



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

06/25/24
09:11 AM
R1807003

Order Instituting Rulemaking To Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	Rulemaking 18-07-003 (Filed July 12, 2018)
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INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK

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

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 19-06-023, 19-08-007, 21-11-029, 22-01-025, 22-06-034
Claimed: \$44,882.50	Awarded: \$
Assigned Commissioner: John Reynolds	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: <u> /s/ </u>	
Date: June 25, 2024	Printed Name: Matthew Freedman

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

A. Brief description of Decision:	<p><u>D.19-06-023</u> Implements the procurement quantity requirements for the California renewables portfolio standard program for years beginning in 2021 that are revised by Senate Bill 100 (De León).</p> <p><u>D.19-08-007</u> Enforces California’s Renewables Portfolio Standard (RPS)1</p>
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	<p>program rules by imposing fines on two entities for failing to comply with certain program requirements and denying the entities' request for waiver of penalties. The two entities are Liberty Power Holdings, LLC (Liberty Power) and Gexa Energy, California LLC (Gexa).</p> <p><u>D.21-11-029</u> Revises the confidentiality matrix for RPS procurement records adopted in Decision 06-06-066. The new rules shorten the confidentiality period for energy and capacity forecast data used in RPS compliance and procurement reporting from four to three years. The energy and capacity forecast data will be confidential two years into the future, and the current year or the year of filing instead of three years into the future and one year in the past.</p> <p><u>D.22-01-025</u> Enforces California's Renewables Portfolio Standard (RPS)¹ program compliance rules against Gexa Energy California LLC's (Gexa) non-compliance with mandatory reporting requirements of its contract's standard terms and conditions.</p> <p><u>D.22-06-034</u> Approves the Joint Motion filed by PG&E, SCE and SDG&E and adopts specific rules governing the Voluntary Allocation and Market Offer process including the Product Content Category classification of both allocated contracts and subsequent resales.</p>
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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:	09/24/2018	
2. Other specified date for NOI:		
3. Date NOI filed:	10/04/2018	
4. Was the NOI timely filed?		

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

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:	I.15-08-019	
6. Date of ALJ ruling:	11/08/2017	
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:	I.15-08-019	
10. Date of ALJ ruling:	11/08/2017	
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.24-05-038	
14. Date of issuance of Final Order or Decision:	06/04/2024	
15. File date of compensation request:	06/25/2024	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
1	Decision 24-05-038 closes the proceeding. Pursuant to Commission Rule 17.3, an intervenor may file a request for compensation “no later than 60 days after the issuance of the decision closing the proceeding.”	

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
1. RPS ENFORCEMENT / 2011-2013 WAIVER REQUESTS TURN opposed the motions of Gexa Energy, Liberty Power and Direct Energy for waivers from RPS compliance requirements and relief from proposed penalties. In response to Liberty Power, TURN noted the failure to conduct any renewable procurement in 2011 and 2012, the unreasonable refusal to consider PCC 1 products, and	<u>TURN response to motions of Gexa, Liberty, and Direct Energy, R.15-05-005, February 26, 2018</u>	

<p>the lack of any demonstration that all reasonable actions to achieve compliance were taken. In response to Gexa, TURN argued that its 3-year contract does not satisfy the long-term contracting requirement, that efforts to claim this agreement as long-term violate §399.14(b) and D.12-06-038, and that Gexa misrepresented the requirements applicable to Load Serving Entities in their first year of providing retail service.</p> <p>With respect to Liberty Power, the Decision found that the failure to engage in timely procurement “as TURN notes” (page 9), along with its refusal to consider PCC 1 products and unilateral conditions on PCC 2 resources, resulted in a shortfall that “was not beyond its control.” (page 11) Based on these facts, the Decision denies the penalty waiver.</p> <p>With respect to Gexa Energy, the Decision found that Gexa’s procurement contract was a 3 year agreement that “did not satisfy the long term contracting requirements of the RPS statute” (page 17) and is better characterized as a short-term contract. The Decision also found that Gexa incorrectly interpreted the requirements of D.12-06-038 with respect to the applicability of long-term contracting requirements to new market entrants.</p>	<p><u>D.19-08-007, pages 8-11</u></p> <p><u>D. 19-08-007, pages 17-24</u></p>	
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<p>2. RPS ENFORCEMENT / 2014-2016 WAIVER REQUEST</p> <p>TURN argued that the Commission should reject Gexa’s waiver request. TURN explained that Gexa’s procurement contract was not a valid long-term commitment and any defects could not be cured through retroactive amendments made approximately four years after the contract was executed and three years after the conclusion of the relevant RPS compliance period.</p> <p>The Decision upheld a penalty for non-compliance on Gexa. Although the Decision held that Gexa had a valid long-term contract, it agreed with TURN that “we do not accept retroactive contract amendments as a basis for establishing that a contract complies with applicable requirements.” (page 14)</p>	<p><u>Comments of TURN and CUE, April 2, 2020.</u></p> <p><u>D. 22-01-025, page 10.</u></p>	
<p>3. SB100 / Procurement Quantities</p> <p>TURN urged the Commission to revise RPS procurement quantities beginning in 2021 using the new SB 100 target (60% by 2030) and applying the straight-line trend methodology that has previously been adopted.</p> <p>The Decision affirms the use of the existing “straight-line” trend method for the new procurement quantity</p>	<p><u>TURN opening comments on ALJ Ruling Requesting Comment on Implementation of Elements of SB 100, February 28, 2019</u></p> <p><u>D.19-06-023, pages 4-6.</u></p>	

<p>requirements between 2021 and 2030, noting that “as TURN points out, SB 100 only increases the RPS targets for each compliance period without making any changes to the structure of the program.” (page 5)</p>		
<p>4. CONFIDENTIALITY / Electric Service Providers</p> <p>TURN argued that, contrary to the claims of Electric Service Providers (ESP), efforts by the Commission to require greater public disclosure of ESP procurement contract information are not constrained by the California Public Records Act, the Contracts Clause of the US Constitution, or the Dormant Commerce Clause. TURN provided substantial legal analysis in support of these arguments.</p> <p>The Decision agrees with TURN and <u>rejects</u> various claims that greater public disclosure of ESP RPS procurement contract data is barred by the California Public Records Act, the Contracts Clause of the US Constitution, or the Dormant Commerce Clause.</p>	<p><u>TURN reply comments on Assigned Commissioner Ruling Requesting Comments on Staff Proposal, April 17, 2020, pages 8-19</u></p> <p><u>D.21-11-029, pages 18-25.</u></p>	
<p>5. CONFIDENTIALITY / Pricing Information</p> <p>TURN urged the Commission to adopt the Staff Proposal for rapid disclosure of pricing information for RPS contracts executed by an IOU, CCA or ESP. TURN also argued that the Commission is not required to seek guidance from the</p>	<p><u>TURN opening comments on Assigned Commissioner Ruling Requesting Comments on Staff Proposal, April 17, 2020, pages 1-2, 5-7</u></p> <p><u>TURN reply comments on Assigned Commissioner Ruling Requesting</u></p>	

<p>Legislature prior to modifying confidentiality rules. TURN further asserted that requiring public disclose of contract pricing does not constitute the direct regulation of Electric Service Provider rates or terms of service.</p> <p>The Decision adopts accelerated timelines for the public disclosure of RPS contract pricing by all LSEs (18 months after contract execution or Commission approval). In doing so, the Decision states “we agree with TURN that the Commission is not required to seek affirmative guidance from the legislature before modifying its confidentiality rules, and the legislature delegates this power to the Commission.” (pages 47-48) The Decision further rejects the claim that requiring pricing disclosure from ESPs constitutes impermissible rate regulation (page 47).</p>	<p><u>Comments on Staff Proposal, April 17, 2020, pages 6-7, 10-11</u></p> <p><u>D.21-11-029, pages 46-48.</u></p>	
<p>6. VOLUNTARY ALLOCATION AND MARKET OFFER PROCESS / Treatment of Resales</p> <p>TURN opposed allowing contracts assigned to other LSEs through the Voluntary Allocation and Market Offer (VAMO) process to retain the Product Content Category (PCC) of the original transaction executed by the IOU. If the Commission were to find that allocations under VAMO retain their original PCC classification, TURN</p>	<p><u>Response of TURN and CUE to the Joint Motion of SCE, PG&E, and SDG&E to Amend Scoping Memorandum to Accommodate Voluntary Allocation Structure, December 23, 2021</u></p> <p><u>Comments of TURN on ALJ Ruling Seeking Comments on Voluntary Allocations of Renewables Portfolio Standard Resources and Portfolio</u></p>	

<p>urged the Commission to find that any subsequent transfer of the resource to another entity would be characterized as a resale and subject to the requirements adopted in D.11-12-052, D.12-06-038, D.17-06-026 and D.18-05-026.</p> <p>While the Decision finds that the initial transfer of resources under VAMO does not alter their PCC classification, the Decision agrees that “any subsequent transfer for Voluntary Allocation shares are resales” for purposes of determining their Product Content Category classification consistent with D.11-12-052 and other relevant prior decisions.</p>	<p><u>Content Category Issues, April 28, 2022, pages 4-5</u></p> <p><u>D.22-06-034, pages 14-15</u></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?	Yes	
c. If so, provide name of other parties: Coalition of California Utility Employees, Green Power Institute, Defenders of Wildlife		
d. Intervenor’s claim of non-duplication: TURN’s positions did not consistently align with any other intervenor including parties representing small customer interests across the five separate decisions identified in this compensation request. TURN coordinated with the Coalition of California Utility Employees on several pleadings in this proceeding relating to Enforcement due to an alignment of interests and the ability to minimize duplication. TURN took care to only address selected issues in order to minimize any overlap or duplication. Moreover, TURN’s participation in this proceeding was targeted and reflected the minimum number of hours necessary to contribute on key issues over the seven-year duration of this proceeding. To the extent that any duplication occurred, it was unavoidable due to the nature of the process and the array of issues identified as within the scope of the proceeding. TURN worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion
1	The motion for compliance waivers filed by Gexa Energy, Liberty and Direct Energy was submitted in R.15-02-020. The	

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

	<p>resolution of this motion was not resolved in R.15-02-020 but was transferred to R.18-07-003. Order Instituting Rulemaking 18-07-003 identifies the scope as including “remaining issues from R.15-02-020” including “completing the waiver determinations from Compliance Period 1.” (pages 6-7) The referenced issues were resolved in D.19-08-007 which notes that “while the pleadings at issue were filed in the predecessor proceeding, Rulemaking 15-02-020, that proceeding is closed and this proceeding is the successor.” (page 2) Because TURN recorded a number of hours relating to this issue in R.15-02-020, those hours are properly included in this compensation request.</p>	
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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>As demonstrated in the substantial contribution section, TURN’s participation had a material impact on the outcome of five separate decisions in this proceeding. TURN’s contributions include the following:</p> <ul style="list-style-type: none"> • Supporting strong enforcement actions to penalize noncompliance with RPS requirements by several Electric Service Providers (ESPs) • Acceleration of RPS procurement targets between 2021-2030 using the linear trend method consistent with the direction provided in SB 100. • Successfully defending and supporting the Commission’s efforts to update confidentiality rules in a manner that promotes transparency and greater public disclosure of RPS procurement information by all Load Serving Entities. • Ensuring that the Voluntary Allocation and Market Offer process does not undermine the goals and purposes of the Product Content Category classification system. <p>Given these specific contributions, and the small number of hours devoted to this proceeding, the benefits associated with TURN’s participation far exceed the cost of TURN’s participation in this proceeding. TURN’s claim should be found to be reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted the minimum number of hours to reviewing rulings, drafting pleadings, reading comments submitted by other parties, and evaluating the proposed decisions. TURN’s pleadings were highly substantive given the amount of time devoted to the task.</p> <p>Reasonableness of Staffing</p> <p><u>Matthew Freedman</u></p> <p>TURN’s lead attorney was Matthew Freedman. Mr. Freedman participated in the prehearing conference and other meetings, drafted all formal pleadings and developed TURN’s positions on all issues in the case. The use of a single TURN staff member to handle the entire proceeding</p>	

<p>significantly reduced the number of total hours required to participate on issues of interest to TURN.</p> <p><u>Compensation Request</u></p> <p>TURN’s request also includes 9.5 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category (note that the numbers do not equal 100% due to rounding).</p> <p>General Participation (GP) – 4.75 hours – 5.8% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing the initial OIR, rulings and proposed decisions, drafting of comments on the OIR, reviewing comments submitted by other parties, and attendance at the Commission workshop (via Webex).</p> <p>Evidentiary Hearing (EH) – 1.5 hours – 1.8% of total</p> <p>Work relating to preparation for, and attendance at, the prehearing conference.</p> <p>RPS Enforcement (ENFORCEMENT) – 38.25 hours – 46.7% of total</p> <p>Work relating to the requests for RPS compliance waivers for the 2011-2013 and 2014-2016 compliance periods by several Electric Service Providers. These requests were addressed in D.19-08-007 and D.22-01-025.</p> <p>RPS Confidentiality Updates (CONFIDENTIALITY) – 24.00 hours – 29.3% of total</p> <p>Work relating to updates to the confidentiality rules applicable to the RPS program adopted in D.21-11-029.</p> <p>SB 100 Implementation (SB100) – 4.5 hours – 5.5% of total</p> <p>Work relating to the implementation of new RPS procurement quantity targets between 2021 and 2030 pursuant to the new requirements enacted in SB 100 (DeLeón, 2018). The Commission adopted the revised targets in D.19-06-023.</p> <p>Voluntary Allocation and Market Offer (VAMO) – 9 hours – 11% of total</p>	

<p>Work related to the determination of RPS Product Content Category rules applicable under the Voluntary Allocation and Market Offer process. The Commission adopted these changes in D.22-06-034.</p> <p>Compensation – 9.5 hours Time spent on the preparation of compensation-related pleadings.</p> <p>-----</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman	2018	16.25	\$435	D.18-04-020	\$7,068.75			
Matthew Freedman	2019	5.25	\$445	D.19-10-013	\$2,336.25			
Matthew Freedman	2020	35.25	\$455	D.20-10-022	\$16,038.75			
Matthew Freedman	2021	10.5	\$625	D.22-03-028	\$6,562.50			
Matthew Freedman	2022	14.75	\$645	D.23-04-054	\$9,513.75			
<i>Subtotal: 41,520.00</i>						<i>Subtotal: \$</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$

Matthew Freedman	2018	1	\$217.5	50% of 2018 rate	\$217.50			
Matthew Freedman	2024	8.5	\$370	50% of 2023 rate approved in D.23-10-013 + 4.1% (Res. ALJ-393, 2023 COLA)	\$3,145.00			
Subtotal: \$3,362.50						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
Subtotal: \$0						Subtotal: \$		
TOTAL REQUEST: \$44,882.50						TOTAL AWARD: \$		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matthew Freedman	March 29, 2001	214812	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	TURN Hours Allocated by Issue

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

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

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

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

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. The Utility Reform Network [has/has not] made a substantial contribution to D.19-06-023, D.19-08-007, D.21-11-029, D.22-01-025, and D.22-06-034
2. The requested hourly rates for The Utility Reform Network’s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

1. THE UTILITY REFORM NETWORK shall be awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay The Utility Reform Network total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of The Utility Reform Network’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.19-06-023, D.19-08-007, D.21-11-029, D.22-01-025, D.22-06-034		
Proceeding(s):	R.18-07-003		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	06/25/24	\$44,882.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	435	2018	
Matthew	Freedman	Attorney	445	2019	
Matthew	Freedman	Attorney	455	2020	
Matthew	Freedman	Attorney	625	2021	
Matthew	Freedman	Attorney	740	2024	

(END OF APPENDIX)

Attachment 1
Certificate of Service

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

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

Revised October 2018

Attachment 2

Timesheets for TURN Attorneys/Experts

Atty	Case #	Code	Description	Date	Time
Matthew Freedman	R18-07-003	Enforcement	Review of Gexa, Direct request for RPS waiver	2/20/18	0.75
Matthew Freedman	R18-07-003	Enforcement	Review of Liberty, Direct and Gexa motions for procurement waivers; drafting TURN response to waiver motions	2/25/18	2.75
Matthew Freedman	R18-07-003	Enforcement	Drafting of TURN response to motions for RPS procurement waivers, review of responses filed by other parties	2/26/18	3.50
Matthew Freedman	R18-07-003	Enforcement	Review of replies by Gexa, Direct, and Liberty Power to TURN response to waiver requests	3/8/18	0.50
Matthew Freedman	R18-07-003	GP	Review of OIR	8/13/18	0.50
Matthew Freedman	R18-07-003	GP	Drafting TURN comments on issues to be included in OIR	8/13/18	1.75
Matthew Freedman	R18-07-003	GP	Review of messages to service list	9/5/18	0.25
Matthew Freedman	R18-07-003	GP	Review of ALJ ruling on ELCC/TOD/Project Viability issues	9/12/18	0.25
Matthew Freedman	R18-07-003	EH	Preparation for PHC	9/24/18	0.50
Matthew Freedman	R18-07-003	EH	Attendance at PHC	9/24/18	1.00
Matthew Freedman	R18-07-003	Comp	Drafting of compensation NOI	10/3/18	1.00
Matthew Freedman	R18-07-003	GP	Review of scoping ruling	11/9/18	0.25
Matthew Freedman	R18-07-003	Enforcement	Review of RPS contract data re: PCC2 eligibility; call w/CPUC ED staff re: PCC2 issues	11/20/18	2.50
Matthew Freedman	R18-07-003	Enforcement	Review of selected RPS compliance reports, communication w/ED staff re: concerns	12/13/18	1.75
Matthew Freedman	R18-07-003	SB100	Review of ALJ ruling re: SB 100 implementation, review of prior Decisions and SB 100 text, drafting of TURN opening	2/26/19	1.50
Matthew Freedman	R18-07-003	SB100	Final edits to TURN comments on SB 100 implementation issues	2/27/19	0.50
Matthew Freedman	R18-07-003	SB100	Review of opening comments on SB 100 implementation submitted by other parties	2/28/19	1.25
Matthew Freedman	R18-07-003	SB100	Review of reply comments on SB 100 targets filed by other parties	3/12/19	0.50
Matthew Freedman	R18-07-003	SB100	Review of SB 100 Proposed Decision	5/23/19	0.50
Matthew Freedman	R18-07-003	SB100	Review of opening comments on SB 100 implementation PD submitted by other parties	6/11/19	0.25
Matthew Freedman	R18-07-003	Enforcement	Initial review of PD on RPS enforcement	7/3/19	0.50
Matthew Freedman	R18-07-003	Enforcement	Review of opening comments on RPS enforcement PD	7/23/19	0.25
Matthew Freedman	R18-07-003	Enforcement	Review of Gexa motion for waiver of RPS penalties	1/8/20	1.00
Matthew Freedman	R18-07-003	Enforcement	Drafting of TURN/CUE joint response to Gexa motion for waiver	1/9/20	2.25
Matthew Freedman	R18-07-003	Enforcement	Drafting TURN/CUE response to Gexa waiver request, TURN/CUE motion to accept late-filed response	1/23/20	2.25
Matthew Freedman	R18-07-003	Enforcement	Review of Gexa response to TURN motion to submit late-filed comments	2/10/20	0.25
Matthew Freedman	R18-07-003	Confidentiality	Review of ACR re: confidentiality rule changes for RPS program	3/2/20	0.50
Matthew Freedman	R18-07-003	Confidentiality	Review of ACR and staff proposal on confidentiality issues; outlining of TURN opening comments	3/27/20	0.75
Matthew Freedman	R18-07-003	Confidentiality	Drafting TURN comments on confidentiality proposal	3/29/20	1.00
Matthew Freedman	R18-07-003	Confidentiality	Drafting TURN comments on confidentiality proposal	3/30/20	4.00
Matthew Freedman	R18-07-003	Enforcement	Review of ALJ ruling re: Gexa reconsideration request and Gexa supplemental filing and associated documents	3/31/20	3.25
Matthew Freedman	R18-07-003	Enforcement	Drafting of TURN/CUE joint response to Gexa supplemental filing	4/1/20	4.00
Matthew Freedman	R18-07-003	Enforcement	Drafting of TURN/CUE joint response to Gexa supplemental filing	4/2/20	2.75
Matthew Freedman	R18-07-003	Confidentiality	Review of opening comments on confidentiality issues	4/16/20	1.00
Matthew Freedman	R18-07-003	Confidentiality	Drafting of TURN reply comments	4/16/20	4.50
Matthew Freedman	R18-07-003	Confidentiality	Drafting of TURN reply comments on confidentiality	4/17/20	4.50
Matthew Freedman	R18-07-003	Enforcement	Review Gexa reply to TURN/CUE response re: RPS penalty waiver request	4/17/20	0.25
Matthew Freedman	R18-07-003	Confidentiality	Review of reply comments on confidentiality filed by other parties	4/20/20	1.25
Matthew Freedman	R18-07-003	GP	Review of ACR/ALJ ruling re: 2020 RPS procurement plan filing requirements, review of D.19-12-042	5/6/20	0.75
Matthew Freedman	R18-07-003	GP	Participation in CPUC webex re: RPS procurement plan templates	5/27/20	1.00
Matthew Freedman	R18-07-003	Confidentiality	Review of confidentiality PD/APD	9/21/21	1.25
Matthew Freedman	R18-07-003	Confidentiality	Review of PD and APD on confidentiality issues, drafting of TURN opening comments	10/5/21	2.50
Matthew Freedman	R18-07-003	Confidentiality	Drafting of TURN opening comments on PD/APD	10/6/21	1.25
Matthew Freedman	R18-07-003	Confidentiality	Review of reply comments on PD/APD submitted by other parties	10/11/21	0.50
Matthew Freedman	R18-07-003	Confidentiality	Review of revised confidentiality PD and attachments	11/11/21	0.50
Matthew Freedman	R18-07-003	Confidentiality	Review of Rev1 and Rev2 changes to ALJ PD on confidentiality issues	11/16/21	0.50
Matthew Freedman	R18-07-003	Enforcement	Review PD on Gexa penalty issues	12/22/21	0.50
Matthew Freedman	R18-07-003	VAMO	Review Joint IOU motion to expand scope of issues, drafting joint TURN-CUE response	12/22/21	3.50
Matthew Freedman	R18-07-003	VAMO	Review of Joint IOU reply comments on TURN/CUE response to Joint IOU motion to amend the scoping ruling	1/6/22	0.25
Matthew Freedman	R18-07-003	Enforcement	Additional review of ALJ PD on Gexa enforcement, review of case materials	1/6/22	1.50
Matthew Freedman	R18-07-003	Enforcement	Drafting joint TURN/CUE opening comments on ALJ PD re: Gexa enforcement	1/6/22	3.25
Matthew Freedman	R18-07-003	Enforcement	Drafting joint TURN/CUE opening comments on ALJ PD re: Gexa enforcement	1/7/22	3.00
Matthew Freedman	R18-07-003	Enforcement	Final review/edits to joint TURN/CUE opening comments on ALJ PD re: Gexa enforcement	1/10/22	1.00
Matthew Freedman	R18-07-003	Enforcement	Review of Gexa reply comments on PD	1/18/22	0.25
Matthew Freedman	R18-07-003	Enforcement	Review of final decision on Gexa penalty issues (D.22-01-025)	2/1/22	0.25
Matthew Freedman	R18-07-003	VAMO	Call w/ED staff re: VAMO and PCC issues	3/23/22	0.50
Matthew Freedman	R18-07-003	VAMO	Review of CalCCA ex parte notice, communication w/CUE re: PCC0 treatment	3/25/22	0.25
Matthew Freedman	R18-07-003	VAMO	Review of ALJ ruling re: VAMO PCC issues	4/18/22	0.25
Matthew Freedman	R18-07-003	VAMO	Review of ALJ ruling re: VAMO and PCC treatment, drafting TURN comments	4/27/22	2.25
Matthew Freedman	R18-07-003	VAMO	Review/edits to TURN comments on VAMO/PCC issues	4/28/22	0.50
Matthew Freedman	R18-07-003	VAMO	Review opening comments on VAMO/PCC issues submitted by other parties	4/29/22	1.00
Matthew Freedman	R18-07-003	VAMO	Review ALJ PD on VAMO PCC issues	5/23/22	0.50
Matthew Freedman	R18-07-003	comp	Drafting request for compensation	6/19/24	4.50
Matthew Freedman	R18-07-003	comp	Drafting request for compensation	6/20/24	4.00
Substantial Total					82.00
Comp Total					9.50
Grand Total					91.50

Revised October 2018

Attachment 3

TURN Hours Allocated by Issue

R.18-07-003 (RPS)
TURN Compensation Claim
TURN Hours Allocated by Issue

			GP	EH	VAMO	SB100	CONFIDENTIALITY	ENFORCEMENT	.	Substantive Hours	Substantive \$\$\$	Comp	Compensation (iComp)	Travel	Compensation (Travel)
Billing Period	Hourly Rate												1/2 of hourly rate		1/2 of hourly rate
Matthew Freedman	2018	\$435	3.00	1.50	-	-	-	11.75	-	16.25	\$ 7,068.75	1.00	\$ 217.50		\$ -
Matthew Freedman	2019	\$445	-	-	-	4.50	-	0.75	-	5.25	\$ 2,336.25	-	\$ -		\$ -
Matthew Freedman	2020	\$455	1.75	-	-	-	17.50	16.00	-	35.25	\$ 16,038.75	-	\$ -		\$ -
Matthew Freedman	2021	\$625	-	-	3.50	-	6.50	0.50	-	10.50	\$ 6,562.50	-	\$ -		\$ -
Matthew Freedman	2022	\$645	-	-	5.50	-	-	9.25	-	14.75	\$ 9,513.75	-	\$ -		\$ -
Matthew Freedman	2024	\$740	-	-	-	-	-	-	-	-		8.50	\$ 3,145.00		
TOTAL			4.75	1.50	9.00	4.50	24.00	38.25	-	82.00	\$ 41,520.00	9.50	\$ 3,362.50	-	\$ -
TOTAL % HOURS ALLOCATED			5.79%	1.83%	10.98%	5.49%	29.27%	46.65%	0.00%	100.00%					

Substantial Contribution	\$ 41,520.00
Intervenor iComp Compensation	\$ 3,362.50
Travel Time Compensation	\$ -
Expenses Compensation	
Grand Total	\$ 44,882.50