



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

08/26/25
11:43 AM
A2202015

Application of Pacific Gas and Electric Company for Compliance Review of Utility-Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility-Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 through December 31, 2021.

**A.22-02-015
(Filed February 28, 2022)**

INTERVENOR COMPENSATION CLAIM OF ALLIANCE FOR NUCLEAR RESPONSIBILITY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF ALLIANCE FOR NUCLEAR RESPONSIBILITY

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: ALLIANCE FOR NUCLEAR RESPONSIBILITY	For contribution to Decision (D.) 25-06-045
Claimed: \$237,427.68	Awarded: \$
Assigned Commissioner: John Reynolds	Assigned ALJ: Elaine Lau and Leah Goldberg
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Rochelle Becker
Date: 8/26/2025	Printed Name: Rochelle Becker, Board Chair

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

A. Brief description of Decision:	D.25-06-045 finds, except for two incidents, that Pacific Gas and Electric Company ("PG&E") met the standard for compliance under the Energy Resources Recovery Account
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	<p>(“ERRA”) regulatory compliance process for the 2021 Record Year, including three forced outages that occurred during the 2020 Record Year at the Diablo Canyon Nuclear Power Plant (“DCNPP”) for which the Commission had deferred review to the 2021 ERRA Compliance Proceeding. D.25-06-045 imposes a \$43,208,116 disallowance for one of the Diablo Canyon forced outages occurring during the 2021 Record Year.</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:	6/8/2022	
2. Other specified date for NOI:		
3. Date NOI filed:	7/6/2022	
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:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D.22-01-016 issued 1/21/2022	
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:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.22-01-016 issued 1/21/2022	
12. Has the Intervenor demonstrated significant financial hardship?		

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

	Intervenor	CPUC Verification
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-06-045	
14. Date of issuance of Final Order or Decision:	7/3/2025	
15. File date of compensation request:	8/26/2025	
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 I.A.	This compensation claim includes 15.56 hours recorded for A4NR’s participation in the PG&E 2020 ERRR Compliance proceeding, A.21-03-008, prior to the deferral of Commission review of three Diablo Canyon forced outages to the 2021 ERRR Compliance proceeding to enable PG&E to complete its Root Cause Evaluations of the outages. See discussion at pp. 14 – 15 of D.25-06-045.	
Part I.B.1.	The Prehearing Conference in A.21-03-008 was held on April 29, 2021.	
Part I.B.3.	A4NR filed its NOI in A.21-03-008 on May 27, 2021.	

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

Revised March 2023

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. A4NR contested the reasonableness of PG&E’s management of its contractor, Siemens, in the design and installation of the DCNPP Unit 2 rebuilt stator (Protest, pp. 2 – 3; Testimony, pp. 3 – 4, 11, 12 – 33; Opening Brief, pp. 6 – 31; Reply Brief, pp. 4 – 15.</p>	<p>D.25-06-045 acknowledges A4NR’s arguments (at pp. 14 – 15, 16 – 17, 19 – 20) and (at p. 22) “concur[s] with A4NR that PG&E failed to recognize that design deficiencies and the design verification testing did not integrate the performance of stator end winding and parallel ring vibration resonance into the design change proposed by Siemens, which was a factor in forced outage four.” D.25-06-045 further concludes (at p. 23), “As a reasonable manager, PG&E should have ensured that the end windings and parallel rings were supported so that they did not have excitable frequencies, as required by the specifications. PG&E also should have recognized that Siemens missed incorporating the specification limits in the design verification testing of the design change.” See also Findings of Fact 16 and 19, and Conclusions of Law 8, 9, and 10.</p>	

<p>2. A4NR argued that PG&E, notwithstanding its criticisms of Siemens, cannot evade responsibility for its contractor’s performance or delegate its obligations as a public utility to its contractor (Testimony, pp. 3 – 4, Opening Brief, pp. 5 – 6, Reply Brief, pp. 8 – 9, 15).</p>	<p>D.25-06-045 acknowledges A4NR’s arguments (at pp. 16 – 17) and notes (at p. 17), “the operation of Diablo Canyon imposes safety considerations that are non-delegable.” D.25-06-045 further concludes (at p. 18), “The Commission declines to adopt PG&E’s proposed modifications of the standard for evaluating reasonableness that would limit the inquiry to the utility’s hiring practices ... hiring technical expertise does not obviate the long-standing rule of nondelegable duties for safety issues, or those imposed by statutory or common law.” See also Findings of Fact 16 and 19, and Conclusions of Law 6, 8, 9, and 10.</p>	
<p>3. For evidence of PG&E’s imprudence, A4NR relied solely on the facts underlying PG&E’s Root Cause Evaluations and argued that past Commission precedent at DCNPP (D.16-04-006) and SONGS (D.11-10-002) had found such reliance appropriate for evaluating compliance with the reasonable manager standard (Opening Brief, pp. 4 – 5, Reply Brief, pp. 1 – 3).</p>	<p>D.25-06-045 acknowledges A4NR’s arguments (at p. 15) and cites D.16-04-006 (at p. 16) for the principle that “the utility’s actions and identified root causes must be evaluated in conjunction with the ‘reasonable manager’ standard in determining whether the outage is reasonable or unreasonable and whether a disallowance based upon replacement costs is warranted.” D.25-06-045 further concludes (at p. 16), “Consistent with D.16-14-006, we determine whether a disallowance is warranted by evaluating PG&E’s actions and the identified root causes under the lens of the reasonable manager standard.”</p>	

<p>4. As part of its argument for the evidentiary value of the Root Cause Evaluations, A4NR had to rebut PG&E’s attempted limitation of the reasonable manager standard to facts as they were known by PG&E at the time of the outages (see PG&E Opening Brief, p. 5). A4NR argued that the reasonable manager standard’s most unforgiving element is facts that <i>should</i> have been known at the time of the outages, something which the Root Cause Evaluations could illuminate (Reply Brief, p. 1).</p>	<p>D.25-06-045 acknowledges (at p. 15) the dispute between A4NR and PG&E and, having explained how the Commission makes use of Root Cause Evaluations, reaffirms (at p. 17) that under the reasonable manager standard, utilities are held to a standard of reasonableness “based upon the facts that are known or should have been known at the time.”</p>	
<p>5. Countering PG&E’s assertion that it should not be required to disclose self-critical analysis, A4NR argued to limit the redaction of certain Root Cause Evaluation excerpts in A4NR’s Testimony and conform to previously stated Commission policies on confidentiality (A4NR February 16, 2023 Response in Opposition to Motion of PG&E for Confidential Treatment of Information).</p>	<p>The Administrative Law Judge’s October 29, 2024 Ruling on Motions to Admit Documents Into the Evidentiary Records and to File Confidential Information Under Seal resulted in 183 lines of A4NR’s Testimony previously characterized by PG&E as confidential being exempted from required redaction.</p>	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	No. A4NR was the only party other than PG&E to address the Diablo Canyon Unit 2 forced outages.	
c. If so, provide name of other parties: N/A		
d. Intervenor’s claim of non-duplication: N/A		

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

#	Intervenor’s Comment	CPUC Discussion
Part II.A.5.	Given the content of PG&E’s factual admissions in the Root Cause Evaluations, A4NR concluded that removing as much redaction as possible from the A4NR Testimony would enhance the likelihood of a Commission disallowance. As the Commission noted in D.06-06-066, “We are a public agency that regulates public utilities, and most of our business must be conducted in the open.”	

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

#	Intervenor’s 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: As A4NR was the only party other than PG&E to address the Diablo Canyon forced outages, it is reasonable to conclude that the \$43,208,116 disallowance would not have occurred without A4NR’s intervention. This direct benefit to ratepayers is 182 times the amount of A4NR’s compensation claim.</p>	
<p>b. Reasonableness of hours claimed: As the only party to challenge PG&E’s recovery of replacement power costs attributed to several forced outages at Diablo Canyon Unit 2, A4NR shouldered the entire burden of evaluating PG&E’s reasonableness with respect to the outages. A4NR reluctantly agreed to defer litigation of the issue from the 2020 ERRA Compliance proceeding to the 2021 case when it became clear that Cal Advocates would not support going forward while a root cause evaluation was still pending. Ultimately, Cal Advocates chose not to pursue the outage issues. As an efficiency, A4NR elected to waive hearings in the 2021 compliance proceeding and rely exclusively on PG&E’s Root Cause Evaluation as uncontested factual evidence. Given the large replacement power costs at stake, A4NR’s investment of slightly less than 350 hours over the 2021-2025 period (no activity from mid-2023 to mid-2025) was reasonable, especially given the size of disallowance that resulted.</p>	
<p>c. Allocation of hours by issue: (1) PG&E’s oversight of Siemens: 131.11 hours, 37.70%; (2) design/installation/fabrication/testing deficiencies: 129.47 hours, 37.23%; (3) Root Cause Evaluation as evidence: 26.92 hours, 7.74%; (4) confidentiality designation: 47.16 hours, 13.56%; general (includes claim preparation): 13.08 hours, 3.76%. Total hours: 347.74, 99.99%.</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman (See Comment 4 below)	2025	25.28	795	D.25-05-017 approved rate for 2024 plus 3.46% ALJ-393 COLA, rounded to nearest \$5	20,097.60			
John Geesman	2023	111.88	745	D.25-05-017	83,350.60			
John Geesman	2022	163.67	715	D.25-05-017	117,024.05			
John Geesman	2021	12.73	660	D.24-10-020	8,401.80			
David Weisman	2025	3.58	235	D.25-05-017 approved rate for 2023 plus ALJ-393 COLAs for 2024 and 2025, rounded to nearest \$5	841.30			
David Weisman	2023	1.74	220	D.25-05-017	382.80			
David Weisman	2022	13.59	210	D.25-05-017	2,853.90			
David Weisman	2021	6.20	195	D.25-07-038	1,209.00			
<i>Subtotal: \$234,161.05</i>						<i>Subtotal: \$</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		

CLAIMED						CPUC AWARD		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
John Geesman	2025	6.25	397.50	one-half of COLA-adjusted rate approved in D.25-05-017	2,484.38			
John Geesman	2022	.82	357.50	one-half of rate approved in D.25-05-017	293.15			
John Geesman	2021	.77	330	one-half of rate approved in D.24-10-020	254.10			
David Weisman	2025	2.00	117.50	one-half of COLA-adjusted rate approved in D.25-05-017	235.00			
<i>Subtotal: \$3,266.63</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
<i>TOTAL REQUEST: \$237,427.68</i>						<i>TOTAL AWARD: \$</i>		

*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 ½ of preparer's normal hourly rate

CLAIMED		CPUC AWARD	
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
John Geesman	June 28, 1977	74448	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time Records of John Geesman
3	Time Records of David Weisman
4	John Geesman is a consultant to A4NR, not a staff member. His 2012 contingent fee retainer agreement with A4NR, which remains in full force and effect, was determined by D.25-05-017 to satisfy Commission policy on consultant compensation: "Geesman has been hired on a contingency basis, where the consultant has not billed or collected compensation for the work performed until the final award is given. Given this contingency, we therefore utilize the reasonable rates established by Resolution ALJ-393 based on Geesman's experience."

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

If so:

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **ALLIANCE FOR NUCLEAR RESPONSIBILITY** [has/has not] made a substantial contribution to D.25-06-045.
2. The requested hourly rates for **ALLIANCE FOR NUCLEAR RESPONSIBILITY**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ _____.

CONCLUSION OF LAW

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

ORDER

1. **ALLIANCE FOR NUCLEAR RESPONSIBILITY** is awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay **ALLIANCE FOR NUCLEAR RESPONSIBILITY** the total award. [for multiple utilities: "Within 30 days of the

effective date of this decision, ^, ^, and ^ shall pay **ALLIANCE FOR NUCLEAR RESPONSIBILITY** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **ALLIANCE FOR NUCLEAR RESPONSIBILITY**’s request, and continuing until full payment is made.

3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-06-045		
Proceeding(s):	A.22-02-015		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Alliance for Nuclear Responsibility	8/26/2025	\$237,427.68		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
John	Geesman	Attorney	795	2025	
John	Geesman	Attorney	745	2023	
John	Geesman	Attorney	715	2022	
John	Geesman	Attorney	660	2021	
David	Weisman	Advocate	235	2025	
David	Weisman	Advocate	220	2023	
David	Weisman	Advocate	210	2022	
David	Weisman	Advocate	195	2021	

(END OF APPENDIX)

A.22-02-015

Time Records of John Geesman

<u>DATE</u>	<u>TASK</u>	<u>PG&E'S OVERSIGHT OF SIEMENS</u>	<u>DSGN./INST./FAB./ TEST. DEFICIENCIES</u>	<u>ROOT CAUSE EVAL. AS EVIDENCE</u>	<u>CONFIDENTIALITY DESIGNATION</u>	<u>GENERAL</u>	<u>TOTAL</u>
7/27/2025	draft Compensation Claim (at one-half hourly rate)					2.5	2.5
7/23/2025	draft Compensation Claim (at one-half hourly rate)					3.75	3.75
6/18/2025	draft Notice of Ex Parte Communications	0.265	0.265				0.53
6/17/2025	ex parte meeting w. Comm. Houck's staff advisors	0.15	0.15				0.3
6/16/2025	ex parte meeting w. Comm. John Reynolds' and Pres. Alice Reynolds' staff advisors	0.24	0.24				0.48
6/13/2025	ex parte meeting w. Comm. Karen Douglas' staff advisors	0.235	0.235				0.47
6/12/2025	prepare presentation for 3 ex parte meeting w. Commissioner staffs	0.5	0.5				1
6/11/2025	draft Reply Comments on PD	3.5					3.5
6/8/2025	draft 3-Day Advance Notice of Ex Parte Communications	0.18	0.18				0.36
6/6/2025	draft Reply Comments on PD	2.35					2.35
6/5/2025	draft Reply Comments on PD	1.75					1.75
5/27/2025	draft Opening Comments on PD	0.44	0.44				0.88
5/23/2025	draft Opening Comments on PD	1.985	1.985				3.97
5/22/2025	draft Opening Comments on PD	1.6	1.6				3.2
5/21/2025	draft Opening Comments on PD	1.215	1.215				2.43
5/20/2025	draft Opening Comments on PD	1.375	1.375				2.75
5/17/2025	review PD	0.437	0.437	0.436			1.31
9/8/2023	email w. PG&E counsel re: amended procedural schedule					0.02	0.02
7/13/2023	email w. ALJ re: A4NR confidential documents				0.1		0.1
7/5/2023	email w. ALJ re: taking hearing off calendar					0.02	0.02
3/17/2023	draft Reply Brief	0.444	1.221	0.555			2.22
3/13/2023	email w. clients re: Reply Brief	0.01	0.03	0.01			0.05
3/13/2023	draft Reply Brief	0.47	1.2925	0.5875			2.35
3/12/2023	draft Reply Brief	1.574	4.3285	1.9675			7.87
3/11/2023	draft Reply Brief	1.506	4.1415	1.8825			7.53
3/6/2023	draft Reply Brief	0.45	1.2375	0.5625			2.25
3/5/2023	draft Reply Brief	0.41	1.1275	0.5125			2.05
2/26/2023	email w. clients re: Opening Brief	0.006	0.007	0.007			0.02
2/24/2023	draft Opening Brief	0.608	0.608	0.304			1.52
							29.03 total 2025 hours (includes 6.25 claim prep.)

2/15/2023	draft Response to PG&E Motion for Confidential Treatment				0.97	0.97	0.97
2/6/2023	draft Response to PG&E Motion for Confidential Treatment				5.33	5.33	5.33
2/5/2023	draft Response to PG&E Motion for Confidential Treatment				6.9	6.9	6.9
2/4/2023	draft Response to PG&E Motion for Confidential Treatment				8.42	8.42	8.42
2/3/2023	draft Response to PG&E Motion for Confidential Treatment				0.92	0.92	0.92
2/2/2023	draft Opening Brief	0.852	0.852	0.426		2.13	2.13
2/1/2023	draft Response to PG&E Motion for Confidential Treatment				1.72	1.72	1.72
2/1/2023	review PG&E Motion for Confidential Treatment, incl. declarations, identify parts of ANR-1 still in dispute				1.57	1.57	1.57
2/1/2023	draft Response to PG&E Motion to Seal				0.88	0.88	0.88
1/22/2023	research <i>Snyder v. Southern Calif. Edison Co.</i> (1955) and associated jurisprudence	5.3				5.3	5.3
1/19/2023	draft Opening Brief	1.648	1.648	0.824		4.12	4.12
1/19/2023	review PG&E draft Joint Motion for Entry of Exhibits				0.2	0.2	0.2
1/18/2023	draft Opening Brief	3.368	3.368	1.684		8.42	8.42
1/17/2023	draft Opening Brief	3.704	3.704	1.852		9.26	9.26
1/17/2023	email w. PG&E re: exhibit list link for ANR-1	0.02	0.02	0.01		0.05	0.05
1/16/2023	draft Opening Brief	3.164	3.164	1.582		7.91	7.91
1/15/2023	draft Opening Brief	3.632	3.632	1.816		9.08	9.08
1/14/2023	draft Opening Brief	1.692	1.692	0.846		4.23	4.23
1/12/2023	research case precedents cited in meet-and-confer				2.27	2.27	2.27
1/12/2023	meet-and-confer w. PG&E re: redactions to A4NR testimony				0.92	0.92	0.92
1/11/2023	preparation research for meet-and-confer w. PG&E on redactions to A4NR testimony				3.1	3.1	3.1
1/10/2023	email w. PG&E counsel re: meet-and-confer on redactions to A4NR testimony				0.05	0.05	0.05
1/6/2023	participate in Status Conference	0.2375	0.2375	0.2375	0.2375	0.95	0.95
1/6/2023	email w. clients re: change in briefing schedule					0.02	0.02
1/4/2023	email w. PG&E counsel re: Joint Status Conference Statement	0.0175	0.0175	0.0175	0.0175	0.07	0.07
1/4/2023	email w. PG&E counsel re: settlement call	0.005	0.005	0.005	0.005	0.02	0.02
1/4/2023	email w. clients re: settlement call	0.0225	0.0225	0.0225	0.0225	0.09	0.09
1/4/2023	participate in settlement meet-and-confer	0.0875	0.0875	0.0875	0.0875	0.35	0.35

1/3/2023	email w. ALJ re: Status Conference					0.02	0.02	0.02
1/3/2023	email w. PG&E counsel re: confidentiality issue				0.14		0.14	0.14
1/3/2023	email w. clients re: confidentiality issue strategy				0.15		0.15	0.15
1/1/2023	email w. PG&E counsel re: comments on Joint Status Conference Statement, response to confidentiality meet-and-confer proposal	0.007	0.007	0.006	0.1		0.12	0.12
1/1/2023	review PG&E draft of Joint Status Conference Statement	0.05	0.05	0.05	0.05		0.2	0.2
12/30/2022	review PG&E draft of Joint Status Conference Statement	0.045	0.045	0.045	0.045		0.18	111.88 total 2023 hours
12/28/2022	email w. PG&E counsel re: A4NR exhibits	0.0075	0.0075	0.0075	0.0075		0.03	
12/27/2022	participate in status conference meet-and-confer w. parties	0.08	0.08	0.08	0.08		0.32	
12/24/2022	research PG&E citations for confidentiality				5.83		5.83	
12/23/2022	review PG&E response to request to reduce redactions to A4NR testimony				0.6		0.6	
12/20/2022	email w. PG&E counsel re: renewed request to meet-and-confer				0.1		0.1	
12/19/2022	email w. PG&E counsel re: settlement conference	0.005	0.005	0.005	0.005		0.02	
12/12/2022	email w. clients re: confidentiality issues				0.05		0.05	
12/12/2022	email w. PG&E counsel re request to meet-and-confer	0.005	0.005	0.005	0.005		0.02	
12/12/2022	draft request for modification of PG&E confidentiality designation under NDA procedure				0.75		0.75	
12/9/2022	review PG&E Rebuttal Testimony	0.474	0.474	0.473			1.42	
11/3/2022	review R.14-11-001 decisions re: Commission confidentiality standards in non-procurement matters				3.17		3.17	
11/3/2022	email w. clients re: PG&E defense on \$155 million fine					0.05	0.05	
11/2/2022	email w. clients re: Blunt book applicability to errors in stator rebuild	0.04	0.04				0.08	
10/31/2022	review CCA, PAO testimony					0.2	0.2	
10/31/2022	email w. PG&E counsel re: confidential testimony					0.04	0.04	
10/31/2022	email w. clients re: summary of testimony	0.02	0.02	0.02	0.02		0.08	
10/23/2022	review Catherine Blunt book on PG&E repair/maintenance history	1.115	1.115				2.23	
10/22/2022	draft Testimony	0.71	0.71				1.42	
10/21/2022	review Catherine Blunt book on PG&E repair/maintenance history	1.375	1.375				2.75	
10/21/2022	email to clients re: draft Testimony	0.01	0.01				0.02	
10/20/2022	draft Testimony	2.27	2.27				4.54	

10/19/2022	draft Testimony	2.365	2.365			4.73
10/18/2022	draft Testimony	2.93	2.93			5.86
10/17/2022	draft Testimony	0.975	0.975			1.95
10/16/2022	review Catherine Blunt book on PG&E repair/ maintenance history	1.085	1.085			2.17
10/14/2022	review Catherine Blunt book on PG&E repair/ maintenance history	1.265	1.265			2.53
10/5/2022	draft Testimony	2.485	2.485			4.97
10/4/2022	review PG&E responses to A4NR third-round data requests	1.45	1.45			2.9
10/3/2022	review PG&E responses to A4NR third-round data requests	2.555	2.555			5.11
7/29/2022	email w. PG&E counsel re: data responses	0.07	0.07			0.14
7/22/2022	strategy Zoom w. clients	0.23	0.23	0.23	0.23	0.92
7/16/2022	research non-delegable duty	1.35				1.35
7/15/2022	draft Testimony	1.85	1.85			3.7
7/15/2022	email w. PG&E counsel re: third-round data requests	0.01	0.01			0.02
7/15/2022	draft third-round data requests to PG&E	0.39	0.39			0.78
7/14/2022	draft Testimony	2.735	2.735			5.47
7/13/2022	draft Testimony	1.485	1.485			2.97
7/12/2022	draft Testimony	2.025	2.025			4.05
7/11/2022	draft Testimony	2.26	2.26			4.52
7/10/2022	draft Testimony	2.34	2.34			4.68
7/9/2022	draft Testimony	1.06	1.06			2.12
7/8/2022	draft Testimony	1.61	1.61			3.22
7/7/2022	draft Testimony	1.685	1.685			3.37
7/6/2022	draft Testimony	2.86	2.86			5.72
7/5/2022	Zoom strategy session w. clients	0.1175	0.1175	0.1175	0.1175	0.47
7/3/2022	draft NOI (at one-half hourly rate)					0.82
6/30/2022	draft Testimony	0.825	0.825			1.65
6/29/2022	draft Testimony	2.075	2.075			4.15
6/27/2022	draft Testimony	1.96	1.96			3.92
6/27/2022	email w. clients re: \$1.27 million fine for PG&E pipeline corrosion					0.05
6/26/2022	draft Testimony	2.44	2.44			4.88
6/25/2022	draft Testimony	1.97	1.97			3.94
6/24/2022	draft Testimony	2.41	2.41			4.82
6/22/2022	email w. clients re: DCNPP's above-market costs					0.02
6/19/2022	draft Testimony	2.395	2.395			4.79
6/17/2022	research Cary Harbor (Plant Director) DCISC video	0.06	0.06			0.12

6/12/2022	draft Testimony	2.165	2.165			4.33
6/11/2022	review opening briefs in A.20-02-009 from Joint Utilities, TURN, CalCCA, PAO re: wholesale generation revenues				1.4	1.4
6/11/2022	research NRC Inspector General report on DCNPP outages	0.125	0.125			0.25
6/10/2022	draft ex parte communication to ALJ				0.57	0.57
6/10/2022	review transcript of PHC	0.125	0.125	0.125	0.125	0.5
6/9/2022	Zoom strategy session w. clients	0.2075	0.2075	0.2075	0.2075	0.83
6/7/2022	email w. clients re: PHC	0.0075	0.0075	0.0075	0.0075	0.03
6/4/2022	email w. clients re: NDAs and RCEs				0.1	0.1
6/2/2022	email w. clients re: PHC	0.0175	0.0175	0.0175	0.0175	0.07
5/31/2022	review earlier Commission decisions regarding DCNPP disallowances	1	1	1		3
5/27/2022	email w. clients re: DCNPP's above-market costs				0.1	0.1
5/12/2022	review PG&E errata testimony				0.05	0.05
5/3/2022	email w. clients re: change in PHC				0.07	0.07
4/18/2022	review PG&E response to Protests	0.04	0.04			0.08
4/14/2022	review notice of May 4 PHC				0.03	0.03
4/8/2022	review PG&E RCE on incorrect hose installation	0.5933	0.5934	0.5933		1.78
4/7/2022	review two Siemens RCEs	0.7067	0.7067	0.7066		2.12
4/7/2022	review PG&E RCE on feedwater heater outage	1.167	1.167	1.166		3.5
4/6/2022	review PG&E RCE on feedwater heater outage	0.39	0.39	0.39		1.17
4/6/2022	review PG&E RCE on stator outages	0.983	0.984	0.983		2.95
4/5/2022	review PG&E RCE on stator outages	0.4167	0.4167	0.4166		1.25
4/4/2022	email w. TURN counsel re: \$178 million outage costs attributable to DCNPP Unit 2		0.1			0.1
4/4/2022	email w. clients re: PG&E Round 2 data responses	0.025	0.025			0.05
4/4/2022	email w. CalCCA counsel re: revised schedule proposal				0.02	0.02
4/4/2022	review Megan Somogyi article on PG&E expenditures		0.15			0.15
4/2/2022	draft Protest	2.56	2.56			5.12
4/1/2022	email w. clients re: PG&E Round 2 data responses	0.06	0.06			0.12
4/1/2022	email w. PG&E re: attachment to Round 2 data responses to Q01-02	0.05	0.05			0.1
4/1/2022	review PG&E responses to A4NR Round 2 data requests	0.335	0.335			0.67
3/31/2022	email w. clients re: NRC inspection shortfalls into Unit 2 auxiliary feedwater leak		0.05			0.05
3/31/2022	email w. PG&E counsel re: A4NR Round 2 data requests	0.05	0.05			0.1

3/29/2022	email w. CalCCA counsel re: revised schedule proposal			0.03	0.03	
3/29/2022	email w. clients re: Unit 2 auxiliary feedwater leak	0.1			0.1	
3/25/2022	email w. CalCCA counsel re: schedule for proceeding			0.07	0.07	
3/15/2022	draft correspondence to TURN counsel re: Unit 2 stator forced outage costs	0.335	0.335		0.67	
3/14/2022	email w. PG&E counsel re: A4NR data requests	0.01	0.01		0.02	
3/14/2022	draft A4NR Round 2 data requests to PG&E	0.39	0.39		0.78	
3/10/2022	Zoom strategy session w. clients	0.265	0.265		0.53	
3/9/2022	email w. clients re: PAO interest in Unit 2 outages	0.025	0.025		0.05	
3/8/2022	review PG&E responses to Round 1 data requests	0.75	0.75		1.5	
3/5/2022	email w. clients re: data requests on DCNPP above-market costs	0.01	0.01		0.02	
3/4/2022	email w. clients re: DCNPP's above-market costs, resident farmer ingestion pathway	0.025	0.025	0.05	0.1	
3/4/2022	email w. PG&E counsel re: NDA, materials sent to PAO	0.055	0.055		0.11	
3/4/2022	review modified form of PG&E NDA	0.175	0.175		0.35	
3/3/2022	review PG&E Application and testimony	1.335	1.335		2.67	
3/2/2022	email clients re: PG&E testimony	0.025	0.025		0.05	
10/19/2021	attend & participate in DCISC meeting re: PG&E Root Cause Evaluation of Unit 2 generator outages	0.417	0.417	0.416	1.25	164.49 total 2022 hours (includes 0.82 claim prep)
6/23/2021	attend & participate by Zoom in DCISC discussion of Unit 2 generator outages	0.725	0.725		1.45	
5/27/2021	draft NOI for A.21-03-008 (at one-half hourly rate)			0.77	0.77	
4/29/2021	participate in A.21-03-008 PHC	0.535	0.535		1.07	
4/29/2021	email w. clients re: PHC	0.03	0.03		0.06	
4/27/2021	email w. clients re: PHC	0.01	0.01		0.02	
4/22/2021	email w. clients re: framing Unit 2 issues for PHC	0.05	0.05		0.1	
4/1/2021	email w. clients re: PG&E data responses	0.01	0.01		0.02	
4/1/2021	email w. PG&E re: data responses	0.01	0.01		0.02	
3/24/2021	email w. PG&E re: NDA			0.02	0.02	
3/24/2021	email w. clients re: NDA			0.03	0.03	
3/24/2021	review PG&E's proposed NDA			0.37	0.37	
3/18/2021	email w. clients re: Response vs. Protest; potential interest of TURN, WEM, SLOMFP in Response	0.01	0.01		0.02	
3/18/2021	draft data request to PG&E	0.1	0.1		0.2	
3/16/2021	email w. clients re: Response to PG&E Application	0.01	0.01		0.02	
3/16/2021	draft A4NR Response to PG&E ERRA Application	2.385	2.385		4.77	
3/4/2021	email w. clients re: PG&E argument for delayed review of Unit 2 outages; implications of delay for discovery; Protest vs. Response	0.125	0.125		0.25	

3/3/2021	email w. clients re: PG&E ERRRA Application					0.02	0.02	
3/3/2021	email w. CEERT re: Unit 2 status and implications for summer reliability					0.15	0.15	
2/27/2021	email w. former CEC Chair re: Unit 2 status and implications for summer reliability					0.17	0.17	
2/22/2021	email w. clients re: Unit 2 auxiliary feedwater outage	0.05					0.05	
2/18/2021	phone call w. clients re: implications of PG&E DCISC presentations for ERRRA proceeding					0.9	0.9	
2/17/2021	email w. clients re: PG&E inconsistency on safety of Unit 2 hydrogen leaks					0.02	0.02	
2/16/2021	email w. clients re: timing and scope of ERRRA case; measure of financial consequences of Unit 2 outages; Unit 2 seismically-sensitive SSCs; PG&E uncertainties about vibrations					0.23	0.23	
2/16/2021	attend & participate in DCISC Zoom discussion of Unit 2 outages					0.75	0.75	
		121.8272	118.4438	23.3025	46.1975	10.86	320.63	12.73 total 2021 hours (includes 0.77 claim prep)

DATE	TASK	PGE Oversight	Dsgn/Inst/Fab	Root Cause Eval	Confidential	General	TOTAL								
		of Siemens	Test Deficiencies	as Evidence	Designation										
8/22/25	Prepare Compensation Claim (at 1/2 hourly rate)						2.00	2.00							
6/17/25	ex parte meeting with staff for Comm. Houck	0.15	0.15				0.30	2							
6/16/25	ex parte meeting with staff for Comm. Reynolds & Pres. Alice Reynolds	0.24	0.24				0.48	0.3							
6/13/25	ex parte meeting with staff for Comm. Douglas	0.23	0.23				0.46	0.48							
6/9/25	review + analyze draft reply comments on PD	0.33	0.33				0.66	0.46							
5/19/25	review + analyze PD	0.25	0.25	0.25			0.75	0.66							
3/13/25	email w/Geesman re: draft reply brief	0.01	0.01	0.01			0.03	0.75							
3/13/25	review + analyze draft reply brief	0.30	0.30	0.30			0.90	0.03							
2/26/23	email w/Geesman re: Opening Brief	0.01		0.01			0.02	0.9							
2/26/23	review + analyze draft Opening Brief	0.30	0.20	0.20			0.70	5.58							total Weisman 2025 hrs. (includes 2.0 claim prep)
1/6/23	participate in status conference	0.23	0.23	0.23	0.23		0.92	0.02							
1/3/23	email w/Geesman re: confidentiality concerns				0.10		0.10	0.7							
12/12/22	email w/Geesman re: confidentiality concerns				0.03		0.03	0.92							
12/12/22	prepare analysis of PGE rebuttal for Geesman	0.17	0.15	0.15			0.47	0.1							
12/12/22	review + analyze PGE Rebuttal Testimony	0.25	0.25	0.30			0.80	1.74							total Weisman 2023 hrs.
11/3/22	email w/Geesman re: PGE's \$155 million fine						0.02	0.02					0.03		1.2
11/2/22	email w/Geesman re: "California Burning" book examples for stator failure	0.01	0.01				0.02	0.47					0.47		1.45
10/31/22	Review CAL CCA Testimony						0.05	0.05					0.8		1.07
10/31/22	review PAO Testimony						0.05	0.05					0.02		0.02
10/31/22	email w/Geesman re: testimony summary	0.01	0.01	0.01	0.01		0.04	0.02					0.02		0.02
10/21/22	email w/Geesman re: testimony draft	0.01	0.01				0.02	0.05					0.05		0.03
10/20/22	review + analyze Geesman draft Testimony pages 20-58	0.50	0.50				1.00	0.05					0.05		0.02
10/19/22	review + analyze Geesman draft Testimony pages 10-20	0.25	0.25				0.50	0.04					0.04		0.02
10/18/22	review + analyze Geesman draft Testimony pages 1-10	0.12	0.13				0.25	0.02					0.02		0.4
10/5/22	review + analyze PGE responses to A4NR data requests	0.15	0.15				0.30	1					1		0.02
7/22/22	Zoom strategy session w/Geesman + Becker	0.23	0.23	0.23	0.23		0.92	0.5					0.5		0.1
7/5/22	Zoom strategy session w/Geesman + Becker	0.11	0.12	0.11	0.12		0.46	0.25					0.25		0.03
6/27/22	email w/Geesman re: PGE pipeline corrosion fine for \$1.27 million						0.02	0.02					0.3		0.9
6/22/22	email w/Geesman re: Diablo Canyon above market costs						0.02	0.02					0.92		0.02
6/9/22	Zoom strategy session w/Geesman + Becker	0.21	0.21	0.21	0.20		0.83	0.46					0.46		0.15
6/8/22	review + analyze PGE Testimony Chapter 4 ERRA	0.40	0.42				0.82	0.02					0.02		0.75
6/7/22	email w/Geesman re: PHC	0.01	0.01	0.01			0.03	0.02					0.02		6.2 total Weisman 2021 hrs.
6/4/22	email w/Geesman re: Root Cause Evaluations and NDA				0.03		0.03	0.83					0.83		
6/2/22	email w/Geesman re: PHC	0.01	0.01	0.01	0.01		0.04	0.82					0.82		
5/27/22	email w/Geesman re: Above Market Costs						0.03	0.03					0.03		
5/23/22	review + analyze Siemens generator parallel ring crack evaluation	0.08	0.10	0.10			0.28	0.03					0.03		
5/23/22	review + analyze Siemens generator manifold leaks root cause evaluation	0.15	0.15	0.12			0.42	0.04					0.04		
5/20/22	review + analyze PGE internal root cause evaluation on multiple outages <p45	0.30	0.30	0.32			0.92	0.03					0.03		
5/18/22	review + analyze PGE internal root cause evaluation on multiple outages >p44	0.35	0.35	0.35			1.05	0.28					0.28		
5/17/22	review + analyze PGE root cause analysis Main Generator Hose installation	0.30	0.30	0.30			0.90	0.42					0.42		
5/11/22	email w/Dave Lochbaum (UCS) re: AFW oversight + NRC inspections	0.08	0.07				0.15	0.92					0.92		
5/10/22	research PGE & NRC history of AFW piping inspections and reports	0.30	0.30				0.60	1.05					1.05		
5/9/22	email w/Dave Lochbaum (UCS) re: AFW oversight + NRC inspections	0.10	0.08				0.18	0.9					0.9		
5/3/22	email w/Geesman re: changes in PHC						0.03	0.03					0.15		
4/18/22	review PG&E reply to Protests	0.08	0.09				0.17	0.6					0.6		

4/4/2022	email w/Geesman re: PG&E Round 2 data responses	0.01	0.01						0.02			0.18					
4/2/22	review + analyze A4NR protest draft for atty. Geesman	0.12	0.13						0.25			0.03					
4/1/22	email w/Geesman re: PG&E Round 2 data responses	0.02	0.02						0.04			0.17					
3/31/22	email w/Geesman re: NRC inspection failing of Unit 2 AFW leak		0.03						0.03			0.02					
3/29/2022	email w/Geesman re: Unit 2 auxiliary feedwater leak		0.03						0.03			0.25					
3/14/22	review second round of A4NR data requests to PG&E	0.04	0.04						0.08			0.04					
3/10/22	Conference Zoom w/Geesman + Becker for strategy + assignments	0.16	0.17						0.33			0.03					
3/9/22	email w/Geesman re: Public Advocates Office interest in Unit 2 outages	0.01	0.01						0.02			0.03					
3/9/22	review + analyze PGE responses to A4NR data requests	0.17	0.18						0.35			0.08					
3/5/22	email w. clients re: data requests on above market costs	0.01	0.02						0.03			0.33					
3/5/22	review + analyze PGE application and Testimony	0.52	0.42						0.94			0.02					
3/2/22	email w/Geesman re: PGE testimony	0.01	0.01						0.02			0.35					
10/19/21	Attend in-person DCISC meeting re: PGE Unit 2 generator outages RCE reports	0.40	0.40		0.40				1.20			0.03					
6/23/21	Attend in-person DCISC meeting + disucss/participate re: Unit 2 generator out	0.73	0.73						1.45			0.94					
4/29/21	Participate in PHC for A.21.03.008	0.54	0.54						1.07			0.02					
4/29/2021	email w/Gessman re: PHC	0.01	0.01						0.02			13.59	total Weisman 2022 hrs.				
4/27/2021	email w/Geesman re: PHC	0.01	0.01						0.02								
4/22/2021	email w/Geesman re: framing Unit 2 issues for PHC	0.01	0.02						0.03								
4/1/2021	email w/Geesman re: PG&E data responses	0.01	0.01						0.02								
3/18/21	email w/Geesman re: Response to PGE + co-intervenor strategies	0.01	0.01						0.02								
3/18/22	review + analyze draft A4NR response to PGE application	0.20	0.20						0.40								
3/16/2021	email w/Geesman re: Response to PG&E Application	0.01	0.01						0.02								
3/4/21	email w/Geesman re: PGE delay/postponment of recovery for outages	0.05	0.05						0.10								
2/22/21	email w/Geesman re: Unit 2 auxiliary feedwater leak		0.03						0.03								
2/18/21	conference call w/Geesman + Becker re: DCISC meeting presentations for ERRR		0.90						0.90								
2/17/21	email w/Geesman re: hydrogen leaks and safety implications	0.01	0.01						0.02								
2/16/21	email w/Geesman re: ERRR case scoping, schedule, and outage implications		0.15						0.15								
2/16/21	participate in remote ZOOM DCISC meeting re: unit 2 outages		0.75						0.75								
									0.00								
		9.28	11.03		3.62		0.96		2.22			27.11					
												27.11					

A.22-02-015 Spreadsheet Verification of Calculations

Allocation of Hours by Issue:	#1	#2	#3	#4	#5	TOTAL
Geesman	121.8282	118.4438	23.3025	46.1975	10.86	320.63
Weisman	9.28	11.03	3.62	0.96	2.22	27.11
total	131.1082	129.4738	26.9225	47.1575	60.25	347.74
%	37.7	37.23	7.74	13.56	3.76	99.99

Attorney/Advocate Fees Requested

Geesman 2025	\$ 20,097.60
Geesman 2023	\$ 83,350.60
Geesman 2022	\$ 117,024.05
Geesman 2021	\$ 8,401.80
Weisman 2025	\$ 841.30
Weisman 2023	\$ 382.80
Weisman 2022	\$ 2,853.90
Weisman 2021	\$ 1,209.00
total	\$ 234,161.05

Claim Preparation Fees Requested

Geesman 2025	\$ 2,484.38
Geesman 2022	\$ 293.15
Geesman 2021	\$ 254.10
Weisman 2025	\$ 235.00
total	\$ 3,266.63

Amount of Total Claim

Attorney/Advocate Fees	\$ 234,161.05
Claim Preparation Fees	\$ 3,266.63
total	\$ 237,427.68