\$650.00	\$65.00	C/P, T, R
10/5/23	1.4	call with Peter Bradford re CEC Cost-effectiveness report; call with Mark Cooper re same; draft email to Peter Bradford re follow-up on CEC Cost-Effectiveness Report; call with Matt Freedman at TURN re non duplication	\$650.00	\$910.00	C/P, T, R
10/6/23	0.7	draft comments on Draft CEC Cost-effectiveness Report	\$650.00	\$455.00	C/P, T, R
10/9/23	2.2	prepare comments to CEC cost effectiveness report for filing on CEC docket	\$650.00	\$1,430.00	C/P, T, R
10/10/23	0.1	R&R emails from client [REDACTED for Attorney-Client Privilege]	\$650.00	\$65.00	C/P, T, R
10/23/23	0.4	call with Peter Bird; r&r emails from client re [REDACTED for Attorney-Client Privilege]; draft email to client re Peter Bird conversation	\$650.00	\$260.00	C/P, T, R
10/24/23	1.4	strategy mtg with client and experts	\$650.00	\$910.00	C/P, T, R
10/25/23	0.5	mtg with client and experts re ex parte meetings	\$650.00	\$325.00	C/P, T, R
10/27/23	0.5	mtg with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
10/30/23	0.5	strategy call with client [REDACTED for Attorney-Client Privilege]	\$650.00	\$325.00	C/P, T, R
10/31/23	1.1	mtg with Jason re Proposed Decision timing and preparation for ex parte meetings	\$650.00	\$715.00	C/P, T, R
11/1/23	0.4	call with Rao re Proposed Decision	\$650.00	\$260.00	C/P, T, R
11/7/23	0.1	call with Peter Bird re DCISC	\$650.00	\$65.00	C/P, T, R

11/7/23	0.3	draft email to Rao and Peter Bradford re commenting on Proposed Decision and making proposed recommendations for changes to PD	\$650.00	\$195.00	C/P, T, R
11/7/23	0.6	ex parte meeting with Commissioner Houck's aides	\$650.00	\$390.00	C/P, T, R
11/13/23	2.2	Analyze, comment and edit Proposed Decision comments draft	\$650.00	\$1,430.00	C/P, T, R
11/14/23	5	continue to review, evaluate PD and evaluate evidentiary record for comment commenting on PD and recommendations	\$650.00	\$3,250.00	C/P, T, R
11/15/23	2.1	edit appendix of proposed changes and draft email to JS regarding same	\$650.00	\$1,365.00	C/P, T, R
11/17/23	0.6	ex parte mtg with Commissioner Reynolds office re PD	\$650.00	\$390.00	C/P, T, R
11/17/23	0.2	mtg with Diane Curran, Mark Cooper and Peter Bradford re summary of DCPD costs for purposes of ex parte discussions with Commissioners' offices	\$650.00	\$130.00	C/P, T, R
11/17/23	0.5	Analyze WEM comments on PD; Analyze A4NR comments on PD; Analyze TURN comments on PD for summary for purposes of ex parte meetings with Commissioners	\$650.00	\$325.00	C/P, T, R
12/4/23	0.1	draft email to JS re status of ex parte meetings; draft email to Commissioner Shiroma's staff requesting ex parte meeting	\$650.00	\$65.00	C/P, T, R
12/4/23	0.1	R&R email from Diane Curran on PD and draft email to M Freedman at TURN re non duplication of efforts	\$650.00	\$65.00	C/P, T, R
12/5/23	0.3	R&R various emails from Diane Curran re strategy; Commissioner Shamori's office; draft emails to experts and client advocates re same to schedule; draft email to client advocates about next steps after CPIUC	\$650.00	\$195.00	C/P, T, R
12/8/23	0.6	ex parte meeting with Commissioner Shamira staff re PD	\$650.00	\$390.00	C/P, T, R
12/12/23	0.3	Analyze redlined version of issue revised Proposed Decision; draft email to client and experts re same with summary analysis	\$650.00	\$195.00	C/P, T, R
12/21/23	0.9	call with Peter Bradford and Diane Curran re strategy; potential request for rehearing	\$650.00	\$585.00	C/P, T, R

TOTAL SV 2023 TIME	217.7		TOTAL SV 2023 VALUE	\$ 141,505.00	
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1/4/24	0.8	mtg with client re strategy [REDACTED for Attorney-Client Privilege]	\$685.00	\$548.00	C/P, T, R
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TOTAL SV 2024 TIME	0.8		TOTAL SV 2024 VALUE	\$ 548.00	
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SV TOTAL TIME	218.5		SV TOTAL VALUE	\$ 142,053.00	
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TIME RECORDS FOR ATTORNEY JASON SANDERS

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
2/6/23	0.9	Meet with Sabrina Venskus regarding case	\$535.00	\$481.50	C/P, T, R
2/7/23	3.6	Legal Research and memo [REDACTED for Attorney Work Product Privilege]	\$535.00	\$1,926.00	C/P, T, R
2/24/23	2.3	Analyze EPA complaint filing options, FCWA and CACWA once through cooling provisions, SWRCB OTC policy and amendment and staff report, calendar relevant dates, download latest mitigation fee payment for Diablo	\$535.00	\$1,230.50	C/P, T, R
3/10/23	1.7	Research and draft email to managing attorney re: [REDACTED for Attorney-Client and Work Product Privileges]	\$535.00	\$909.50	C/P, T, R
3/30/23	0.1	Review CPUC website for expert hourly rates	\$535.00	\$53.50	C/P, T, R
3/31/23	2.0	Analyze CEC report, note to file. Analyze Natural Resource Agency's description of actions required under SB 846, note to file.	\$535.00	\$1,070.00	C/P, T, R

4/7/23	1.3	Analyze Scoping Ruling, websites of CSLC, CNRA and CCC to determine status of upcoming hearings	\$535.00	\$695.50	C/P, T, R
4/20/23	0.5	Telephone call with managing attorney [REDACTED for Attorney Work Product Doctrine/Attorney-Client Privilege]	\$535.00	\$267.50	C/P, T, R
4/21/23	0.3	Draft Request addition to service list	\$535.00	\$160.50	C/P, T, R
4/21/23	0.2	receive and review ALJ April 20th ruling and attachments	\$535.00	\$107.00	C/P, T, R
4/21/23	1.7	Draft expert retainer and draft template email explaining retainer and rate selection and upcoming deadlines for expert - send both to SV for review and approval.	\$535.00	\$909.50	C/P, T, R
4/21/23	1.8	Legal research [REDACTED for Attorney Work Product Privielge] draft email to SLOMFP [REDACTED for Attorney-Client Privilege]; draft intro to data request, call with SLOMFP [REDACTED for Attorney-Client Privilege]	\$535.00	\$963.00	C/P, T, R
4/24/23	1.4	Draft expert retainer agreements and emails to experts	\$535.00	\$749.00	C/P, T, R
4/26/23	0.3	Draft correspondence to client [REDACTED for Attorney-Client Privilege] draft emails to other experts regarding retainer.	\$535.00	\$160.50	C/P, T, R
4/27/23	1.1	review and finalize retainers, draft emails to client [REDACTED for Attorney-Client Privilege]	\$535.00	\$588.50	C/P, T, R
4/28/23	1.2	Finalize retainers, call with client re: same, email experts who have not signed retainer. Draft retainer for Peter Bird	\$535.00	\$642.00	C/P, T, R
4/28/23	0.2	receive and review and forward emails from experts to SV	\$535.00	\$107.00	C/P, T, R
4/28/23	0.8	draft data requests	\$535.00	\$428.00	C/P, T, R
5/5/23	0.3	Email Peter Bird re: status of retainer	\$535.00	\$160.50	C/P, T, R

5/5/23	0.4	Review ALJ May 2023 ruling	\$535.00	\$214.00	C/P, T, R
5/8/23	0.2	Revise Bird retainer send to client for approval	\$535.00	\$107.00	C/P, T, R
5/10/23	2.4	Finalize initial draft of Data Request after analyzing Nuclear Intelligence Weekly Article, and A4NR's prior data request in A16-08-006	\$535.00	\$1,284.00	C/P, T, R
5/12/23	0.7	Draft emails to experts providing data request and requesting input on additional requests for documents the expert may need	\$535.00	\$374.50	C/P, T, R
5/19/23	3.7	Finalize data requests (incorporating language from expert suggestions) and send to SV for final review and approval	\$535.00	\$1,979.50	C/P, T, R
6/4/23	2.2	Research and finalize memo [REDACTED for Attorney Work Product Privilege]	\$535.00	\$1,177.00	C/P, T, R
6/7/23	0.8	Complete Notice designating representatives	\$535.00	\$428.00	C/P, T, R
6/12/23	0.8	call with SV [REDACTED for Attorney-Client Privilege]	\$535.00	\$428.00	C/P, T, R
6/12/23	0.4	Analyze and respond to email from PG&E requesting emails and phone numbers for disclosure to setup disclosure of confidential material and provide PG&E with final two expert disclosure certificates	\$535.00	\$214.00	C/P, T, R
6/12/23	1.4	Analyze PG&E responses to data request and note potential responses and identify requests that should be compelled.	\$535.00	\$749.00	C/P, T, R
6/15/23	3.2	Draft additions to Motion to Compel and send to Managing Attorney	\$535.00	\$1,712.00	C/P, T, R
6/16/23	1.9	Make revisions to and proof final version of Motion To Cmpel and draft direction to paralegal; Legal research [REDACTED for Attorney Work Product Privilege]	\$535.00	\$1,016.50	C/P, T, R
6/19/23	0.1	Draft email to experts requesting response as to whether they have been able to access the documents	\$535.00	\$53.50	C/P, T, R

6/20/23	0.3	Draft Data Requests 29-30	\$535.00	\$160.50	C/P, T, R
6/22/23	1.7	Analyze and evaluate PG&E response to Motion to Compel, discuss with SV, email experts	\$535.00	\$909.50	C/P, T, R
6/23/23	4.1	Draft and finalize Reply to PG&E Response to Motion to Compel	\$535.00	\$2,193.50	C/P, T, R
6/26/23	0.3	Calendar requirements set forth in ALJ scoping memo	\$535.00	\$160.50	C/P, T, R
6/28/23	0.3	call with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$160.50	C/P, T, R
6/28/23	0.3	Draft emails to experts re: PG&E data responses to other parties' data requests	\$535.00	\$160.50	C/P, T, R
6/29/23	0.1	call with Sabrina Venskus re: data responses [REDACTED for Attorney-Client Privilege]	\$535.00	\$53.50	C/P, T, R
7/5/23	0.2	call with Sabrina Venskus re: division of labor on reviewing opening testimony of other parties [REDACTED for Attorney-Client Privilege]	\$535.00	\$107.00	C/P, T, R
7/5/23	0.1	Communications with PG&E re: supplemental discovery	\$535.00	\$53.50	C/P, T, R
7/5/23	1.2	review PG&E supplemental response to Data Request	\$535.00	\$642.00	C/P, T, R
7/5/23	0.2	Email to experts re: PG&E supplemental testimony	\$535.00	\$107.00	C/P, T, R
7/5/23	0.9	Analyze Calpine Opening Testimony	\$535.00	\$481.50	C/P, T, R
7/5/23	1.8	Analyze and summarize CGNP opening testimony	\$535.00	\$963.00	C/P, T, R
7/6/23	1.4	Analyze Data Responses, correspond with PG&E about missing records, correspond with experts re: supplemental testimony	\$535.00	\$749.00	C/P, T, R

7/6/23	0.6	Analyze and summarize County of SLO testimony	\$535.00	\$321.00	C/P, T, R
7/6/23	0.6	Communications with experts and managing attorney re: July 3rd data requests	\$535.00	\$321.00	C/P, T, R
7/6/23	1.7	Analyze and summarize GPI opening testimony	\$535.00	\$909.50	C/P, T, R
7/6/23	0.8	Communications with PG&E and Digby Macdonald re: NDA and Data Requests	\$535.00	\$428.00	C/P, T, R
7/6/23	0.2	call with Sabrina Venskus re intervenors' testimony	\$535.00	\$107.00	C/P, T, R
7/7/23	1.2	Finalize Analysis of GPI testimony and then summarize	\$535.00	\$642.00	C/P, T, R
7/7/23	0.8	Analyze and summarize Opening Testimony of PUC public advocates office	\$535.00	\$428.00	C/P, T, R
7/7/23	0.8	Analyze and summarize Small Business Utility Advocates testimony	\$535.00	\$428.00	C/P, T, R
7/7/23	0.7	Analyze UCS+NRDC Testimony and summarize	\$535.00	\$374.50	C/P, T, R
7/7/23	0.6	Edit summaries of testimony	\$535.00	\$321.00	C/P, T, R
7/7/23	1.9	Analyze and summarize PG&E testimony	\$535.00	\$1,016.50	C/P, T, R
7/7/23	0.3	Draft email to expert MacDonald providing expert with relevant testimony and directing expert to analyze certain portions of the testimony to determine if rebuttal is appropriate	\$535.00	\$160.50	C/P, T, R
7/7/23	0.4	Draft email to expert Miranda providing expert with relevant testimony and directing expert to analyze certain portions of the testimony to determine if rebuttal is appropriate	\$535.00	\$214.00	C/P, T, R
7/7/23	0.3	Draft email to expert Bradford providing expert with relevant testimony and directing expert to analyze certain portions of the testimony to determine if rebuttal is appropriate	\$535.00	\$160.50	C/P, T, R

7/7/23	0.4	Draft email to expert Cooper providing expert with relevant testimony and directing expert to analyze certain portions of the testimony to determine if rebuttal is appropriate	\$535.00	\$214.00	C/P, T, R
7/7/23	0.3	Draft email to expert Konidena providing expert with relevant testimony and directing expert to analyze certain portions of the testimony to determine if rebuttal is appropriate	\$535.00	\$160.50	C/P, T, R
7/7/23	0.3	Telephone call with Sabrina Venskus re Cooper testimony	\$535.00	\$160.50	C/P, T, R
7/10/23	1.5	Finalize Cooper corrected testimony	\$535.00	\$802.50	C/P, T, R
7/11/23	0.2	Analyze and respond to email from clients and expert Digby MacDonald re: joint DCISC report	\$535.00	\$107.00	C/P, T, R
7/11/23	1.1	Finalize motion to late file and opening testimony of Dr. Digby Macdonald	\$535.00	\$588.50	C/P, T, R
7/12/23	2.0	Analyze Rao Konidena Testimony	\$535.00	\$1,070.00	C/P, T, R
7/13/23	1.9	Finish analyzing Konidena testimony	\$535.00	\$1,016.50	C/P, T, R
7/13/23	0.7	Draft data request to PG&E 31-35.	\$535.00	\$374.50	C/P, T, R
7/13/23	0.3	call with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$160.50	C/P, T, R
7/14/23	0.1	Phone call to Peter Bird re: receipt of opening testimony and his analysis	\$535.00	\$53.50	C/P, T, R
7/14/23	0.7	Finalize data request nos. 31-37 and serve on PG&E	\$535.00	\$374.50	C/P, T, R
7/14/23	0.2	Analyze and respond to email from expert Mark Cooper re: confidential materials	\$535.00	\$107.00	C/P, T, R
7/14/23	0.6	Further analysis of PUC Public Advocate Office testimony, locate NDAs and submit to office with request to disclose confidential version of tesitmony	\$535.00	\$321.00	C/P, T, R

7/17/23	0.2	Draft emails to PG&E and SCE regarding request for confidential version of PUC Public Advocates Office opening testimony after evaluating PAO's response	\$535.00	\$107.00	C/P, T, R
7/18/23	0.5	Merge NDA and respond to SCE via email requesting copy of confidential version of opening testimony	\$535.00	\$267.50	C/P, T, R
7/18/23	0.5	Analyze confidential opening testimony from Public Advocates' [PG&E version]	\$535.00	\$267.50	C/P, T, R
7/19/23	0.5	Analyze email from managing attorney [Attorney Client Privilege and Attorney Work Product Privilege]	\$535.00	\$267.50	C/P, T, R
7/19/23	0.8	review and respond to email from Diane Curran re: confidentiality of PG&E's document production and provided analysis of the same while specifically addressing the Westinghouse reports	\$535.00	\$428.00	C/P, T, R
7/19/23	0.3	review and respond to email from Expert Peter Bradford about Union for Concerned Scientist + NRDC testimony re: need for review and analysis and impact on SLOMFP's position	\$535.00	\$160.50	C/P, T, R
7/19/23	2.6	review and evaluate opening testimony of GPI, Cal Public Advocates and PG&E re: definition of too high to justify and draft rebuttal on correct statutory interpretation	\$535.00	\$1,391.00	C/P, T, R
7/24/23	0.3	Analyze PG&E data request responses to determine if a motion to compel is required	\$535.00	\$160.50	C/P, T, R
7/24/23	0.7	meeting with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$374.50	C/P, T, R
7/24/23	1.2	Meeting with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$642.00	C/P, T, R
7/25/23	0.1	Contact DCISC and request copy of June 28-June 29 Fact Finding Report	\$535.00	\$53.50	C/P, T, R
7/27/23	0.3	draft verification and draft email re verification to Mark Cooper	\$535.00	\$160.50	C/P, T, R

7/27/23	3.5	Analyze Mark Cooper testimony for citations for confidential information and notate where Cooper must confirm.	\$535.00	\$1,872.50	C/P, T, R
7/27/23	0.3	Analyze Second Supplemental answers from PG&E	\$535.00	\$160.50	C/P, T, R
7/27/23	0.1	call with Sabrina Venskus	\$535.00	\$53.50	C/P, T, R
7/31/23	0.7	Analyze A4NR reply testimony to determine if it should be sent to expert and if so which expert, in preparation for Meet and Confer required by Code and for Request for Evidentiary Hearing	\$535.00	\$374.50	C/P, T, R
7/31/23	0.6	Analyze AReM rebuttal/reply testimony to determine which expert, if any, should analyze for purposes of meet and confer required by code for evidentiary hearing request	\$535.00	\$321.00	C/P, T, R
7/31/23	0.5	Analyze CARE rebuttal testimony to determine which expert, if any, should analyze the testimony for purposes of identifying issues and facts in dispute for meet and confer as required by code and request for evidentiary hearing	\$535.00	\$267.50	C/P, T, R
7/31/23	0.1	Analyze CCCA's rebuttal testimony to determine which, if any, expert should receive the testimony to analyze for disputed issues/facts in preparation for meet and confer as required by code and any request for evidentiary hearing	\$535.00	\$53.50	C/P, T, R
7/31/23	0.2	Analyze CGNP rebuttal testimony to determine which, if any, experts should receive the testimony to analyze for identification of issues and/or facts in dispute as required by the meet and confer process per code and any request for evidentiary hearing	\$535.00	\$107.00	C/P, T, R
7/31/23	0.1	Analyze CUE rebuttal testimony to determine which, if any, expert should receive a copy to analyze to identify disputed issues and facts in preparation for meet and confer as a required by code and any request for evidentiary hearing	\$535.00	\$53.50	C/P, T, R

7/31/23	0.4	Analyze GPI's rebuttal testimony to determine which, if any, experts should receive the testimony in order to identify issues and facts in dispute in preparation for meet and confer as required by code and any request for evidentiary hearing	\$535.00	\$214.00	C/P, T, R
7/31/23	0.3	Analyze PG&E rebuttal testimony to determine which, if any, experts should receive this testimony to identify issues and facts in dispute in preparation for meet and confer as required by code and any request for evidentiary hearing	\$535.00	\$160.50	C/P, T, R
8/1/23	0.4	Analyze Cal Advocates Rebuttal testimony to determine which, if any, expert should receive the testimony to identify issues and facts in dispute in preparation for meet and confer as required by code and any request for evidentiary hearing	\$535.00	\$214.00	C/P, T, R
8/1/23	0.1	Analyze SBUA rebuttal testimony to determine which, if any, expert should receive the testimony to identify issues and facts in dispute in preparation for meet and confer as required by the code and any request for evidentiary hearing	\$535.00	\$53.50	C/P, T, R
8/1/23	0.3	Analyze WEM rebuttal testimony to determine which, if any, expert should receive the testimony to identify issues and facts in dispute in preparation for meet and confer as required by code and any request for evidentiary hearing	\$535.00	\$160.50	C/P, T, R
8/1/23	2.1	Outline and organize rebuttal testimony that needs to be analyzed by the experts	\$535.00	\$1,123.50	C/P, T, R
8/1/23	0.7	Draft example table to be completed by each expert to facilitate their identification of issues in dispute	\$535.00	\$374.50	C/P, T, R
8/1/23	0.4	Draft email to Konidena providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$214.00	C/P, T, R
8/1/23	0.3	Draft email to Cooper providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$160.50	C/P, T, R
8/1/23	0.3	Draft email to Miranda providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$160.50	C/P, T, R

8/1/23	0.3	Draft email to Bird providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$160.50	C/P, T, R
8/1/23	0.4	Draft email to Bradford providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$214.00	C/P, T, R
8/2/23	2.5	Analyze email from Konidena re IRP and Resource Adequacy Allocation, review AREM, PG&E and WEM testimony and draft response email re: issue/facts in dispute	\$535.00	\$1,337.50	C/P, T, R
8/2/23	0.4	Draft email to Macdonald providing rebuttal testimony and explaining process of identifying issues in dispute	\$535.00	\$214.00	C/P, T, R
8/8/23	0.6	Draft Request for Evidentiary Hearing and Briefs	\$535.00	\$321.00	C/P, T, R
8/9/23	1.2	Finish draft of Motion for Evidentiary Hearing and Brief	\$535.00	\$642.00	C/P, T, R
8/10/23	0.4	Analyze recent CPUC Rulings in this proceeding and upload to server	\$535.00	\$214.00	C/P, T, R
8/11/23	0.7	Meeting with Sabrina [REDACTED for Attorney-Client Privilege]	\$535.00	\$374.50	C/P, T, R
8/15/23	0.3	call with Sabrina Venskus re data requests [REDACTED for Attorney-Client Privilege]	\$535.00	\$160.50	C/P, T, R
8/17/23	0.5	Communicate with Daniel Wasserman re: CEC notification and docket, access and review the same and register in preparation of reviewing CEC cost effectiveness report	\$535.00	\$267.50	C/P, T, R
8/17/23	0.1	Communications with Jean Merrigan from WEM regarding non duplication of efforts for evidentiary hearing	\$535.00	\$53.50	C/P, T, R
8/17/23	0.1	Schedule conference call with experts, our office and the client re: evidentiary hearing	\$535.00	\$53.50	C/P, T, R
8/17/23	0.8	Analyze CGNP's amended reply comments and motion to late file to determine if opposition is warranted draft email to managing attorney re: same	\$535.00	\$428.00	C/P, T, R
8/18/23	1.6	Analyze Ruling re: Evidentiary hearing and transmit ruling to experts and requested their availability	\$535.00	\$856.00	C/P, T, R

8/18/23	1.6	Draft proposed witness list	\$535.00	\$856.00	C/P, T, R
8/21/23	0.7	Draft cross-exam list and send to managing attorney for analysis	\$535.00	\$374.50	C/P, T, R
8/21/23	0.7	Coordinate strategy meeting amongst client and experts re: witness lists and discuss the same with managing attorney	\$535.00	\$374.50	C/P, T, R
8/21/23	1.1	Analyze WEM opening testimony in context of email from their expert re: bidirectional charging and battery storage in general to determine whether to raise issue of bidirectional charging during evidentiary hearing	\$535.00	\$588.50	C/P, T, R
8/22/23	0.8	mtg with Sabrina Venskus re [Attorney-Client and work product Privilege]	\$535.00	\$428.00	C/P, T, R
8/22/23	1.1	Meeting with client, expert Bradford, and managing attorney re: Strategy for evidentiary hearing	\$535.00	\$588.50	C/P, T, R
8/22/23	0.1	Draft revisions to Witness List and email to PG&E	\$535.00	\$53.50	C/P, T, R
8/23/23	0.2	Communications with Digby Macdonald re: billing and tracking work for ICOMP purposes	\$535.00	\$107.00	C/P, T, R
8/23/23	4.1	Analyze Data Request Responses by SLOMFP and other parties and identify those to be included on the exhibit list and mark the confidential responses in preparation for further meet and confer with PG&E, forward to managing attorney	\$535.00	\$2,193.50	C/P, T, R
8/23/23	0.3	mtg with Sabrina Venksus [REDACTED for Attorney-Client Privilege]	\$535.00	\$160.50	C/P, T, R
8/24/23	0.2	call with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$107.00	C/P, T, R
8/24/23	0.6	Data request 004 to PG&E re: responses to other parties data requests from June 24, 2023 to present	\$535.00	\$321.00	C/P, T, R
8/24/23	3.6	Work on Opening Briefing	\$535.00	\$1,926.00	C/P, T, R

8/24/23	0.7	Correspond with parties and SLOMFP experts regarding availability for cross-examination, call with managing attorney regarding same.	\$535.00	\$374.50	C/P, T, R
8/28/23	0.2	Draft SLOMFP active participant list	\$535.00	\$107.00	C/P, T, R
8/29/23	3.7	Draft opening brief by analyzing and then incorporating evidence referenced in A4NR's testimony and filings	\$535.00	\$1,979.50	C/P, T, R
8/29/23	1.8	Draft Opening Brief by analyzing and incorporating evidence discussed in Cal Advocates Opening and Rebuttal Brief	\$535.00	\$963.00	C/P, T, R
8/30/23	2.3	Analyze Evidence and Testimony submitted by Cal Advocates and incorporate into Opening Brief	\$535.00	\$1,230.50	C/P, T, R
8/30/23	1.4	Analyze and incorporate TURN testimony and evidence into Opening Brief	\$535.00	\$749.00	C/P, T, R
8/31/23	0.6	develop SLOMFP Cross-examination Exh. 9	\$535.00	\$321.00	C/P, T, R
8/31/23	2.5	Download and Analyze PG&E responses to SLOMFP data requests 38-39 and prepare potential cross-examination exhibits for analysis by relevant experts and managing attorney	\$535.00	\$1,337.50	C/P, T, R
9/1/23	3.1	Prepare and finalize SLOMFP cross-examination exhibits for September 5th Evidentiary Hearing	\$535.00	\$1,658.50	C/P, T, R
9/1/23	0.5	Communications with CPUC and parties regarding schedule for September 5th Evidentiary Hearing	\$535.00	\$267.50	C/P, T, R
9/7/23	0.8	Analyze CPUC and CEC portals for evidence of CEC Cost-Effectiveness Evaluation as the schedule indicates that was to be submitted into the record on 9/1	\$535.00	\$428.00	C/P, T, R
9/11/23	0.7	Strategy meeting on Briefing with co-counsel	\$535.00	\$374.50	C/P, T, R
9/13/23	2.9	Continue research for brief [REDACTED for Attorney Work Product Privilege]	\$535.00	\$1,551.50	C/P, T, R

9/14/23	3.5	Draft prudence/imprudence definition section of opening brief consistent with Peter Bradford testimony	\$535.00	\$1,872.50	C/P, T, R
9/14/23	3.0	Draft subsection pertaining to cost of nuclear power compared with renewables consistent with Mark Cooper testimony	\$535.00	\$1,605.00	C/P, T, R
9/14/23	0.5	Draft subsection pertaining to desired result of dealing with Diablo Canyon vis-a-vis the 100% renewable and clean energy standard	\$535.00	\$267.50	C/P, T, R
9/16/23	5.5	Draft statutory interpretation section and sections on cost-effectiveness, imprudence while locating testimony both in favor and in need of rebuttal with respect to SI OMFP's position on these issues	\$535.00	\$2,942.50	C/P, T, R
9/16/23	6.1	Continuing drafting imprudence, cost-effectiveness and statutory interpretation section	\$535.00	\$3,263.50	C/P, T, R
9/17/23	4.6	Draft Cost Effectiveness, imprudence and too high to justify sections, Analyze corresponding evidence for citation	\$535.00	\$2,461.00	C/P, T, R
9/17/23	4.8	Draft additions to brief with respect to evidentiary citations and arguments in various sections after conferring with managing attorney in division of labor	\$535.00	\$2,568.00	C/P, T, R
9/18/23	3.9	Analyze suggested revisions to reply brief, edit cost effectiveness, imprudence and too high to justify sections	\$535.00	\$2,086.50	C/P, T, R
9/19/23	0.5	meeting with Sabrina Venskus [REDACTED for Attorney-Client Privilege]	\$535.00	\$267.50	C/P, T, R
9/18/23	2.9	Edit Brief Footnotes, add citations to portions of brief	\$535.00	\$1,551.50	C/P, T, R
9/20/23	0.5	Meeting with SV to discuss PG&E Opening Brief	\$535.00	\$267.50	C/P, T, R
9/20/23	0.6	review and evaluate CUE opening brief to determine need for rebuttal	\$535.00	\$321.00	C/P, T, R
9/20/23	0.7	review and evaluate PG&E opening brief to determine need for rebuttal	\$535.00	\$374.50	C/P, T, R
9/20/23	0.5	review and evaluate CaCCA opening brief to determine need for rebuttal	\$535.00	\$267.50	C/P, T, R

9/20/23	0.4	review and evaluate Cal Advocates Opening Brief to determine need for rebuttal	\$535.00	\$214.00	C/P, T, R
9/20/23	0.6	review and evaluate CARE Opening Brief to determine need for rebuttal and areas to buttress SLOMFP argument	\$535.00	\$321.00	C/P, T, R
9/20/23	0.5	review and evaluate CGNP opening brief to determine need for rebuttal	\$535.00	\$267.50	C/P, T, R
9/20/23	0.3	review and evaluate SCE opening brief to determine need for rebuttal	\$535.00	\$160.50	C/P, T, R
9/20/23	0.3	review and evaluate AReM + DCCA opening brief to determine need for rebuttal	\$535.00	\$160.50	C/P, T, R
9/20/23	0.6	review and evaluate SBUA opening brief to determine need for rebuttal	\$535.00	\$321.00	C/P, T, R
9/21/23	0.9	Draft Response to PG&E statement on operation of SB 846 and decision making after 12/31/2023	\$535.00	\$481.50	C/P, T, R
9/25/23	0.2	Analyze email from Diane Curran re: NRC license exemption and respond with further inquires in need of clarification in preparation for drafting reply brief	\$535.00	\$107.00	C/P, T, R
9/25/23	1.8	Strategy discussion with Managing Attorney regarding Reply Brief	\$535.00	\$963.00	C/P, T, R
9/26/23	5.3	Draft Sections of Reply Brief re: Timing of Decision, Cost-Effectiveness, Imprudence.	\$535.00	\$2,835.50	C/P, T, R
9/27/23	1.6	review and annotate CEC Draft Cost Comparison report	\$535.00	\$856.00	C/P, T, R
9/27/23	0.1	Draft email to Expert Konindena and Cooper regarding CEC Draft Report	\$535.00	\$53.50	C/P, T, R
9/27/23	0.1	review and evaluate and comment on Konindena comments on CEC Report	\$535.00	\$53.50	C/P, T, R
9/28/23	0.1	review and respond to email from WEM re prudence	\$535.00	\$53.50	C/P, T, R

9/28/23	3.1	make revisions and additions to Cost Effectiveness/Imprudence Sections of reply brief and add required citations throughout	\$535.00	\$1,658.50	C/P, T, R
9/28/23	1.4	implement additional revisions to Reply Section after comments from managing attorney	\$535.00	\$749.00	C/P, T, R
9/29/23	2.3	proper citations throughout document and locate additional citations to evidence and law at request of managing attorney	\$535.00	\$1,230.50	C/P, T, R
9/29/23	2.1	Edit Request for Official Notice and prepare exhibits and finalize document for service and filing	\$535.00	\$1,123.50	C/P, T, R
9/29/23	1.0	review and identify evidence in record for documentation describing withdrawal schedule modifications requested by PG&E to NRC for use in Reply Brief	\$535.00	\$535.00	C/P, T, R
10/2/23	0.2	review and evaluate GPI Reply Brief	\$535.00	\$107.00	C/P, T, R
10/2/23	0.4	review and evaluate CUE Reply Brief	\$535.00	\$214.00	C/P, T, R
10/2/23	0.2	review and evaluate A4NR Reply Brief	\$535.00	\$107.00	C/P, T, R
10/2/23	0.3	review and evaluate WEM Reply Brief	\$535.00	\$160.50	C/P, T, R
10/2/23	0.2	review and evaluate PG&E Reply Brief	\$535.00	\$107.00	C/P, T, R
10/2/23	0.1	review and evaluate CARE Reply Brief	\$535.00	\$53.50	C/P, T, R
10/2/23	0.2	review and evaluate TURN reply brief	\$535.00	\$107.00	C/P, T, R
10/2/23	0.1	review and evaluate CGNP Reply Brief	\$535.00	\$53.50	C/P, T, R
10/6/23	0.3	Finalize Comments on Draft CEC Report	\$535.00	\$160.50	C/P, T, R

10/9/23	0.3	Summarize CARE reply in preparation for discussion with managing attorney	\$535.00	\$160.50	C/P, T, R
10/10/23	0.2	review ALJ ruling setting oral argument and forward to assistant with direction to upload to server and calendar deadlines	\$535.00	\$107.00	C/P, T, R
10/10/23	0.4	Analyze Comments on CEC report made by RS and note to file	\$535.00	\$214.00	C/P, T, R
10/11/23	1.3	Analyze PG&E application for Modification to Retention Program, Analyze prior decisions on the issue and draft email to managing attorney discussing strategy on whether to participate	\$535.00	\$695.50	C/P, T, R
10/12/23	0.1	Email to ALJ re request to speak during oral argument	\$535.00	\$53.50	C/P, T, R
10/12/23	3.3	Analyze CGNP, CARE, PG&E, CUE and GPI's reply briefs specific sections and re-review for summarization SLOMFP Opening and Reply Brief in preparation for Commission oral comments	\$535.00	\$1,765.50	C/P, T, R
10/25/23	1.7	Legal research [REDACTED for Attorney Work Product Privilege]; phone call with managing attorney, prepare meeting request form for each commissioner and submit	\$535.00	\$909.50	C/P, T, R
10/27/23	0.3	Telephone calls to Commissioner Houck and J. Reynolds office to inquire about meeting request	\$535.00	\$160.50	C/P, T, R
10/30/23	0.3	Draft ex parte notice for November 3 meetings provide to managing attorney for review and approval	\$535.00	\$160.50	C/P, T, R
10/30/23	0.1	Send email re: speaker at November 7 meeting to parties and ALJ, modifying speaker from Venskus to Seeley	\$535.00	\$53.50	C/P, T, R
10/30/23	0.5	Draft CoS and draft emails to service list re: Advanced Notice	\$535.00	\$267.50	C/P, T, R

10/30/23	0.4	Prepare, finalize, file and serve 3 Day Advance Notice of Ex Parte Communication	\$535.00	\$214.00	C/P, T, R
10/30/23	0.1	review and annotate AN4NR's Motion for Official Notice	\$535.00	\$53.50	C/P, T, R
10/30/23	0.1	review A4NR's ex parte communications	\$535.00	\$53.50	C/P, T, R
10/31/23	2.9	Analyze portions of proposed decision re: too high to justify, cost-effectiveness and imprudence and develop subargument outline for comments on those sections	\$535.00	\$1,551.50	C/P, T, R
10/31/23	1.1	Telephone meeting with Managing attorney	\$535.00	\$588.50	C/P, T, R
11/1/23	0.1	Email to managing attorney, Bradford, Seeley and Konidena re: Nov 3rd ex parte meeting.	\$535.00	\$53.50	C/P, T, R
11/1/23	1.7	Legal research re: [Attorney Client Work Product Privilege] in preparation for drafting Comments on Proposed Decision	\$535.00	\$909.50	C/P, T, R
11/2/23	0.9	Draft memo to managing attorney re: [Attorney Client Work Product Privilege]	\$535.00	\$481.50	C/P, T, R
11/2/23	0.8	Correspond with Scheduler for Commissioner Houck regarding meeting, coordinate with team of experts and managing attorney and then draft, file and serve notice	\$535.00	\$428.00	C/P, T, R
11/2/23	0.1	Correspondence with Diane Curran regarding meetings with Commissioners	\$535.00	\$53.50	C/P, T, R
11/2/23	0.7	Draft, file and serve 3 day advance ex parte notice re: meeting with staff for Commissioner Houck	\$535.00	\$374.50	C/P, T, R
11/3/23	0.1	Analyze SB 846 and draft email to managing attorney in preparation for her meeting with commission staff	\$535.00	\$53.50	C/P, T, R
11/3/23	0.3	Correspondence with staff for Commissioner Houck to arrange for meeting	\$535.00	\$160.50	C/P, T, R

11/3/23	0.8	Draft, file and serve Notice of Ex Parte Communication Re: November 3rd meeting and attaching written materials provided during meeting	\$535.00	\$428.00	C/P, T, R
11/6/23	1.1	Complete legal research [REDACTED for Attorney Work Product Privilege] meeting with managing attorney re: same	\$535.00	\$588.50	C/P, T, R
11/7/23	3.8	Analyze relevant portions of proposed decision discussing PUC Section 451, sheppardize case law on PUC 451, and draft Comments raising legal error	\$535.00	\$2,033.00	C/P, T, R
11/7/23	0.8	Draft, file and serve Notice of Ex Parte Communication re: Commissioner Houck Staff	\$535.00	\$428.00	C/P, T, R
11/8/23	1.8	Draft revisions to PUC section 451 comments in comments to proposed decision, identify related FOF of COL that will be challenged	\$535.00	\$963.00	C/P, T, R
11/8/23	3.2	Legal research [REDACTED for Attorney Work Product Privilege] for comments on proposed decision	\$535.00	\$1,712.00	C/P, T, R
11/9/23	2.9	Analyze Peter Bradford comments and suggestions on proposed decision and incorporate to master document and further revise prudence discussion and corresponding proposed changes in master document	\$535.00	\$1,551.50	C/P, T, R
11/13/23	1.4	Legal research [REDACTED for Attorney Work Product Privilege] and draft email summarizing research to managing attorney [REDACTED For Attorney Work Product and Attorney-Client Privileges]	\$535.00	\$749.00	C/P, T, R
11/13/23	0.5	Prepare, file and serve Three Day Advanced Notice of Ex Parte Communication	\$535.00	\$267.50	C/P, T, R
11/16/23	0.7	Analyze A4NR Comments on PD to determine need for reply	\$535.00	\$374.50	C/P, T, R
11/16/23	0.1	Analyze CalCCA comments to determine need for reply	\$535.00	\$53.50	C/P, T, R
11/16/23	0.1	Analyze PG&E proposed comments to determine need for reply	\$535.00	\$53.50	C/P, T, R
11/16/23	0.4	Analyze CGNP comments on PD to determine need for reply/	\$535.00	\$214.00	C/P, T, R

11/16/23	0.2	Analyze CUE and TURN comments to determine need for reply	\$535.00	\$107.00	C/P, T, R
11/16/23	0.2	Analyze SCE & SDGE Comments on PD to determine need for reply	\$535.00	\$107.00	C/P, T, R
11/16/23	0.1	Analyze GPI Comments on PD to determine need for reply	\$535.00	\$53.50	C/P, T, R
11/16/23	0.1	Analyze CASMU Comments on PD to determine need for Reply.	\$535.00	\$53.50	C/P, T, R
11/17/23	0.7	Draft, serve and file Notice of Ex Parte Communication	\$535.00	\$374.50	C/P, T, R
11/20/23	0.1	Email to Chief of Staff for Commissioner Shiroma	\$535.00	\$53.50	C/P, T, R
11/20/23	0.3	Resubmit Notice of Ex Parte Communication at the request of the docket office	\$535.00	\$160.50	C/P, T, R
11/21/23	0.9	Review docket office email and Resubmit Comments on Proposed Decision at request of docket office	\$535.00	\$481.50	C/P, T, R
11/30/23	0.4	Analyze Voting Meeting Recording and determined that DCPD extension item will be held until the December 14th meeting and draft email to managing attorney and client re same	\$535.00	\$214.00	C/P, T, R
12/5/23	0.7	Prepare, file and serve Three Day Advance Notice of Ex Parte Communication re: Commissioner Shiroma's staff.	\$535.00	\$374.50	C/P, T, R
12/6/23	0.4	Analyze CEC 4th Quarter Reliability Planning Assessment and draft email to managing attorney and Konidena re same for purposes of the evidentiary record	\$535.00	\$214.00	C/P, T, R
12/8/23	0.5	Prepare, serve and file Notice of Ex Parte communication re: Staff for Commissioner Shiroma	\$535.00	\$267.50	C/P, T, R
12/8/23	0.3	Analyze email from CPUC, Analyze agenda for December 14th and notice of RSD.	\$535.00	\$160.50	C/P, T, R

12/27/23	2.1	Analyze A4NR ICOMP Proposed Decision and ICOMP request from former Diablo proceeding and formulate and draft email to experts describing level detail required in timekeeping records presumably now required by the CPUC and providing said decision, request and other examples for their review and guidance.	\$535.00	\$1,123.50	C/P, T, R
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TOTAL JS 2023 TIME	244.3		TOTAL JS 2023 VALUE	\$ 130,700.50	
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TIME RECORDS FOR PARALEGAL RACHAEL KIMBALL

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
6/16/23	0.4	Prepare Motion to Compel for efilng; obtain service matrix and prepare certificate of mailing; serve and file with CPUC	\$180.00	\$72.00	C/P, T, R
6/20/23	0.1	Prepare certificate of service and serve PG&E with Data Request No. 29-30	\$180.00	\$18.00	C/P, T, R
6/23/23	0.6	File and serve reply to opp to mt. to compel	\$180.00	\$108.00	C/P, T, R
6/29/23	1	Research and prepare memo on procedure for filing and serving comments and testimony; Analyze scoping memo and rules of practice and procedure	\$180.00	\$180.00	C/P, T, R
7/10/23	0.4	Serve and file corrected testimony	\$180.00	\$72.00	C/P, T, R
7/10/23	0.5	Analyze and prepare COS/MacDonald Testimony for service	\$180.00	\$90.00	C/P, T, R
9/18/23	1.4	Analyze CPUC rules re table of contents and authorities; prepare TOC/TOA; serve and file opening brief	\$180.00	\$252.00	C/P, T, R
9/29/23	2.2	Prepare TOC/TOA for Reply Brief	\$180.00	\$396.00	C/P, T, R

TOTAL RA 2023 TIME	6.6	TOTAL 2023 RA VALUE	\$ 1,188.00
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TIME RECORDS FOR EXPERT DIGBY MACDONALD

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
06/25/23	4.0	Analyze draft DCISC report; review PG&E documents to confirm accuracy and revise	\$378.55	\$ 1,514.20	C/P, T
06/26/23	3.5	Begin preparation of technical background and foundation section.	\$378.55	\$ 1,324.93	C/P, T
06/27/23	4.5	continue preparation of technical background addition	\$378.55	\$ 1,703.48	C/P, T
06/28/23	5.5	continue reviewing documents for DCISC report on Unit 1 PV	\$378.55	\$ 2,082.03	C/P, T
06/30/23	4.2	Continue preparation of technical background addition.	\$378.55	\$ 1,589.91	C/P, T
07/02/23	3.0	Finalize section of technical background and DCISC report	\$378.55	\$ 1,135.65	C/P, T
07/03/23	3.0	conduct further Analysis and editing of the report.	\$378.55	\$ 1,135.65	C/P, T
07/04/23	2.0	Further Analyze and editing of the report.	\$378.55	\$ 757.10	C/P, T
07/05/23	1.5	Finalize the submitted version of the report	\$378.55	\$ 567.83	C/P, T

07/06/23	6.2	Two conference call with SV (Sabrina Venskus), LS (Linda Seely), and GBS (Bruce Severance) and download documents, scan fluence report (WCAP-17299-NP) and analyze technical details.	\$378.55	\$	2,347.01	C/P, T
07/07/23	1.5	Analyze the PG&E document data response (WCAP-17299-NP).	\$378.55	\$	567.83	C/P, T
07/08/23	1.7	Continued Analysis of fluence report (WCAP-17299-NP) and calculations.	\$378.55	\$	643.54	C/P, T
07/09/23	10.5	Literature Analysis on thermal annealing and embrittlement of stainless steels and preparation of expert testimony.	\$378.55	\$	3,974.78	C/P, T
07/09/23	5.2	Continue prepare written testimony, telephone conf. re same with Attorney Jason Sanders and Telephone conversation with RBS.	\$378.55	\$	1,968.46	C/P, T
07/10/23	10.2	preparation of expert testimony and review comments from Venskus	\$378.55	\$	3,861.21	C/P, T
07/17/23	4.5	strategy meeting with attorney Venskus/Curran and SLOMFP. Update DCISC letter and review additional documents	\$378.55	\$	1,703.48	C/P, T
07/19/23	7.0	Phone call with DC,review and respond to significant email correspondence, download DCPD Safety Evaluation, begin analysis.	\$378.55	\$	2,649.85	C/P, T
07/20/23	4.0	Phone call with DC. Analysis of fluence calculations by PG&E (WCAP-17299-NP), evaluate PG&E responses to SLOMFP's data requests. Phone call with Attorney Curran regarding questions about expert testimony; continue analysis of PG&E documents	\$378.55	\$	1,514.20	C/P, T
07/21/23	1.0	Submit opinions to attorneys, Analyze emails and documents from DC and GBS, perform analysis of PG&E data	\$378.55	\$	378.55	C/P, T
07/22/23	3.0	Telephone discussions with GBS, Analyze RG 1.99 and 10 CFR Part 50 and appendices and provide opinion.	\$378.55	\$	1,135.65	C/P, T

07/25/23	0.5	Analyze GBS's arguments on PG&E errors.	\$378.55	\$	189.28	C/P, T
07/29/23	8.5	Analysis of WCPA-17462-NP, Unit 1 Reactor Vessel Embrittlement NRC Analysis History of 12/14/2016, 10 CFR Part 50.61a and provide opinion.	\$378.55	\$	3,217.68	C/P, T
TOTAL 2023 TIME	95.00		TOTAL 2023 VALUE	\$	35,962.25	

TIME RECORDS FOR EXPERT PETER BRADFORD

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
5/3/23	1.7	Prepare my testimony on imprudence of decision to extend life of Diablo Canyon	\$378.55	\$	643.54 C/P
5/3/23	1.2	Prepare note for Sabrina Venskus on prudence of decision to extend DC operation topic as presented in SB846	\$378.55	\$	454.26 C/P
5/13/23	1.2	Analysis of PG&E data request responses relevant to preparation of my testimony	\$378.55	\$	454.26 C/P
5/17/23	0.5	Telcon with Diane Curran regarding scope of her possible CALPUC testimony as to cost implications of NRC proceedings	\$378.55	\$	189.28 C/P
5/18/23	1.7	telcom w. Sabrina Venskus re embrittlement costs, research as to possible metallurgy expert witness for PUC proceeding	\$378.55	\$	643.54 C/P
5/20/23	1	Prepare my testimony on prudence of decision to extend Diablo Canyon operating life	\$378.55	\$	378.55 C/P
5/24/23	1	Analyze and comment on Sam Miranda testimony on potential economic impact of embrittlement issues	\$378.55	\$	378.55 C/P

5/27/23	1.50	Prepare my testimony on prudence of decision to extend Diablo Canyon operating life	\$378.55	\$	567.83	C/P
5/31/23	1.7	Prepare my testimony on prudence of decision to extend Diablo Canyon operating life	\$378.55	\$	643.54	C/P
6/1/23	1	Analyze of Miranda testimony on embrittlement, telcon with Diane Curran, Sabrina Venskus re Miranda testimony	\$378.55	\$	378.55	C/P
6/2/23	1	Prepare my testimony on prudence of decision to extend Diablo Canyon operation	\$378.55	\$	378.55	C/P
6/4/23	0.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	264.99	C/P
6/10/23	1.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	643.54	C/P
6/11/23	1	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	378.55	C/P
6/16/23	1	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	378.55	C/P
6/17/23	1	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	378.55	C/P
6/18/23	2	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	757.10	C/P
6/20/23	2.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	1,022.09	C/P

6/21/23	0.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	264.99	C/P
6/22/23	1.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	643.54	C/P
6/23/23	3.2	Analyze PG&E data responses, assist Jason Sanders as to PG&E positions on federal preemption and the loan agreement	\$378.55	\$	1,211.36	C/P
6/24/23	2.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	1,022.09	C/P
6/25/23	3.5	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	1,324.93	C/P
6/26/23	6	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	2,271.30	C/P
6/27/23	4	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	1,514.20	C/P
6/28/23	8.5	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	3,217.68	C/P
6/29/23	3.7	Prepare my testimony on imprudence of the decision to extend Diablo Canyon operation	\$378.55	\$	1,400.64	C/P
7/3/23	0.5	Discussions of potential rebuttal prudence PUC testimony with Sabrina Veskus and Jason Sanders	\$378.55	\$	189.28	C/P
7/8/23	1	Discussion of MacDonald PUC testimony on pressure vessel toughness with Diane Curran, Sabrina Venskus	\$378.55	\$	378.55	C/P

7/14/23	2	Prepare draft of rebuttal PUC testimony on prudence testimony	\$378.55	\$	757.10	C/P
7/19/23	3	Analyze filed testimony of PG&E, A4NR and other parties, prepare memo for Sabrina Venskus and Jason Sanders regarding opinions	\$378.55	\$	1,135.65	C/P
8/4/23	2.2	Analyze rebuttal testimony of all parties and assist with statement of issues for Jason Sanders	\$378.55	\$	832.81	C/P
8/22/23	1	Strategy call as to cross examination of PG&E witnesses with Sabrina Venskus	\$378.55	\$	378.55	C/P
8/30/23	4.5	Assistance and memoranda for Sabrina Venskus in preparing for Cross-examination of PG&E witnesses	\$378.55	\$	1,703.48	C/P
9/4/23	0.7	Assistance to Sabrina Venskus with cross-examination of Rhett Kikuyama	\$378.55	\$	264.99	C/P
9/17/23	0.7	Assistance to Sabrina Venskus regarding the prudence aspects of SLOMFP brief	\$378.55	\$	264.99	C/P
9/26/23	3	Assistance to Sabrina Venskus on prudence and economic aspects of reply brief	\$378.55	\$	1,135.65	C/P
9/27/23	1.5	Assistance to Sabrina Venskus on prudence and economic aspects of reply brief	\$378.55	\$	567.83	C/P
9/28/23	3	Assistance to Sabrina Venskus on prudence and economic aspects of reply brief	\$378.55	\$	1,135.65	C/P
10/4/23	2.5	Correspondence with Sabrina Venskus on economic ways that the draft CEC report is not what SB846 requires for the PUC proceeding	\$378.55	\$	946.38	C/P

10/30/23	1.7	Comments for Sabrina Venskus on PUC Proposed Decision	\$378.55	\$	643.54	C/P
11/1/23	1.2	Preparation for meetings with PUC commissioners staff - Nick Dahlberg and Kourtney Vaccaro to present prudence aspects of SLOMPF case	\$378.55	\$	454.26	C/P
11/2/23	1	Preparation for meetings with PUC commissioners staff - Nick Dahlberg and Kourtney Vaccaro to present prudence aspects of SLOMPF case	\$378.55	\$	378.55	C/P
11/3/23	2.7	Preparation and meetings with PUC commissioners staff - Nick Dahlberg and Kourtney Vaccaro to present prudence aspects of SLOMPF case	\$378.55	\$	1,022.09	C/P
11/7/23	1	Preparation for meetings with PUC commissioners staff - Amanda Singh and Victor SMith to present prudence aspects of SLOMPF case	\$378.55	\$	378.55	C/P
11/9/23	0.5	Preparation of proposed changes to proposed decision for Sabrina Venskus	\$378.55	\$	189.28	C/P
11/10/23	0.5	continue preparation of proposed changes to proposed decision for Sabrina Venskus	\$378.55	\$	189.28	C/P
11/17/23	2	conitnue preparation of proposed changes to proposed decision for Sabrina Venskus	\$378.55	\$	757.10	C/P

TOTAL 2023 TIME	93.8		TOTAL 2023 VALUE	\$	35,507.99	
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TIME RECORDS FOR EXPERT RAO KONIDENA

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
4/26/23	0.5	Rao Konidena call with Peter Bradford discussing the scope of Konidena testimony	\$378.55	\$	189.28 R

4/27/23	2	Rao Konidena prepared outline of Konidena testimony	\$378.55	\$	757.10	R
4/28/23	2.5	Rao Konidena read March CEC report + continued working on Konidena testimony outline	\$378.55	\$	946.38	R
4/29/23	3	Rao Konidena gathered Sources for footnotes in the Konidena testimony outline	\$378.55	\$	1,135.65	R
5/5/23	1.5	Rao Konidena gathered Sources for footnotes in the Konidena testimony outline	\$378.55	\$	567.83	R
5/6/23	3	Konidena Draft testimony - section A - Reliability Issues with and without DCP	\$378.55	\$	1,135.65	R
5/7/23	1.5	Konidena Draft testimony - section A - Reliability Issues with and without DCP	\$378.55	\$	567.83	R
5/8/23	1.5	Konidena Draft testimony - section B - CAISO Operating Reserves Requirements Study Proposal	\$378.55	\$	567.83	R
5/9/23	1	Konidena Draft testimony - section B - CAISO Operating Reserves Requirements Study Proposal	\$378.55	\$	378.55	R
5/10/23	3	Konidena Draft testimony - section B - CAISO Operating Reserves Requirements Study Proposal + Sabrina call w Konidena to discuss Konidena testimony	\$378.55	\$	1,135.65	R
5/11/23	4	Decision links to Konidena testimony (e.g. imports don't count towards DCP replacement capacity, restrictions on energy storage projects towards Net Qualifying Capacity, IOUs speeding up transmission interconnections	\$378.55	\$	1,514.20	R
5/12/23	2	Decision links to Konidena testimony (e.g. imports don't count towards DCP replacement capacity, restrictions on energy storage projects towards Net Qualifying Capacity, IOUs speeding up transmission interconnections for renewables, long lead time resource restrictions, sensitivity case for	\$378.55	\$	757.10	R

5/13/23	2	Rao Konidena prepared technical SLOMFP data request to PG&E	\$378.55	\$	757.10	R
5/14/23	2	Rao Konidena wrote contingency reserves explainer in Section A - Reliability Issues with and without DCP	\$378.55	\$	757.10	R
5/17/23	1	Rao Konidena wrote contingency reserves explainer in Section A - Reliability Issues with and without DCP	\$378.55	\$	378.55	R
5/21/23	2	Konidena Draft testimony - section D - Continued Operation of DCP comes at the expense of Zero Carbon alternatives	\$378.55	\$	757.10	R
5/23/23	0.5	Konidena Draft testimony - section D - Continued Operation of DCP comes at the expense of Zero Carbon alternatives - curtailment data	\$378.55	\$	189.28	R
5/26/23	2	Added CEC's March 2023 report - Attachment D to the ALJ's April 20, 2023 Ruling - link to Sections of Konidena testimony	\$378.55	\$	757.10	R
5/31/23	2	revise Konidena testimony	\$378.55	\$	757.10	R
6/5/23	2	Rao Konidena Read and summarised May Joint Agency report	\$378.55	\$	757.10	R
6/13/23	2.5	Rao Konidena wrote contingency reserves explainer in Section A - Reliability Issues with and without DCP	\$378.55	\$	946.38	R
6/14/23	3.5	Rao Konidena edits to the draft Konidena testimony	\$378.55	\$	1,324.93	R
6/15/23	0.5	Konidena Summarised Relevance for SLOMFP data request to PG&E	\$378.55	\$	189.28	R

6/19/23	1.5	Konidena research on Helms pumped storage for testimony - Reliability Issues with and without DCP	\$378.55	\$	567.83	R
6/21/23	0.5	Rao Konidena Slide for SLOMFP meeting presentation	\$378.55	\$	189.28	R
6/23/23	1.5	Rao Konidena analysis of PG&E data responses and review and evaluate Mark Cooper chapter	\$378.55	\$	567.83	R
6/25/23	0.7	Konidena Research on Helms pumped storage - Reliability Issues with and without DCP	\$378.55	\$	264.99	R
6/26/23	2	Rao Konidena Prep for SLOMFP call for Rep mtg	\$378.55	\$	757.10	R
6/27/23	0.5	SLOMFP mtg	\$378.55	\$	189.28	R
6/28/23	0.5	Rao Konidena presentation finalization	\$378.55	\$	189.28	R
7/8/23	0.7	Rao Konidena reviewing rebuttal testimony	\$378.55	\$	264.99	R
7/10/23	1.5	Rao Konidena reviewing rebuttal testimony	\$378.55	\$	567.83	R
7/14/23	1	Rao Konidena reviewing rebuttal testimony	\$378.55	\$	378.55	R
8/2/23	1.5	Facts in Dispute email and review	\$378.55	\$	567.83	R

8/29/23	0.5	Rao Konidena summary for Joint Agency Third Quaterly Report	\$378.55	\$	189.28	R
8/31/23	1	Rao Konidena Call with Attorney regarding Opening Brief Prep	\$378.55	\$	378.55	R
9/1/23	3.5	Prepare SLOMFP Attorney for Cross Exam Technical Reliability Exhibits	\$378.55	\$	1,324.93	R
9/16/23	1.5	Prepare technical materials for SLOMFP Opening Brief	\$378.55	\$	567.83	R
9/17/23	3	Prepare technical materials for SLOMFP Opening Brief	\$378.55	\$	1,135.65	R
9/24/23	3.5	Prepare technical materials for SLOMFP Reply brief	\$378.55	\$	1,324.93	R
9/27/23	2.5	Rao Konidena written Comments on Draft CEC staff Report	\$378.55	\$	946.38	R
10/24/23	2	Rao Konidena Prep for presentation	\$378.55	\$	757.10	R
10/30/23	2	Rao Konidena Analysis of Proposed Decision	\$378.55	\$	757.10	R
11/3/23	0.5	ex parte meeting - Nick Dahlberg (Energy Advisor for President Busching Reynolds) and Kourtney Vaccaro (Chief of Staff for Commissioner Douglas).	\$378.55	\$	189.28	R
11/7/23	0.5	ex parte meeting with Amanda Singh, Deputy Chief of Staff and Victor Smith, Advisor, for Commissioner Darcie L. Houck	\$378.55	\$	189.28	R

11/7/23	1	Q+ Konidena redlines to the PD	\$378.55	\$	378.55	R
11/8/23	5.5	Konidena redlines to the PD + SLOMFP mtg	\$378.55	\$	2,082.03	R
11/11/23	3.5	Konidena redlines to the PD	\$378.55	\$	1,324.93	R
11/12/23	1	Konidena redlines to the PD	\$378.55	\$	378.55	R
11/14/23	1	Konidena redlines to the PD	\$378.55	\$	378.55	R
11/15/23	3	Konidena redline edits to the PD - revise	\$378.55	\$	1,135.65	R
11/17/23	0.5	Konidena presentation at ex parte meeting with Jake McDermott, Carolyn Chen - Advisors to Comm Reynolds	\$378.55	\$	189.28	R
12/4/23	2	Rao Konidena draft email re WEM Freehling's comments, and Peter's emails about DR and Opr Reserves	\$378.55	\$	757.10	R
12/6/23	1.5	Rao Konidena Updated presentation based on Joint Agency 4th qtr report	\$378.55	\$	567.83	R
12/7/23	1.5	Rao Konidena updates to Konidena analysis based on Joint Agency 4th Qtr report	\$378.55	\$	567.83	R
12/8/23	0.5	Konidena presentation at ex parte meeting with Ritta Mersa, Aide to Commissioner Genevieve Shiroma	\$378.55	\$	189.28	R

TOTAL 2023 TIME	98.9		TOTAL 2023 VALUE	\$	37,438.60
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TIME RECORDS FOR EXPERT SAMUEL MIRANDA

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
6/1/23	4	Preparation of opening testimony on cost of deferred maintenance and aging equipment, including teleconference with Sabrina Venskus, Diane Curran and Peter Bradford	\$378.55	\$ 1,514.20	T
6/29/23	4	Preparation of opening testimony on cost of deferred maintenance and aging equipment	\$378.55	\$ 1,514.20	T
6/30/23	4	Preparation of opening testimony on cost of deferred maintenance and aging equipment	\$378.55	\$ 1,514.20	T
7/6/23	1	Zoom meeting with Linda Seeley and Jill Zamek re: expected costs of extended operations based on cost of deferred maintenance and aging equipment to inform discussion of strategy and need for supplemental testimony and/or reply testimony	\$378.55	\$ 378.55	T
7/7/23	1	Zoom meeting with Sabrina Venskus, Digby Macdonald re cost of aging components and deferred maintenance to inform discussion of strategy and need for supplemental testimony and/or reply testimony	\$378.55	\$ 378.55	T
7/7/23	4	Analyze Comment to the Diablo Canyon Independent Safety Committee Regarding Discrepancies in Reported Fracture Toughness Test Results for DCP Unit 1" to inform discussion of cost of aging components and deferred maintenance	\$378.55	\$ 1,514.20	T

7/10/23	4	Draft data requests for submittal by Venskus & Assoc. to PG&E on issue of deferred mainteance and aging components	\$378.55	\$	1,514.20	T
7/11/23	4	Draft additional data requests for submittal by Venskus & Assoc. to PG&E on issue of deferred mainteance and aging components	\$378.55	\$	1,514.20	T
7/14/23	2	Draft additional data requests for submittal by Venskus & Assoc. to PG&E on issue of cost of deferred mainteance and aging components	\$378.55	\$	757.10	T
7/20/23	4	Analyze PG&E's Data Responses to SLOMFP_003 to inform strategy on the issue of costs of deferred mainteance and aging components	\$378.55	\$	1,514.20	T
8/4/23	2	Draft list of issues/facts in dispute for SLOMFP's request for briefing and evidentiary hearing	\$378.55	\$	757.10	T

TOTAL 2023 TIME	34		TOTAL 2023 VALUE	\$	12,870.70	
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TIME RECORDS FOR EXPERT MARK COOPER

Date	Hours	Description	Rate (\$)	Billable (\$)	User
4/24/23	0.5	Analyze litreature on macroeconomics of electrical systems for incorporation into and referenced in opening testimony	\$378.55	\$	189.28 C/P
4/25/23	0.5	Analyze litreature on resource adequacey for incorporation into and which are referenced in opening testimony	\$378.55	\$	189.28 C/P

4/26/23	1	Continue analysis of literature on resource adequacy for incorporation into and which are referenced in opening testimony	\$378.55	\$	378.55	C/P
4/27/23	0.5	Analyze literature on clean energy scenarios and related costs for incorporation into and which are referenced in opening testimony	\$378.55	\$	189.28	C/P
4/28/23	1	Analyze literature on system reliability and related costs thereof for incorporation into and which are referenced in opening testimony	\$378.55	\$	378.55	C/P
5/1/23	0.5	Analyze literature on cost of energy resources for incorporation into and which are referenced in opening testimony	\$378.55	\$	189.28	C/P
5/2/23	1	Continued analysis of literature on cost of energy resources for incorporation into and which are referenced in opening testimony	\$378.55	\$	378.55	C/P
5/5/23	1	Prepared Cost analysis detailing long-term, short-term, projected and system costs and related attachments for opening testimony on issues of costs of extended operations versus clean, renewable energy	\$378.55	\$	378.55	C/P
5/5/23	1.50	Drafted Chapter 2 of testimony re: the Cost of Electricity detailing estimates of short-term costs, other components of costs such as energy efficiency and the levelized avoided cost of electricity.	\$378.55	\$	567.83	C/P
5/8/23	0.50	Work on Chapter 3 of testimony re: subsidies needed to offset high cost of nuclear power and describing the cost of operating aging nuclear reactors like Diablo.	\$378.55	\$	189.28	C/P
5/8/23	1.00	Continued work on Chapter 3 of testimony describing costs of conflict between nuclear crowding out of renewable energy resources.	\$378.55	\$	378.55	C/P
5/8/23	1.50	Work on Chapter 4 of testimony explaining supply adequacy and the related components of efficiency, demand management and renewable sources with storage.	\$378.55	\$	567.83	C/P
5/9/23	0.50	Continued work on Chapter 4 of testimony by describing demand management and renewable sources with storage.	\$378.55	\$	189.28	C/P

5/9/23	2.50	Work on Chapter 5 describing the low-cost 21st Century Electric System for opening testimony, including analysis of literature referenced therein	\$378.55	\$	946.38	C/P
5/10/23	2.50	Continue work on Chapter 5 describing the low-cost 21st Century Electric System for opening testimony, including analysis of literature referenced therein	\$378.55	\$	946.38	C/P
5/10/23	1.50	Continue work on Chapter 5 describing the low-cost 21st Century Electric System for opening testimony, including analysis of literature referenced therein	\$378.55	\$	567.83	C/P
5/11/23	4.00	Work on Chapter 1 as Introduction to Opening Testimony and opinions summarizes chapters thus far	\$378.55	\$	1,514.20	C/P
5/12/23	4.00	Compile and/or prepare attachments referenced in opening testimony thus far	\$378.55	\$	1,514.20	C/P
5/15/23	1.50	Revisions to Chapter 2 of testimony re: the Cost of Electricity detailing estimates of short-term costs, other components of costs such as enegery efficiency and the levelized avodied cost of electricity.	\$378.55	\$	567.83	C/P
5/15/23	1.50	Revisions to Chapter 4 of testimony explaining supply adequacy and the releated components of efficiency, demand management and renewable sources with storage.	\$378.55	\$	567.83	C/P
5/16/23	5.50	Work on Chapter 6 of opening testimony explaining reliability issue with nuclear power at Diablo Cayon, including additional research and analysis of literature referenced therein	\$378.55	\$	2,082.03	C/P
5/17/23	5.50	Revise Draft Opening Testimony and provide attorney for SLOMFP	\$378.55	\$	2,082.03	C/P
6/9/23	3.40	Analyze PG&E's Prepared May Testimony	\$378.55	\$	1,287.07	C/P
6/13/23	1.50	Draft Conclusions and recommendaitons for Cooper Opening Testimony	\$378.55	\$	567.83	C/P

6/13/23	2.50	Continue preparing and/or compiling of attachments to Opening Testimony	\$378.55	\$	946.38	C/P
6/13/23	4.50	Revisions to Chapters 3-4 of Opening Testimony	\$378.55	\$	1,703.48	C/P
6/14/23	6.10	Revisions to Chapters 1, 2 and 5-6 of Opening Testimony	\$378.55	\$	2,309.16	C/P
6/22/23	2.90	Make additions and revisions to attachments to Opening Testimony	\$378.55	\$	1,097.80	C/P
6/22/23	1.80	Further analysis of PG&E's May Testimony	\$378.55	\$	681.39	C/P
6/22/23	5.10	Continue work on Opening Testimony by making further revisions, deletions and additions	\$378.55	\$	1,930.61	C/P
6/26/23	3.70	Continue work on Opening Testimony by making further revisions, deletions and additions	\$378.55	\$	1,400.64	C/P
6/27/23	2.60	Work on finalizing Opening Testimony	\$378.55	\$	984.23	C/P
6/28/23	3.70	Continue work on finalizing Opening Testimony	\$378.55	\$	1,400.64	C/P
6/29/23	4.50	Analyze responses to PG&E data requests concerning costs of extended operations	\$378.55	\$	1,703.48	C/P
6/29/23	4.20	Continue work on finalizing Opening Testimony	\$378.55	\$	1,589.91	C/P

6/30/23	2	Finalize Opening Testimony on issues of cost operating aging nuclear power plant such as Diablo and costs of alternative, clean and renewable energy sources	\$378.55	\$	757.10	C/P
7/6/23	3.2	Further analysis of PG&E data request concerning costs of extended operations	\$378.55	\$	1,211.36	C/P
7/6/23	2.5	Draft corrections to Opening Testimony to make correct references to certain attachments.	\$378.55	\$	946.38	C/P
7/9/23	0.5	Analyze corrected Opening Testimony and provide to SLOMFP and attorney for SLOMFP	\$378.55	\$	189.28	C/P
7/11/23	2	Analyze A4NR's Opening Testimony for incorporation into Rebuttal	\$378.55	\$	757.10	C/P
7/12/23	2	Analyze Cal Advocates' Opening Testimony for Incorporation in Rebuttal and points of support	\$378.55	\$	757.10	C/P
7/13/23	1.3	Analyze WEM Opening Testimony for incorporation into Rebuttal as a point of support	\$378.55	\$	492.12	C/P
7/14/23	2.7	Analyze PG&E's June Opening Testimony for Incorporation into Rebuttal and to address points of contention	\$378.55	\$	1,022.09	C/P
7/15/23	1.5	Analyze CNGP's Opening Testimony for incorporation into Rebuttal and to address points of contention	\$378.55	\$	567.83	C/P
7/17/23	2.3	Analyze GPI's Opening Testimony for incorporation into Rebuttal and to address points of contention	\$378.55	\$	870.67	C/P
7/18/23	2	Analyze CCUE's Opening Testimony for incorporation into Rebuttal and to address points of contention	\$378.55	\$	757.10	C/P

7/19/23	2	Analyze Union of Concerned Scientists and NRDC's Opening Testimony for incorporation to Rebuttal	\$378.55	\$	757.10	C/P
7/20/23	3.6	work on Draft of Rebuttal testimony addressing opening testimony; analysis on issues of the economics of diablo canyon , the availability of alternatives and a realistic view of system reliability in the context of cost savings	\$378.55	\$	1,362.78	C/P
7/21/23	0.8	Compile and/or prepare attachments to Rebuttal testimony	\$378.55	\$	302.84	C/P
7/25/23	0.8	Work on finalizing rebuttal testimony and attachments	\$378.55	\$	302.84	C/P
7/26/23	3.6	Finalize rebuttal testimony and attachments	\$378.55	\$	1,362.78	C/P
9/1/23	0.7	Analyze further responses to data requests from PG&E on issue of costs of extended operations	\$378.55	\$	264.99	C/P
9/5/23	2	Attend Evidentiary Hearing for consultation on framing questions in response to testimony	\$378.55	\$	757.10	C/P

TOTAL 2023 TIME	121.5		TOTAL 2023 VALUE	\$	45,993.83	
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TIME RECORDS FOR GEORGE PETER BIRD

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
5/7/23	0.7	Reading email & attachments from Jason Sanders.	\$378.55	\$ 264.99	T
5/8/23	1.0	Draft version 1 of my Testimony to CPUC	\$378.55	\$ 378.55	T
5/10/23	1.4	respond to Sabrina Venskus; analyze IPRP meeting	\$378.55	\$ 529.97	T
5/11/23	1.5	edit Testimony; review 2015 PSHA (or SSC) in NRC/WBA	\$378.55	\$ 567.83	T
5/11/23	1.5	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$ 567.83	T
5/12/23	0.7	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$ 264.99	T
5/12/23	0.8	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$ 302.84	T
5/13/23	2.4	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$ 908.52	T

5/13/23	1.0	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$	378.55	T
5/14/23	0.5	revise draft Testimony to reflect contents of long SSC Report	\$378.55	\$	189.28	T
5/15/23	0.9	clarify para. 13f; send to LS & SV	\$378.55	\$	340.70	T
5/15/23	1.0	revise Testimony based on comments from SV	\$378.55	\$	378.55	T
5/16/23	1.7	consider, reject missing-Qal argument for thrust under DCP	\$378.55	\$	643.54	T
5/16/23	1.0	check Hardebeck2013 & Nishenko2018; accept vert. Shoreline fault	\$378.55	\$	378.55	T
5/17/23	0.6	research, discuss similar models of Nitchman, and of Hamilton	\$378.55	\$	227.13	T
6/29/23	1.0	final edits to CPUC Testimony	\$378.55	\$	378.55	T
8/2/23	1.7	draft issues/facts rebuttal table for Jason	\$378.55	\$	643.54	T
9/1/23	1.2	advise Sabrina Venskus on possible cross-ex of PG&E	\$378.55	\$	454.26	T
9/1/23	0.6	call with Sabrina Venskus; answered her questions	\$378.55	\$	227.13	T
9/2/23	0.9	read and comment on 6 discovery responses from PG&E	\$378.55	\$	340.70	T
9/5/23	1.0	appear for cross-X in Evidentiary Hearing, w/Sabrina	\$378.55	\$	378.55	T
9/14/23	3.5	attend DCISC meeting and comment/question	\$378.55	\$	1,324.93	T
9/17/23	0.9	Analyze A4NR testimony & exhibits from Linda	\$378.55	\$	340.70	T
10/9/23	1.3	review testimony on seismic related issues and costs	\$378.55	\$	492.12	T
11/9/23	1.6	attend IPRP meeting (via MS Teams) and comment	\$378.55	\$	605.68	T
TOTAL 2023 TIME	30.40		TOTAL 2023 VALUE	\$	11,507.92	

TIME RECORDS FOR EXPERT DIANE CURRAN

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
6/1/23	1.5	Teleconference with Sabrina Venskus, Peter Bradford, Samuel Miranda regarding strategy on testimony for costs of extended operations	\$378.55	\$	567.83 C/P, T
6/8/23	1	Analyze Sam Miranda testimony on issues of cost of extended operations; comment on testimony, and respond to Sabrina Venskus comments and provide analysis of cost of PG&E compliance with federal regulations and procedure	\$378.55	\$	378.55 C/P, T

TOTAL 2023 TIME	2.5		TOTAL 2023 VALUE	\$	946.38
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TIME RECORDS FOR JILL ZAMEK

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
3.13.2023	0.5	Conference call with attorney Sabrina Venskus and Mothers for Peace (MFP) board members re retention	\$125.00	\$ 62.50	C/P. T. R
4.3.2023	1	Strategy discussion with Sabrina Venskus and MFP board members	\$125.00	\$ 125.00	C/P. T. R
4.10.2023	0.5	Zoom conversation with seismologist Peter Bird re potential testimony in this proceeding.	\$125.00	\$ 62.50	C/P. T. R
4.24.2023	0.3	call with Sabrina Venskus re scoping memo	\$125.00	\$ 37.50	C/P. T. R
6.13.2023	1.5	Attended CPUC workshop; a discussion by parties	\$125.00	\$ 187.50	C/P. T. R
6.27.2023	0.6	mtg with Sabrina Venskus, Linda Seeley, and Jane Swanson re: preparations and work assignments for testimony	\$125.00	\$ 75.00	C/P. T. R
6.27.2023	1.5	Communication with Ms. Venskus and MFP board members on data collection for testimony; research on CPUC and DCISC websites	\$125.00	\$ 187.50	C/P. T. R
6.28.2023	2.5	Reading and research for testimony of experts re: projected maintenace and capital projects and costs.	\$125.00	\$ 312.50	C/P. T. R
6.29.2023	6	Continued research and documentation for testimony of experts; communication with Arnie Gundersen re: projected mainteance and capital projects and costs with follow up conversation with Sabrina Venskus and Linda Seeley re same.	\$125.00	\$ 750.00	C/P. T. R

7.6.2023	0.7	Phone conversation with Sabrina Venskus and MFP board members	\$125.00	\$	87.50	C/P. T. R
7.12.2023	0.7	mtg with Sabrina Venskus, Linda Seeley, Jane Swanson, and Diane Curran, Esq. to discuss testimony	\$125.00	\$	87.50	C/P. T. R
7.16.2023	0.7	Reading and research for testimony of experts re: Costs of cooling tower compliance expanded fuel storage and feed water heaters	\$125.00	\$	87.50	C/P. T. R
7.17.2023	2	mtg with Digby Macdonald (MFP expert), and Diane Curran (attorney) re: Costs for cooling towers, expanded fuel storage, feed water heaters	\$125.00	\$	250.00	C/P. T. R
8.22.2023	1	mtg with Sabrina Venskus, Diane Curran, Peter Bird, Linda Seeley, Jason Sanders re: aging components and deferred mainteance	\$125.00	\$	125.00	C/P. T. R
9.5.2023	2	attend evidentiary hearing	\$125.00	\$	250.00	C/P. T. R
9.11.2023	1.2	mtg with Sabrina Venskus, Diane Curran, MFP board members to set strategy	\$125.00	\$	150.00	C/P. T. R
9.14.2023	1	Reviewed July's CEC workshop and provided notes to Sabrina Venskus regarding salient points	\$125.00	\$	125.00	C/P. T. R
10.2.2023	1	mtg with Sabrina Venskus, Diane Curran, MFP board members re: next procedural steps in CPUC process	\$125.00	\$	125.00	C/P. T. R
10.10.2023	0.5	Read CEC Reply comments	\$125.00	\$	62.50	C/P. T. R
12.14.2023	3	Attended CPUC meeting	\$125.00	\$	375.00	C/P. T. R

TOTAL 2023 TIME	28.2	TOTAL 2023 VALUE	\$	3,525.00
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TIME RECORDS FOR LINDA SEELEY

Date	Hours	Description	Rate (\$)	Billable (\$)	Issue
3/27/23	1.3	Planning and strategy meeting with Sabrina Venskus	\$125.00	\$ 162.50	C/P, T, R
4/24/23	3.3	Research on costs associated with aging components and deferred mainteance, analyze NRC website regarding same.	\$125.00	\$ 412.50	C/P, T, R
4/25/23	4	Additional research on costs associated with aging reactors and deferred mainteance with analysis of NRC reporting on aging components.	\$125.00	\$ 500.00	C/P, T, R
4/27/23	4	Analyze documentation re: costs of seismic threats. Phone call w Peter Bird re NRC and PG&E reports on seismic issues.	\$125.00	\$ 500.00	C/P, T, R
5/1/23	5.5	Analyze Westinghouse reports for hazards analysis and past seismic documents on NRC website in contenxt of costs of deferred mainteance and upgrades.	\$125.00	\$ 687.50	C/P, T, R
5/3/23	3	Phone calls, analyze articles and draft emails to marine bioligists as potential expert witnesses on costs of marine impacts of extended operations.	\$125.00	\$ 375.00	C/P, T, R
5/4/23	3	Phone calls/marine biologist expert to opine on costs of extended operations	\$125.00	\$ 375.00	C/P, T, R
5/9/23	2	IPRP meetig re seismic issues. Discussed Peter Bird's report.	\$125.00	\$ 250.00	C/P, T, R
5/15/23	1	strategy meeting with Sabrina Venskus re strategy	\$125.00	\$ 125.00	C/P, T, R

5/15/23	3	Research State Lands Commission to determine potential issue of cost of compliance with agency regulations. Phone call to SLC office re: same.	\$125.00	\$	375.00	C/P, T, R
5/15/23	2	Phone with Mark Cooper; draft emails to potential marine/Once through cooling environmental and financial cost experts	\$125.00	\$	250.00	C/P, T, R
5/16/23	1	mtg with Sabrina Venskus re strategy and evidence	\$125.00	\$	125.00	C/P, T, R
5/18/23	3.5	Research on NRC documents on pressurized thermal shock to inform participation on cost of extended operations from an aging component and deferred maintenance perspective.	\$125.00	\$	437.50	C/P, T, R
5/22/23	1	Strategy meeting with Sabrina Venskus re research	\$125.00	\$	125.00	C/P, T, R
5/22/23	2	Analyze DCISC documents regarding aging components and deferred maintenance in the context of cost for extended operations.	\$125.00	\$	250.00	C/P, T, R
5/24/23	3	Additional research on pressurized thermal shock to inform strategy on cost of extended operations from an aging component and deferred maintenance perspective. Review and distribute scholarly articles.	\$125.00	\$	375.00	C/P, T, R
6/13/23	2	Attend CPUC workshop.	\$125.00	\$	250.00	C/P, T, R
6/13/23	3	Analyze DCISC document, contact P. Bird and D. Macdonald regarding testimony of MacDonald.	\$125.00	\$	375.00	C/P, T, R
6/20/23	1.5	Phone call to Dr. Macdonald re expert witness services	\$125.00	\$	187.50	C/P, T, R
6/26/23	1	Phone call Dr. Macdonald to discuss aging component and deferred maintenance issues	\$125.00	\$	125.00	C/P, T, R

6/28/23	0.6	Phone call with Sabrina Venskus and Jill ZamEk re [Attorney-Client Priv]	\$125.00	\$	75.00	C/P, T, R
6/29/23	3	Research projected costs of deferred maintenance	\$125.00	\$	375.00	C/P, T, R
6/29/23	8	Additional research projected costs of deferred maintenance.	\$125.00	\$	1,000.00	C/P, T, R
7/6/23	1.5	Meet with attorney and expert witnesses re: deferred mainteance and aging components.	\$125.00	\$	187.50	C/P, T, R
7/6/23	2	Meet with expert witness re aging components and deferred mainteance.	\$125.00	\$	250.00	C/P, T, R
7/12/23	0.7	phone meeting with Sabrina Venskus [Attorney-Client Priv].	\$125.00	\$	87.50	C/P, T, R
9/14/23	5	Attend DCISC meeting avila beach to obtain information on aging components and deferred mainteance, seismic issues.	\$125.00	\$	625.00	C/P, T, R
9/15/23	2	Assist sabrina venskus with factual research for brief	\$125.00	\$	250.00	C/P, T, R
9/18/23	5	Assist sabrina venskus with factual research for brief	\$125.00	\$	625.00	C/P, T, R
9/27/23	4	Assist sabrina venskus with factual research for brief	\$125.00	\$	500.00	C/P, T, R
9/29/23	3.5	Research DCISC and IPRP websites for reports on issues of seismic upgrades, deferred mainteance and aging components.	\$125.00	\$	437.50	C/P, T, R

10/22/23	0.5	Phone call with Sabrina Venskus re next needs for assistance with case	\$125.00	\$	62.50	C/P, T, R
10/23/23	1.5	Strategy meeting with Sabrina Venskus and experts re: strategy and talking points for ex parte meetings	\$125.00	\$	187.50	C/P, T, R
11/7/23	4.5	attend and oral argument at CPUC Meeting SF	\$125.00	\$	562.50	C/P, T, R
11/17/23	0.5	attend and present at ex parte Meeting with Advisor for Commissioner Alice Reynolds.	\$125.00	\$	62.50	C/P, T, R
TOTAL 2023 TIME	92.4		TOTAL 2023 VALUE	\$	11,550.00	

TOTAL HOURS ON SUB ISSUES	1066.10		TOTAL VALUE ON SUB ISSUES	\$	469,244.16	
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TIME DISTRIBUTION BY ISSUE

**Cost-Effectiveness/
Prudence = C/P**

**489.1 or
46%**

156.4 [V&A] + 40.2 [Advocate] + 76 [80% of Macdonald] + 93.8 [Bradford] + 121.5 [Cooper] + 1.25 [50% of Curran] = 489.15

**Too High to
Justify = T**

**281.2 or
26%**

156.4 [V&A] + 40.2 [Advocate] + 19 [20% of Macdonald] + 34 [Miranda] + 30.4 [Bird] + 1.25 [50% of Curran] = 281.25

Reliability = R

295.8 or
28%

$156.4 \text{ [V\&A]} + 40.2 \text{ [Advocate]} + 98.9 \text{ [Konidena]} = 295.51$

V&A Total	469.4
Advocate Total	120.6
MacDonald	95
Bradford	93.8
Konidena	98.9
Miranda	34
Cooper	121.5
Bird	30.4
Curran	2.5
Total Hours	1066.1

ICOMP PREPARATION TIME RECORDS OF SABRINA VENKSUS

Date	Hours	Description	Rate (\$)	Billable (\$)	User
4/13/23	0.3	review and comment on draft NOI; draft email to JS re direction	\$325.00	\$97.50	Sabrina Venskus
4/14/23	0.6	review and edit NOI and draft email to client re same, with direction	\$325.00	\$195.00	Sabrina Venskus
4/17/23	0.7	conf call with Diane Curran and Peter Bradford and Jason Sanders re NOI and strategy and timing	\$325.00	\$227.50	Sabrina Venskus

TOTAL SV 2023			TOTAL SV 2023		
ICOMP TIME	1.6		ICOMP VALUE	\$	520.00

2/11/24	1.5	review and edit draft ICOMP claim	\$342.50	\$	513.75	Sabrina Venskus
2/12/24	0.5	call with Jason re [REDACTED for atty-client privilege]	\$342.50	\$	171.25	Sabrina Venskus
		review timeslips for atty client privilege and work product privilege and confidential information	\$342.50			Sabrina Venskus
2/12/24	1.5	subject to protective order		\$	513.75	
		review CPUC manual on intervenor compensation re breaking out categories to ensure that CPUC properly	\$342.50			Sabrina Venskus
2/12/24	0.2	compensates SLOMFP intervenor		\$	68.50	
		review timeslips for privilege and redact where necessary; draft enail to Jason Sanders re timesheets and next steps and division of labor of ICOMP prep	\$342.50			Sabrina Venskus
2/12/24	2.5			\$	856.25	
		review, comment, and/or edit justifications for SLOMFP representatives -- 10 individuals	\$342.50			Sabrina Venskus
2/12/24	0.6	(10 total attachments)		\$	205.50	
2/13/24	2.3	Review ICOMP Claim Form, add additional detail	\$342.50	\$	787.75	Sabrina Venskus
2/13/24	0.2	review and approve all ICOMP documents for submittal	\$342.50		68.50	Sabrina Venskus

TOTAL SV 2024			TOTAL SV 2024		
ICOMP TIME	9.3		ICOMP VALUE	\$	3,185.25

ICOMP PREPARATION TIME RECORDS FOR RACHAEL ANDREWS [KIMBALL]

Date	Hours	Description	Rate (\$)	Billable (\$)	User
4/17/23	0.7	Prepare Notice of Intent for filing with CPUC, convert all documents for filing; prepare service list from CPUC list; file and serve	\$90.00	\$63.00	Rachael Andrews [Kimball]

TOTAL RA 2023			TOTAL RA 2023		
ICOMP TIME	0.7		ICOMP VALUE	\$61.20	

ICOMP PREPARATION TIME RECORDS FOR JASON SANDERS

Date	Hours	Description	Rate (\$)	Billable (\$)	User
4/7/23	4.4	Prepare NOI	\$267.50	\$1,177.00	Jason Sanders
4/11/23	1.6	Analyze events in proceeding and estimate time spent on each issue re: NOI	\$267.50	\$428.00	Jason Sanders
4/13/23	2.8	Revise draft NOI and send to managing attorney	\$267.50	\$749.00	Jason Sanders
4/17/23	0.3	Telephone call with Diane, Peter and SV re: NOI	\$267.50	\$80.25	Jason Sanders
4/17/23	1.1	Finalize and revise NOI and prepare for filing	\$267.50	\$294.25	Jason Sanders

TOTAL JS 2023			TOTAL JS 2023		
ICOMP TIME	10.2		ICOMP VALUE	\$2,728.50	

1/5/24	0.4	Curran	\$280.00	\$112.00	Jason Sanders
Send email requesting timesheets and detail required in time entries to Linda Seeley, Jill ZaMeki and Diane					

		ICOMP claim preparation - complete sections A and B and perform rate calculations for [annual step increase for Sabrina Venskus and Jason Sanders time keepers] and outline response to substantial			
2/2/24	2.4	contribution section.	\$280.00	\$672.00	Jason Sanders
		Draft Justification Attachment for Expert Digby			
2/2/24	0.5	Macdonald	\$280.00	\$140.00	Jason Sanders
		Draft justification attachment for expert Peter			
2/2/24	0.6	Bradford for ICOMP Claim	\$280.00	\$168.00	Jason Sanders
		Draft justification attachment for Rao Konidena for			
2/2/24	0.4	ICOMP Claim Request	\$280.00	\$112.00	Jason Sanders
		Draft rate justifications for Mark Cooper, Diane			
2/6/24	1.8	Curran and Linda Seeley	\$280.00	\$504.00	Jason Sanders
2/7/24	0.6	Draft justification for Expert Samuel Miranda	\$280.00	\$168.00	Jason Sanders
		Combine and format timsheets from 7 experts and 2 advocates and import and format timesheets from			
2/8/24	3.7	V&A consisting of three timekeepers	\$280.00	\$1,036.00	Jason Sanders
		Draft substantial contribution and duplicaiton			
2/8/24	1.8	sections	\$280.00	\$504.00	Jason Sanders
2/8/24	0.9	Calculate percentage of time spent per issue	\$280.00	\$252.00	Jason Sanders
2/9/24	2	Review calcualtions for accuracy	\$280.00	\$560.00	Jason Sanders
		Review ICOMP Claim, justifications and submit to			
2/11/24	1	Sabrina Venskus	\$280.00	\$280.00	Jason Sanders
		Additional work on Substantial Justification and Reasonableness components ressubmit to Sabrina			
2/12/24	1.9	Venskus	\$280.00	\$532.00	Jason Sanders
2/13/24	2.7	Finalze ICOMP documents.	\$280.00	\$756.00	Jason Sanders

TOTAL JS 2024

ICOMP TIME

20.7

TOTAL JS 2024

ICOMP VALUE

\$5,796.00

GRAND TOTAL OF MOTHERS FOR PEACE ICOMP PREPARATION TIME		42.5	GRAND TOTAL OF VALUE FOR ICOMP PREPARATION TIME		\$ 12,290.95
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