



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

02/13/25

01:45 PM

A2403018

Application of Pacific Gas and Electric Company to Recover in Customer Rates the Costs to Support Extended Operation of Diablo Canyon Power Plant from September 1, 2023 through December 31, 2025 and for Approval of Planned Expenditure of 2025 Volumetric Performance Fees (U 39 E)	Application 24-03-018 (Filed March 29, 2024)
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INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK

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

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 24-12-033	
Claimed: \$ 292,960.75	Awarded: \$	
Assigned Commissioner: Karen Douglas	Assigned ALJ: Nilgun Atamturk	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		/s/
Date: 02/13/25	Printed Name:	Matthew Freedman

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

A. Brief description of Decision:	D.24-12-033 Approves Pacific Gas and Electric Company's (PG&E's) 2024 Diablo Canyon Power Plant (DC) extended operations revenue requirement of \$722.6 million, reducing PG&E's requested revenue requirement of \$761 million by
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	approximately \$38 million, to account for the Tax Gross Up adjustment (\$33.63 million), Fixed Management Fee Escalation adjustment (\$4.737 million), and the Internal Revenue Code Normalization adjustment (\$0.051 million). Also conditionally approves PG&E’s 2025 Volumetric Spending Plan.
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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:	05/31/2024	
2. Other specified date for NOI:		
3. Date NOI filed:	06/12/2024	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.23-06-008	
6. Date of ALJ ruling:	03/20/2024	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.23-06-008	
10. Date of ALJ ruling:	03/20/2024	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		

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

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.24-12-033	
14. Date of issuance of Final Order or Decision:	12/20/2024	
15. File date of compensation request:	02/13/2025	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion

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

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. COSTS / Fixed Management Fee Escalation</p> <p>TURN opposed PG&E’s escalation methodology for the fixed management fee and offered an alternative approach that uses the same inflation index but limits the calculation to electric generation capital costs. TURN’s alternative approach reduces the fee by \$4.428 million relative to PG&E’s request.</p> <p>The Decision agrees with TURN’s alternative approach, noting that “the use of a generation-specific escalator is reasonable and appropriate. Hence, PG&E’s proposed</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 26-33</u></p> <p><u>TURN opening brief, October 1, 2024, pages 12-14</u></p> <p><u>TURN reply brief, October 21, 2024, pages 4-6</u></p> <p><u>TURN reply comments on Proposed Decision, pages 3-4.</u></p> <p><u>D.24-12-033, pages 24-25</u></p>	

<p>escalation rate is not approved. PG&E must update the fixed management fees escalation rates using TURN’s proposed escalation rate.” (page 25)</p>		
<p>2. COSTS / Fixed Management Fee Tax Gross Up</p> <p>TURN opposed PG&E’s request to collect \$33.63 million in 2025 to cover the anticipated federal and state tax liabilities for Fixed Management Fee revenues. TURN argued that there is no basis in law for this additional charge, that the fixed management fee deviates in significant respects from a traditional return on equity, and that PG&E previously failed to receive a tax gross up for similar energy efficiency incentive awards. TURN urged the Commission to deny PG&E’s request.</p> <p>The Decision agrees with TURN that there is no basis for providing the tax gross-up on the Fixed Management Fee. Relying on TURN’s statutory arguments and the fact that the fixed management is not equivalent to a return on equity, the Decision finds that “any incremental tax liabilities on fixed management fees should be born exclusively by PG&E and its shareholders.” (page 43)</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 33-34</u></p> <p><u>TURN opening brief, October 1, 2024, pages 14-18</u></p> <p><u>TURN reply brief, October 21, 2024, pages 6-8</u></p> <p><u>TURN reply comments on Proposed Decision, pages 2-3.</u></p> <p><u>D.24-12-033, pages 40-43</u></p>	

<p>3. COSTS / Correction of mistaken values in PD</p> <p>TURN’s reply comments on the Proposed Decision noted errors in the calculation of the impact of adopting TURN’s Fixed Management Fee escalation proposal and the inappropriate inclusion of the Fixed Management Fee tax gross up values that are otherwise rejected in the Decision. TURN urged the Commission to modify the PD to change the erroneous reference to \$108.5 million in Fixed Management Fees to \$74.318 million.</p> <p>The final decision notes that “in response to PG&E’s and TURN’s comments, the proposed decision is revised to correct computational errors regarding the adopted Fixed Management Fee values.” The final decision includes the revisions suggested by TURN.</p>	<p><u>TURN reply comments on Proposed Decision, page 1.</u></p> <p><u>D.24-12-033, pages 2, 12, 24, 76</u></p> <p><u>Proposed Decision of ALJ Atamturk, pages 2, 12, 24, 78</u></p>	
<p>4. COST / Resource Adequacy Substitution Cost</p> <p>TURN expressed concern that PG&E’s efforts to use the 2024 Market Price Benchmark (MPB) forecast Resource Adequacy (RA) value is artificially inflated due to problems with a methodology that relies on a small subset of short-term transactions, is inconsistent with costs for new generation capacity that would substitute for Diablo Canyon, and does not reflect a proxy for the transactions that would be</p>	<p><u>TURN opening brief, October 1, 2024, pages 66-68</u></p> <p><u>Opening comments of TURN to Update Prepared Testimony, October 18, 2024, pages 1-4.</u></p>	

<p>executed to meet RA obligations. TURN also pointed out PG&E’s own statements that the 2024 MPB RA benchmark may not be just and reasonable.</p> <p>The Decision quoted extensively from TURN’s comments and notes that “the Commission is cognizant of the pros and cons of the use of a PG&E estimate benchmark versus an administratively set price benchmark as offered by the party testimony.” (page 32) Although the Decision does not adopt any change to PG&E’s proposal to rely on the RA MPB, it notes that the Commission is evaluating comments on the tripling of this value in A.24-05-009 and states that, if the Commission adopts any mitigation measures in that proceeding, “PG&E must incorporate those measures into the [Diablo Canyon] NBC via a Tier 1 advice letter”. (page 32)</p>	<p><u>D.24-12-033, pages 30-32.</u></p>	
<p>5. COSTS / Tax Normalization</p> <p>TURN expressed concern with PG&E’s proposal to collect \$0.051 million in 2025 (and \$8.2 million through 2030) to address potential tax normalization requirements. TURN urged PG&E to instead seek a private letter ruling from the IRS that could eliminate the need for these revenues. TURN noted that pursuing this alternative option will result in near-term ratepayer savings</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 34-36</u></p> <p><u>TURN opening brief, October 1, 2024, pages 20-21</u></p> <p><u>TURN reply brief, October 21, 2024, page 6.</u></p>	

<p>until PG&E is able to clarify the applicability of normalization requirements to Diablo Canyon. TURN proposed requiring PG&E to file an Advice Letter if the IRS determines that excluding recovery of a deferred tax asset represents a normalization violation.</p> <p>The Decision agrees with TURN that PG&E’s alternative proposal, which involves seeking a private letter ruling from the IRS, would result in near-term ratepayer savings and clarify the applicability of normalization requirements to Diablo Canyon. The Decision adopts this approach.</p>	<p><u>D.24-12-033, pages 36-40</u></p>	
<p>6. FORECAST / Confidentiality</p> <p>TURN’s testimony and brief raised concerns with excessive confidentiality practices by PG&E that prevent public disclosure of basic information about the costs of operating Diablo Canyon. TURN urged the Commission to require future cost presentations to provide public information on total costs of operations in each year and total forecasted generation in each year.</p> <p>The Decision agreed with TURN that “PG&E must minimize the amount of confidential information in the next annual application and protect only market-sensitive data, as permitted by Commission decisions.”</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 6-8</u></p> <p><u>TURN opening brief, October 1, 2024, pages 5-8</u></p> <p><u>D.24-12-033, pages 70-71.</u></p>	

<p>7. FORECAST / Presentation of Costs through 2030</p> <p>TURN expressed concerns about changes in the long-term cost forecast presented in the current proceeding compared to the forecast provided in R.23-01-007. TURN noted that total forecasted costs for Diablo Canyon through 2030 are 12.16% higher than the forecast presented in the prior proceeding. To address concerns about the adequacy of this forecast, TURN urged the Commission to require PG&E to continue to update its long-term forecasts in each cost recovery proceeding.</p> <p>The Decision requires PG&E, in future forecast and cost recovery proceedings, to “provide the total cost of DCPD extended operations through 2030 in each annual application for informational purposes.” (page 70)</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 15-20.</u></p> <p><u>TURN opening brief, October 1, 2024, pages 60-62.</u></p> <p><u>D.24-12-033, page 70, Ordering Paragraph 10(b).</u></p>	
<p>8. FORECAST / A&G costs</p> <p>TURN argued that PG&E unreasonably assumed that Diablo Canyon will be assigned zero Administrative and General costs in 2025 and 2026. TURN developed an alternative forecast of Diablo Canyon-related A&G for 2025 and 2026 and urged the Commission to require PG&E to assign a fair allocation of these costs to Diablo Canyon in those years.</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 21-23.</u></p> <p><u>TURN opening brief, October 1, 2024, pages 69-70.</u></p>	

<p>The Decision agrees with TURN that PG&E “has no excuse for not accounting for A&G for 2025 and beyond in this application.” (page 69) The Decision requires PG&E to “include the A&G costs in its next DCPD forecast application” (page 69) and provide “updated A&G costs for 2025 and beyond.” (page 70).</p>	<p><u>D.24-12-033, pages 69-70, Ordering Paragraphs 8, 10(c).</u></p>	
<p>9. FORECAST / Production Tax Credits</p> <p>TURN identified significant uncertainty as to whether PG&E will be eligible to receive federal Production Tax Credits (PTC) for the operation of Diablo Canyon pursuant to IRC §45(U)(a)(2). Due to this uncertainty, TURN recommended that PG&E provide an update on any changes in PTC eligibility in its next application and promptly report on the receipt of any PTCs.</p> <p>Although the Commission did not expressly address this recommendation in the Decision, PG&E’s rebuttal testimony “agrees with this approach”. The Commission should find that TURN’s recommendation on this point was adopted by PG&E.</p>	<p><u>Ex. TURN-01, Monsen testimony, pages 21-23.</u> <u>TURN opening brief, October 1, 2024, pages 72-73.</u></p> <p><u>Ex. PGE-02, page 5-14.</u></p>	
<p>10. VOLUMETRIC PERFORMANCE FEES / Reporting of Spending and Annual Plans</p> <p>TURN opposed PG&E’s plan to utilize a Tier 3 Advice Letter</p>		

<p>several spending proposals that appeared to fall outside the scope of 712.8(s)(1). TURN further pointed out the potential for PG&E’s plan to use VPFs to cover costs that would otherwise be paid through its General Rate Case funding. Moreover, TURN highlighted the many ways in which PG&E shareholders could directly financially benefit from its VPF spending and violate the prohibitions in 712.8(s)(2).</p> <p>The Proposed Decision denies PG&E’s proposed VPF spending plan without prejudice due to its finding that the Commission cannot determine whether the plan “satisfies Section 712.8(s) requirements.” (page 65) The Proposed Decision further notes that PG&E must present “further project details”, demonstrate compliance with §712.8(s)(2), and show that “no double counting has occurred and no shareholder profits were received.” (page 66)</p> <p>The final Decision finds that PG&E’s VPF plan “must be supplemented with additional information submitted by PG&E through the Advice Letter process.” (page 65) The Decision agrees with TURN that “the spending plan lacks the detail necessary for the Commission to conclude that the projects: (1) fall within the required (s)(1) categories and</p>	<p><u>TURN opening comments on Proposed Decision, pages 2-6</u></p> <p><u>Proposed Decision of ALJ Atamturk, pages 65-66.</u></p> <p><u>D.24-12-033, pages 65-67</u></p>	
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<p>(2) will not increase shareholder profits, consistent with (s)(2).” (page 66) The Decision holds that “it is incumbent on PG&E” to demonstrate that its plan satisfies these requirements.” The Decision further notes that PG&E will be required to track VPF spending to ensure it supports work that is incremental to, and separately identifiable from, costs previously authorized for recovery in rates.</p>		
<p>12. VOLUMETRIC PERFORMANCE FEES / TURN alternative plan and Private Letter Ruling</p> <p>TURN presented an alternative VPF spending plan that would use the funds to offset capital investments in customer energization and wildfire mitigation projects. TURN explained how its approach would yield superior long-term savings for ratepayers, prevent PG&E shareholders from realizing direct financial benefits, and accelerate progress on critical public purpose priorities defined in Section 712.8(s)(1). As part of its alternative proposal, TURN recommended that PG&E be directed to seek a private letter ruling from the IRS to determine whether the use of VPFs to support capital investments under TURN’s alternative approach would be considered non-taxable contributions to PG&E. TURN noted that the result of this</p>	<p><u>Ex. TURN-02, Dowdell testimony, pages 15-27</u></p> <p><u>TURN opening brief, October 1, 2024, pages 39-55</u></p> <p><u>TURN reply brief, October 21, 2024, pages 18-31</u></p> <p><u>TURN opening comments on Proposed Decision, pages 4-6.</u></p>	

<p>request could assist with recommended changes to relevant statutory provisions to achieve nontaxable treatment.</p> <p>Noting that the Commission previously encouraged parties to offer new VPF spending proposals, the Decision “finds the potential ratepayer benefits and savings described by TURN substantial enough to warrant seeking clarification on the tax question to inform future Diablo Canyon forecast proceedings and VPF spending plans.” (page 77) The Decision adopts TURN’s proposal to require PG&E to seek a private letter ruling from the IRS addressing this topic.</p> <p>The Decision further affirms TURN’s proposal by stating that “as TURN suggests, submitting a request for a Private Letter Ruling provides an opportunity to assess whether VPFs qualify for nontaxable treatment. Even if considered gross income, the IRS may offer guidance that allows modifications to the VPF mechanism to meet relevant IRS requirements for nontaxable treatment. This guidance could inform recommendations to the Legislature to amend the relevant statutory provisions, facilitating nontaxable treatment, aligning with SB 846 goals, and benefitting ratepayers.” (page 77)</p>	<p><u>D.24-12-033, pages 76-77, Finding of Fact 28, Ordering Paragraph 12.</u></p>	
<p>13. Application for Rehearing / PG&E</p>		

<p>Application for Rehearing on Tax Gross up for Fixed Management Fee</p> <p>TURN opposed PG&E's application for rehearing of D.24-12-033 seeking to overturn the Commission's determination that PG&E may not collect a tax gross-up on its Fixed Management Fee. TURN argued that SB 846 does not authorize a tax gross up on this fee, that several provisions of state law prohibit such treatment, and that the Commission has not previously authorized tax gross ups for incentive payments. TURN urged the Commission not to modify this portion of D.24-12-033.</p> <p>As of the date of filing of this compensation request, the Commission has not issued a decision on PG&E's application for rehearing. TURN believes there is a strong likelihood that the Commission will issue such a decision prior to the issuance of a decision resolving TURN's compensation request. TURN requests an opportunity to supplement the substantial contribution portion of this request once a decision on PG&E's rehearing request has been issued.</p>	<p><u>TURN response to PG&E Application for Rehearing of D.24-12-033, February 5, 2025</u></p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	No	
c. If so, provide name of other parties:		
Alliance for Nuclear Responsibility, Green Power Institute, Californians for Renewable Energy, Small Business Utility Advocates, and Energy Producers and Users Coalition.		
d. Intervenor’s claim of non-duplication:		
<p>TURN’s work in this proceeding was markedly different from the contributions provided by other intervenors. TURN addressed a far larger number of issues than other intervenors, provided more in-depth analysis of the issues it addressed, and did not take positions on a number of topics that were heavily contested by other intervenors. Moreover, TURN’s positions in this proceeding did not consistently align with any other intervenor.</p> <p>TURN was the lead party on a number of key issues including the fixed management fee escalation and tax gross up, confidentiality issues, PG&E’s normalization adjustment, the unreasonable omission of A&G costs, and flaws with PG&E’s Volumetric Performance Fees (VPF) plan. TURN was also the only party to provide a comprehensive alternative VPF plan and recommendations.</p> <p>To the extent that any duplication occurred, it was unavoidable due to the nature of the process, the large number of parties, and the array of issues identified as within the scope of the proceeding. TURN worked diligently to ensure that its involvement uniquely influenced the outcome of the final Decision.</p>		

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

#	Intervenor’s Comment	CPUC Discussion

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

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

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>As demonstrated in the substantial contribution section, TURN’s participation had a material impact on the outcome of the final decision. TURN’s contributions include the following:</p> <ul style="list-style-type: none"> • Reducing PG&E’s Fixed Management Fee by \$4.428 million to reflect a lower escalation methodology. • Eliminating the \$33.63 million tax gross up requested by PG&E for its Fixed Management Fee. • Reducing PG&E’s request by \$0.051 million in 2025 (and \$8.2 million through 2030) to exclude the costs of a deferred tax asset proposed by PG&E to address potential normalization issues. • Requiring the inclusion of A&G costs in future Diablo Canyon forecasts. • Denying PG&E’s request to review future VPF spending plans and recorded spending through an Advice Letter process. • Requiring PG&E to demonstrate that its current VPF plan only funds work that falls within the scope of §712.8(s)(1) and does not enrich its shareholders pursuant to §712.8(s)(2). • Directing PG&E to seek a Private Letter Ruling from the IRS to determine opportunities to use VPF spending to offset capital expenditures. <p>Given these specific contributions, the benefits associated with TURN’s participation far exceed the cost of TURN’s participation in this proceeding. TURN’s claim should be found to be reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN devoted the minimum number of hours to reviewing rulings, conducting discovery, drafting comments and testimony, reading testimony submitted by other parties, drafting briefs, participating in CPUC-authorized evidentiary hearings and oral arguments, and commenting on</p>	

the proposed decision. TURN's pleadings were highly substantive given the amount of time devoted to the task.

Reasonableness of Staffing

Matthew Freedman

TURN's lead attorney was Matthew Freedman. Mr. Freedman was responsible for the development of TURN's overall strategy in this proceeding. Mr. Freedman drafted all formal pleadings, assisted with discovery, worked with TURN's experts on the development of testimony, attended the Prehearing conference, represented TURN at evidentiary hearings, drafted TURN's briefs and comments, and participated in oral arguments and *ex parte* meetings.

Robert Finkelstein

TURN attorney Robert Finkelstein provided very limited assistance to Jennifer Dowdell relating to her development of proposals relating to Volumetric Performance Fees.

Jennifer Dowdell

TURN Senior Policy Expert Jennifer Dowdell served as an expert witness to TURN on the issue of Volumetric Performance Fees. Ms. Dowdell sponsored written testimony and provided feedback to TURN's attorney on written pleadings addressing the issues within her scope.

William Monsen

Mr. Monsen, a consultant to TURN, served as an expert witness on the issue of accounting for, and forecasting, the reasonable costs of Diablo Canyon extended operations. Mr. Monsen drafted discovery, sponsored written testimony that addressed cost and forecasting issues, and provided feedback to TURN's attorney on written pleadings addressing the issues within his scope.

Time spent on Ex Parte communications

TURN's request includes hours devoted to *ex parte* meetings. These hours include time spent making the initial request, preparing for the meetings, participating in the meetings, and drafting the required post-meeting *ex parte* notices. The Commission should find that hours spent on these *ex parte* communications represent the "reasonable costs of preparation for and participation in a hearing or proceeding." (Cal. Pub. Util. Code §1803)

<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.</p> <p>As noted in TURN’s <i>ex parte</i> notices, the primary subject of these meetings was to defend provisions of the Proposed Decision that rejected PG&E’s request for a Fixed Management Fee tax gross up and declined to approve PG&E’s VPF spending plan. TURN also urged the Commission to recognize TURN’s alternative VPF plan. (<i>See</i> TURN notice of Ex Parte communication, December 16, 2024). TURN initiated these <i>ex parte</i> meetings in response to PG&E’s notice of <i>ex parte</i> meetings with all Commissioner offices. Since PG&E engaged in significant <i>ex parte</i> activity in this proceeding, TURN was obligated to similarly engage to defend and support the positions articulated in its testimony and briefs. The final decision retained TURN’s proposed adjustments to the Fixed Management Fee, required PG&E to provide additional information on its VPF plan, and acknowledged the potential ratepayer benefits of TURN’s alternative VPF plan.</p> <p>The Commission has routinely approved compensation for <i>ex parte</i> activities by intervenors in decisions dating back for 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.24-09-049, 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, D.19-07-020, D.19-03-005, D.18-11-043, D.18-04-021, D.15-08-023, D.12-08-041.</p> <p><u>Compensation Request</u></p> <p>TURN’s request also includes 10.5 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all attorney and expert time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p>General Participation (GP) – 36 hours – 7.00% of total</p> <p>General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing the initial application, rulings and proposed decisions, reviewing testimony and briefs submitted by other parties that address multiple issues, initial meetings with experts to discuss</p>	

strategy and substance, and review and execution of nondisclosure agreements.

Commission hearings and events (COMM) – 48.5 hours – 9.43% of total

Preparation for, and participation in, the prehearing conference, evidentiary hearings, required meet-and-confer sessions with all parties, ex parte meetings, and the December 16, 2024 oral argument. Also includes review of hearing and oral argument transcripts.

Discovery (DISC) – 45.75 hours – 8.90% of total

Time devoted to developing data requests, reviewing data responses, and drafting data responses to requests submitted to TURN by PG&E.

Diablo Canyon Costs (COSTS) – 82.35 hours – 16.02% of total

Work on all Diablo Canyon operating costs PG&E sought for recovery in this application including the Fixed Management Fee, the tax gross up on the Fixed Management Fee, Resource Adequacy Substitution costs, the deferred tax asset, working cash and government transition costs.

Diablo Canyon Forecast (FORECAST) – 48.5 hours – 9.43% of total

Work on PG&E’s long-term forecast of Diablo Canyon operating costs through 2030 including issues relating to confidentiality, the need to present a long-term forecast in a future application, A&G costs, property taxes, Greenhouse Gas Values, and the treatment of future Production Tax Credits.

Volumetric Performance Fees (VPF) – 246 hours – 47.85% of total

Work evaluating and critiquing PG&E’s VPF spending plan, developing TURN’s alternative VPF plan, assessing relevant tax treatment and recommending a private letter ruling request, and responding to PG&E’s request to rely on an Advice Letter process to review future plans.

Application for Rehearing (AFR) – 7 hours – 1.36% of total

Work responding to PG&E’s application for rehearing of D.24-12-033.

Compensation (COMP) – 10.5 hours

Time spent on the preparation of compensation-related pleadings.

TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jennifer Dowdell, TURN Energy Policy Expert	2024	194.00	\$495	Res. ALJ-393, 2023 Rate + 2024 4.07% COLA + 5% step increase. See Comment #3.	\$96,030.00			
Matthew Freedman, TURN Staff Attorney	2024	183.50	\$740	D.24-09-015	\$135,790.00			
Matthew Freedman, TURN Staff Attorney	2025	7.0	\$805	D.24-09-015 + 3.5% COLA + 5% Step Increase; See Comment #2	\$5,635.00			
Robert Finkelstein, General Counsel	2024	0.25	\$875	D.24-07-033	\$218.75			
William Monsen, Expert Consultant	2024	129.35	\$395	Res. ALJ-393, 2021 rate + 2022 3.31% COLA + 2023 4.46% COLA + 2024 4.07% COLA. See Comment #1	\$51,093.35			
Subtotal: \$288,767.00						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour s	Rate	Total \$
Matthew Freedman	2024	1	\$370	50% of 2024 rate	\$370.00			
Matthew Freedman	2025	9.5	\$402.5	50% of rate approved in D.24-09-015 + 3.5% COLA + 5% Step Increase; See comment #2	\$3,823.75			
Subtotal: \$4,193.75						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
Subtotal: \$0						Subtotal: \$		
TOTAL REQUEST: \$292,960.75						TOTAL AWARD: \$		

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate 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.

**Travel and Reasonable Claim preparation time are typically compensated at 1/2 of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matthew Freedman	March 29, 2001	214812	No
Robert Finkelstein	June 1990	124776	No

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

Attachment or Comment #	Description/Comment

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

Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Allocation of hours by issue
Attachment 4	TURN-MRW agreement for 2024 hourly rates
Comment #1	<p>2024 Hourly Rate for William Monsen</p> <p>TURN requests a 2024 hourly rate of \$395 for work conducted by consultant William Monsen.</p> <p>To calculate the 2024 hourly rate for Mr. Monsen, TURN applied the COLAs from Res. ALJ-393 for 2022 (3.31%), 2023 (4.46%) and 2024 (4.07%) to the approved 2021 hourly rate of \$355 approved in D.23-05-023. Formula: $\\$355 * (1+0.031+0.0446+0.0407) = \\396.29</p> <p>The rate of \$395 was charged by MRW to TURN for Mr. Monsen’s work in this proceeding. See Attachment 4 for a demonstration that this rate was used for work performed in 2024 in this proceeding.</p>
Comment #2	<p>2025 Hourly Rate for Matthew Freedman</p> <p>TURN requests an hourly rate of \$805 for work conducted by TURN Attorney Matthew Freedman in 2025.</p> <p>To calculate the 2025 hourly rate for Mr. Freedman, TURN applied the 2025 escalation rate of 3.5% to his authorized 2024 rate of \$740 (D.24-09-015), as well as the second 5% step increase in the Attorney – Level V experience tier. Formula: $\\$740 \times [1 + (0.035 + 0.05)] = \\802.90</p> <p>TURN applies the 3.5% COLA based on the Bureau of Labor Statistics’ update for the 12-months ended December 2024. See https://www.bls.gov/news.release/eci.t05.htm (Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations”).</p> <p>TURN asks that the Commission also apply the second 5% step increase when it calculates the 2025 rate for Mr. Freedman.</p>
Comment #3	<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. TURN has a pending compensation request seeking the same 2024 rate for Ms. Dowdell in A.22-04-008/A.22-04-009/A.22-04-011/A.22-04-012.</p> <p>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. Ms. Dowdell took the first 5% step increase in this experience tier in 2023. See D.24-09-016. Formula: $\\$455 * (1+0.0407+0.05) = \\496.27</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 Rule 14.6(c)(6))</i>?	
--	--

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.24-12-033
2. The requested hourly rates for The Utility Reform Network’s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

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

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.24-12-033		
Proceeding(s):	A.24-03-018		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	02/13/25	\$292,960.75		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	740	2024	
Matthew	Freedman	Attorney	805	2025	
Robert	Finkelstein	Attorney	875	2024	
Jennifer	Dowdell	Expert	495	2024	
William	Monsen	Expert	395	2024	

(END OF APPENDIX)

Attachment 1
Certificate of Service

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

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

Attachment 2

Daily Time Records for Attorneys and Experts

A.24-03-018 (PG&E Diablo Canyon) TURN Compensation Claim

Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Robert Finkelstein	A24-03-018	VPF	Discuss use of funds options with JDowdell for testimony in DC case	7/23/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Analysis of Diablo DRs- review all DRs and DR responses	7/10/2024	4.25
Jennifer Dowdell	A24-03-018	VPF	Draft DRs regarding VPFs	7/11/2024	2.50
Jennifer Dowdell	A24-03-018	VPF	Discussion w/attorney MF	7/19/2024	0.50
Jennifer Dowdell	A24-03-018	VPF	Diablo Volumetric fees analysis	7/22/2024	8.00
Jennifer Dowdell	A24-03-018	VPF	Diablo Volumetric fees drafting	7/23/2024	8.00
Jennifer Dowdell	A24-03-018	VPF	Diablo Volumetric fees	7/23/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Discussion w/attorney MF	7/25/2024	0.75
Jennifer Dowdell	A24-03-018	VPF	Diablo VPF analysis	7/25/2024	7.75
Jennifer Dowdell	A24-03-018	VPF	Discussion w/attorney MF	7/26/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Analysis to support Testimony	7/26/2024	10.25
Jennifer Dowdell	A24-03-018	VPF	Further testimony drafts	7/27/2024	8.50
Jennifer Dowdell	A24-03-018	VPF	Further testimony drafts	7/28/2024	13.25
Jennifer Dowdell	A24-03-018	VPF	Update Workpapers-Diablo	8/5/2024	5.00
Jennifer Dowdell	A24-03-018	VPF	Discussion with Bill Monson re: DR 1	8/6/2024	0.50
Jennifer Dowdell	A24-03-018	VPF	Prepare response to Diablo DR 4	8/6/2024	4.50
Jennifer Dowdell	A24-03-018	VPF	Prepare transmittal and explanatory text for attorney MF	8/7/2024	1.00
Jennifer Dowdell	A24-03-018	VPF	Prepare additional update analysis	8/7/2024	3.00
Jennifer Dowdell	A24-03-018	VPF	Transmittal to attorney MF including all updates and bullets	8/7/2024	1.00
Jennifer Dowdell	A24-03-018	VPF	Review Bill Monson DR1	8/7/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Confirm response w/attorney MF	8/7/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Draft responses to DR 4	8/8/2024	3.25
Jennifer Dowdell	A24-03-018	VPF	DR 4 Transmittal to attorney MF	8/8/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Draft responses to DR2	8/8/2024	4.50
Jennifer Dowdell	A24-03-018	VPF	DR 2 Transmittal to attorney MF	8/8/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Tax analysis supporting VPF position	8/9/2024	6.50
Jennifer Dowdell	A24-03-018	VPF	Analysis of applicable IRS sources for attorney MF	8/11/2024	4.25
Jennifer Dowdell	A24-03-018	VPF	Transmittal of analysis and opinion to attorney MF	8/11/2024	0.25
Jennifer Dowdell	A24-03-018	VPF	Provide feedback to attorney MF re DR 3	8/12/2024	0.50
Jennifer Dowdell	A24-03-018	VPF	Further tax analysis to support TURN positions	8/15/2024	2.25
Jennifer Dowdell	A24-03-018	VPF	Prepare and edit Final Errata	8/15/2024	2.75
Jennifer Dowdell	A24-03-018	VPF	Analyze PG&E's rebuttal testimony	8/22/2024	3.00
Jennifer Dowdell	A24-03-018	VPF	Prepare edits and additions to TURN DRs	8/22/2024	4.25
Jennifer Dowdell	A24-03-018	VPF	Provide analysis and memo to attorney MF regarding tax and accounting issues	8/22/2024	1.00
Jennifer Dowdell	A24-03-018	VPF	Accounting research and analysis in support of TURN positions	8/24/2024	4.75
Jennifer Dowdell	A24-03-018	VPF	FERC Accounting research and analysis	8/25/2024	4.00
Jennifer Dowdell	A24-03-018	VPF	Analysis in response to PG&E rebuttal	8/26/2024	4.00
Jennifer Dowdell	A24-03-018	VPF	Analysis in response to PG&E rebuttal	8/29/2024	7.25
Jennifer Dowdell	A24-03-018	VPF	Analyze PG&E rebuttal	8/30/2024	3.00
Jennifer Dowdell	A24-03-018	VPF	Draft response to PG&E DR 5	8/30/2024	4.25
Jennifer Dowdell	A24-03-018	VPF	Prepare response to DR 5 (in lieu of cross)	9/1/2024	2.00
Jennifer Dowdell	A24-03-018	VPF	Prepare response to DR 5 (in lieu of cross)	9/2/2024	3.00
Jennifer Dowdell	A24-03-018	VPF	Confer with Attorney MF regarding draft response to DR 5	9/3/2024	1.00
Jennifer Dowdell	A24-03-018	VPF	Analyze PG&E DRs and citations	9/3/2024	5.00
Jennifer Dowdell	A24-03-018	VPF	Incorporate feedback from attorney MF re: data response DR 5	9/4/2024	1.00
Jennifer Dowdell	A24-03-018	VPF	Complete DR Draft for attorney MF	9/4/2024	2.75
Jennifer Dowdell	A24-03-018	VPF	Provide final edits and comments to attorney MF regarding TURN DR 5 in lieu of cross	9/5/2024	0.75
Jennifer Dowdell	A24-03-018	VPF	Research IRS Notices to support TURN position	9/5/2024	3.25
Jennifer Dowdell	A24-03-018	VPF	Provide edits and comments to cross script for attorney MF	9/6/2024	2.00
Jennifer Dowdell	A24-03-018	VPF	Provide edits and comments to cross script for attorney MF	9/9/2024	1.75
Jennifer Dowdell	A24-03-018	VPF	Analyze PG&E proposed cross exhibits for tax and accounting issues	9/10/2024	1.50
Jennifer Dowdell	A24-03-018	VPF	Prepare writeup on PG&E proposed cross exhibits	9/10/2024	0.50
Jennifer Dowdell	A24-03-018	VPF	provide final edits and feedback on cross script to attorney MF	9/11/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Attendance at Evidentiary Hearings	9/11/2024	3.00
Jennifer Dowdell	A24-03-018	COMM	Attendance at Evidentiary Hearings	9/12/2024	2.50
Jennifer Dowdell	A24-03-018	VPF	Edits to VPF section of brief prepared for attorney MF	9/29/2024	2.25
Jennifer Dowdell	A24-03-018	VPF	Edits to TURN brief to attorney MF	9/30/2024	1.75
Jennifer Dowdell	A24-03-018	VPF	Edits to TURN Opening brief to attorney MF	10/1/2024	1.50
Jennifer Dowdell	A24-03-018	VPF	Edits to attorney MF	10/20/2024	2.00
Jennifer Dowdell	A24-03-018	VPF	Analyze PG&E Rebuttal testimony	11/7/2024	1.75
Jennifer Dowdell	A24-03-018	VPF	Analyze Diablo PD	11/14/2024	1.25
Jennifer Dowdell	A24-03-018	VPF	Provide comments and redline draft additions for comments on Diablo PD for attorney MF	12/2/2024	2.00
Jennifer Dowdell	A24-03-018	VPF	Analysis and strategic response to PG&E's comments on Diablo PD	12/5/2024	3.00
Jennifer Dowdell	A24-03-018	VPF	Analysis and strategic response to CUE's comments on Diablo PD	12/6/2024	1.75
Jennifer Dowdell	A24-03-018	VPF	Prepare response strategy notes and transmittal for attorney MF regarding PG&E & CUE comments on Diablo PD	12/6/2024	1.25
Jennifer Dowdell	A24-03-018	VPF	Final redline on reply PD comments to attorney MF	12/9/2024	0.75
Jennifer Dowdell	A24-03-018	COMM	Feedback for attorney MD re ex parte script and notes	12/10/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Diablo final ex parte script review	12/10/2024	0.25
Jennifer Dowdell	A24-03-018	COMM	Prep for Diablo ex parte	12/11/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Diablo ex parte	12/11/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Prep for Diablo ex parte	12/12/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Diablo ex parte	12/12/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Diablo ex parte	12/12/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Prep for Diablo ex parte	12/13/2024	0.50
Jennifer Dowdell	A24-03-018	COMM	Diablo ex parte	12/13/2024	0.50
Matthew Freedman	A24-03-018	GP	Initial review of PG&E application	3/29/2024	1.00
Matthew Freedman	A24-03-018	COST	Review and analysis of DOE award document	4/11/2024	1.50
Matthew Freedman	A24-03-018	GP	Review of application and email to PG&E re: protest date	4/18/2024	0.50

A.24-03-018 (PG&E Diablo Canyon) TURN Compensation Claim

Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Matthew Freedman	A24-03-018	GP	Review PG&E application and testimony	5/2/2024	2.50
Matthew Freedman	A24-03-018	DISC	Draft TURN DR 1 to PG&E	5/2/2024	1.50
Matthew Freedman	A24-03-018	COST	Draft TURN protest to PG&E application	5/2/2024	1.00
Matthew Freedman	A24-03-018	FORECAST	Draft TURN protest to PG&E application	5/3/2024	1.00
Matthew Freedman	A24-03-018	VPF	Draft TURN protest to PG&E application	5/3/2024	0.25
Matthew Freedman	A24-03-018	DISC	Draft TURN DR 1 to PG&E	5/3/2024	1.50
Matthew Freedman	A24-03-018	GP	Review PG&E application and testimony	5/3/2024	1.50
Matthew Freedman	A24-03-018	GP	Review NDA	5/6/2024	0.25
Matthew Freedman	A24-03-018	DISC	Review and revise TURN DR 1 to PG&E	5/6/2024	0.25
Matthew Freedman	A24-03-018	FORECAST	Review and revise TURN protest to PG&E application	5/8/2024	0.25
Matthew Freedman	A24-03-018	GP	Review/execution of NDA	5/16/2024	0.25
Matthew Freedman	A24-03-018	GP	Review of PG&E reply to protests	5/21/2024	0.50
Matthew Freedman	A24-03-018	DISC	Review of PG&E responses to TURN DR 1	5/21/2024	1.00
Matthew Freedman	A24-03-018	DISC	Drafting TURN DR#2 to PG&E	5/21/2024	0.50
Matthew Freedman	A24-03-018	GP	Review of ALJ message to service list with agenda, proposed schedule, speaker list	5/30/2024	0.25
Matthew Freedman	A24-03-018	GP	Preparation for PHC - review of case materials, PG&E data responses, case notes	5/30/2024	0.50
Matthew Freedman	A24-03-018	COMM	Attendance at PHC	5/31/2024	1.00
Matthew Freedman	A24-03-018	DISC	Review and revise TURN DR#2	6/3/2024	1.00
Matthew Freedman	A24-03-018	DISC	Communication w/PG&E re: response to TURN DR 1, Q46	6/5/2024	0.25
Matthew Freedman	A24-03-018	Comp	Drafting compensation NOI	6/11/2024	1.00
Matthew Freedman	A24-03-018	DISC	Review of PG&E responses to TURN DR#2	6/17/2024	0.50
Matthew Freedman	A24-03-018	VPF	Call w/Jenn to discuss testimony on surplus ratepayer funds	6/18/2024	0.50
Matthew Freedman	A24-03-018	VPF	Call w/Jenn to discuss DR responses	8/7/2024	0.50
Matthew Freedman	A24-03-018	DISC	Review and revise TURN response to PG&E DR1	8/8/2024	0.50
Matthew Freedman	A24-03-018	DISC	Review and revise TURN response to PG&E DR4	8/8/2024	1.00
Matthew Freedman	A24-03-018	DISC	Review and revise TURN response to PG&E DR4	8/8/2024	1.25
Matthew Freedman	A24-03-018	VPF	Call w/Jenn to discuss workpapers and errata changes	8/8/2024	0.50
Matthew Freedman	A24-03-018	VPF	Call w/Jenn to discuss DR responses	8/8/2024	0.50
Matthew Freedman	A24-03-018	VPF	Call w/Jenn to discuss DR responses	8/9/2024	0.25
Matthew Freedman	A24-03-018	DISC	Review and revise TURN responses to PG&E DR 2, 4	8/9/2024	0.75
Matthew Freedman	A24-03-018	DISC	Review and revise TURN responses to PG&E DR 3	8/12/2024	0.25
Matthew Freedman	A24-03-018	GP	Review of ALJ ruling re: evidentiary hearings, email to CPUC staff providing TURN participation information	8/15/2024	0.25
Matthew Freedman	A24-03-018	GP	Review of rebuttal testimony served by various parties	8/21/2024	1.00
Matthew Freedman	A24-03-018	GP	Review of PG&E rebuttal testimony	8/21/2024	2.50
Matthew Freedman	A24-03-018	DISC	Drafting TURN Data Requests to PG&E	8/21/2024	2.00
Matthew Freedman	A24-03-018	VPF	Review/revise Dowdell errata testimony	8/22/2024	1.00
Matthew Freedman	A24-03-018	DISC	Drafting TURN Data Requests to PG&E	8/23/2024	2.00
Matthew Freedman	A24-03-018	COMM	Participation in meet-and-confer with all parties	8/26/2024	1.00
Matthew Freedman	A24-03-018	VPF	Review/revise Dowdell errata testimony	8/26/2024	1.00
Matthew Freedman	A24-03-018	COMM	Develop initial cross examination estimates	8/26/2024	1.00
Matthew Freedman	A24-03-018	GP	Review/edit draft joint case management statement	8/26/2024	0.25
Matthew Freedman	A24-03-018	DISC	Review/revise TURN DR#7 to PG&E	8/26/2024	0.50
Matthew Freedman	A24-03-018	GP	Review draft meet and confer report circulated to parties	8/30/2024	0.25
Matthew Freedman	A24-03-018	DISC	Review PG&E responses to TURN DR6	8/30/2024	1.25
Matthew Freedman	A24-03-018	VPF	Review PG&E DR5 to TURN	8/30/2024	0.25
Matthew Freedman	A24-03-018	DISC	Review PG&E responses to TURN DR7	8/30/2024	0.25
Matthew Freedman	A24-03-018	VPF	Call w/Jennifer Dowdell to discuss responses to PG&E DR to TURN	9/3/2024	1.00
Matthew Freedman	A24-03-018	COST	Call w/Bill Monsen to discuss hearing preparations and cross examination	9/3/2024	0.25
Matthew Freedman	A24-03-018	COMM	Review of PG&E rebuttal testimony in preparation for hearings	9/4/2024	1.00
Matthew Freedman	A24-03-018	COST	Preparation of cross - PG&E witness Brown	9/4/2024	1.50
Matthew Freedman	A24-03-018	FORECAST	Preparation of cross - PG&E witness Doyle	9/4/2024	1.00
Matthew Freedman	A24-03-018	COST	Preparation of cross - PG&E witness Ketelsen	9/4/2024	1.00
Matthew Freedman	A24-03-018	VPF	Review and revise TURN response to PG&E DR5	9/4/2024	1.50
Matthew Freedman	A24-03-018	FORECAST	Review PG&E response to TURN DR7, Q1	9/5/2024	0.25
Matthew Freedman	A24-03-018	VPF	Review and revise TURN response to PG&E DR5	9/5/2024	0.25
Matthew Freedman	A24-03-018	COMM	Review of rebuttal testimony - PG&E witness Cruz	9/5/2024	0.50
Matthew Freedman	A24-03-018	VPF	Preparation of cross and exhibits - PG&E witness Hayashida	9/5/2024	2.50
Matthew Freedman	A24-03-018	VPF	Review of IRS regulations and treatment of capital contributions	9/6/2024	2.00
Matthew Freedman	A24-03-018	DISC	Review of PG&E responses to TURN DR6 and DR7	9/6/2024	1.50
Matthew Freedman	A24-03-018	VPF	Preparation of cross and exhibits - PG&E witness Manz	9/6/2024	1.50
Matthew Freedman	A24-03-018	VPF	Preparation of cross and exhibits - PG&E witness Manz	9/9/2024	2.50
Matthew Freedman	A24-03-018	VPF	Review of PG&E hearing exhibits re: IRS rulings	9/9/2024	1.50
Matthew Freedman	A24-03-018	VPF	Call w/Jennifer Dowdell to discuss hearings and cross examination	9/10/2024	0.50
Matthew Freedman	A24-03-018	COMM	Hearing preparations - review and revise cross script	9/10/2024	1.50
Matthew Freedman	A24-03-018	COMM	Hearing preparations - review and revise cross exhibits	9/10/2024	1.25
Matthew Freedman	A24-03-018	COMM	Attendance at pre-hearing logistics and sound check (required by ALJ)	9/11/2024	0.25
Matthew Freedman	A24-03-018	COMM	Participation in evidentiary hearing	9/11/2024	6.50
Matthew Freedman	A24-03-018	COMM	Attendance at pre-hearing logistics and sound check (required by ALJ)	9/12/2024	0.25
Matthew Freedman	A24-03-018	COMM	Participation in evidentiary hearing	9/12/2024	4.25
Matthew Freedman	A24-03-018	COST	Review of additional PG&E data response re: net for return	9/12/2024	0.25
Matthew Freedman	A24-03-018	COST	Initial outline of opening brief	9/16/2024	0.50
Matthew Freedman	A24-03-018	FORECAST	Initial outline of opening brief	9/16/2024	0.75
Matthew Freedman	A24-03-018	VPF	Initial outline of opening brief	9/16/2024	0.25
Matthew Freedman	A24-03-018	COMM	Review of hearing transcript	9/18/2024	1.00
Matthew Freedman	A24-03-018	COST	Drafting TURN opening brief -- RA value section	9/18/2024	1.50
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- GHG value section	9/18/2024	2.00
Matthew Freedman	A24-03-018	COST	Drafting TURN opening brief -- Government Funded Transition costs	9/18/2024	2.50

A.24-03-018 (PG&E Diablo Canyon) TURN Compensation Claim

Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- Confidentiality	9/19/2024	2.50
Matthew Freedman	A24-03-018	COST	Drafting TURN opening brief -- Fixed Management Fee Escalation and Tax Gross up	9/19/2024	4.25
Matthew Freedman	A24-03-018	COST	Drafting TURN opening brief -- Working Cash Adjustment and Normalization issues	9/19/2024	2.00
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- Confidentiality	9/20/2024	1.00
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- A&G costs	9/20/2024	0.50
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- Property Taxes	9/20/2024	1.25
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- Production Tax Credits	9/20/2024	0.50
Matthew Freedman	A24-03-018	FORECAST	Drafting TURN opening brief -- Overall cost escalation in long-term forecast	9/20/2024	2.00
Matthew Freedman	A24-03-018	VPF	Drafting TURN opening brief -- VPF Expenditure Reporting Process	9/22/2024	3.00
Matthew Freedman	A24-03-018	VPF	Drafting TURN opening brief -- VPF Spending Plan	9/26/2024	3.50
Matthew Freedman	A24-03-018	VPF	Drafting TURN opening brief -- VPF Spending Plan	9/27/2024	5.50
Matthew Freedman	A24-03-018	VPF	Drafting TURN opening brief -- VPF Spending Plan / TURN alternative approach	9/30/2024	6.50
Matthew Freedman	A24-03-018	COST	Review and edit TURN opening brief - Cost sections	10/1/2024	1.25
Matthew Freedman	A24-03-018	FORECAST	Review and edit TURN opening brief - Forecast sections	10/1/2024	1.25
Matthew Freedman	A24-03-018	VPF	Review and edit TURN opening brief - VPF sections	10/1/2024	2.50
Matthew Freedman	A24-03-018	GP	Initial review of opening briefs filed by other parties	10/7/2024	2.50
Matthew Freedman	A24-03-018	VPF	Outline of reply brief - VPF sections	10/9/2024	0.75
Matthew Freedman	A24-03-018	COST	Outline of reply brief - Cost sections	10/9/2024	0.25
Matthew Freedman	A24-03-018	COST	Review of CGNP cost claims and development of accurate alternative cost estimate	10/10/2024	1.25
Matthew Freedman	A24-03-018	COST	Drafting TURN reply brief - response to CGNP cost claims	10/10/2024	1.50
Matthew Freedman	A24-03-018	COST	Review PG&E update testimony and workpapers	10/14/2024	1.00
Matthew Freedman	A24-03-018	COST	Drafting TURN reply brief - response to CGNP cost claims	10/14/2024	0.50
Matthew Freedman	A24-03-018	COST	Drafting TURN reply brief - Tax normalization issues	10/14/2024	0.50
Matthew Freedman	A24-03-018	COST	Drafting TURN reply brief - Working cash adjustment	10/14/2024	1.00
Matthew Freedman	A24-03-018	COST	Drafting TURN reply brief - Fixed management fee and gross up	10/15/2024	1.50
Matthew Freedman	A24-03-018	VPF	Drafting TURN reply brief - Volumetric Performance Fee issues	10/15/2024	3.00
Matthew Freedman	A24-03-018	COST	Drafting TURN opening comments on PG&E update testimony	10/16/2024	2.50
Matthew Freedman	A24-03-018	VPF	Drafting TURN reply brief - Volumetric Performance Fee tax issues	10/17/2024	3.00
Matthew Freedman	A24-03-018	VPF	Drafting TURN reply brief - Volumetric Performance Fee issues	10/18/2024	4.00
Matthew Freedman	A24-03-018	COST	Drafting TURN opening comments on PG&E update testimony	10/18/2024	0.50
Matthew Freedman	A24-03-018	COST	Review opening comments on PG&E update testimony filed by A4NR	10/18/2024	0.50
Matthew Freedman	A24-03-018	COST	Review and revise TURN reply brief - cost issues	10/19/2024	1.00
Matthew Freedman	A24-03-018	VPF	Review and revise TURN reply brief - VPF issues	10/21/2024	3.50
Matthew Freedman	A24-03-018	GP	Review of reply briefs filed by other parties	10/21/2024	1.50
Matthew Freedman	A24-03-018	GP	Review Joint motion to file confidential exhibits	10/23/2024	0.25
Matthew Freedman	A24-03-018	COST	Review of PG&E reply comments on update testimony	11/5/2024	0.50
Matthew Freedman	A24-03-018	GP	Review of ALJ Ruling re: Oral Argument and response to CPUC staff	11/12/2024	0.25
Matthew Freedman	A24-03-018	GP	Review of Proposed Decision	11/14/2024	1.50
Matthew Freedman	A24-03-018	DISC	Drafting of TURN DR8 to PG&E (Advertising)	11/19/2024	1.00
Matthew Freedman	A24-03-018	FORECAST	Drafting of TURN opening comments on PD - forecast issues	11/27/2024	1.00
Matthew Freedman	A24-03-018	VPF	Drafting of TURN opening comments on PD - VPF issues	12/1/2024	3.50
Matthew Freedman	A24-03-018	COST	Drafting of TURN opening comments on PD - cost issues	12/2/2024	1.00
Matthew Freedman	A24-03-018	VPF	Drafting of TURN opening comments on PD - VPF issues	12/2/2024	1.75
Matthew Freedman	A24-03-018	COMM	Drafting Ex Parte meeting requests for Commissioners Houck, J Reynolds, A Reynolds and Douglas	12/3/2024	0.25
Matthew Freedman	A24-03-018	VPF	Review and revise TURN opening comments on PD	12/3/2024	0.25
Matthew Freedman	A24-03-018	COST	Review and revise TURN opening comments on PD	12/3/2024	0.25
Matthew Freedman	A24-03-018	COMM	Drafting Ex Parte meeting request for Commissioner Baker	12/3/2024	0.25
Matthew Freedman	A24-03-018	GP	Review opening comments on PD by various parties	12/5/2024	1.50
Matthew Freedman	A24-03-018	GP	Review of PG&E ex parte presentation	12/5/2024	0.25
Matthew Freedman	A24-03-018	COMM	Drafting three-day advance ex parte notice for meetings with all 5 Commissioner offices	12/6/2024	0.50
Matthew Freedman	A24-03-018	COMM	Communication w/Commissioner offices re: ex parte meetings	12/6/2024	0.50
Matthew Freedman	A24-03-018	COST	Drafting TURN reply comments on PD - fixed management fee sections	12/6/2024	2.50
Matthew Freedman	A24-03-018	VPF	Drafting TURN reply comments on PD - VPF sections	12/8/2024	2.00
Matthew Freedman	A24-03-018	COST	Review/revise TURN reply comments on PD - fixed management fee sections	12/9/2024	0.50
Matthew Freedman	A24-03-018	VPF	Review/revise TURN reply comments on PD - VPF sections	12/9/2024	0.50
Matthew Freedman	A24-03-018	GP	Review reply comments submitted by other parties	12/9/2024	1.00
Matthew Freedman	A24-03-018	COMM	Develop script for ex parte meetings	12/10/2024	2.50
Matthew Freedman	A24-03-018	COMM	Ex Parte meeting with staff for Comm. Darcie Houck	12/11/2024	0.50
Matthew Freedman	A24-03-018	COMM	Revise script for additional ex parte meetings	12/11/2024	0.50
Matthew Freedman	A24-03-018	COMM	Ex Parte meeting with staff for Comm. Alice Reynolds and Karen Douglas	12/12/2024	0.50
Matthew Freedman	A24-03-018	COMM	Ex Parte meeting with staff for Comm. Matt Baker	12/12/2024	0.50
Matthew Freedman	A24-03-018	COMM	Ex Parte meeting with staff for Comm. John Reynolds	12/13/2024	0.50
Matthew Freedman	A24-03-018	COMM	Drafting of TURN ex parte notice	12/13/2024	1.00
Matthew Freedman	A24-03-018	COMM	Preparation for oral argument	12/13/2024	0.50
Matthew Freedman	A24-03-018	COMM	Preparation of oral argument script including additional notes for questions	12/15/2024	2.00
Matthew Freedman	A24-03-018	COMM	Review of script and preparation for oral argument	12/16/2024	0.75
Matthew Freedman	A24-03-018	COMM	Participation in oral argument (in person)	12/16/2024	3.00
Matthew Freedman	A24-03-018	GP	Review of revised PD	12/18/2024	0.25
Matthew Freedman	A24-03-018	AFR	Review PG&E application for rehearing of D.24-12-033	2/3/2025	2
Matthew Freedman	A24-03-018	AFR	Draft response to PG&E Application for Rehearing of D.24-12-033	2/3/2025	3.5
Matthew Freedman	A24-03-018	AFR	Review and revise TURN response to PG&E Application for Rehearing of D.24-12-033	2/4/2025	1
Matthew Freedman	A24-03-018	AFR	Review and revise TURN response to PG&E Application for Rehearing of D.24-12-033	2/5/2025	0.5
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/10/2025	2.00
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/11/2025	4.50
Matthew Freedman	A24-03-018	comp	Drafting of compensation request	2/12/2025	3.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: NDA for workpapers for DCP application and testimony	4/9/2024	0.25
William Monsen	A24-03-018	GP	Review application and testimony	4/9/2024	2.00

A.24-03-018 (PG&E Diablo Canyon) TURN Compensation Claim

Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
William Monsen	A24-03-018	GP	Notes to M. Freedman re: PG&E workshop re: DCP application and testimony	4/11/2024	0.50
William Monsen	A24-03-018	GP	M. Freedman re: Next steps on DCP application review	4/23/2024	0.25
William Monsen	A24-03-018	GP	Review application and testimony	4/23/2024	3.00
William Monsen	A24-03-018	GP	PG&E workshop on DCP application and testimony	4/24/2024	1.00
William Monsen	A24-03-018	COST	Review and analyze application and testimony for protest	4/29/2024	2.00
William Monsen	A24-03-018	COST	Note to M. Freedman re: Review of testimony and data requests	4/29/2024	0.25
William Monsen	A24-03-018	DISC	Draft data requests	4/29/2024	1.50
William Monsen	A24-03-018	GP	Prepare and send signed NDA for proceeding to M. Freedman	5/6/2024	0.25
William Monsen	A24-03-018	FORECAST	Notes to M. Freedman re: Normalization vs. flow-through and next data request	5/10/2024	0.50
William Monsen	A24-03-018	GP	M. Freedman re: Status of proceeding and next steps	5/17/2024	0.25
William Monsen	A24-03-018	COST	Note to M. Freedman re: Market price for capacity under slice-of-day	5/20/2024	0.25
William Monsen	A24-03-018	DISC	Begin review and analysis of data request responses	5/23/2024	2.25
William Monsen	A24-03-018	DISC	Note to M. Freedman re: PG&E response to data request	5/23/2024	0.25
William Monsen	A24-03-018	DISC	Review and analysis of data request responses and confidential workpapers	5/24/2024	3.00
William Monsen	A24-03-018	DISC	Review PG&E responses to TURN DRs	6/17/2024	1.50
William Monsen	A24-03-018	DISC	Notes to M. Freedman re: Data request responses	6/17/2024	0.50
William Monsen	A24-03-018	DISC	Review and analyze data request responses	6/19/2024	1.00
William Monsen	A24-03-018	DISC	Draft data request	6/19/2024	1.00
William Monsen	A24-03-018	DISC	Review and analyze data request responses	6/20/2024	2.00
William Monsen	A24-03-018	DISC	Draft data request	6/20/2024	1.00
William Monsen	A24-03-018	DISC	Notes to M. Freedman re: PG&E responses to TURN DRs and next steps	6/20/2024	1.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: Status of proceeding and next steps for testimony	6/25/2024	0.50
William Monsen	A24-03-018	COST	Draft outline of testimony - Cost issues	7/3/2024	1.50
William Monsen	A24-03-018	FORECAST	Develop outline of testimony - Forecast issues	7/10/2024	1.75
William Monsen	A24-03-018	COST	Note to M. Freedman re: Draft outline of testimony	7/10/2024	0.25
William Monsen	A24-03-018	COST	M. Freedman re: Tax gross-up issues for testimony	7/11/2024	0.25
William Monsen	A24-03-018	DISC	Draft data requests	7/11/2024	1.50
William Monsen	A24-03-018	DISC	Draft data requests	7/12/2024	0.50
William Monsen	A24-03-018	DISC	Note to M. Freedman re: Data requests re: DCP	7/12/2024	0.25
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/12/2024	2.00
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/13/2024	3.00
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/14/2024	4.50
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/15/2024	1.50
William Monsen	A24-03-018	COST	Note to M. Freedman re: Draft testimony	7/15/2024	0.25
William Monsen	A24-03-018	COST	Notes to M. Freedman re: CNC awards for testimony	7/16/2024	0.50
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/16/2024	2.50
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/17/2024	4.00
William Monsen	A24-03-018	FORECAST	Note to M. Freedman re: Draft testimony	7/17/2024	0.25
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/18/2024	2.50
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/19/2024	2.75
William Monsen	A24-03-018	DISC	Review data request responses	7/19/2024	1.00
William Monsen	A24-03-018	DISC	Review data request responses	7/22/2024	0.75
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/22/2024	2.00
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/23/2024	3.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: Next steps on DCP testimony	7/23/2024	0.25
William Monsen	A24-03-018	COST	Draft testimony - cost issues	7/24/2024	3.50
William Monsen	A24-03-018	FORECAST	Draft testimony - forecast issues	7/25/2024	4.00
William Monsen	A24-03-018	GP	Prepare list of attachments for testimony	7/25/2024	0.75
William Monsen	A24-03-018	DISC	Review data request responses	7/25/2024	1.25
William Monsen	A24-03-018	GP	M. Freedman re: Finalizing testimony	7/26/2024	0.25
William Monsen	A24-03-018	COST	Update analysis to reflect PG&E errata testimony	7/26/2024	4.75
William Monsen	A24-03-018	COST	Draft testimony to reflect PG&E errata and additional data request responses	7/26/2024	5.25
William Monsen	A24-03-018	FORECAST	Note to M. Freedman re: LCOE for DCP compared to prior proceeding	7/26/2024	0.50
William Monsen	A24-03-018	FORECAST	Various notes to M. Freedman re: Final issues in testimony	7/26/2024	0.75
William Monsen	A24-03-018	COST	Finalize testimony - cost issues	7/27/2024	1.50
William Monsen	A24-03-018	FORECAST	Finalize testimony - forecast issues	7/27/2024	2.00
William Monsen	A24-03-018	COST	Develop attachments for testimony	7/27/2024	1.00
William Monsen	A24-03-018	FORECAST	Develop attachments for testimony	7/27/2024	1.00
William Monsen	A24-03-018	COST	Notes to M. Freedman re: Final draft of testimony and attachments	7/27/2024	1.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: PG&E request for workpapers	7/30/2024	0.25
William Monsen	A24-03-018	COST	Prepare workpapers - cost issues	8/4/2024	1.75
William Monsen	A24-03-018	FORECAST	Prepare workpapers - forecast issues	8/4/2024	1.75
William Monsen	A24-03-018	COST	Prepare and finalize workpapers - cost issues	8/5/2024	0.50
William Monsen	A24-03-018	FORECAST	Prepare and finalize workpapers - forecast issues	8/5/2024	0.75
William Monsen	A24-03-018	COST	Note to M. Freedman re: Workpapers	8/5/2024	0.25
William Monsen	A24-03-018	COST	Note to J. Dowdell re: Analysis of working capital	8/5/2024	0.25
William Monsen	A24-03-018	COST	J. Dowdell re: Working capital and responses to data requests from PG&E	8/5/2024	0.75
William Monsen	A24-03-018	DISC	Note to PG&E re: Data request	8/6/2024	0.25
William Monsen	A24-03-018	DISC	Draft response to PG&E data request	8/6/2024	1.00
William Monsen	A24-03-018	DISC	Note to M. Freedman re: Draft response to data request	8/6/2024	0.25
William Monsen	A24-03-018	COST	J. Dowdell re: Working capital	8/9/2024	0.50
William Monsen	A24-03-018	DISC	Notes to M. Freedman re: Draft responses to PG&E data requests	8/9/2024	0.50
William Monsen	A24-03-018	DISC	Draft responses to PG&E data requests and follow-up data requests to PG&E	8/9/2024	1.50
William Monsen	A24-03-018	COST	Notes to J. Dowdell re: Working capital issues	8/9/2024	0.50

A.24-03-018 (PG&E Diablo Canyon) TURN Compensation Claim

Attorney Time Sheets

Staff	Case #	Code	Description	Date	Time
William Monsen	A24-03-018	DISC	Note to M. Freedman and J. Dowdell re: Review of edits to TURN response to PG&E data request (inc. review of draft response)	8/12/2024	0.50
William Monsen	A24-03-018	DISC	Note to M. Freedman re: PG&E responses to TURN data requests	8/23/2024	0.25
William Monsen	A24-03-018	GP	Review rebuttal testimony from PG&E, EPU, and SBUA.	8/23/2024	2.25
William Monsen	A24-03-018	DISC	Draft data requests re: Rebuttal testimony	8/23/2024	1.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: Review of rebuttal testimony and next steps	8/23/2024	0.25
William Monsen	A24-03-018	COMM	Note to M. Freedman re: Revised schedule for hearings	8/27/2024	0.25
William Monsen	A24-03-018	COST	Note to M. Freedman re: Cross examination of PG&E witnesses	8/29/2024	0.25
William Monsen	A24-03-018	DISC	Review data request responses from PG&E	9/1/2024	0.50
William Monsen	A24-03-018	DISC	Note to M. Freedman re: Review of data request responses	9/1/2024	0.25
William Monsen	A24-03-018	COST	M. Freedman re: Next steps in preparation for hearings.	9/3/2024	0.25
William Monsen	A24-03-018	COST	Review and comment on cross-examination scripts	9/6/2024	1.25
William Monsen	A24-03-018	DISC	Review data request responses	9/6/2024	0.75
William Monsen	A24-03-018	COST	Notes to M. Freedman re: Cross-examination scripts, cross exhibits, and review of data request responses	9/8/2024	0.75
William Monsen	A24-03-018	COST	Review/edit and draft cross-examination scripts for hearings	9/8/2024	2.50
William Monsen	A24-03-018	COMM	Note to M. Freedman re: Additional cross of PG&E	9/9/2024	0.25
William Monsen	A24-03-018	COMM	Note to M. Freedman re: Upcoming hearings on DCPD	9/10/2024	0.25
William Monsen	A24-03-018	COMM	Hearings re: DCPD Cost recovery	9/11/2024	4.25
William Monsen	A24-03-018	COMM	Attend DCPD hearings	9/12/2024	0.50
William Monsen	A24-03-018	GP	M. Freedman re: Next steps in proceeding	9/12/2024	0.50
William Monsen	A24-03-018	FORECAST	Review CGNP documents	9/12/2024	0.50
William Monsen	A24-03-018	FORECAST	Note to M. Freedman re: Review of CGNP documents	9/12/2024	0.25
William Monsen	A24-03-018	COST	Review PG&E calculations re: Gap in costs	9/13/2024	0.25
William Monsen	A24-03-018	COST	Note to M. Freedman re: Gap in PG&E costs	9/13/2024	0.25
William Monsen	A24-03-018	COST	Note to M. Freedman re: Draft brief - cost issues	9/18/2024	0.25
William Monsen	A24-03-018	FORECAST	Note to M. Freedman re: Draft brief - forecast issues	9/23/2024	0.50
William Monsen	A24-03-018	COST	Review and comment on draft brief - cost issues	9/25/2024	1.00
William Monsen	A24-03-018	FORECAST	Review and comment on draft brief - forecast issues	9/25/2024	1.25
William Monsen	A24-03-018	GP	Note to M. Freedman re: Draft brief	9/25/2024	0.25
William Monsen	A24-03-018	GP	Review opening briefs	10/9/2024	1.00
William Monsen	A24-03-018	GP	Note to M. Freedman re: Review of opening briefs	10/9/2024	0.25
William Monsen	A24-03-018	GP	Review opening briefs	10/17/2024	0.50
William Monsen	A24-03-018	GP	Note to M. Freedman re: Review of opening briefs and next steps for reply brief	10/17/2024	0.25
William Monsen	A24-03-018	GP	Note to M. Freedman re: Proposed decision and next steps	11/14/2024	0.25
William Monsen	A24-03-018	GP	Review proposed decision	11/14/2024	0.50
William Monsen	A24-03-018	COST	Note to M. Freedman re: PG&E comments on Proposed Decision	12/5/2024	0.25
William Monsen	A24-03-018	COST	Review PG&E opening comments re: Proposed Decision	12/5/2024	1.50
William Monsen	A24-03-018	COST	Draft notes re: Potential replies to PG&E's opening comments on Proposed Decision	12/5/2024	0.75
William Monsen	A24-03-018	COST	Draft notes re: Potential replies to PG&E's opening comments on Proposed Decision	12/6/2024	0.25
William Monsen	A24-03-018	COST	Analyze PG&E's opening comments on Proposed Decision, including error in PD	12/6/2024	0.50
William Monsen	A24-03-018	COST	Note to M. Freedman re: Possible responses to opening comments on PD (inc. identification of error in PD)	12/6/2024	0.25
William Monsen	A24-03-018	COST	Review and comment on draft reply comments on Proposed Decision	12/9/2024	0.25
William Monsen	A24-03-018	FORECAST	Review and comment on draft reply comments on Proposed Decision	12/9/2024	0.25
William Monsen	A24-03-018	COST	Note to M. Freedman re: Edits to draft reply comments on PD	12/9/2024	0.25
William Monsen	A24-03-018	COST	M. Freedman re: Reply comments to Proposed Decision	12/9/2024	0.10
Substantial Total					514.10
Comp Total					10.50
Grand Total					524.60

Attachment 3

TURN Hours Allocated by Issue

A.24-03-018 (PGE Diablo Canyon) TURN Compensation Claim
TURN Hours Allocated by Issue

				GP	DISC	COMM	COST	FORECAST	VPF	AFR	Substantive Hours	Substantive \$\$\$	Comp	Compensation (iComp)	Travel	Compensation (Travel)
	Billing Period	Hourly Rate												1/2 of hourly rate		1/2 of hourly rate
Jennifer Dowdell	2024	\$495	-	-	-	9.75	-	-	184.25	-	194.00	\$96,030.00	-	\$0.00	0.00	\$0.00
Matthew Freedman	2024	\$740	-	20.50	18.75	33.25	34.25	15.25	61.50	-	183.50	\$135,790.00	1.00	\$370.00	0.00	\$0.00
Matthew Freedman	2025	\$805	-	-	-	-	-	-	-	7.00	7.00	\$5,635.00	9.50	\$3,823.75	-	-
Robert Finkelstein	2024	\$875	-	-	-	-	-	-	0.25	-	0.25	\$218.75	-	\$0.00	0.00	\$0.00
William Monsen	2024	\$395	-	15.50	27.00	5.50	48.10	33.25	-	-	129.35	\$51,093.25	-	\$0.00	0.00	\$0.00
TOTAL			-	36.00	45.75	48.50	82.35	48.50	246.00	7.00	514.10	\$288,767.00	10.50	\$4,193.75	\$0.00	\$0.00
TOTAL % HOURS ALLOCATED			0.00%	7.00%	8.90%	9.43%	16.02%	9.43%	47.85%	1.36%	100.00%					

Substantial Contribution	\$ 288,767.00
Intervenor iComp Compensation	\$ 4,193.75
Travel Time Compensation	\$ -
Expenses Compensation	\$ -
Grand Total	\$ 292,960.75

Attachment 4

TURN-MRW agreement for 2024 hourly rates



May 10, 2024

Mr. David Howarth
MRW & Associates, LLC
1736 Franklin Street, Suite 700
Oakland, CA 94612

Re: Consulting Agreement for work on PG&E's Diablo Canyon Cost Recovery case (A.24-03-018)

Dear Mr. Howarth:

This letter will confirm the terms of the consulting agreement between The Utility Reform Network ("TURN") and MRW & Associates, LLC.

All work will be performed by Bill Monsen with assistance from MRW staff as needed. Mr. Monsen will provide assistance in the development of case strategy and expert witness testimony regarding the issues to be mutually discussed and agreed upon with TURN. Mr. Monsen will be asked to sponsor testimony and appear as an expert witness on issues raised in PG&E's Diablo Canyon Cost Recovery case (A.24-03-018). In addition, Mr. Monsen may be asked to help draft data requests, review the data requests and responses of other parties to the case, review other parties' testimony, assist with settlement strategy and negotiations, participate in hearing preparation, provide technical support with the drafting and review of filings made by TURN in this proceeding including opening and reply briefs and comments on rulings and proposed decisions in this proceeding. The scope of issues to be addressed by Mr. Monsen is subject to reconsideration and amendment based on further discussion between Mr. Monsen and TURN's representatives in this case.

Mr. Monsen proposes to charge an hourly rate of \$395 for work performed in 2024. TURN and MRW will discuss and mutually agree on the treatment of any substantial expenses.

The initial scope of work for this proceeding is expected to involve up to 200 hours. To the extent that TURN and MRW mutually agree to expand the number of hours for this project and/or the project scope, TURN will provide such authorizations in writing (via email).

MRW will submit (on a monthly basis) detailed, daily timesheets for work on behalf of TURN and detailed accounting of any expenses. Upon receipt of a bill from MRW, TURN will pay one-half of the hourly billing and all billed expenses in accordance with the billing terms. The remaining one-half of the hourly billing will be deferred pending the receipt of TURN's intervenor compensation from the California Public Utilities Commission. MRW and TURN understand that the Commission may not fully reimburse TURN for work performed by Mr. Monsen or may not approve Mr. Monsen's requested hourly rate. In that event, TURN will reimburse MRW for all of the deferred invoiced amounts except half of the amount disallowed by the Commission. When and if intervenor compensation is received, TURN will promptly remit payment to MRW.

Mr. Monsen will perform all work on this project and will function as an expert witness on the areas TURN and Mr. Monsen mutually discuss. TURN and MRW understand that work began on April 9, 2024 and will end once the Commission adopts a final decision, or upon mutual agreement of both TURN and MRW

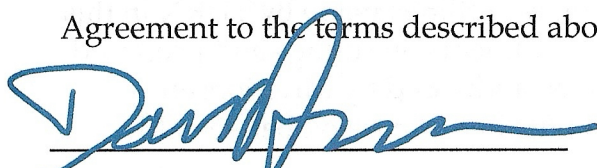
We are very pleased to have you performing services for TURN in this case. Please signify your agreement to the terms outlined in this letter by signing below.

Very truly yours,



Richard Perez
Chief Financial Officer

Agreement to the terms described above:


MRW & Associates