



Decision

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

12/23/24

04:59 PM

A2204008

Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism (U39M).

A.22-04-008
(Filed April 20, 2022)

And Related Matters

A.22-04-009
A.22-04-011
A.22-04-012
[Consolidated]

**INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY
REFORM NETWORK**

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

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 22-12-031 and D.24-10-008
Claimed: \$281,152.25	Awarded: \$
Assigned Commissioner: Alice Reynolds	Assigned ALJ: Jonathan Lakey
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/ Hayley Goodson
Date: 12/23/24	Printed Name: Hayley Goodson

PART I: PROCEDURAL ISSUES

(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	In D.22-12-031, <i>Decision Addressing Test Year 2023 Cost of Capital for Pacific Gas and Electric, Southern California Edison, Southern California Gas Company, and San Diego Gas & Electric Company</i> , the Commission adopted the Test Year 2023 Cost of Capital for Pacific Gas and Electric (PG&E), Southern California Edison (SCE) Southern California Gas Company (SoCalGas) and San Diego Gas &
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	<p>Electric Company (SDG&E) for ratemaking purposes. For each utility, the decision identified capital structure, the costs of debt and equity, and authorized rates of return. The decision also continued the Cost of Capital Mechanism (CCM), authorized PG&E to create a “Yield Spread Adjustment” (YSA) memorandum account to track certain potential recovery amounts if authorized later by the Commission, and kept the proceeding open for a second phase.</p> <p>In D.24-10-008, <i>Phase 2 Decision</i>, the Commission modified the CCM effective January 1, 2025, changed the filing date for cost of capital applications to March 20 in the year prior to the test year, denied PG&E’s YSA request, and directed PG&E to eliminate the YSA memorandum account.</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:	July 6, 2022	
2. Other specified date for NOI:		
3. Date NOI filed:	August 22, 2022	
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:	See Comment #1, 2	
6. Date of ALJ ruling:	See Comment #1, 2	
7. Based on another CPUC determination (specify):	See Comment #1, 2	
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:	See Comment #1	

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

	Intervenor	CPUC Verification
10. Date of ALJ ruling:	See Comment #1	
11. Based on another CPUC determination (specify):	See Comment #1	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.24-10-008	
14. Date of issuance of Final Order or Decision:	10/22/24	
15. File date of compensation request:	12/23/24	
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	<p>California Public Utilities Code § 1804(b)(1) provides, “A finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in another commission proceeding commencing within one year of the date of that finding.” As TURN explained in its NOI filed in this proceeding, this proceeding commenced in the window of time between the expiration on December 11, 2021, of TURN’s finding of significant financial hardship made by ALJ Ruling in R.20-08-021 on December 11, 2020, and the finding of significant financial hardship made by ALJ Ruling in A.21-12-007 on May 31, 2022. TURN accordingly referred the Commission to TURN’s annual showing of financial hardship presented in the NOI filed by TURN on August 19, 2021 in A.21-06-016, where no ruling has issued. This is the same showing that formed the basis for the financial hardship finding in A.21-12-007. (See <i>Administrative Law Judge’s Ruling on</i></p>	

#	Intervenor's Comment(s)	CPUC Discussion
	<p><i>The Utility Reform Network's Showing of Significant Financial Hardship</i>, issued 5/31/22 in A.21-12-007, pp. 6-7).</p> <p>The Commission declined to issue the ruling requested by TURN on TURN's NOI in this proceeding. TURN accordingly refers the Commission to the showing presented there regarding TURN's significant financial hardship, and specifically TURN's reference to the showing TURN presented in the NOI filed by TURN on August 19, 2021 in A.21-06-016.</p>	
2	<p>TURN presented its showing of eligible customer status in its NOI filed in this proceeding, but the Commission declined to issue a ruling on that NOI. TURN accordingly refers the Commission to the rulings on TURN's NOIs referenced in Comment #1.</p>	

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

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. Capital Structure-SoCalGas</p> <p>SoCalGas requests that its current capital structure of 45.6% long term debt, 2.4% preferred equity and 52% common equity be adjusted to 45.6% long term debt, .4% preferred equity and 54% common equity.</p> <p>TURN recommended a capital structure of 47.6% long-term debt, .4% preferred equity and 52% common equity which better reflects the appropriate consumer cost consistent with the benefits.</p> <p>The Commission agrees with TURN and others that the common equity ratio should remain 52% but adopts ratios of 45.6% long-term debt and 2.4% preferred equity.</p>	<p>Ex. EPUC/IS/TURN-01, p. IX-4-IX-10</p> <p>TURN Opening Brief, 9/23/22, p. 23-24, 33-39²</p> <p>D.22-12-031, pp. 9-10, p. 46 FOF 9, pp. 50-51 COL 5-6</p>	

² All citations to TURN's testimony and filings are to Phase 1 submissions (preceding D.22-12-031) unless explicitly labeled as Phase 2 work.

<p>2. Capital Structure- SDG&E</p> <p>SDG&E requested that its current capital structure of 45.25% long term debt, 2.75% preferred equity and 52% common equity be adjusted to 46% long term debt, 0% preferred equity and 54% common equity.</p> <p>TURN recommended a capital structure of 48% long-term debt and 52% common equity which better reflects a reasonable cost for SDG&E operations and remains at the high end of industry range.</p> <p>The Commission agrees with TURN and others that the common equity ratio should remain 52% but adopts ratios of 45.6% long-term debt and 2.4% preferred equity.</p>	<p>Ex. EPUC/IS/TURN-01, p. VIII-4-VIII-9</p> <p>TURN Opening Brief, 9/23/22, pp. 23-33</p> <p>TURN Reply Brief , 9/30/22, pp. 9-13.</p> <p>D.22-12-031, p. 12, p. 46 FOF 9, pp. 50-51 COL 5-6.</p>	
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<p>3. Wildfire Risk</p> <p>The Electric Utilities highlight risks to operations posed by wildfire and argue that AB 1054 did not adequately address liability concerns. Utilities claim that these risk recommend an ROE on the higher side of the reasonable range.</p> <p>TURN along with EPUC/IS argued that in fact AB 1054 does address this risk and is factored into utility credit ratings.</p> <p>The Commission in D.22-12-031 does not make any affirmative conclusion that a higher ROE is required specifically because of wildfire risk. The final ROE adopted is a decrease for the electric utilities.</p>	<p>Ex. EPUC/IS/TURN-01, pp. IV-2, IV-5-6, IV-8, VI0</p> <p>TURN Opening Brief, 9/23/22, pp. 14-19</p> <p>TURN PD Reply Comments, 12/5/22, pp. 3-4.</p> <p>D.22-12-031, pp. 28, 32, 34, p. 48 FOF 35, p. 51 COL 15.</p>	
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<p>4. Cashflow Risk</p> <p>SCE and SDG&E highlighted the risk of reduced cash flow in light of increased customer arrearages resulting from Covid-19.</p> <p>TURN highlighted that not only were the impacts of Covid-19 not unique to the California utilities, but also that the utilities had two-way balancing accounts to track uncollectibles.</p> <p>The Commission in D.22-12-031 acknowledges this and it influences the ultimate ROEs adopted which are significantly lower than the utility requests.</p>	<p>TURN Opening Brief,, 9/23/22, p. 32</p> <p>TURN Reply Brief, 9/30/22, p. 8</p> <p>TURN PD Reply Comments, 12/5/22, p. 5.</p> <p>D.22-12-031, pp. 28, 32, 34, p. 48 FOF 37, p. 51 COL 15.</p>	
<p>5. Macroeconomic Environment</p> <p>The utilities argue that general market volatility necessitates higher ROEs.</p> <p>TURN/EPUC/IS argued that these risks face utilities nationwide and are not unique to the California utilities. Further the joint witness forecasted ROE using long term treasury rates.</p> <p>The Commission in D.22-12-031 highlights that there has been a downward trend in ROE for other utilities also operating in the same macroeconomic environment. The Commission adopted an ROE decrease for all IOUs.</p>	<p>Ex. EPUC/IS/TURN-01, Ch. III</p> <p>TURN Reply Brief, 9/30/22, pp. 5-7.</p> <p>D.22-12-031, pp. 29, 32, 34, p. 48 FOF 38, p. 51 COL 15.</p>	

<p>6. Regulatory Risk</p> <p>The utilities argue that operating in California presents new and unique operational risk and supports a higher ROE.</p> <p>TURN alongside EPUC and IS argue that these claims are unsupported, there are no new risks and regulation offers certainty.</p> <p>The Commission in D.22-12-031 acknowledges this and it influences the ultimate ROEs adopted which is significantly lower than the utility requests.</p>	<p>TURN Protest p. 4</p> <p>Ex. EPUC/IS/TURN-01 Ch IV</p> <p>TURN Opening Brief, 9/23/22, p. 19-21</p> <p>TURN Reply Brief, 9/30/22, pp. 8-9</p> <p>TURN PD Reply Comments, 12/5/22, pp. 3-4.</p> <p>D.22-12-031, pp. 30, 32, 34, p. 48 FOF 39, 40, p. 51 COL 15.</p>	
<p>7. PG&E ROE</p> <p>PG&E requested an increase in its ROE to 11% in TY 2023.</p> <p>TURN/EPUC/IS recommended a ROE of 9.5% based on the financial models and risk profile of the utility.</p> <p>The Commission adopted a ROE of 10%.</p>	<p>Ex. EPUC/IS/TURN-01, pp. VII-35-VII-36</p> <p>TURN Opening Brief, 9/23/22, pp. 11-12, 13-23</p> <p>TURN PD Reply Comments, 12/5/22, pp. 1-3.</p> <p>D.22-12-031, p. 35, p. 52 COL 20.</p>	
<p>8. SCE ROE</p> <p>SCE requested an increase in its ROE to 10.53% in TY 2023.</p> <p>TURN/EPUC/IS recommended a ROE of 9.5% based on the financial models and risk profile of the utility.</p> <p>The Commission adopted a ROE of 10.05%</p>	<p>Ex. EPUC/IS/TURN-01, pp. VI-36</p> <p>TURN Opening Brief, 9/23/22, pp. 11-12, 13-23</p> <p>TURN Reply Brief, 9/30/22, pp. 2-5</p> <p>TURN PD Reply Comments, 12/5/22, pp. 1-3.</p> <p>D.22-12-031, p. 36, p. 52 COL 21.</p>	

<p>9. SoCalGas ROE</p> <p>SoCalGas requested an increase in its ROE to 10.75% in TY 2023.</p> <p>TURN/EPUC/IS recommended a ROE of 9.5% based on the financial models and risk profile of the utility.</p> <p>The Commission adopted a ROE of 9.8%.</p>	<p>Ex. EPUC/IS/TURN-01, pp. IX-38-IX-39</p> <p>TURN Opening Brief, 9/23/22, pp. 11-12, 13-23</p> <p>TURN PD Reply Comments, 9/30/22, pp. 1-3.</p> <p>D.22-12-031, p. 37, p. 52 COL 22.</p>	
<p>10. SDG&E ROE</p> <p>SDG&E requested an increase in its ROE to 10.55% in TY 2023.</p> <p>TURN/EPUC/IS recommended a ROE of 9.5% based on the financial models and risk profile of the utility.</p> <p>The Commission adopted a ROE of 9.95%.</p>	<p>Ex. EPUC/IS/TURN-01, pp. VIII-38-VIII-39</p> <p>TURN Opening Brief, 9/23/22, pp. 11-12, 13-23</p> <p>TURN Reply Brief, 9/30/22, p. 4</p> <p>TURN PD Reply Comments, 12/5/22, pp. 1-3.</p> <p>D.22-12-031, p. 38, p. 52 COL 23.</p>	

<p>11. PG&E Yield Spread Adjustment YSA</p> <p>PG&E requested the temporary approval of a YSA beyond the commercial paper rate for short term financing to match PG&E’s actual cost of short-term financing.</p> <p>Alongside EPUC and IS, TURN recommended the Commission reject this request since the utility already had a capital structure waiver.</p> <p>The Commission in D.22-12-031 deferred resolution of PG&E’s YSA request to a later phase in the proceeding. In the meantime, the Commission allowed PG&E to track the amount that would have been collected if the YSA was in place.</p> <p>The Commission denied PG&E’s YSA request in the Phase 2 decision, D.24-10-008, and ordered PG&E to eliminate the YSA memorandum account authorized in D.22-12-031. The Commission ultimately agreed with the position articulated by TURN, EPUC, and IS (in Phase 1) and reiterated by EPUC/IS (in Phase 2) that PG&E’s existing capital structure waiver is relevant to the consideration of the fairness of PG&E’s requested YSA, and PG&E does not need additional compensation. (Note: TURN did not address PG&E’s YSA request again in Phase 2</p>	<p>TURN Protest, p. 4</p> <p>Ex. EPUC/IS/TURN-01, p. V-3</p> <p>TURN Reply Brief, 9/30/22, p. 14.</p> <p>D.22-12-031, pp. 40-41, p. 49 FOF 52, p. 52 COL 24.</p> <p>D.24-10-008, pp. 12-13.</p>	
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because of EPUC/IS's comprehensive coverage of the issue there.)		
<p>12. SCE Accrued Carrying Cost Proposal</p> <p>SCE requested that balancing and memorandum accounts collected over longer than 12 months accrue carrying costs at the Weighted Average Cost of Capital.</p> <p>TURN, EPUC and IS opposed this proposal arguing that it is better for ratepayers if the rate is the commercial paper rate.</p> <p>In D.22-12-031, the Commission elects to keep balancing and memorandum accounts at the commercial paper rate.</p>	<p>Ex. EPUC/IS/TURN-01, pp. V-2-V-3</p> <p>TURN Reply Brief, 9/30/22, p. 13.</p> <p>D.22-12-031, p. 42, p. 49 FOF 54, p. 52 COL 25.</p>	

<p>13. Continuation of the Cost of Capital Mechanism (CCM)</p> <p>PG&E and SCE requested that the CCM be modified to delay the adjustment of a required CCM until the Commission acts on an application.</p> <p>Among others, TURN opposed this change in Phase 1.</p> <p>The Commission in D.22-12-031 finds that the record supports continuing the existing structure of the CCM, without the proposals and clarifications requested by PG&E and SCE. The Commission also commits to further evaluating those proposals and other changes to the CCM in a second phase of the proceeding.</p>	<p>Ex. EPUC/IS/TURN-01, pp.V-4-V-5</p> <p>TURN Opening Brief, 9/23/22, pp. 42-43.</p> <p>D.22-12-031, p. 43, p. 52 COL 24.</p>	
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<p>14. Modifications to the CCM in Phase 2</p> <p>In Phase 2 testimony and briefing, TURN urged the Commission to modify the CCM to address the structural asymmetry, resulting in bias towards utility shareholders at the expense of ratepayers, and which has recently led to protracted disputes, contrary to the purpose of the CCM.</p> <p>TURN offered several proposals for reforming the CCM that would make ROE adjustments truly automatic under certain conditions (without an opportunity for utilities to file an “extraordinary event” application) and would otherwise equalize procedural opportunities for utilities and ratepayer advocates to address the merits of ROE changes.</p> <p>TURN alternatively supported Cal Advocates’ proposal to reduce the CCM adjustment ratio from 50% to 20% as a way to reduce controversy surrounding CCM-triggers because of relatively smaller financial implications. TURN noted that this change would not reduce the structural bias in the CCM, but it would reduce the stakes of that bias. TURN demonstrated that the equity return dollars at stake when the CCM triggers are substantially higher now than in 2008 when the CCM was adopted because of growth in rate base and</p>	<p>Ex. TURN-Ph2-01, pp. 5-9</p> <p>TURN Phase 2 Opening Brief, 4/22/24, pp. 7-14 (TURN’s proposal); pp. 15-17 (supporting Cal Advocates’ proposal)</p> <p>TURN Phase 2 Reply Brief, 5/6/24, pp. 6-7 (rebutting Joint IOU arguments against Cal Advocates’ proposal); pp. 7-9 (offering a third proposal for reforming the CCM)</p> <p>D.24-10-008, pp. 19-24 (discussion of party positions), 24-26 (discussion of need to modify the CCM and adoption of adjustment ratio reduction)</p>	
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<p>suggested that a smaller adjustment ratio could also be warranted on this basis.</p> <p>The Commission in D.24-10-008 agreed with TURN and other intervenors that modifications to the CCM are warranted. The Commission pointed to the controversy surrounding even “the smallest possible ROE adjustment” because of the resulting financial impacts, as well as the “structural asymmetry in the implementation of the CCM that favors shareholders.” The Commission further agreed that the current 50% adjustment ratio likely leads to excessive changes to ROE. The Commission concluded that the CCM adjustment ratio should be reduced to 20%.</p> <p>As noted above, the change adopted by the Commission was initially offered by Cal Advocates in testimony and supported by TURN (and also UCAN) in briefing. While the Commission did not adopt either of the proposals developed by TURN, TURN submits that its showing in testimony and briefing on the need for modification to the CCM contributed to the Commission’s analysis and conclusions in this decision. Moreover, TURN’s own proposals and its analysis of Cal Advocate’s proposal helped to provide the Commission with a full record</p>		
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on the options available for addressing the deficiencies with the current CCM.		
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<p>15. Effective Date of Modifications to the CCM</p> <p>In testimony and briefing, the Joint Utilities argued that any changes to the CCM should take effect only in the next cost of capital cycle, not the current cycle which runs from 2023-2025. TURN disagreed, pointing to plain language in D.22-12-031 and the decision's treatment of both issues deferred to Phase 2. TURN also argued that the Phase 2 Ruling clearly indicated which Phase 2 issues were under consideration only for future cost of capital cycles, and that list did not include CCM modifications.</p> <p>When the Commission issued the proposed decision that preceded D.24-10-008, which agreed with TURN's analysis and ordered CCM modifications effective 1/1/25, the Joint Utilities argued that the PD committed legal error by engaging in retroactive ratemaking. TURN, along with other intervenors, demonstrated in reply comments that the PD clearly did not engage in retroactive ratemaking.</p> <p>In D.24-10-008, the Commission pointed to TURN's analysis in concluding that modifying the CCM on a prospective basis for the remainder of this cost of capital cycle is consistent with D.22-12-031 and the</p>	<p>Ex. TURN-Ph2-01, pp. 1-2 (recounting the Commission's contemplation of CCM modifications applying to this cost of capital cycle)</p> <p>TURN Phase 2 Opening Brief, 4/22/24, pp. 18-20</p> <p>TURN Phase 2 Reply Brief, 5/6/24, pp. 3-4</p> <p>Phase 2 Proposed Decision, pp. 16-17</p> <p>TURN Phase 2 Reply Comments on PD, 10/7/24, pp. 1-5</p> <p>D.24-10-008, pp. 16-17 (timing of CCM modifications), 32 (retroactive ratemaking)</p>	
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<p>Commission’s scoping of Phase 2. The Commission also agreed with TURN (and others) that the prospective changes to ROE in 2025 do not constitute retroactive ratemaking.</p>		
<p>16. Schedule for Future Cost of Capital Applications</p> <p>The Joint IOUs recommended a new procedural schedule for cost of capital proceedings, including a March 20 application due date plus expedited procedural steps thereafter, leading to submission in August and a PD in November.</p> <p>TURN was the only party to address the IOUs’ proposed due date for intervenor testimony. TURN opposed their proposed schedule because it reduced the time for intervenors to prepare testimony relative to the schedules in recent cost of capital proceedings.</p> <p>The Commission in D.24-10-008 adopted a filing date of March 20 in the year prior to the test year for future cost of capital applications. Consistent with TURN’s position, the Commission declined to adopt the IOUs’ other procedural schedule recommendations.</p>	<p>TURN Phase 2 Reply Brief, 5/6/24, pp. 12-13</p> <p>D.24-10-008, pp. 6-7</p>	

<p>16. Other Policy Modifications for Future Cost of Capital Cycles</p> <p>On 9/20/23, the Commission solicited input from parties on the identification of issues to include in the Phase 2 scope. One of the issues tentatively identified was: “Whether other policy modifications should be ordered with regard to future cost of capital applications.” TURN accordingly filed a Joint Response with other intervenors identifying a list of policy modifications to consider in Phase 2. TURN et al. recommended three specific issues related to the relationship between the Commission’s authorized capital structure and the utility’s actual capital structure, focused on whether and how non-cash accounting adjustments should impact authorized cost of capital. The Commission then authorized the parties to address each of these three issues proposed by TURN et al. in their Phase 2 testimony.</p> <p>TURN accordingly proposed the development of new policies in the next cost of capital proceeding to address the risks to ratepayers that arise when a utility’s actual capital structure continues to have more debt and less equity than the authorized capital structure. TURN also recommended that the Commission standardize the treatment of non-cash</p>	<p>ALJ’s Ruling Regarding Resolution of the Remaining Issues Scoped into This Proceeding, 9/20/23, pp. 2-3</p> <p>Joint Response of EPUC, FEA, IS, TURN, Walmart Inc, and WTF to ALJ’s Ruling Regarding Resolution of the Remaining Issues Scoped into This Proceeding, 10/2/23, pp. 2-4</p> <p>ALJ’s Ruling Outlining Phase 2 Issues and Schedule, 10/31/23, pp. 3-4</p> <p>Ex. TURN-PhII-01, pp. 13-24</p> <p>TURN Phase 2 Brief, 4/22/24, pp. 31-43</p> <p>TURN Phase 2 Reply Brief, 5/6/24, pp. 10-12</p> <p>D.24-10-008, p. 29</p> <p>TURN Comments on Phase 2 PD, 9/30/24, pp. 2-4</p> <p>TURN Reply Comments on Phase 2 PD, 10/7/24, p. 5</p> <p>Phase 2 Proposed Decision, Rev1 Redline, p. 29</p>	
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<p>accounting adjustments -- including the treatment of innovative financial transactions like securitization that impact the utilities' actual capital structure and perceived investor risk -- when setting the cost of capital.</p> <p>The Commission in D.24-10-008 did not analyze any of the "other policy modifications" proposed by TURN and others, instead summarily declining to implement any of them now -- but without prejudice to their consideration in the future. In the meantime, the Commission reminded the utilities of their obligation "to file applications with empirically accurate and reasonable assumptions about past, present, and future states of the world."</p> <p>Finally, the Commission modified the treatment of this issue in the proposed decision preceding D.24-10-008 in both regards recommended by TURN. The Commission clarified that these policy modifications were being denied without prejudice. The Commission also struck legally erroneous language suggesting that intervenor parties have a duty to alert the Commission to deficiencies in the utilities' showings, when in fact the duty to thoroughly consider utility proposals belongs only to the Commission.</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?³	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: EPUC/IS, UCAN, FEA, PCF, Wild Tree, Walmart, EDF, SCGC		
d. Intervenor's claim of non-duplication: TURN's compensation in this proceeding should not be reduced for duplication of the showings of other parties. In a proceeding involving multiple participants, it is virtually impossible for TURN to completely avoid some duplication of the work of other parties. In Phase 1 of this case, TURN partnered with the Energy Producers and Users Coalition (EPUC) and the Indicated Shippers (IS) to the costs for the consulting services of Brubaker & Associates, Inc., who prepared and submitted the testimony of Mr. Michael Gorman jointly on behalf of TURN and EPUC/IS. TURN thus reduced TURN's consulting costs in this case by at least 50%. By coordinating with EPUC/IS, TURN also was able to selectively identify the issues that it would cover, with other issues with significant impacts on customer rates addressed by EPUC/IS. For example, TURN largely declined to address after tax weighted average cost of capital leaving advocacy on that issue to EPUC/IS. EPUC and IS, assisted by BAI were successful on this topic which ultimately will benefit ratepayers. TURN also coordinated with aligned intervenors to discuss the protest of this application. This early coordination limited the amount of unnecessary duplication. In Phase 2, TURN again coordinated with other intervenors to the extent feasible. TURN filed a joint response to the ALJ ruling soliciting input on scope and schedule with many of the other intervenors. TURN also coordinated with other aligned intervenors on issue coverage in testimony. This coordination allowed TURN to focused on only a subset of Phase 2 issues in briefing to avoid undue duplication. Further, where multiple		

³ 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?³	Yes	
<p>intervenors addressed the same issues, each proposed unique solutions to commonly perceived problems. For example, intervenors generally agreed on structural flaws in the CCM that disadvantaged ratepayers, but each intervenor offered unique suggestions for remedying those flaws (D.24-10-008, pp. 19-24).</p> <p>The Commission should find that TURN (and other intervenors) avoided undue duplication and overlapping issue coverage reflected complementary participation. Where any incidental duplication may have occurred here, TURN submits that this duplication was more than offset by TURN's unique contribution to the proceeding. Under these circumstances, no reduction to our compensation due to duplication is warranted given the standard adopted by the Commission in D.03-03-031 and consistent with the conditions set forth in Section 1802.5.</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>TURN requests compensation of approximately \$280,000 for its work in this proceeding.</p> <p>TURN's primary contribution to Phase 1 of this proceeding was to provide legal and technical analyses and arguments that assisted the Commission in concluding that the current ROEs earned by the utilities should be adjusted downward. Further, TURN established that the Sempra Utilities had not</p>	

	CPUC Discussion
<p>demonstrated that the requested adjustment of their capital structure was necessary to maintain financial health. While TURN cannot take sole credit, since several intervenors submitted expert testimonies addressing similar issues, TURN notes that the equity returns proposed by TURN's witness Gorman were in most cases the closest to the values adopted by the Commission (only in the case of PG&E was the FEA proposal higher than TURN's recommendation).</p> <p>While it is impossible to calculate the exact financial impact of TURN's participation, an approximate benefit can be derived as compared to the original IOU applications, which quantified the revenue requirement increases associated with the requests. Comparing the adopted outcome in D.22-12-031 to the requests for ROEs and adjustments to the capital structure, TURN conservatively estimates at least a \$500 million reduction across the four utilities in 2023, plus ongoing savings related to capital structure in 2024-2025. These are funds that would otherwise have gone directly to shareholders.</p> <p>Furthermore in Phase 2, TURN's participation contributed to the Commission's conclusion that the CCM should be modified for 2025. The rate of return changes stemming from D.24-10-008 will reduce the 2025 revenue requirement for all utilities. The IOUs estimated these impacts in compliance advice letters submitted pursuant to Ordering Paragraph 4 of D.24-10-008. SoCalGas estimated this reduction as \$28.9 million, SDG&E as \$24.9 million, SCE as \$104.4 million, and PG&E as \$114.9 million – a total of roughly \$275 million statewide. <i>See</i> SoCalGas AL 6404-G, p. 4; SDG&E AL 4553-E/3369-G, p. 4; SCE AL 5406-E, p. 3; PG&E AL 4996-G/7423-E, p. 2.</p> <p>For all of these reasons, the Commission should find that TURN's efforts have been productive.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted a total of approximately 360 hours of attorney time and approximately 180 hours of expert witness and analyst time for work in this proceeding. As discussed previously, TURN was responsible for 50% of outside expert costs.</p> <p>TURN suggests that this amount of time was reasonable in order to conduct all of the financial modeling, technical analyses, and legal research and analyses, so as to address equity return, capital structure issues, and utility risks in California for all four large energy utilities for the next three-year period, as well as the Phase 2 issues. As mentioned above, the</p>	

	CPUC Discussion
<p>ratepayer impacts of the initial utility proposals represented a total annual rate increase of approximately \$500 million, and all that money would otherwise flow directly to shareholders, rather than covering any necessary utility investments or operations. TURN details the nature of the attorney and expert work below.</p> <p>Reasonableness of Attorney Hours:</p> <p>TURN devoted a total of approximately 360 hours of attorney time, primarily for work performed by attorneys Hayley Goodson and Katy Morsony who shared responsibilities for this proceeding.</p> <p>Ms. Goodson has been an attorney at TURN for over 20 years and has represented TURN in multiple Cost of Capital proceedings over the years, as well as nearly every type of major energy utility proceeding before the Commission. She also acts as the Managing Attorney of the TURN Energy Team. Her significant experience in utility regulation informs her participation in this proceeding and makes her well suited to address the issues in this proceeding.</p> <p>Ms. Morsony, a TURN attorney at the time of this proceeding, has previously participated in a cost of capital proceeding as an attorney for former clients Energy Producers and Users Coalition/Indicated Shippers. While at TURN Ms. Morsony was the lead counsel working on utility risk assessment in R.20-07-013, the second SMAP proceeding. Additionally, her expertise on risk and wildfire issues is informed by her participation in SCE's GRC (A.19-08-013), the Wildfire Mitigation Plan reviews and the ongoing Sempra GRC (A.22-05-015). Ms. Morsony was able to draw on this experience to address the complex issues, particularly related to utility risk profiles in this proceeding.</p> <p>Ms. Morsony and Ms. Goodson shared the work in Phase 1. Ms. Morsony focused on ROE and Risk during hearings, briefing, and commenting on the proposed decision, while Ms. Goodson focused on capital structure and disputes around affordability. Ms. Goodson was TURN's only attorney during Phase 2 after Ms. Morsony's initial assistance before testimony.</p> <p>Reasonableness of Expert Hours</p> <p>In Phase 1, TURN partnered with EPUC/IS to share the costs for the consulting services of Brubaker & Associates, Inc. who prepared and submitted the testimony of Mr. Michael Gorman jointly on behalf of TURN and EPUC/IS. This claim includes only those costs allocated to TURN for the consulting services of Brubaker & Associates, Inc. after TURN entered into this partnership with EPUC/IS, roughly 80 hours,</p>	

	CPUC Discussion
<p>which is a fraction of the total time required to prepare Mr. Gorman’s testimony.</p> <p>In Phase 2, TURN relied on in-house expert Jennifer Dowdell, who devoted roughly 100 hours to preparing testimony and advising and assisting Ms. Goodson through briefing. Ms. Dowdell is a Senior Policy Expert at TURN with over 40 years in regulated utilities, independent power, financial services, and accounting. She has an extensive background in corporate finance and accounting -- including several managerial positions in various financial and regulatory roles at PG&E, including Director of Investor Relations – and is no stranger to Cost of Capital cases, having worked on prior cases for TURN and while previously employed by PG&E.</p> <p>Effort to Resolve CCM Disputes</p> <p>During Phase 2, TURN spearheaded an effort to explore alignment between various intervenors and the IOUs on modifications to the CCM – a hotly contested issue. Intervenors generally agreed that the current CCM was structurally flawed and disadvantaged ratepayers, but had offered a variety of proposals for remedying those flaws (D.24-10-008, pp. 19-24). The IOUs opposed structural changes to the CCM and its elimination, which was recommended by some intervenors. TURN includes in this claim 13.75 hours devoted to exploring settlement of the CCM issues. While the intervenors and IOUs were ultimately unable to reach agreement on CCM modifications, the Commission should find that these good faith efforts were productive and consistent with the Commission’s general encouragement of settlements. The Commission has similarly found such work reasonable to include in an award of intervenor compensation in past proceedings. <i>See, e.g.</i>, D.20-08-010, issued in A.17-10-007 et al. (SDG&E/SoCalGas TY 2019 GRC), p. 38 (reference to TURN’s participation in initial settlement negotiations, which were ultimately unfruitful), p. 42 (30.25 hours allocated to code “Sett”), pp. 43-47 (no disallowances).</p> <p>Time Spent on <i>Ex Parte</i> Communications</p> <p>TURN’s request includes hours devoted to <i>ex parte</i> meetings conducted jointly with EPUC/IS. These hours include time spent preparing for the meetings, participating in the meetings, and reviewing/revising the required post-meeting <i>ex parte</i> notices drafted by counsel for EPUC/IS.</p> <p>The Commission should find that hours spent on these <i>ex parte</i> communications represent the “reasonable costs of preparation for and participation in a hearing or proceeding” (Cal. Pub. Util. Code §1803)</p>	

	CPUC Discussion
<p>and that hours spent by advocates reflect costs “incurred by the customer in preparing or presenting” (§1802(j)) TURN’s arguments to the Commission. The joint IOUs also engaged in significant <i>ex parte</i> activity in this proceeding, making TURN’s <i>ex parte</i> communications important for defending and supporting the positions articulated in TURN’s testimony, briefs, and recommendations related to the proposed decisions preceding D.22-12-031 and D.24-10-008.</p> <p>In Phase 1, the Joint IOUs engaged in <i>ex parte</i> communications on 12/2/22, 12/6/22, 12/7/22, and 12/8/22, opposing the Proposed Decision’s treatment of risk and reductions to ROE. (SDG&E, SoCalGas, PG&E, SCE Joint IOUs Notice of Ex Parte Communication, 12/7/22, pp. 2-4; SDG&E, SoCalGas, PG&E, SCE Joint IOUs Notice of Ex Parte Communication, 12/9/22, pp. 3-4 and Attachment A). TURN (and EPUC/IS) in turn defended the Proposed Decision’s treatment of risk and ROE in meetings on 12/8/22 and 12/9/22, where we summarized record evidence and our reply comments on the PD. (Notice of Ex Parte Communications of EPUC/IS and TURN, 12/12/22, pp. 3-6 and Attachment A). The Commission’s final Decision adopted the PD’s treatment of risk and ROE. (E.g., <i>Compare</i> Proposed Decision, p. 1 <i>with</i> D.22-12-031, p. 1).</p> <p>In Phase 2, the Joint IOUs engaged in <i>ex parte</i> communications on 10/7, 10/8/24, and 10/11/24, opposing the Proposed Decision’s changes to the CCM and implementation of resultant ROE changes in 2025. They argued that such changes were beyond the scope of Phase 2 and constituted impermissible retroactive ratemaking. (PG&E, SDG&E, SoCalGas, SCE Joint Notice of Ex Parte Communication, 10/10/24, p. 2 and attached presentation; PG&E, SCE, SoCalGas, SDG&E Joint Notice of Ex Parte Communication, 10/16/24, p. 2). TURN (and EPUC/IS) in turn defended the Proposed Decision’s treatment of the CCM, summarizing the Phase 2 record and legal arguments presented in our reply comments on the Proposed Decision. (Notice of Ex Parte Communication of EPUC, IS, and TURN, 10/11/24, pp. 3-7). The final Phase 2 Decision, in pertinent part, rejected the joint IOUs’ claims and adopted the Proposed Decision’s CCM modifications and implementation of the adjusted ROE in 2025 (as described in Section II(A)).</p> <p>The Commission has routinely approved compensation for <i>ex parte</i> activities by intervenors in decisions dating back more than 20 years. A sampling of prior decisions awarding compensation for time devoted to <i>ex parte</i> communications include (but are not limited to) D.24-10-026, D.24-09-049, D.24-01-024, D.23-10-013, D.23-06-045, D.22-08-050, D.22-08-010, D.22-06-018, D.21-12-051, D.21-08-033, D.21-06-016, D.21-07-017, D.21-04-013, D.19-10-020, D.19-10-018, D.19-08-032,</p>	

				CPUC Discussion
D.19-07-020, D.19-03-005, D.18-11-043, D.18-04-021, D.15-08-023, D.12-08-041.				
c. Allocation of hours by issue:				
Code	Description	Allocation of Time	Hours	
GP	General work necessary for participation	3.54%	19.25	
Coord	Coordination with other intervenors	1.88%	10.25	
NDA	Work negotiating terms of nondisclosure agreements with IOUs	1.10%	6.00	
Disc	Discovery - Phase 1	0.55%	3.00	
Afford	Work related to affordability impacts of cost of capital determinations - Phase 1	4.09%	22.25	
CapStr	Work related to utility capital structure - Phase 1	5.33%	29.00	
CCM	Work related to the CCM - Phase 1	0.37%	2.00	
Risk	Work related to risks facing CA IOUs	14.72%	80.05	
ROE	Work related to establishing rates of return on equity for each IOU	14.44%	78.50	
Evid	Work related to completing the evidentiary record through factual stipulations, development of cross-examination and associated exhibits, negotiations re exhibits, participation in evidentiary hearings	4.37%	23.75	
Brief	Work related to TURN's briefs that cannot be accurately allocated to one of the specific issue areas, as well as reviewing other parties' briefs	3.72%	20.25	
PD	Work related to the PD preceding D.22-12-031	4.46%	24.25	
Ph2-Proc	Phase 2 procedural issues, including scope and schedule of this proceeding and schedule for future CoC applications	0.60%	3.25	
Ph2-Coord	Phase 2 coordination with other intervenors	0.41%	2.25	
Ph2-Disc	Phase 2 discovery	3.63%	19.75	
Ph2-Afford	Phase 2 work related to affordability impacts of cost of capital determinations	1.84%	10.00	
Ph2-CapStr	Phase 2 work related to relationship between capital structure and ROE	4.74%	25.75	
Ph2-CCM	Phase 2 modifications to the CCM	5.38%	29.25	

				CPUC Discussion
Ph2-Test	Preparation of TURN's Phase 2 testimony and review of other party Phase 2 testimony	12.83%	69.75	
Ph2-CCM-Sett	Phase 2 settlement discussions related to modifications to the CCM	2.53%	13.75	
Ph2-Evid	Phase 2 work related to completing the evidentiary record, including evaluation of need for evidentiary hearing, attending Rule 13.9 meet and confer, motion to admit exhibits in lieu of evidentiary hearing	0.41%	2.25	
Ph2-Brief	Phase 2 work related to TURN's briefs that cannot be accurately allocated to one of the specific issue areas, as well as reviewing other parties' briefs	3.68%	20.00	
Ph2-PD	Phase 2 work related to the PD preceding D.24-10-008	5.38%	29.25	
Comp	work related to preparing TURN's NOI and Intervenor Compensation Claim for Phase 1 and Phase 2			
TOTAL	(excluding intervenor compensation time)	100.00%	543.80	
<p>Please also see Attachment 3, which presents an allocation of TURN's time by person, issue, and year.</p> <p>TURN submits that this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>				

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2022	94.50	\$570.00	D.23-01-015	\$53,865.00			
Hayley Goodson,	2023	0.50	\$625.00	D.24-02-040	\$312.50			

CLAIMED						CPUC AWARD		
TURN Attorney								
Hayley Goodson, TURN Attorney	2024	118.25	\$680.00	D.24-09-017	\$80,410.00			
Jennifer Dowdell, TURN Energy Policy Expert	2023	1.25	\$455.00	D.24-09-016	\$568.75			
Jennifer Dowdell, TURN Energy Policy Expert	2024	103.50	\$495.00	Res. ALJ-393, 2023 Rate plus 2024 4.07% COLA plus 5% step increase. See Comment #1.	\$51,232.50			
Katy Morsony, TURN Attorney	2022	146.25	\$515.00	D.23-10-017	\$75,318.75			
Katy Morsony, TURN Attorney	2023	0.75	\$565.00	D.23-10-017	\$423.75			
Katy Morsony, TURN Attorney	2024	1.00	\$615.00	Res. ALJ-393, 2023 Rate plus 2024 4.07% COLA plus 5% step increase. See Comment #2.	\$615.00			
Maggie G Ackenhausen, Brubaker & Associates	2022	37.00	\$155.00	Res. ALJ-393 - Consultant Rate. See Comment #3	\$5,735.00			
<i>Adjustment per TURN 50% share of costs</i>				See Comment #4	<i>-\$2,867.50</i>			
Matthew Smith,	2022	28.30	\$165.00	Res. ALJ-393 - Consultant	\$4,669.50			

CLAIMED						CPUC AWARD		
Brubaker & Associates				Rate. See Comment #3				
<i>Adjustment per TURN 50% share of costs</i>				See Comment #4	<i>-\$2,334.75</i>			
Michael Gorman, Brubaker & Associates	2022	12.50	\$285.00	Res. ALJ-393 - Consultant Rate. See Comment #3	\$3,562.50			
<i>Adjustment per TURN 50% share of costs</i>				See Comment #4	<i>-\$1,781.25</i>			
Subtotal: \$269,729.75						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 \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2024	15.75	\$340.00	½ of 2024 Rate	\$5,355.00			
Katy Morsony, TURN Attorney	2022	0.25	\$257.50	½ of 2022 Rate	\$64.38			
Katy Morsony, TURN Attorney	2023	21.25	\$282.50	½ of 2023 Rate	\$6,003.13			
Subtotal: \$11,422.50						Subtotal: \$		

CLAIMED				CPUC AWARD
COSTS				
#	Item	Detail	Amount	Amount
1.				
2.				
Subtotal: \$				Subtotal: \$
TOTAL REQUEST: \$281,152.25				TOTAL AWARD: \$
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR ⁴	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	
Hayley Goodson	December 2003	228535	No	
Katy Morsony	December 2011	281538	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	Attorney and Expert Time Sheet Details
Attachment 3	Allocation of Hours by Issue
Attachment 4	Statements of Qualifications for BAI consultants Gorman, Smith and Ackenhausen
Attachment 5	BAI invoice providing 2022 hourly rates for consultants Gorman, Smith, and Ackenhausen

⁴ 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
Comment 1	<p>2024 Hourly Rate for TURN Senior Policy Expert Jennifer Dowdell</p> <p>TURN requests a 2024 hourly rate of \$495 for Senior Policy Expert Jennifer Dowdell. This rate is equal to Ms. Dowdell’s 2023 authorized rate of \$455, adjusted by the 4.07% annual escalation rate for 2024 and the second 5% step increase permitted by Res. ALJ-393 for Ms. Dowdell in the Public Policy Analyst – Level IV experience tier, rounded down to the nearest \$5 increment. Formula: $\\$455 * (1+0.0407+0.05) = \\496.27</p> <p>Ms. Dowdell took the first 5% step increase in this experience tier in 2023. See D.24-09-016.</p>
Comment 2	<p>2024 Hourly Rate for TURN Staff Attorney Katy Morsony</p> <p>TURN requests a 2024 hourly rate of \$615.00 for Staff Attorney Katy Morsony. This rate is equal to Ms. Morsony’s 2023 authorized rate of \$565, adjusted by the 4.07% annual escalation rate for 2024 and the second 5% step increase permitted by Res. ALJ-393 for Ms. Morsony in the Attorney – Level IV experience tier, rounded down to the nearest \$5 increment. Formula: $\\$565 * (1+0.0407+0.05) = \\616.25</p> <p>Ms. Morsony took the first 5% step increase in this experience tier in 2023. See p. D.23-10-017.</p>
Comment 3	<p>2022 Hourly Rate for TURN Consultants from Brubaker and Associates, Inc. (BAI), Michael P. Gorman, Matthew Smith, and Magdalena (Maggie) G. Ackenhausen</p> <p>In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. For each level, a market rate-based hourly rate range is established. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website (www.cpuc.ca.gov/icomp) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission clarified that hourly rates for 2021 will be based on the approved hourly rate ranges in the Market Rate Study, without regard to previously established hourly rates for 2020 or prior years. (Res. ALJ-393, p. 4). Finally, the Commission directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a</p>

Attachment or Comment #	Description/Comment
	<p>supporting document, and (2) a justification for the requested rate that ties to the individual's labor role and level of experience, per the Market Rate Study's Hourly Rate Chart. (Res. ALJ-393, p. 5).</p> <p>Pursuant to the requirements of ALJ-393, TURN hereby submits its request for a 2022 hourly rate for TURN Consultants and Expert Witnesses Michael P. Gorman, Matthew Smith and Magdalena (Maggie) G. Ackenhausen. BAI provided TURN with statements of qualifications for each of these consultants, which are provided in Attachment 4 as supporting documents to this claim.</p> <p><u>Michael P. Gorman, BAI</u></p> <p>Labor Role: Economist Level: V 2022 Hourly Rate Range: \$197.43 - \$379.35 2022 Requested Hourly Rate: \$285 Justification for the Requested Hourly Rate:</p> <p>Michael P. Gorman is a Managing Principal with Brubaker & Associates, Inc. (BAI), an energy, economic and regulatory consulting firm, where he has worked for over 30 years (1990–1995 at the predecessor firm Drazen-Brubaker & Associates; and 1995 – Present at BAI). Mr. Gorman has sponsored testimony on cost of capital, revenue requirements, cost of service, and other issues before the Federal Energy Regulatory Commission, 34 state regulatory commissions, including California, the provincial regulatory boards in Alberta and Nova Scotia, Canada, and various municipal regulatory boards. During this time, he has performed various analyses and sponsored testimony on cost of capital, cost/benefits of utility mergers and acquisitions, utility reorganizations, level of operating expenses and rate base, cost of service studies, and analyses related to industrial jobs and economic development. Mr. Gorman's earlier professional experiences include 6 years at the Illinois Commerce Commission as an analyst, Senior Analyst, and eventually the Director of the Financial Analysis Department (1983–1989) and a year with Merrill-Lynch as a financial consultant (1989-1990).</p> <p>Mr. Gorman received a Master's Degree in Business Administration with a concentration in Finance from the University of Illinois at Springfield and a BS in Electrical Engineering from Southern Illinois University. His qualifications are included in Attachment 4.</p>

Attachment or Comment #	Description/Comment
	<p>The Market Rate Study Hourly Rate Chart describes an Economist as one who: “Conducts research and analyses on economic data/trends and provides recommendations based on expertise. Researches and develops new data statistical models and technological innovations. Organizes data into report format and arranges graphic illustrations of research findings. Interprets and predicts economic conditions and advises management on implications.” TURN believes this is the best fit for Mr. Gorman’s field of expertise and education (a MBA with a concentration in Finance). He has over 30 years of professional experience testifying on utility markets and cost of capital requests. Moreover, in light of his academic qualifications and over 30 years of professional experience, TURN finds that Mr. Gorman should be assigned to Level V of the rate range. Mr. Gorman’s background more than satisfies the Market Study’s requirement that a Level V Expert has a Master’s degree and 15+ years of experience.</p> <p>Mr. Gorman charged TURN an hourly rate of \$285 for his work in this proceeding in 2022. This rate is well below the 2022 high rate for an Economist - Level V (\$379.35) and closer to the median rate adjusted for 2022 (\$277.76).</p> <p>Given Mr. Gorman’s professional experience and education, TURN submits that the Commission should find a 2022 hourly rate of \$285 reasonable for Mr. Gorman as a Level V Expert – Economist.</p> <p><u>Matthew Smith, BAI</u></p> <p>Labor Role: Economist Level: II 2022 Hourly Rate Range: \$153.44 - \$283.60 2022 Requested Hourly Rate: \$165 Justification for the Requested Hourly Rate:</p> <p>Matthew Smith is a consultant with BAI. Since joining BAI as an analyst in 2018, Mr. Smith has been promoted to Senior Analyst and now consultant. Mr. Smith has performed detailed analyses on a variety of subjects within the scope of electric, natural gas, and water regulatory proceedings. These analyses include cost of service studies, return on equity, rate design, and resource adequacy issues. Mr. Smith has also been engaged in the evaluation of request for proposals responses, the creation of regional electric market price forecast models, and load forecast models for industrial energy users in the electric and natural gas fields. Mr. Smith received a Bachelors in Economics from Southern Illinois University.</p>

Attachment or Comment #	Description/Comment
	<p>The Market Rate Study Hourly Rate Chart describes an Economist as one who: “Conducts research and analyses on economic data/trends and provides recommendations based on expertise. Researches and develops new data statistical models and technological innovations. Organizes data into report format and arranges graphic illustrations of research findings. Interprets and predicts economic conditions and advises management on implications.” TURN believes this is the best fit for Mr. Smith’s field of expertise and education (a bachelors in Economics). He has over 5 years of professional experience analyzing utility markets and contributing testimony on cost of service studies and returns on equity. TURN finds that Mr. Smith should be assigned to Level II of the rate range. Mr. Smith’s background satisfies the Market Study’s requirement that a Level II Expert has a Bachelor’s Degree and 2-5 years of experience.</p> <p>Mr. Smith charged TURN an hourly rate of \$165 for his work in this proceeding in 2022. This rate is well below the 2022 high rate for an Economist - Level II (\$283.60) and closer to the low rate adjusted for the COLA for 2022 (\$153.44).</p> <p>Given Mr. Smith’s professional experience and education, TURN submits that the Commission should find a 2022 hourly rate of \$165 reasonable for Mr. Smith as a Level II Expert – Economist.</p> <p><u>Magdalena (Maggie) Ackenhausen, BAI</u></p> <p>Labor Role: Economist Level: V 2022 Hourly Rate Range: \$197.43 - \$379.35 2022 Requested Hourly Rate: \$155 Justification for the Requested Hourly Rate:</p> <p>Maggie Ackenhausen is an associate consultant with BAI. Since joining BAI 2004, Ms. Ackenhausen has been involved in various electric, natural gas and water regulatory issues in the field of cost of capital, capital structure, financial integrity, merger evaluation, commodity risk management, energy procurement, depreciation studies, revenue requirement and rate base evaluation. Ms. Ackenhausen received a Bachelors of Science in Business Administration with a concentration in Finance and a minor in Economics from Truman State University. Ms. Ackenhausen also has a Master of Business Administration with a concentration in Finance from the University of Missouri-Saint Louis.</p>

Attachment or Comment #	Description/Comment
	<p>The Market Rate Study Hourly Rate Chart describes an Economist as one who: “Conducts research and analyses on economic data/trends and provides recommendations based on expertise. Researches and develops new data statistical models and technological innovations. Organizes data into report format and arranges graphic illustrations of research findings. Interprets and predicts economic conditions and advises management on implications.” TURN believes this is the best fit for Ms. Ackenhausen’s field of expertise and education (a MBA with a concentration in finance). Ms. Ackenhausen has over 15 years of professional experience analyzing utility markets and contributing testimony on cost of service studies and returns on equity. TURN finds that Ms. Ackenhausen should be assigned to Level V of the rate range. Ms. Ackenhausen’s background more than satisfies the Market Rate Study’s requirement that a Level V Economist have a Master’s degree and 15+ years of experience.</p> <p>Ms. Ackenhausen charged TURN an hourly rate of \$155 for her work in this proceeding in 2022. This rate is well below the 2022 high rate for an Economist - Level V (\$379.35) as well as the low rate for an Economist - Level V (\$197.43).</p> <p>Given Ms. Ackenhausen’s professional experience and education, TURN submits that the Commission should find a 2022 hourly rate of \$155 very reasonable for Ms. Ackenhausen as a Level V Expert – Economist.</p>
Comment 4	<p>Adjustment to Claim for Brubaker and Associates, Inc. (BAI) Consulting Costs</p> <p>As explained above, TURN shared the expert consulting services of Brubaker and Associates, Inc. (BAI) consultants Michael P. Gorman, Matthew Smith, and Magdalena (Maggie) G. Ackenhausen with EPUC/Indicated Shippers. This arrangement reduced costs and increased efficiencies for both parties, as BAI sponsored expert testimony on behalf of both TURN and EPUC/Indicated Shippers.</p> <p>Consistent with this cost-sharing arrangement, BAI allocated 50% of the costs of work conducted on behalf of both TURN and EPUC/Indicated Shippers to TURN and the other 50% to EPUC/Indicated Shippers. TURN’s claim presents the full number of hours billed by BAI, as well as an adjustment removing 50% of the costs for time billed, consistent with TURN’s actual responsibility for paying BAI.</p>

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

Item	Reason

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

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

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. The Utility Reform Network [has/has not] made a substantial contribution to D.22-12-031 and D.24-10-008.
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 is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay The Utility Reform Network the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of The Utility Reform Network’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.22-12-031, D.24-10-008		
Proceeding(s):	A.22-04-008, A.22-04-009, A.22-04-011, A.22-04-012 (Consolidated)		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	12/23/24	\$281,152.25		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Katy	Morsony	Attorney	2022	\$515	
Katy	Morsony	Attorney	2023	\$565	
Katy	Morsony	Attorney	2024	\$615	
Hayley	Goodson	Attorney	2022	\$570	
Hayley	Goodson	Attorney	2023	\$625	
Hayley	Goodson	Attorney	2024	\$680	
Jennifer	Dowdell	Expert	2023	\$455	
Jennifer	Dowdell	Expert	2024	\$495	
Michael	Gorman	Expert	2022	\$285	
Magdalena	Ackenhausen	Expert	2022	\$155	
Matthew	Smith	Expert	2022	\$165	

(END OF APPENDIX)

Revised August 2021

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 August 2021

Attachment 2
Attorney and Expert Time Sheet Details

**A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Katy Morsony	A22-04-008	GP	Review and analyze COC Applications	4/20/2022	0.75
Katy Morsony	A22-04-008	Coord	participate in aligned ratepayer call to discuss protest.	5/12/2022	1.00
Hayley Goodson	A22-04-008	GP	discuss protest, case staffing with Katy	5/13/2022	0.25
Katy Morsony	A22-04-008	GP	Confer with HG regarding protest	5/13/2022	0.25
Katy Morsony	A22-04-008	GP	Review and analyze Cost of Capital Applications/testimony.	5/17/2022	1.50
Katy Morsony	A22-04-008	GP	Continue to review and analyze testimony	5/18/2022	1.00
Katy Morsony	A22-04-008	GP	Continue to review and analyze testimony	5/19/2022	1.00
Katy Morsony	A22-04-008	GP	Continue to review and analyze testimony	5/20/2022	1.00
Katy Morsony	A22-04-008	GP	Draft Protest	5/23/2022	3.00
Katy Morsony	A22-04-008	GP	Continue to draft common protest document.	5/24/2022	2.00
Katy Morsony	A22-04-008	GP	Review and revise common protest.	5/25/2022	1.00
Katy Morsony	A22-04-008	GP	Revise protest to reflect PG&E details	5/27/2022	0.50
Katy Morsony	A22-04-008	GP	Revise protest to reflect SCE details	5/27/2022	0.50
Katy Morsony	A22-04-008	GP	Revise protest to reflect SoCalGas details	5/27/2022	0.50
Katy Morsony	A22-04-008	GP	Revise protest to reflect SDG&E details	5/27/2022	0.50
Katy Morsony	A22-04-008	GP	Review replies to protest.	6/7/2022	0.25
Hayley Goodson	A22-04-008	Coord	confer with other intervenors, CalPA re schedule in prep for PHC	7/5/2022	0.25
Hayley Goodson	A22-04-008	GP	review, analyze straw proposal schedule from ALJ Stevens for PHC	7/6/2022	0.50
Hayley Goodson	A22-04-008	GP	complete related rsch in prep for PHC	7/6/2022	0.50
Hayley Goodson	A22-04-008	GP	attend PHC (join webex at 12:40, PHC 1-2:30)	7/6/2022	1.75
Hayley Goodson	A22-04-008	NDA	evaluate NDA concerns raised by SCGC to Sempra and confer with KM, DC re same because of overlap with 2022 CoC and 2024 Sempra GRC	7/14/2022	0.50
Hayley Goodson	A22-04-008	NDA	continue analysis of Sempra proposed NDA vis-à-vis 2022 CoC NDA and status of similar dispute in Sempra GRC	7/14/2022	0.50
Katy Morsony	A22-04-008	NDA	Review NDA from previous COC Proceeding.	7/14/2022	0.50
Hayley Goodson	A22-04-008	NDA	mtg with SoCalGas, SCGC (Norman) re NDA issues	7/15/2022	1.00
Hayley Goodson	A22-04-008	NDA	review and reply to changes to proposed NDA from J. Fohrer/SCG	7/15/2022	0.25
Hayley Goodson	A22-04-008	NDA	review and execute final NDA, NDC	7/19/2022	0.25
Hayley Goodson	A22-04-008	Risk	review TURN qualitative risk testimony in prior CoC	7/19/2022	0.50
Hayley Goodson	A22-04-008	GP	call with KM re experts, scope of TURN's participation	7/21/2022	0.50
Hayley Goodson	A22-04-008	Risk	begin review of IOU risk analysis	7/27/2022	0.50
Hayley Goodson	A22-04-008	Risk	rsch, draft memo on risk analysis framework, 2020 CoC decision	7/27/2022	0.50
Hayley Goodson	A22-04-008	Risk	call with KM re risk testimony	7/27/2022	0.25
Katy Morsony	A22-04-008	Risk	Review and analyze Utility Testimony	7/27/2022	4.75
Katy Morsony	A22-04-008	Risk	Confer with HG regarding strategy in COC case	7/27/2022	0.25
Katy Morsony	A22-04-008	Coord	Confer with M. Gorman/BAI and EPUC/IS regarding status of testimony	7/28/2022	0.75
Katy Morsony	A22-04-008	Risk	continue to review and analyze utility testimony testimony	7/28/2022	4.75
Hayley Goodson	A22-04-008	GP	review and provide feedback on KM draft retainer agreement for BAI	7/29/2022	0.25
Katy Morsony	A22-04-008	GP	Draft consultant agreement	7/29/2022	1.50
Katy Morsony	A22-04-008	Risk	Continue to review and analyze utility testimony.	7/29/2022	2.00
Katy Morsony	A22-04-008	Comp	Draft NOI	8/1/2022	0.25
Hayley Goodson	A22-04-008	NDA	confer with SDG&E re NDA	8/1/2022	0.25
Katy Morsony	A22-04-008	NDA	Communicate with IOUs about NDAs	8/1/2022	0.50
Katy Morsony	A22-04-008	NDA	Review NDAs from PG&E and SCE	8/2/2022	0.75
Hayley Goodson	A22-04-008	GP	review and analyze SCE proposal re memo acct costs amortized longer than 12 months, Gorman analysis re same	8/3/2022	0.25
Hayley Goodson	A22-04-008	NDA	review and draft edits to PG&E's proposed NDA	8/3/2022	0.50
Hayley Goodson	A22-04-008	NDA	review and provide edits to SCE's proposed NDA	8/3/2022	0.50
Hayley Goodson	A22-04-008	ROE	initial review of BAI partial draft of testimony	8/3/2022	0.25
Katy Morsony	A22-04-008	ROE	Review and revise MPG Testimony.	8/3/2022	2.25
Hayley Goodson	A22-04-008	NDA	execute negotiated NDA with SDG&E	8/5/2022	0.25
Katy Morsony	A22-04-008	ROE	Review and revise M. Gorman/BAI testimony draft	8/5/2022	2.00
Katy Morsony	A22-04-008	Risk	Review and revise Gorman Testimony.	8/8/2022	1.25
Katy Morsony	A22-04-008	Risk	Review and analyze other intervenor Opening Testimony.	8/10/2022	2.50
Katy Morsony	A22-04-008	Coord	confer with EPUC/Indicated Shippers regarding rebuttal	8/11/2022	0.25
Katy Morsony	A22-04-008	Risk	Continue review and analysis of opening testimony	8/11/2022	0.25
Katy Morsony	A22-04-008	Coord	Confer with EPUC/IS regarding rebuttal, discovery, evidentiary hearings	8/17/2022	1.00
Hayley Goodson	A22-04-008	NDA	confer with PG&E re NDA, execute same	8/17/2022	0.25
Katy Morsony	A22-04-008	Evid	Review draft of request for Evidentiary Hearings.	8/22/2022	1.00
Katy Morsony	A22-04-008	Evid	Attend stipulated facts meeting.	8/27/2022	1.00
Katy Morsony	A22-04-008	Evid	Review and provide feedback on Stipulated Facts Drafts	8/29/2022	0.75
Hayley Goodson	A22-04-008	Evid	call with KM re rebuttal testimony, hearing prep	8/30/2022	0.50
Katy Morsony	A22-04-008	ROE	Review and analyze Rebuttal.	8/30/2022	1.00
Hayley Goodson	A22-04-008	Afford	read and analyze IOU rebuttal testimony	8/31/2022	2.50
Hayley Goodson	A22-04-008	CapStr	read and analyze intervenor rebuttal testimony	8/31/2022	2.75
Katy Morsony	A22-04-008	ROE	Review and analyze Rebuttal.	8/31/2022	4.50
Hayley Goodson	A22-04-008	CapStr	research re capital structure	9/1/2022	1.00
Hayley Goodson	A22-04-008	Coord	call with EPUC/IS, Gorman et al., re IOU rebuttal and EH strategy	9/1/2022	1.00

**A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Hayley Goodson	A22-04-008	Coord	f/u call with EPUC/IS attys re EH strategy	9/1/2022	1.25
Katy Morsony	A22-04-008	Coord	Confer with EPUC/IS regarding case strategy	9/1/2022	1.75
Hayley Goodson	A22-04-008	Evid	f/u call with KM re issue coverage	9/1/2022	0.50
Katy Morsony	A22-04-008	Risk	Review and analyze rebuttal related to California specific risks,	9/1/2022	1.00
Maggie G Ackenh, Brub	A22-04-008	Disc	Drafted an additional discovery request.	9/1/2022	3.00
Maggie G Ackenh, Brub	A22-04-008	ROE	Worked on summarizing the model and input results of the 2013 direct testimonies of Hunt and Avera for the brief.	9/1/2022	6.00
Matthew Smith, Bruebak	A22-04-008	ROE	Working on tables and graphs re ROE for MGA.	9/1/2022	8.90
Katy Morsony	A22-04-008	Risk	Continue to review, analyze testimony and develop cross related to California risk.	9/2/2022	4.00
Katy Morsony	A22-04-008	Risk	Continue to analyze discovery responses	9/3/2022	2.50
Hayley Goodson	A22-04-008	Afford	prepare for hearings - rsch to ID cross exhibits and draft cross exam	9/4/2022	3.75
Hayley Goodson	A22-04-008	CapStr	prepare for hearings - rsch to ID cross exhibits and draft cross exam	9/4/2022	1.00
Hayley Goodson	A22-04-008	Afford	prepare for hearings - rsch to ID cross exhibits and draft cross exam	9/5/2022	2.25
Hayley Goodson	A22-04-008	CapStr	prepare for hearings - rsch to ID cross exhibits and draft cross exam	9/5/2022	1.75
Hayley Goodson	A22-04-008	Afford	confer with SCE, PG&E, SDG&E re potential stipulations in lieu of cross	9/6/2022	0.50
Hayley Goodson	A22-04-008	Evid	attend meet and confer with all parties re EH	9/6/2022	0.25
Katy Morsony	A22-04-008	Risk	Continued preparations for hearing including identifying discovery responses for the record	9/6/2022	5.50
Maggie G Ackenh, Brub	A22-04-008	ROE	Finished summarizing the input and model results from the 2013 direct testimonies of Morin for the Sempra utilities.	9/6/2022	8.00
Matthew Smith, Bruebak	A22-04-008	ROE	Working on Credit ratings history and other tables for Maggie.	9/6/2022	6.30
Hayley Goodson	A22-04-008	CapStr	review and analyze rating agency reports, note for EH, briefing (SDG&E)	9/7/2022	1.50
Katy Morsony	A22-04-008	Risk	Continued hearing preparation and cross development	9/7/2022	4.00
Maggie G Ackenh, Brub	A22-04-008	ROE	Draft an additional cross exhibit that summarizes the model results and the inputs for all parties.	9/7/2022	2.50
Maggie G Ackenh, Brub	A22-04-008	ROE	Summarized the inputs and the model results from the 2020 COC proceeding and send them as cross-exhibit for the hearing. S	9/7/2022	6.00
Matthew Smith, Bruebak	A22-04-008	ROE	Researching indices price history for quarterly graph.	9/7/2022	5.30
Matthew Smith, Bruebak	A22-04-008	ROE	Credit report history for 4 CA utilities and creation of subsequent tables.	9/7/2022	4.50
Hayley Goodson	A22-04-008	CapStr	review SDG&E response to DR Set 3	9/8/2022	0.50
Hayley Goodson	A22-04-008	CapStr	confer with counsel for SDG&E re potential for stipulation to exhibits in lieu of cross	9/8/2022	0.50
Hayley Goodson	A22-04-008	CapStr	confer with counsel for SoCalGas re potential for stipulation to exhibits in lieu of cross	9/8/2022	0.25
Hayley Goodson	A22-04-008	CapStr	continue review of rating agency reports, note for EH, briefing (SDG&E)	9/8/2022	1.00
Hayley Goodson	A22-04-008	CapStr	review rating agency reports, note for EH, briefing (SoCalGas)	9/8/2022	2.00
Hayley Goodson	A22-04-008	Coord	mtg with KM, counsel for EPUC/IS re cross exhibits, hearing strategy	9/8/2022	1.50
Hayley Goodson	A22-04-008	Evid	f/u call with KM re TURN cross exhibits, strategy	9/8/2022	0.25
Katy Morsony	A22-04-008	Risk	Confer with EPUC/IS regarding case strategy	9/8/2022	1.25
Katy Morsony	A22-04-008	Risk	confer with H. Goodson re hearings	9/8/2022	0.25
Katy Morsony	A22-04-008	Risk	prepare potential cross and stipulations.	9/8/2022	3.25
Maggie G Ackenh, Brub	A22-04-008	ROE	Participated in a zoom meeting to discuss the cross-exhibits.	9/8/2022	1.25
Maggie G Ackenh, Brub	A22-04-008	ROE	Reviewed the discovery responses that started coming in and flagged a few for potential cross-exhibits.	9/8/2022	3.00
Maggie G Ackenh, Brub	A22-04-008	ROE	Made some changes to the COC Proceeding Comparisons cross-exhibit. Expanded the table with all witnesses' ROE results and made additional tables to separate the CAPM and the risk premium.	9/8/2022	4.25
Hayley Goodson	A22-04-008	Evid	call with KM re cross exhibits	9/9/2022	0.25
Katy Morsony	A22-04-008	Risk	Develop hearing exhibits	9/9/2022	0.75
Katy Morsony	A22-04-008	Risk	confer with H. Goodson regarding hearing preparations	9/9/2022	0.25
Hayley Goodson	A22-04-008	Evid	prep cross exhibits	9/10/2022	1.00
Hayley Goodson	A22-04-008	Evid	prep cross exhibits	9/11/2022	5.75
Hayley Goodson	A22-04-008	Evid	share coverage of EH with Katy and address identification of TURN's exhibits (10:30-12:30)	9/12/2022	2.00
Hayley Goodson	A22-04-008	Evid	communicate with parties re access to TURN's CONF exhibits	9/12/2022	0.25
Katy Morsony	A22-04-008	Evid	Attend hearings	9/12/2022	4.50
Katy Morsony	A22-04-008	Risk	Confer with HG re Briefing strategy	9/12/2022	0.25
Katy Morsony	A22-04-008	Risk	Draft outline of Brief	9/12/2022	1.50
Hayley Goodson	A22-04-008	Evid	attend EH for purpose of addressing TURN's NDA obligations	9/13/2022	1.75
Katy Morsony	A22-04-008	Evid	Attend hearings	9/13/2022	4.00
Michael Gorman, Brubak	A22-04-008	ROE	hearing prep	9/13/2022	3.00
Hayley Goodson	A22-04-008	Coord	provide feedback to counsel for EPUC/IS re motion to submit Gorman CONF testimony under seal	9/14/2022	0.25
Katy Morsony	A22-04-008	Risk	continue to outline brief incorporating record evidency	9/14/2022	3.00
Michael Gorman, Brubak	A22-04-008	ROE	hearing prep.	9/14/2022	5.00
Katy Morsony	A22-04-008	Risk	Continue to outline brief.	9/15/2022	1.00
Matthew Smith, Bruebak	A22-04-008	Risk	CA research and analysis for hearing	9/15/2022	3.30
Katy Morsony	A22-04-008	Risk	Continue to develop and outline brief	9/16/2022	5.00
Katy Morsony	A22-04-008	Brief	Draft Brief	9/19/2022	7.00

A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Hayley Goodson	A22-04-008	Afford	work on opening brief	9/20/2022	4.75
Katy Morsony	A22-04-008	Risk	Draft Brief	9/20/2022	5.00
Hayley Goodson	A22-04-008	Afford	work on opening brief	9/21/2022	3.50
Hayley Goodson	A22-04-008	CapStr	work on opening brief	9/21/2022	3.75
Katy Morsony	A22-04-008	Risk	Continue to draft brief	9/21/2022	3.00
Katy Morsony	A22-04-008	Risk	Review and Revise brief draft	9/21/2022	1.00
Hayley Goodson	A22-04-008	Brief	call with KM re brief	9/22/2022	0.25
Hayley Goodson	A22-04-008	CapStr	review Jenn's feedback on PG&E/SCE arguments, call with Jenn re same	9/22/2022	0.25
Hayley Goodson	A22-04-008	CapStr	draft brief on SDG&E cap str	9/22/2022	4.00
Katy Morsony	A22-04-008	CCM	draft brief on CCM	9/22/2022	2.00
Katy Morsony	A22-04-008	Risk	Continue to review and revise brief.	9/22/2022	3.00
Hayley Goodson	A22-04-008	Brief	integrate sections of brief, prepare tables, summary of recs	9/23/2022	2.00
Katy Morsony	A22-04-008	Brief	Review and analyze opening briefs.	9/23/2022	0.50
Katy Morsony	A22-04-008	Brief	Review and revise brief	9/23/2022	1.50
Hayley Goodson	A22-04-008	CapStr	finish brief on SDG&E cap str	9/23/2022	2.00
Hayley Goodson	A22-04-008	CapStr	draft brief on SoCalGas cap str	9/23/2022	2.50
Hayley Goodson	A22-04-008	Risk	review and revise WF risk issue per KM request	9/23/2022	0.25
Hayley Goodson	A22-04-008	Brief	call with KM re reply brief issues, division of labor	9/26/2022	0.25
Katy Morsony	A22-04-008	Brief	confer with HG re issues for reply brief	9/26/2022	0.25
Hayley Goodson	A22-04-008	Brief	review, analze, make notes on op briefs of other parties for reply brief	9/26/2022	2.75
Hayley Goodson	A22-04-008	Coord	call with EPUC/IS, Gorman et al., re reply brief	9/26/2022	0.75
Katy Morsony	A22-04-008	Coord	Confer with EPUC/IS counsel re briefs	9/26/2022	0.50
Katy Morsony	A22-04-008	Risk	Review OB filed by PG&E, SCE, SoCalGas;	9/26/2022	3.25
Maggie G Ackenh, Brub	A22-04-008	Brief	Reviewed and analyzed several of the IOUs' briefs	9/26/2022	2.50
Maggie G Ackenh, Brub	A22-04-008	Brief	attended a meeting w EPUC/IS and TURN to discuss reply briefs	9/26/2022	0.50
Hayley Goodson	A22-04-008	Afford	continue review and analysis of other party op briefs	9/27/2022	0.50
Hayley Goodson	A22-04-008	Afford	draft reply brief	9/27/2022	4.50
Hayley Goodson	A22-04-008	CapStr	continue review and analysis of other party op briefs	9/27/2022	0.50
Katy Morsony	A22-04-008	Risk	Review and analyze opening briefs.	9/27/2022	4.50
Hayley Goodson	A22-04-008	Brief	review and analyze briefs from intervenors	9/28/2022	1.00
Hayley Goodson	A22-04-008	CapStr	draft reply brief	9/28/2022	3.75
Katy Morsony	A22-04-008	Risk	Draft Reply Brief.	9/28/2022	4.00
Katy Morsony	A22-04-008	Risk	Review and revise Reply Brief.	9/29/2022	1.00
Michael Gorman, Brubal	A22-04-008	ROE	reply brief review and support	9/29/22	4.50
Hayley Goodson	A22-04-008	Brief	draft reply brief	9/30/2022	1.00
Katy Morsony	A22-04-008	Risk	Review and analyze Reply briefs.	9/30/2022	0.75
Hayley Goodson	A22-04-008	Brief	review and analyze pertinent sections of other party reply briefs (CapStr, Afford, other CoC adjustments)	10/5/2022	0.75
Hayley Goodson	A22-04-008	PD	review and analyze COC PD	11/9/2022	0.50
Katy Morsony	A22-04-008	PD	Review and analyze PD	11/9/2022	0.50
Hayley Goodson	A22-04-008	PD	confer with KM re cmts on PD, OA	11/28/2022	0.25
Hayley Goodson	A22-04-008	PD	begin working on op cmts on PD	11/28/2022	1.50
Katy Morsony	A22-04-008	PD	Review and analyze PD	11/28/2022	1.00
Hayley Goodson	A22-04-008	PD	continue working on op cmts on PD	11/29/2022	1.00
Hayley Goodson	A22-04-008	PD	review and analyze opening comments of other parties	11/29/2022	1.50
Katy Morsony	A22-04-008	PD	Review and analyze opening comments on PD	11/29/2022	1.50
Hayley Goodson	A22-04-008	PD	call with KM re oral argument, ex parte strategy	11/30/2022	0.50
Katy Morsony	A22-04-008	PD	Continue to review and analyze PD opening comments	11/30/2022	1.50
Katy Morsony	A22-04-008	PD	Outline PD Reply Comments	11/30/2022	0.50
Katy Morsony	A22-04-008	PD	Draft PD Reply comments.	12/1/2022	4.50
Katy Morsony	A22-04-008	PD	Continue to draft PD comments.	12/2/2022	1.00
Hayley Goodson	A22-04-008	PD	attend oral argument	12/5/2022	1.25
Hayley Goodson	A22-04-008	PD	review and revise KM draft reply cmts on PD	12/5/2022	0.50
Katy Morsony	A22-04-008	PD	Monitor Oral Argument	12/5/2022	1.00
Katy Morsony	A22-04-008	PD	coordinate with EPUC/IS to prepare for Ex Parte Meetings	12/7/2022	1.50
Katy Morsony	A22-04-008	PD	Prepare for and attend Ex Parte Meetings.	12/8/2022	2.00
Katy Morsony	A22-04-008	PD	Prepare for and attend Ex Parte Meetings.	12/9/2022	1.50
Katy Morsony	A22-04-008	PD	Review and revise draft of ex parte notice	12/9/2022	0.50
Hayley Goodson	A22-04-008	PD	review and analyze redlined PD as compared to recent ex parte notices	12/13/2022	0.25
Katy Morsony	A22-04-008	Comp	Review time sheets to develop comp request for D.22-12-031	2/6/23	2.00

A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/7/23	1.00
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/8/23	1.00
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/9/23	2.00
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/10/23	4.00
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/13/23	1.50
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/14/23	2.00
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	2/15/23	1.50
Katy Morsony	A22-04-008	Comp	Continue to draft comp request for D.22-12-031	3/6/23	0.25
Katy Morsony	A22-04-008	Comp	Draft Comp Request	6/20/23	3.25
Katy Morsony	A22-04-008	Comp	Review and revise comp request draft for D.22-12-031	6/26/23	0.75
Hayley Goodson	A22-04-008	Ph2-Proc	rsch, draft memo to Katy with input on ALJ ruling re resolution of remaining issues scoped into this proceeding in prep for intervenor coordination mtg tomorrow	9/26/23	0.50
Katy Morsony	A22-04-008	Ph2-Proc	Attend call with Aligned Intervenor on Ph 2 Ruling, Response	9/27/23	0.75
Jennifer Dowdell	A22-04-008	Ph2-Proc	Review and provide suggested edits to draft joint party response to ALJ ruling on scope as requested by attorney KM	9/28/23	1.00
Katy Morsony	A22-04-008	Comp	Update Comp Request; code entries	9/29/23	1.00
Jennifer Dowdell	A22-04-008	Ph2-Proc	Discussion w/attorney KM on scope and schedule recommendations	9/29/23	0.25
Katy Morsony	A22-04-008	Comp	Review and continue to code hours.	10/3/23	1.00
Katy Morsony	A22-04-008	Ph2-Coord	Attend aligned intervenor meeting to ensure coordination on testimony	1/11/24	0.75
Hayley Goodson	A22-04-008	Ph2-Test	call with Katy for report from intervenor coordination call this morning re testimony	1/11/24	0.25
Hayley Goodson	A22-04-008	Ph2-Test	call with Jenn re testimony	1/11/24	1.00
Hayley Goodson	A22-04-008	Ph2-Test	prepare memo for Jenn with questions to guide consideration of potential TURN testimony	1/11/24	0.50
Jennifer Dowdell	A22-04-008	Ph2-Test	Discuss Cost of Capital strategy with attorney HG	1/11/24	1.00
Jennifer Dowdell	A22-04-008	Ph2-Test	Strategy discussion on CoC Phase 2 w/ KM	1/11/24	0.50
Katy Morsony	A22-04-008	Ph2-Test	Review Phase 2 rulings on scope in preparation for aligned intervenor coordination call	1/11/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-Coord	Meeting w/Mike Gorman (EPUC/IS) to coordinate re CoC Phase 2 testimony issues	1/12/24	0.50
Jennifer Dowdell	A22-04-008	Ph2-Test	Prepare analysis for attorney HG on CoC Phase 2 issues for testimony	1/14/24	2.25
Hayley Goodson	A22-04-008	Ph2-Test	review memo from Jenn re PhII testimony and take notes for mtg tomorrow on potential TURN testimony	1/16/24	0.50
Jennifer Dowdell	A22-04-008	Ph2-Coord	Coordinate w/common cause partners-Aaron Rothschild (WTF)	1/17/24	1.00
Hayley Goodson	A22-04-008	Ph2-Test	mtg with Jenn to discuss strategy and contents of TURN testimony	1/17/24	2.00
Jennifer Dowdell	A22-04-008	Ph2-Test	Discuss CoC Phase 2 testimony w/HG	1/17/24	2.00
Jennifer Dowdell	A22-04-008	Ph2-Test	Draft testimony for CoC Phase 2	1/18/24	7.25
Jennifer Dowdell	A22-04-008	Ph2-Test	Draft testimony for CoC Phase 2	1/19/24	8.00
Jennifer Dowdell	A22-04-008	Ph2-Test	Draft testimony for CoC Phase 2	1/20/24	8.50
Jennifer Dowdell	A22-04-008	Ph2-Test	Draft testimony for CoC Phase 2	1/21/24	6.75
Hayley Goodson	A22-04-008	Ph2-Test	begin review of JD draft testimony	1/22/24	0.25
Hayley Goodson	A22-04-008	Ph2-Test	continue reviewing, editing JD draft testimony	1/23/24	5.25
Jennifer Dowdell	A22-04-008	Ph2-Test	Responses to question for attorney HG on CoC Phase 2 testimony	1/23/24	4.50
Hayley Goodson	A22-04-008	Ph2-Test	confer with JD re questions about draft testimony	1/24/24	0.25
Hayley Goodson	A22-04-008	Ph2-Test	continue review, editing of JD testimony	1/24/24	1.50
Hayley Goodson	A22-04-008	Ph2-Test	continue review, editing of JD testimony	1/25/24	4.00
Jennifer Dowdell	A22-04-008	Ph2-Test	revise draft of CoC Phase 2 testimony per HG feedback	1/27/24	5.25
Hayley Goodson	A22-04-008	Ph2-Test	review Jenn's next version of testimony and provide additional feedback	1/28/24	3.50
Hayley Goodson	A22-04-008	Ph2-Disc	review PG&E DR to Jenn	2/13/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-Disc	Prepare draft responses to PG&E DR in CoC Phase 2	2/13/24	6.50
Hayley Goodson	A22-04-008	Ph2-Test	review op testimony from other parties	2/13/24	1.50
Hayley Goodson	A22-04-008	Ph2-Disc	call with Jenn re PG&E data request	2/14/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-Disc	Prepare draft responses to PG&E DR in CoC Phase 2	2/14/24	4.00
Jennifer Dowdell	A22-04-008	Ph2-Disc	Discuss draft DR responses w/ attorney HG	2/14/24	1.25
Hayley Goodson	A22-04-008	Ph2-Test	continue review of Ph II testimony from other parties	2/14/24	3.00
Hayley Goodson	A22-04-008	Ph2-Disc	working meeting with Jenn to discuss further development of DR responses	2/15/24	1.00
Hayley Goodson	A22-04-008	Ph2-Disc	research capital structure waivers for DR	2/15/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-Disc	Prepare draft responses to PG&E DR in CoC Phase 2	2/15/24	4.00
Hayley Goodson	A22-04-008	Ph2-Disc	review Jenn's expanded draft of DR responses and provide feedback	2/20/24	1.00
Hayley Goodson	A22-04-008	Ph2-Disc	call with Jenn to further expand DR responses	2/20/24	1.00
Hayley Goodson	A22-04-008	Ph2-Disc	review Jenn's workpapers requested by PG&E	2/22/24	0.25
Hayley Goodson	A22-04-008	Ph2-Evid	confer with Jenn re need for EH	2/29/24	0.25
Hayley Goodson	A22-04-008	Ph2-Evid	review reply testimony to TURN to evaluate need for EH	2/29/24	1.50
Hayley Goodson	A22-04-008	Ph2-Evid	attend Rule 13.9 meet and confer	3/6/24	0.25
Hayley Goodson	A22-04-008	Ph2-Evid	review SCE draft of joint motion to admit exhibits, provide edits and authorize filing on TURN's behalf	3/27/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM	work on brief - CCM	4/17/24	4.00
Hayley Goodson	A22-04-008	Ph2-CCM	work on brief - CCM	4/18/24	6.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	CCM - call with counsel for IOUs re exploring settlement of CCM modifications	4/18/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	CCM - call with Jenn re meeting with IOUs	4/18/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	CCM - draft email to EPUC/IS, EDF, and CalPA re my conversation with IOUs	4/18/24	0.25

**A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Jennifer Dowdell	A22-04-008	Ph2-CCM-Sett	Analysis of CoC Phase 2 documents to support discussions w/ areas of commonality	4/18/24	3.50
Hayley Goodson	A22-04-008	Ph2-CCM	CCM - continue work on brief	4/19/24	6.00
Jennifer Dowdell	A22-04-008	Ph2-CCM	Analysis of IOU CCM rebuttal to advise HG for Phase 2 brief	4/19/24	2.00
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	CCM - call with EPUC/IS, EDF, and CalPA re exploring settlement with IOUs re CCM	4/19/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	CCM - draft email to IOUs after call with EPUC/IS, EDF, and CalPA re CCM settlement exploration	4/19/24	0.25
Hayley Goodson	A22-04-008	Ph2-Afford	Afford - review IOU rebuttal and take notes for brief	4/20/24	1.00
Hayley Goodson	A22-04-008	Ph2-Afford	Afford - rsch, draft brief section on affordability	4/20/24	6.25
Hayley Goodson	A22-04-008	Ph2-CapStr	CapStr - review IOU rebuttal and develop questions for Jenn for brief	4/20/24	1.00
Hayley Goodson	A22-04-008	Ph2-CCM	CCM - review input from Jenn and revise draft brief	4/20/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-CCM	CoC Phase 2 draft edits and comments to attorney HG on brief - CCM	4/20/24	4.00
Jennifer Dowdell	A22-04-008	Ph2-Afford	Further feedback on next draft of brief	4/21/24	1.00
Hayley Goodson	A22-04-008	Ph2-CapStr	CapStr - review Jenn's feedback re plan for brief	4/21/24	0.25
Hayley Goodson	A22-04-008	Ph2-CapStr	CapStr - call with Jenn re ideas for brief	4/21/24	0.75
Hayley Goodson	A22-04-008	Ph2-CapStr	CapStr - rsch, draft brief	4/21/24	6.75
Jennifer Dowdell	A22-04-008	Ph2-CapStr	Drafting analysis for brief sections as requested by attorney HG	4/21/24	8.50
Hayley Goodson	A22-04-008	Ph2-Afford	Afford - review feedback from Jenn and revise draft	4/22/24	1.25
Hayley Goodson	A22-04-008	Ph2-Brief	draft summary of recommendations and revise findings, COL in draft	4/22/24	1.00
Hayley Goodson	A22-04-008	Ph2-Brief	final review and revisions to brief	4/22/24	1.00
Hayley Goodson	A22-04-008	Ph2-Brief	begin review of other party opening briefs	4/22/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-Brief	Discussion w/attorney HG on reply brief arguments and strategies for review, issue coverage	4/22/24	1.00
Hayley Goodson	A22-04-008	Ph2-CapStr	CapStr - review feedback from Jenn and revise draft	4/22/24	0.50
Jennifer Dowdell	A22-04-008	Ph2-CapStr	Further edits to CoC draft brief as requested by attorney HG	4/22/24	3.00
Hayley Goodson	A22-04-008	Ph2-Brief	continue review of opening briefs (per workload plan with JD) - SCGC, IOUs, EDF, CalPA	4/23/24	3.00
Jennifer Dowdell	A22-04-008	Ph2-Brief	Analyze parties' opening briefs - PCF, UCAN, WTF, EPUC/IS	4/28/24	4.50
Jennifer Dowdell	A22-04-008	Ph2-Brief	Continue to analyze parties' opening briefs	4/29/24	4.25
Jennifer Dowdell	A22-04-008	Ph2-Brief	Summary of useful points from selected parties briefs for HG	4/30/24	1.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	review sett offer from IOUs re CCM	4/30/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	call with J. York/Sempra and S. Ramaiya/PG&E re CCM offer	4/30/24	0.50
Hayley Goodson	A22-04-008	Ph2-Afford	draft reply brief - afford	5/1/24	0.50
Hayley Goodson	A22-04-008	Ph2-Brief	start developing reply brief issues and potential arguments	5/1/24	2.00
Hayley Goodson	A22-04-008	Ph2-Brief	confer with Jenn re reply brief	5/1/24	0.50
Hayley Goodson	A22-04-008	Ph2-Brief	draft email to Jenn re guidance for her sections	5/1/24	0.25
Hayley Goodson	A22-04-008	Ph2-CapStr	draft reply brief - capital structure	5/1/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM	draft reply brief - CCM (my issues)	5/1/24	0.75
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	develop ideas for counter to IOU CCM offer	5/1/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	confer with Jenn re CCM offer	5/1/24	0.50
Hayley Goodson	A22-04-008	Ph2-Proc	draft reply brief - schedule	5/1/24	0.75
Jennifer Dowdell	A22-04-008	Ph2-CCM	CoC Reply Brief arguments and edits for attorney HG	5/2/24	2.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	confer with Jenn re CCM counter ideas	5/2/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	mtg with counsel for EPUC/IS, EDF, Cal Advocates re potential counters to IOUs re CCM	5/2/24	1.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	draft counter re CCM	5/2/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	discuss counter with R. Fulton/SDG&E by phone and all IOUs by email	5/2/24	0.25
Jennifer Dowdell	A22-04-008	Ph2-CapStr	CoC Reply Brief arguments and edits for attorney HG	5/3/24	3.50
Jennifer Dowdell	A22-04-008	Ph2-CCM	CoC Reply Brief arguments and edits for attorney HG	5/3/24	1.50
Hayley Goodson	A22-04-008	Ph2-Brief	finish drafting intro, conclusion sections of reply brief, and final review/revisions to full brief	5/6/24	0.75
Hayley Goodson	A22-04-008	Ph2-Brief	review other party reply briefs on issues TURN addressed	5/6/24	0.25
Hayley Goodson	A22-04-008	Ph2-CapStr	expand capital structure reply brief section in response to JD input	5/6/24	1.00
Hayley Goodson	A22-04-008	Ph2-CCM	expand CCM reply brief argument in response to JD input and to include new recommendation	5/6/24	2.00
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	confer with EDF, EPUC/IS re new CCM proposal	5/6/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	call with counsel for SCE re potential future sett negotiations re CCM	5/7/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	confer with counsel for EPUC/IS, EDF, CalPA re new IOU counter offer and potential reactions	5/8/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	meeting with EPUC/IS, EDF, Cal Advocates re IOU counter on CCM issues	5/9/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	review email from IOUs re continuing CCM sett discussions and draft email to other intervenors re same	5/15/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	confer with IOUs on sur-reply, future settlement discussions	5/16/24	0.25
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	prep for sett call with SCE, SDG&E, SoCalGas re CCM	5/20/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	sett call with SCE, SDG&E, SoCalGas re CCM	5/20/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	prepare summary of sett mtg for other interested intervenors participating in negotiations and confer with SCE re same	5/20/24	0.50
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	mtg with counsel for EPUC/IS re potential CCM settlement concepts	5/28/24	0.75

A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Hayley Goodson	A22-04-008	Ph2-CCM-Sett	additional email conversation with IOUs re potential CCM settlement	5/29/24	0.25
Hayley Goodson	A22-04-008	Ph2-PD	initial review of PD	9/10/24	0.25
Hayley Goodson	A22-04-008	Ph2-PD	further review of PD considering need for comments	9/12/24	1.00
Hayley Goodson	A22-04-008	Ph2-PD	begin drafting comments on PD	9/29/24	1.50
Hayley Goodson	A22-04-008	Ph2-PD	continue drafting comments on PD	9/30/24	4.00
Hayley Goodson	A22-04-008	Ph2-PD	review other party op cmts on PD for possible reply comments	9/30/24	1.25
Hayley Goodson	A22-04-008	Ph2-PD	begin rsch for response to IOU retroactive ratemaking argument	10/1/24	2.50
Hayley Goodson	A22-04-008	Ph2-PD	mtg with TL re strategy on retroactive ratemaking argument	10/1/24	0.25
Hayley Goodson	A22-04-008	Ph2-PD	continue rsch on retroactive ratemaking for reply cmts	10/4/24	5.00
Hayley Goodson	A22-04-008	Ph2-PD	rsch, draft rep cmts	10/5/24	6.25
Hayley Goodson	A22-04-008	Ph2-PD	continue working on PD rep cmts	10/6/24	1.50
Hayley Goodson	A22-04-008	Ph2-PD	finish drafting PD rep cmts	10/7/24	3.50
Hayley Goodson	A22-04-008	Ph2-PD	read reply cmts of other parties	10/7/24	0.25
Hayley Goodson	A22-04-008	Ph2-PD	prep for ex parte meetings today to highlight points in PD cmts	10/8/24	0.25
Hayley Goodson	A22-04-008	Ph2-PD	attend ex parte mtg with Nick Dahlberg (Pres. Reynolds) and Victor Smith (Houck) - 10:00 - 10:30 am	10/8/24	0.50
Hayley Goodson	A22-04-008	Ph2-PD	attend ex parte mtg with Maria Sotero (J. Reynolds) - 1 - 1:30 pm	10/8/24	0.50
Hayley Goodson	A22-04-008	Ph2-PD	attend ex parte mtg (Caryn M. & Jason S. (K. Douglas) - 10-10:30 am	10/9/24	0.50
Hayley Goodson	A22-04-008	Ph2-PD	review, edit ex parte notice drafted by Buchalter for our joint mtgs this week	10/10/24	0.25
Hayley Goodson	A22-04-008	Comp	comp request - work on phase 2 substantial contributions	12/12/24	3.25
Hayley Goodson	A22-04-008	Comp	comp request - review hours post 2022 for inclusion in comp request	12/16/24	1.00
Hayley Goodson	A22-04-008	Comp	comp request - continue work on post 2022 hours	12/17/24	2.50
Hayley Goodson	A22-04-008	Comp	comp request - finish substantial contributions	12/18/24	2.50
Hayley Goodson	A22-04-008	Comp	comp request - finish work on TURN 2023-2024 hours	12/18/24	2.00
Hayley Goodson	A22-04-008	Comp	comp request - work on duplication, reasonableness of costs and hours for Ph2 work	12/19/24	4.50
Substantial Total					543.80
Comp Total					37.25
Grand Total					581.05

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Attachment 3
Allocation of Hours by Issue

A.22-04-008 et al. (Cost of Capital) TURN Compensation Claim
TURN Hours Allocated by Issue

			Ph2-Proc	Ph2-Coord	Ph2-Test	Ph2-Disc	Ph2-Evid	Ph2-CCM	Ph2-CCM-Sett	Ph2-Afford	Ph2-CapStr	Ph2-Brief	Ph2-PD	GP	Coord	NDA	Risk	ROE	Evid	Afford	CapStr	Brief	CCM	PD	Disc	Substantive Hours	Substantive \$\$\$	Comp	Compensation (IComp)	Travel	Compensation (Travel)																
	Billing Period	Hourly Rate																																											1/2 of hourly rate		1/2 of hourly rate
Hayley Goodson	2022	\$570	-	-	-	-	-	-	-	-	-	-	-	4.00	5.00	4.25	2.00	0.25	12.50	22.25	29.00	8.00	-	7.25	-	94.50	\$53,865.00	-	\$0.00	0.00	\$0.00																
Hayley Goodson	2023	\$625	0.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.50	\$312.50	-	\$0.00	0.00	\$0.00																
Hayley Goodson	2024	\$680	0.75	-	23.50	4.00	2.25	19.50	10.25	9.00	10.75	9.00	29.25	-	-	-	-	-	-	-	-	-	-	-	-	118.25	\$80,410.00	15.75	\$5,355.00	0.00	\$0.00																
Jennifer Dowdell	2023	\$455	1.25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.25	\$568.75	-	\$0.00	0.00	\$0.00																
Jennifer Dowdell	2024	\$495	-	1.50	46.00	15.75	-	9.75	3.50	1.00	15.00	11.00	-	-	-	-	-	-	-	-	-	-	-	-	-	103.50	\$51,232.50	-	\$0.00	0.00	\$0.00																
Katy Morsony	2022	\$515	-	-	-	-	-	-	-	-	-	-	-	15.25	5.25	1.75	74.75	9.75	11.25	-	-	9.25	2.00	17.00	-	146.25	\$75,318.75	0.25	\$64.38	0.00	\$0.00																
Katy Morsony	2023	\$565	0.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.75	\$423.75	21.25	\$6,003.13	0.00	\$0.00																
Katy Morsony	2024	\$615	-	0.75	0.25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.00	\$615.00	-	\$0.00	0.00	\$0.00																
Maggie G Ackenh, Brubaker & Associates	2022	\$155	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	31.00	-	-	-	3.00	-	-	3.00	37.00	\$5,735.00	-	\$0.00	0.00	\$0.00																
Matthew Smith, Bruebaker & Associates	2022	\$165	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.30	25.00	-	-	-	-	-	-	-	28.30	\$4,669.50	-	\$0.00	0.00	\$0.00																
Michael Gorman, Brubaker & Associates	2022	\$285	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12.50	-	-	-	-	-	-	12.50	\$3,562.50	-	\$0.00	0.00	\$0.00																
TOTAL			3.25	2.25	69.75	19.75	2.25	29.25	13.75	10.00	25.75	20.00	29.25	19.25	10.25	6.00	80.05	78.50	23.75	22.25	29.00	20.25	2.00	24.25	3.00	543.80	\$276,713.25	37.25	\$11,422.50	\$0.00	\$0.00																
TOTAL % HOURS ALLOCATED			0.60%	0.41%	12.83%	3.63%	0.41%	5.38%	2.53%	1.84%	4.74%	3.68%	5.38%	3.54%	1.88%	1.10%	14.72%	14.44%	4.37%	4.09%	5.33%	3.72%	0.37%	4.46%	0.55%	100.00%																					

Substantial Contribution	: \$	276,713.25
Intervenor/Comp Compensation	: \$	11,422.50
Travel Time Compensation	: \$	-
Expenses Compensation	: \$	-
Grand Total	: \$	288,135.75

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Attachment 4
Statements of Qualifications for BAI consultants Gorman, Smith and Ackenhausen

Michael Gorman



Areas of Expertise

Competitive Procurement

Competitive Energy Procurement
Price Forecasts
Risk Management
Supplier Management

Cost of Service/Rate Design

Alternative/Incentive Regulatory
Plans/Mechanisms
Cost of Service
Electric Fuel and Gas Cost
Reviews and Rates
Marginal Cost Analysis
Nuclear Decommissioning Costs
Performance Based Rates
Prudence and Used/Useful
Evaluation
Rate Design and Tariff Analysis
Storage Cost/Necessity

Financial

Asset /Enterprise Valuation
Cost of Capital
Depreciation Studies
Financial Integrity
Merger Evaluations
(Benefit/Costs)
Revenue Requirement Issues

Special Projects

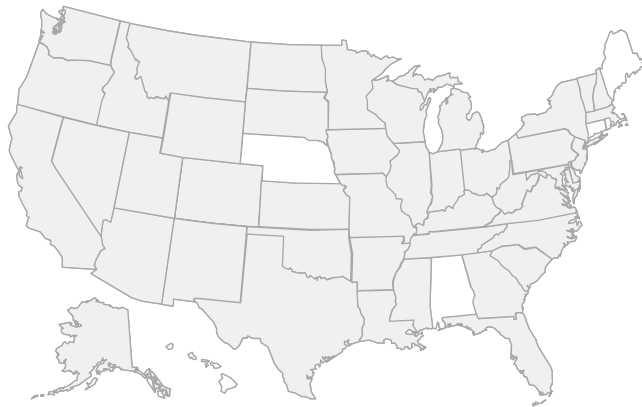
Site Selection and Evaluation
Training Seminars

Mr. Gorman is a Managing Principal at BAI. He received Degrees of Bachelor of Science in Electrical Engineering from Southern Illinois University at Carbondale and Master of Business Administration from the University of Illinois at Springfield. Mr. Gorman has also done extensive graduate studies in Financial Economics. He earned the designation Chartered Financial Analyst (CFA) from the CFA Institute.

Mr. Gorman has been in the consulting practice since 1990, and in the energy business since 1983. Mr. Gorman was employed by the Illinois Commerce Commission and held positions including Director of the Financial Analysis Department, Senior Analyst, Planning Analyst and Utility Engineer. Mr. Gorman was also employed by Merrill Lynch as a Financial Consultant. In this position, he consulted on cash management and investment strategies.

His responsibilities at BAI include project management, cost of capital studies, depreciation studies, financial integrity studies, system resource planning studies, alternative regulation plan/mechanisms, cost of service, rate design, production cost evaluations, commodity risk management, commodity procurement management, competitive supplier management and counterparty credit risk.

Project Work



Other Project Work

- Alberta
- Board of Public Utilities of Kansas City, Kansas
- City of Austin Electric Utility Council
- Federal Energy Regulatory Commission (FERC)
- LaGrange, Georgia / Municipal Electric Authority of Georgia
- Newfoundland
- Nova Scotia
- Salt River Project

Qualifications of Matthew Smith

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Matthew Smith. My business address is 16690 Swingley Ridge Road, Suite 140,
3 Chesterfield, MO 63017.

4 **Q PLEASE STATE YOUR OCCUPATION.**

5 A I am a Consultant in the field of public utility regulation with the firm of Brubaker &
6 Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

7 **Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

8 A In 2017, I received a Bachelor of Science Degree in Economics from Southern Illinois
9 University.

10 In May of 2018, I accepted an Analyst position with Brubaker & Associates, Inc.
11 ("BAI"). I was promoted to Senior Analyst in 2021, and in 2023 I was promoted to
12 Consultant. During my employment at BAI I have performed detailed analysis on a
13 variety of subjects within the scope of electric, natural gas, and water regulatory
14 proceedings. This analysis includes, but is not limited to the following: Cost of Service
15 Studies ("COSS"), Return on Equity ("ROE"), Rate Design, and Resource Adequacy
16 issues. I have also been engaged in the evaluation of Request for Proposals ("RFP")
17 responses, the creation of regional electric market price forecast models, and load
18 forecast models for industrial energy users in the electric and natural gas fields.

19 BAI was formed in April 1995. BAI and its predecessor firm have participated
20 in more than 700 regulatory proceedings in 40 states and Canada.

21 BAI provides consulting services in the economic, technical, accounting, and
22 financial aspects of public utility rates and in the acquisition of utility and energy

1 services through RFPs and negotiations, in both regulated and unregulated markets.
2 Our clients include large industrial and institutional customers, some utilities and, on
3 occasion, state regulatory agencies. We also prepare special studies and reports,
4 forecasts, surveys and siting studies, and present seminars on utility-related issues.

5 In general, we are engaged in energy and regulatory consulting, economic
6 analysis and contract negotiation. In addition to our main office in St. Louis, the firm
7 also has branch offices in Corpus Christi, Texas; Detroit, Michigan; Louisville, Kentucky
8 and Phoenix, Arizona.

Magdalena Ackenhausen



Areas of Expertise

Competitive Procurement

Energy Procurement
Request for Proposals
Risk Management

Financial

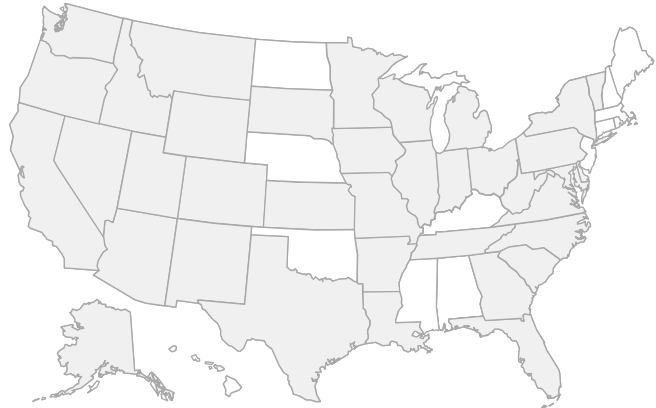
Asset Valuation
Off-Balance Sheet Debt
Bankruptcy-Related Issues
Cost of Capital
Depreciation Studies
Electric Industry Financial
Analysis
Financial Integrity
Fuel Cost Recovery
Merger Evaluations
Rate Base Issues
Revenue Requirement Issues
Utility Revenue Analysis

Ms. Ackenhausen is an Associate Consultant at BAI. She received a Bachelor of Science Degree in Business Administration with a concentration in Finance and minors in Economics and German from Truman State University in 2002. Ms. Ackenhausen also earned a Master of Business Administration Degree, again with a concentration in Finance from the University of Missouri-St. Louis in 2007.

Prior to joining BAI, Ms. Ackenhausen was employed by Nexstar Financial Corporation. In this position, she assisted first-time home buyers and existing borrowers with obtaining mortgage financing. She also assessed the net worth of her clients' financial assets.

Ms. Ackenhausen joined BAI in 2004 and she has been involved in various electric, natural gas and water regulatory issues in the field of cost of capital, capital structure, financial integrity, merger evaluation, commodity risk management, energy procurement, depreciation studies revenue requirement and rate base evaluation.

Project Work



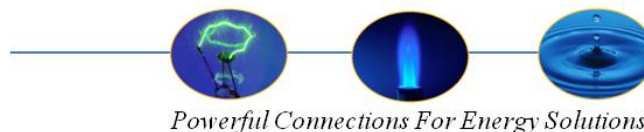
Other Project Work

- Federal Energy Regulatory Commission (FERC)
- Nova Scotia
- Ontario

Revised August 2021

Attachment 5

BAI invoice providing 2022 hourly rates for consultants Gorman, Smith, and Ackenhausen



PO Box 412000
St. Louis, MO 63141-2000
Tel (636) 898-6725
Fax (636) 898-6726

Physical Address
16690 Swingley Ridge Road
Suite Number 140
Chesterfield, MO 63017

INVOICE

The Utility Reform Network
Katy Morsony, Esq.
785 Market Street, Suite 1400
San Francisco, CA 94103

DATE 10/17/2022
INVOICE 20960

TERMS: NET 30 DAYS
Fed ID No. 43-1708220

RE: 11300
Various Utilities
Energy Producers & Users Coalition (EPUC) /TURN

TO CONSULTING SERVICES during the month of September 2022. Review Company's filing; assess impact on EPUC and IS rates; measures deficiencies and/or limitations in Company's recommendations; outline proposed consulting intervention; direct testimony issues; draft testimony.

Managing Principal	MPG	35.50 hours at	285.00/hr	10,117.50
Associate Consultant	MGA	71.50 hours at	155.00/hr	11,082.50
Senior Analyst	MPS	37.10 hours at	165.00/hr	6,121.50
Secretary	SDW	7.25 hours at	0.00/hr	0.00
Total Hours		151.35	Subtotal Fees: \$	27,321.50

Group Total: \$27,321.50

The Utility Reform Network

PLEASE PAY YOUR ALLOCATED PORTION BELOW

Your allocated portion of the total above is: 50% \$ 13,660.80