



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

06/12/26

03:41 PM

Order Instituting Rulemaking to Consider Regulating Telecommunications Services Used by Incarcerated People.

Rulemaking 20-10-002
(Filed October 8, 2020)
R2010002

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

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

Intervenor: The Utility Reform Network	For contribution to Decisions (D.) 26-04-004
Claimed: \$137,978.00	Awarded: \$
Assigned Commissioner: Darcie L. Houck	Assigned ALJ: Robert Haga
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: June 12, 2026	Printed Name: Kori Cordero

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

A. Brief description of Decision:	In D.26-04-004, the Commission adopted a permanent intrastate rate cap of \$0.045 per minute for incarcerated persons calling services (IPCS) debit, prepaid, and collect calls. The decision maintains existing prohibitions on certain ancillary fees, including single-call, paper bill, live agent, and automated payment fees, while permitting the pass-through, without markup, of third-party financial transaction fees up to \$6.95 per transaction and government taxes and fees. The decision also requires IPCS providers to implement the adopted rate and fee requirements, submit compliance
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	filings and customer notification plans, and provide service-related information in multiple languages.
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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:	December 10, 2020	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	January 11, 2021	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.20-08-021	
6. Date of ALJ ruling:	12/11/20	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-021	
10. Date of ALJ ruling:	12/11/20	
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.26-04-004	
14. Date of issuance of Final Order or Decision:	April 13, 2026	
15. File date of compensation request:	June 12, 2026	
16. Was the request for compensation timely?		

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

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

#	Intervenor’s Comment(s)	CPUC Discussion

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

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>1. Background</u> In D.26-04-004, the Commission adopted a permanent intrastate rate cap of \$0.045 per minute for incarcerated persons calling services (IPCS) debit, prepaid, and collect calls. The decision maintains existing prohibitions on certain ancillary fees, including single-call, paper bill, live agent, and automated payment fees, while permitting the pass-through, without markup, of third-party financial transaction fees up to \$6.95 per transaction and government taxes and fees. The decision also requires IPCS providers to implement the adopted rate and fee requirements, submit compliance filings and customer notification plans, and provide service-related information in multiple languages.</p> <p>This claim covers The Utility Reform Network’s (TURN) work and advocacy in Phase II of this proceeding, up to the conclusion and closure of R.20-10-002. In Phase I, the Commission set an interim rate cap for voice incarcerated people’s communications services (IPCS) and largely prohibited ancillary fees on those services. In fall 2022, the Commission began Phase II,</p>	<p><i>See generally D.21-08-037 (issued on Aug. 23, 2021).</i></p>	

<p>which included permanent voice IPCS rate caps, examination of whether the Commission has jurisdiction over video IPCS and related services and whether the Commission should set rate and fee caps for those services. Parties, including TURN, filed briefs on the jurisdictional issues related to video IPCS in January and February 2022.</p> <p>In 2022, Commissioner Houck was assigned to this proceeding. Commissioner Houck solicited party input on a revised scope and issued a revised proceeding scope and schedule in May 2022. The Commission revised the Phase II scope to include questions about whether the Commission should consider requiring IPCS providers to bifurcate contracts for various IPCS services. The revised Phase II schedule solicited testimony from IPCS providers on contracting, video IPCS, and providers' networks. TURN submitted reply testimony on December 7, 2022, in response to assertions by IPCPS providers in their testimony, including contract bundling and service quality issues. The Commission further delayed another slate IPCS-related of issues to a planned Phase III.</p> <p>After submission of testimony, this proceeding entered a period of dormancy until the Commission issued a staff proposal on permanent voice IPCS rates for party comment in September 2024, which TURN commented on. Despite a number of issues lined up for a subsequent phase in this rulemaking and backsliding at the federal level, the Commission issued D.26-04-004 in April 2026, which established a permanent voice IPCS rate and closed the proceeding.</p>	<p>Assigned Commissioner's Phase II Scoping Memo and Ruling Extending Statutory Deadline (issued Nov. 29, 2021) at 11-12.</p> <p>Joint Brief of Public Advocates Office, TURN, Prison Policy Initiative, and Center for Accessable [sic] Technology (filed Jan. 28, 2022); Joint Reply Brief of Public Advocates Office, TURN, Prison Policy Initiative, and Center for Accessible Technology (filed Feb. 28, 2022).</p> <p>Assigned Commissioner's Ruling Amending Phase II Scope and Schedule and Directing Testimony (issued May 20, 2022) at 2-3.</p> <p><i>Id.</i> at 4-8; Opening Comments of TURN and Center for Accessible Technology on Staff Proposal (filed Oct. 29, 2024); Reply Comments of TURN and Center for Accessible Technology on Staff Proposal (filed Nov. 19, 2024).</p> <p>Intervenor Reply Testimony of Stephen Raher, submitted on behalf of TURN (filed Dec. 7, 2022).</p> <p>Assigned Commissioner's Ruling Amending Phase II Scope and Schedule and Directing Testimony at 10.</p> <p>Administrative Law Judge's Ruling Requesting Comments on Staff</p>	
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	<p>Proposal (issued Sept. 30, 2024).</p> <p><i>See Amended Motion for Official Notice of TURN (filed July 31, 2025); Final Decision at 16.</i></p>	
<p><u>2. Establishment of Final Rate Cap for IPCS Voice Services</u></p> <p>TURN substantially contributed to the Final Decision as it relates to the establishment of a final rate cap for IPCS for debit, prepaid, and collect voice-only calls for correctionally facilities in California not covered by by Senate Bill 1008 and contributed substantially to the record and proceeding discussion on these issues.</p>	<p><i>See generally: TURN Notice of Filing Protective Order Acknowledgment (submitted September 14, 2022) TURN Intervenor [Opening] Testimony of Stephen Raher (filed September 19, 2022) (“TURN Intervenor Opening Testimony”); Motion of The Utility Reform Network for Leave to Seal the Record as To Confidential Information Submitted by NCIC Inmate Communications Contained in Intervenor Testimony Exhibit 5 (filed September 19, 2022); TURN Intervenor Reply Testimony of Stephen Raher (filed December 7, 2022) (“TURN Intervenor Reply Testimony”); Opening Comments of the Utility Reform Network and Center for Accessible Technology on Staff Proposal (filed October 29, 2024) (“Joint Consumers Opening Comments”); TURN Notice of Filing of Additional Protective Order Acknowledgements (filed November 1, 2029); Joint Motion for Leave to File Under Seal by the Utility Reform Network and Center for Accessible Technology</i></p>	

	<p>(filed November 19, 2024); <i>Reply Comments of the Utility Reform Network and Center for Accessible Technology on Staff Proposal</i> (Filed November 19, 2024.) (“Joint Consumers Reply Comments”); <i>Amended Motion for Official Notice of the Utility Reform Network</i> (filed July 31, 2025; <i>Opening Comments of the Utility Reform Network on the Decision Adopting Rate Relief for Incarcerated Persons Calling Services</i> (filed March 02, 2026) (“TURN Opening PD Comments”); and <i>TURN Reply Comments on the Decision Adopting Rate Relief for Incarcerated Persons Calling Services</i> (filed March 09, 2026) (“TURN Reply PD Comments”).</p>	
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<p>TURN’s advocacy on this topic was reflected in OPs 1, 2, 3, 6, 10, and 11 of the Final Decision.</p> <p>For example, TURN specifically recommended that:</p> <ul style="list-style-type: none"> • The uniform rate of \$0.045 appeared reasonable, which is the rate cap ultimately adopted. • That the Commission should independently promulgate California rate caps to account for California communities’ unique needs (and not merely defer to federal rate caps), which is the ultimate approach taken by the Commission • The Commission should review the record compiled by the FCC and use the information to protect California IPCS users as it reduces excessive ancillary fees and the Commission Final Decision reflects consideration and adoption of this recommendation. • TURN, as part of Joint Consumers, identified flaws in IPCS provider arguments claim that the rate is unsupported by evidence, which the Commission directly included in its 	<ul style="list-style-type: none"> • Final Decision at 77-78. • Joint Consumers Opening Comments at 2. • Final Decision, OP 1, at 77. • Joint Consumer Opening Comments at 3, 6-9, 15, and 19-20. • <i>E.g.</i> Final Decision at 59-63. • Joint Consumers Opening Comments at 1. • Final Decision, FOF 16 at 76; Final Decision, COL 3 at 76; and Final Decision OP 3 at 77. • Final Decision at 61-62, referencing Reply Comments of Joint Consumers at 12-13 and 18-21 	
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<p>analysis and reasoning supporting the \$0.045 rate cap established by the Final Decision.</p> <p>Finally, TURN brought substantial subject matter expertise to this proceeding and remained an active participant throughout. TURN consultant Stephen Raheer submitted opening testimony and reply testimony, and TURN’s motion practice ensured relevant pricing data, and state/federal regulatory changes were properly before the Commission all of which informed TURN’s advocacy the Commission’s analysis and Final Decision as evidenced by the primary results of the proceeding in OPs 1-7.</p>	<p>discussed in the Final Decision at 46.</p> <ul style="list-style-type: none"> • TURN Intervenor Opening Testimony at 5-8, 9-11, 13-14, and 20-21. • TURN Intervenor Reply Testimony at 2-7. • See above Background section specific citations to TURN’s motions related to confidential data and notice of other regulatory activities on relevant IPCS topics. 	
<p><u>3. Process for Adjusting IPCS Rate Cap in the Future</u></p> <p>TURN substantially contributed to the Final Decision as it relates to the Commission’s decision to create a process for adjusting IPCS rates in the future and contributed substantially to the record and proceeding discussion on these issues. TURN’s advocacy on this issue is reflected in OPs 4 and 5 of the Final Decision.</p> <p>For example, TURN specifically recommended that:</p> <ul style="list-style-type: none"> • Any allowed rate revisions should not occur as a formal general rate case and to avoid any rate adjustment application process that would result in the initiation of a formal rate case 	<ul style="list-style-type: none"> • Joint Consumer Opening Comments at 27-31; Joint Consumer Reply Comments at 27-29; and TURN Opening PD Comments at 5-6. • Joint Consumers Opening Comments at 28-29; Joint Consumers Reply Comments at 29. 	

<p>cycle for IPCS provider and likely avoid the “rate of return” regulatory framework.</p> <ul style="list-style-type: none"> • The Commission establish a Tier 1 Advice letter process for rate decreases • The Commission require IPCS providers be allowed to revise rates through a Tier 2 Advice Letter process that includes specific comprehensive data • The Commission reject proposed Consumer Price Index and X Factor mechanisms for rate adjustments because of their ambiguity • The Commission reject the Staff Proposal’s proposed automatic adjustment mechanism <p>As a result of TURN’s advocacy, the Commission’s Final Decision adopted a “streamlined process for future rate changes” that included the Tier 2 Advice Letter Process.</p> <p>Although the Commission evaluated and ultimately partially adopted TURN/Joint Consumers’ suggestions relating to audited financial statements, the Commission adopted a modified requirement that data submitted through the Tier 2 Advice Letter Process be actual, detailed cost data, including IPCS providers’ internal financial statements and operating expenses to substantiate the need for a higher rate that clearly shows the allowable costs and how those will be recovered on a per minute basis, including</p>	<ul style="list-style-type: none"> • Joint Consumers Opening Comments at 28. • Joint Consumers Opening Comments at 28-29; TURN Opening PD Comment at 5-6. • Joint Consumers Reply Comments at 27. • Joint Consumers Opening Comments at 27-28. • Final Decision at 64. • Final Decision at 65. • Final Decision at 65. 	
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<p>relevant financials, operating costs, capital costs, facility data, revenue, and usage.</p>		
<p><u>4. Commission Determination that No Further Action Needed due to SB 1008 and federal activities</u></p> <p>TURN substantially contributed to the Final Decision as it relates to how the Commission evaluated the impacts of SB 1008, the Martha Wright-Reed Act of 2022, and various related efforts by the Federal Communications Commission (“FCC”). TURN worked to keep the Commission apprised of where these activities did, and did not, impact the Proceeding, pushed back on provider arguments that the Commission did not have jurisdiction or should follow the non-binding federal approach, and developed record evidence whereby the Commission could focus its Final Decision on the most pressing needs of establishing California’s permanent IPCS rate cap and determine which issues required no further action, and/or could be evaluated in other proceedings. TURN contributed substantially to the record and proceeding discussion on these issues, as discussed and cited in Section 1 Background and Section 2 Establishment of Final Rate Cap for IPCS Services, above. TURN’s advocacy was reflected across the Final Decision.</p> <p>For example, TURN specifically advised the Commission on impacts of SB 1008 and FCC’s July 22, 2024, Report and Order on Rates for Interstate Inmate Calling Services (“FCC Order”), including the Commission’s ability to continue its efforts in other aspects of IPCS regulation.</p>	<p><i>See generally: Motion of The Utility Reform Network for Leave to Seal the Record as To Confidential Information Submitted by NCIC Inmate Communications Contained in Intervenor Testimony Exhibit 5 (filed September 19, 2022); TURN Intervenor Opening Testimony; TURN Intervenor Reply Testimony; Joint Consumers Opening Comments; Joint Motion for Leave to File Under Seal by the Utility Reform Network and Center for Accessible Technology (filed November 19, 2024); Joint Consumers Reply Comments; TURN Opening PD Comments; and TURN Reply PD Comments.</i></p> <ul style="list-style-type: none"> • Joint Consumers Opening Comments at 2-3. 	

<p>While not all of TURN’s recommendations were fully adopted, the Commission’s approach shares TURN’s intended outcome of ensuring California-specific consideration in the permanent rate cap established in this proceeding were considered in light of SB 1008 and the Commission’s decision to continue to exert its jurisdiction over facilities in California not covered by SB1008 instead of deferring to the FCC.</p> <p>TURN recommended that the Commission review the record compiled by the FCC, gather additional data, and use this information to exercise its jurisdiction to protect California IPCS users to reduce the excessive interim rates and ancillary fees currently in place.</p> <p>TURN also helped develop the record as to new federal rate cap, ancillary fees, and site commission analysis, which was reflected in the outcomes of OPs 1-7 of the Final Decision and specifically discussed by the Commission in its analysis.</p> <p>As a result of TURN’s advocacy, the Commission’s Final Decision stated: “As SB 1008 does not govern facilities outside the jurisdiction of CDCR, such as federal prisons or local jails, the Proposal [which TURN generally supported with modifications taken by the Commission] identified a continuing need to address communication affordability and accessibility in non-CDCR facilities.”</p> <p>And further stated “When we opened this proceeding in 2020, we identified a number of</p>	<ul style="list-style-type: none"> • Final Decision at 16-19, 22, 27-29; Joint Consumers Reply Comments at 21. • Final Decision at 60, 62-63, FOF 13 at 75 and COL 7 at 76. • Joint Consumers Opening Comments at 1. • Joint Consumers Opening Comments at 4-6, 44, and 45; Joint Consumers Reply Comments at 7, 9, 11-14. • Final Decision at 15, 57-59, and 67. • Final Decision at 18. • Final Decision at 58-59, COL 7 at 76. 	
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<p>issues related to communication services for incarcerated individuals. Since that time, many of those issues have been satisfactorily addressed through [...] action by the California Legislature, SB 1008, and action at the federal level by the FCC and the Martha Wright-Reed Just and Reasonable Communications Act of 2022. Because of these actions we do not see a need to take further action at this time to address rates, fees, or service quality of video and related services, whether we should require IPCS providers to bifurcate contracts providing voice-only calling services and video calling services. <u>Upon consideration of the record developed in this proceeding we believe no further action is needed at this time.</u>” (emphasis added)</p>		
<p><u>5. Service Quality Determination</u></p> <p>TURN substantially contributed to the Final Decision as it relates to the service quality determination and contributed substantially to the record and proceeding discussion on this topic, and TURN claims a modest 335.14 hours for this contribution.</p> <p>TURN’s advocacy was reflected in the Final Decision, and the Commission specifically stated that “Upon consideration of the record developed in this proceeding we believe no further action [re: service quality] is needed at this time.” Further, the Commission found that existing service quality requirements are sufficient. While TURN advocated for a different outcome, the Commission considered TURN’s record development in the Final Decision, which constitutes a substantial contribution appropriate for this claim.</p>	<ul style="list-style-type: none"> • TURN Intervenor Opening Testimony at 15-20; TURN Intervenor Reply Testimony at 12; TURN Opening PD Comment at 6-11. • Final Decision at 58-59, COL 7 at 76. 	

<p><u>6. Ongoing Monitoring by Commission</u></p> <p>TURN substantially contributed to the Final Decision as it relates to the Commission’s decision to order ongoing monitoring of IPCS providers by Commission staff and reporting by IPCS providers and contributed substantially to the record and proceeding discussion on these issues. For example, TURN (as one half of Joint Consumers) specifically recommended:</p> <ul style="list-style-type: none"> • the collection of contracts, costs, and service quality information, as well as the calling programs and privileges offered to incarcerated persons, at both facilities covered by SB 1008 and other facilities where calls are offered to end users at no charge • the Commission examine how implementation of SB 1008 may have impacted call volume and service quality compared to facilities charging end users for the services. • The Commission further supplement the data underlying the Staff Proposal by requiring additional, ongoing data collection. • Commission prohibit the pass through of these facility costs unless, and until, the service provider and the facility can demonstrate that the only funding option for reimbursement of these facility costs is through the rates charged to incarcerated persons and their families. <p>As a result of TURN’s advocacy, the Commission’s Final Decision requires IPCS providers to submit a Notice of Compliance</p>	<ul style="list-style-type: none"> • Joint Consumers Opening Comments at 21-22; Final Decision at 29. • Joint Consumers Opening Comments at 23-24; Final Decision at 30. • Joint Consumers Opening Comment at 16. 	

<p>and submit a Rate Compliance Report as well as OP 2’s prohibition that permanently prohibits IPCS providers from “paying or recovering site commissions, sign-on bonuses, or similar payments for rates charged to end-users. Further the Commission determined it “should track the rates charged for video calls and the percentage of video calls as a subset of all calls made by incarcerated people.”</p>	<ul style="list-style-type: none"> • Final Decision, OPs 2-3 at 77, OP 8 at 78. • Final Decision at 59. 	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: Center for Accessible Technology (CforAT), Prison Policy Initiative (PPI), and the Californians for Jail and Prison Phone Justice Coalition (Worth Rises)		
d. Intervenor’s claim of non-duplication: This compensation request covers work that had implications and significant impacts on some of California’s most vulnerable consumers, including during the coronavirus pandemic. The Commission should find that TURN efficiently coordinated with all intervenors with similar interests wherever possible, avoiding undue duplication as explained below. TURN’s compensation should not be reduced for duplication of effort with the other parties to the proceeding. TURN took reasonable steps to keep any duplication to a minimum, including working closely with CforAT, Cal Advocates, PPI, and Worth Rises to complement and assist the work of each consumer representative. TURN and the other intervenors engaged in extensive coordination that allowed each organization to inform the Commission about the new issues of		

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

<p>communications services for incarcerated persons in California, and to file joint pleadings wherever feasible. As TURN’s time records reflect, and as further described herein and in TURN’s prior, awarded Compensation Request for Phase I of this proceeding, TURN’s advocates met with and provided technical assistance to subject matter champions who were new to the Commission and the Commission process to participate and file pleadings in this proceeding. This coordination avoided unnecessary duplication of efforts by facilitating the subject matter champions’ expertise shared with the Commission and by also relying on this information instead of attempting to recreate field studies or conducting the same qualitative analysis. These parties were not active in Phase II, which further avoided duplication. TURN hired Stephen Raher as a consultant (who had previously worked on behalf of Worth Rises in this proceeding), which further avoided potential duplication and ensured efficiency. Mr. Raher was already aware of the background in Phase I which another consultant would have needed to spend time reviewing the past record.</p> <p>TURN provided unique contributions to the discussion that were covered in a more limited way by other intervenors. For example, Finally, TURN brought substantial subject matter expertise to this proceeding and remained an active participant throughout. TURN consultant Stephen Raher submitted opening testimony and reply testimony, and TURN’s motion practice ensured relevant pricing data, and state/federal regulatory changes were properly before the Commission³ all of which informed TURN’s advocacy the Commission’s analysis and Final Decision, as evidenced by the primary results of the proceeding in OPs 1-7.</p> <p>Although TURN coordinated or discussed some issues with other intervenors and jointly filed several filings with CforAT to avoid duplication and better deploy resources, TURN independently contributed unique approaches and proposals for the Commission to consider as it determined the rates and fees for communications services for incarcerated persons in California, for example in our separate comments on the Proposed Decision. TURN submits that its combined efforts with Joint Consumers resulted in a net savings of resources for each organization compared to if each organization tried to tackle the same issues alone.</p>	
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C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor’s Comment	CPUC Discussion

³ See above Issues section for specific citations to TURN’s motions related to confidential data and notice of other regulatory activities on relevant IPCS topics.

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

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

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness:</p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$137,978.00 as the reasonable cost of TURN’s participation in the proceeding. Considering the scope and quality of TURN’s work, and the breadth and depth of benefits achieved through TURN’s participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The Commission’s review of incarcerated person’s calling services in this proceeding was an issue of first impression, with many components that were novel before the Commission, and it has implications of service to some of California’s most vulnerable residents. For example, the Commission’s work on this proceeding built upon the work already done at the FCC and judicial orders and was influenced by work done in other states. For another example, the Commission found that the status quo for incarcerated person’s calling services caused significant harms to people who are low-income and disproportionately harmed people of color. Prior to the Commission’s adoption of interim (and eventually, permanent) rules in this proceeding, incarcerated person’s calling services providers charged varying yet exorbitant prices, resulting in incarcerated persons and their family members going into debt to stay in touch. Yet, staying connected with loved once reduces the rate of recidivism. TURN’s advocacy focused on bolstering the Commission’s jurisdiction to regulate rates and require consumer protections for IPCS.</p> <p>As is often the case for telecommunications proceedings in recent years, it is more difficult to quantify the dollar impacts of TURN’s work here than is the case in Commission proceedings addressing rates. Here, TURN’s advocacy helped achieve benefits that were clear and substantial, though hard to quantify. As discussed above, TURN’s efforts resulted in important, permanent relief for individuals incarcerated or detained and their families through the adoption of permanent, lower voice calling rates and limited fees for IPCS. This relief and the associated protections will provide direct financial benefits to these consumers, particularly in ESJ communities. Similarly, the efficient compliance requirements, notification measure, and rate adjustment process adopted should help to ensure IPCS providers’ compliance with the permanent rules and thus increase the likelihood that the intended public benefits will be realized. TURN submits that such outcomes demonstrate benefits to incarcerated and detained</p>	

	CPUC Discussion
<p>individuals and their families that, though difficult to quantify, more than support a compensation award in the amount requested here.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN’s attorneys and advocates recorded a reasonable number of hours for their work in this proceeding. The total hours of professional time included in this compensation request (approximately 335 hours of substantive work, exclusive of compensation-related work) is equivalent to approximately 41 days of full-time work by a single person. TURN’s efforts included motions, testimony, opening and reply comments on the Staff Proposal, motions for official notice, opening and reply comments on the Proposed, and multiple ex parte communications with Commissioners. This work addressed the establishment of permanent intrastate IPCS rate caps, ancillary fee restrictions, future rate-adjustment mechanisms, Commission jurisdiction over IPCS providers, and issues relating to service quality, accessibility, and video calling.</p> <p>TURN seeks compensation for approximately 64.34 hours that Stephen Raheer devoted to substantive issues in this proceeding. Mr. Raheer served as TURN’s consultant and expert on IPCS. His work included drafting and revising Phase II opening and reply testimony, preparing testimony exhibits, analyzing calling practices, site commissions, procurement practices, service quality issues, billing practices, and rate-related issues, and assisting TURN in evaluating developments at the federal level that affected this proceeding.</p> <p>TURN seeks compensation for approximately 124.25 hours that Leo Fitzpatrick devoted to substantive issues in this proceeding. Mr. Fitzpatrick served as TURN’s Telecommunications Policy Analyst and was responsible for policy analysis, development of advocacy positions, drafting and revising comments and reply comments on the Staff Proposal, coordinating with consumer advocates, and advancing TURN’s positions regarding permanent rate caps, affordability, data collection, jurisdictional issues, service quality, and future regulation of IPCS.</p> <p>TURN seeks compensation for approximately 7.25 hours that Kori Cordero devoted to substantive issues in this proceeding. As Telecommunications Managing Attorney from October 2025 onwards, Mx. Cordero reviewed the Proposed Decision, assisted with strategy for comments on the Proposed Decision, and reviewed and revised TURN’s opening comments on the Proposed Decision. Mx. Cordero also led the preparation of this intervenor compensation claim.</p>	

	CPUC Discussion
<p>TURN seeks compensation for approximately 72 hours that Alexandra Green devoted to substantive issues in this proceeding. Ms. Green served as TURN’s Telecommunications Attorney and was responsible for legal research and analysis, development of advocacy strategy, drafting and revising comments, reply comments, motions, coordinating with other parties, and advancing TURN’s positions regarding Commission jurisdiction, permanent rate caps, and related consumer protection issues.</p> <p>TURN seeks compensation for approximately 2.75 hours that Ashley L. Salas devoted to substantive issues in this proceeding. Ms. Salas served as TURN’s lead Telecommunications Attorney during portions of the proceeding and assisted with strategy development, coordination among TURN staff and consultants, and advocacy relating to service quality issues affecting incarcerated persons calling services. While Ms. Salas contributed more hours to the proceeding, TURN voluntarily reduced her hours to reflect the specific scope of the final Decision.</p> <p>TURN seeks compensation for approximately 56 hours that Christine Mailloux devoted to substantive issues in this proceeding. As Telecommunications Managing Attorney for the second half of 2024, Ms. Mailloux provided strategic guidance and oversight, reviewed and revised pleadings, coordinated with consumer advocates, and assisted in the development of TURN’s positions regarding permanent IPCS rates, affordability, data collection, automatic adjustment mechanisms, jurisdictional issues, and related matters addressed in the Staff Proposal and proceeding.</p> <p>TURN seeks compensation for approximately 8.55 hours that Brenda D. Villanueva devoted to substantive issues in this proceeding. As Telecommunications Managing Attorney and Lead Counsel from its inception to July 2023 and again from January 2024 to July 2024, Ms. Villanueva provided strategic oversight and guidance regarding TURN’s participation in the proceeding, including issues related to service quality, advocacy strategy, and coordination of TURN’s efforts.</p> <p>*Please note that due to the length of the present proceeding and staff changes at TURN, multiple Telecommunications Managing Attorneys are listed in this claim, but their tenures did not overlap.</p> <p><u>Coordination</u></p> <p>In addition to the coordination described in the Substantial Contribution portion of this submission, and coordination activities by TURN in Phase 1 of the proceeding, TURN worked closely with CforAT and coordinated</p>	

	CPUC Discussion
<p>with Cal Advocates through Phase II of the proceeding to avoid duplication of efforts and pool resources for joint filings, where feasible.</p> <p><u>Establishment of Final Rate Cap for IPCS Voice Services</u></p> <p>A substantial portion of TURN’s hours were dedicated to this outcome of the proceeding, including submission of testimony, analysis of (and comments on) the staff proposal, record development on rates, pricing, jurisdiction and state/federal activities impacting the proceeding.</p> <p><u>Process for Adjusting IPCS Rate Cap in the Future</u></p> <p>TURN engaged meaningfully with this portion of the proceeding and upon close evaluation of the Staff Proposal and in light of the data challenges presented by some parties to the proceeding ultimately aligned with Commission and some IPCS providers in rejecting the CPI and X factor automatic mechanism but brought unique consumer interests to ensure that this rejection would not result in rubber-stamp rate increases for providers but instead recommended comprehensive data submission as part of Tier 2 Advice Letter options for reasonable incremental rate increases over term. TURN’s positions uniquely contributed by balancing the opposing party recommendations.</p> <p><u>Time Spent Reviewing and Monitoring SB 1008 and Federal Activities</u></p> <p>As the Commission recognized in the October 19, 2020, Order Instituting Rulemaking (OIR), the Commission has not previously regulated the rates of telephone services for incarcerated persons in California prisons and jails and has not reviewed the contracts for these services. See OIR at 4-6. These communications services provided in these carceral settings are novel issues for the Commission. In fact, the Commission acknowledged that its work here would build off prior work by the FCC, and the approaches seen in other states. See OIR at pp. 4-6; Scoping Memo at pp. 1-3, 11-18 (discussing FCC); and 18-19 (discussing states). The Scoping Memo directly sought comment on whether the “FCC regulations over interstate and international calls [should] inform the Commission’s approach to intrastate inmate communication services” and whether the Commission should “use some elements of FCC orders but not others as models for ensuring just and reasonable, and affordable, inmate communication services rates in California.” Scoping Memo at 25 (Phase I question 4). The Phase II Scoping Memo asked “Does the Commission have authority to regulate rates, fees and/or service quality of video and related services provided to incarcerated persons in California, including remote video calling services, in-person video calling” (Phase II Scoping</p>	

	CPUC Discussion
<p>Memo at 1) which directly requires review of changes in federal and state law (and subsequent implementation and interpretation) in the IPCS regulator space which occurred during Phase II of the proceeding.</p> <p>Therefore, to comprehensively advocate for reasonable solutions for California, TURN advocates reviewed FCC precedent establishing rules and rates for calling services for incarcerated persons, and the FCC’s various information collection materials <u>and changes related to California’s SB 1008 as well as the Martha Wright-Reed Act of 2022 and related federal actions</u>. See FCC, Rates for Interstate Inmate Calling Services Rates for Interstate Inmate Calling Services, WC Docket No. 12-375. Both sets of FCC workstreams required TURN advocates to have familiarity of more than seven years of FCC decisions and a DC Circuit court opinion, some of which changed during the course of the Commission’s Phase I and Phase II work. <i>See e.g.</i> FCC, Rates for Interstate Inmate Calling Services Rates for Interstate Inmate Calling Services, Third Report and Order, Order on Reconsideration, and Fifth Further Notice of Proposed Rulemaking, WC Docket No. 12-375, FCC 21-60 (FCC 2021). <i>See also, e.g.</i>, July 30, 2025, <i>Motion for Official Notice of the Utility Reform Network</i> informing the Commission of, and requesting official notice in the proceeding, the FCC Order <i>In the Matter of Incarcerated People’s Communications Services; Implementation of the Martha Wright-Reed Act and Rates for Interstate Inmate Calling Services</i>, Order, WC Docket Nos. 23-6 and 12-375, released June 30, 2025 (2025 Waiver Order).</p> <p>Similarly, during Phase II of this proceeding, in September of 2022 California Senate Bill 1008 (the Keep Families Connected Act) was signed by Governor Newsom and directly related to issues in the present proceeding and required analysis by the Commission and intervenors. For example, as described previously, SB 1008 analysis and related comments from TURN informed the Commission’s Final Decision and TURN uniquely contributed record evidence that was evaluated as part of this determination by the Commission.</p> <p><u>Service Quality Determination</u></p> <p>While specific IPCS service quality requirements were not implemented as part of Phase II, TURN contributed substantial record evidence and analysis to this discussion, which was credited in the analysis of the Final Decision (see the Service Quality discussion in the Substantial Contribution section of this claim, above). TURN's work on service quality issues was reasonable, as the Commission expressly scoped service quality for certain IPCS services in the Amended Scoping Memo (Amended Phase II Scoping Memo, issued May 20, 2022, at 1-2), and the issue was also</p>	

	CPUC Discussion
<p>identified for consideration in Phase III of this proceeding (Phase II Scoping Memo, issued Nov. 29, 2021 at 10). In light of the Commission’s decision to forego further specific IPCS requirements at this time, TURN voluntarily reduced some of its time in this area.</p> <p><u>Issues Covered in TURN’s Phase II Testimony</u></p> <p>As described above, the Commission scoped issues, including “Does the Commission have authority to regulate rates, fees and/or service quality of video and related services provided to incarcerated persons in California, including remote video calling services, in-person video calling” (Phase II Scoping Memo at 1), which were addressed in TURN testimony and were discussed throughout the proceeding, resulting in the Commission’s Final Decision that no further action was needed on several of the Phase II issues originally scoped.</p> <p><u>Ex Parte Advocacy Efforts</u></p> <p>TURN notes that this request for compensation includes time devoted to ex parte communications with advisors from the offices of three Commissioners following issuance of the Proposed Decision and subsequent revisions thereto. TURN determined that the meetings would assist in communicating TURN’s positions regarding issues addressed in the Proposed Decision and the treatment of issues scoped for Phase III of this proceeding. Moreover, IPCS providers were actively engaged in ex parte advocacy regarding the Proposed Decision (<i>see, e.g.</i>, Notice of Ex Parte Meeting of ViaPath, filed Apr. 7, 2026; Notice of Ex Parte Communication of Securus Technologies, LLC and Network Communications International Corporation d/b/a NCIC Inmate Communications, filed Apr. 8, 2026), and TURN was likewise entitled to engage in ex parte advocacy on an equal basis pursuant to Rule 8.2(c)(2)(A) of the Commission’s Rules of Practice and Procedure. During these meetings, TURN discussed its support for adoption of a permanent intrastate IPCS voice rate cap and the Proposed Decision’s mechanism allowing providers to seek rate increases through a Tier 2 Advice Letter process. TURN explained that providers had multiple opportunities throughout the proceeding to submit cost data supporting higher rates and emphasized the importance of establishing a permanent rate structure rather than continuing to rely on interim measures. TURN also discussed the need for a successor proceeding to address issues originally scoped for Phase III, including service quality, implementation of SB 1008, contract and consumer protection issues, outages, billing disputes, and accessibility concerns affecting incarcerated persons with disabilities. TURN thus submits that the time devoted to preparing for, participating in, and drafting the required notices for these ex parte meetings was productive and contributed to TURN’s advocacy on issues ultimately addressed in D.26-</p>	

			CPUC Discussion
04-004.			
c. Allocation of hours by issue:			
Code	Description	% of Substantive Hours	
TEST	Testimony Preparation and Development – Work related to the research, analysis, drafting, revision, and preparation of testimony and supporting exhibits.	12.36%	
GP	General Preparation - Work that generally does not vary with the number of issues TURN addresses in a proceeding.	3.16%	
NFA	Issues Requiring No Further Action – Work related to issues requiring no further Commission action due to enactment of SB 1008 and federal actions, including implementation of the Martha Wright-Reed Act of 2022 and related FCC proceedings.	7.94%	
PROC	Procedural Matters – Work related to procedural issues, Commission rulings, filing requirements, and development of procedural strategy in the proceeding.	4.67%	
COOR	Coordination – Work related to coordination with parties, consultants, and Commission staff regarding advocacy strategy and participation in the proceeding.	4.03%	
SQ	Service Quality Issues – Work related to service quality, reliability, accessibility, and user experience issues affecting incarcerated persons calling services.	1.64%	

			CPUC Discussion
FRC	Final Rate Cap – Work related to permanent intrastate IPCS rate caps, including rate-setting methodology, supporting data, and related regulatory issues	0.22%	
SP	Staff Proposal Comments – Work related to review, analysis, development, drafting, and revision of comments on the Staff Proposal.	46.94%	
VCR	Video Call Rates – Work related to video calling rates, pricing practices, and related regulatory issues affecting incarcerated persons calling services.	0.09%	
PD	Proposed Decision – Time spent reviewing and analyzing the proposed decision as well as preparing TURN’s opening and reply comments on the PD and reviewing PD comments from other parties to the proceeding.	17.31%	
EX	Ex Parte – Work related to TURN’s preparation and participation in ex parte meetings.	1.64%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Alexandra Green, TURN Attorney	2023	8.00	\$220.00	D.24-09-018	\$1,760.00			
Alexandra Green,	2024	46.50	\$240.00	D.24-09-018	\$11,160.00			

CLAIMED						CPUC AWARD		
TURN Attorney								
Alexandra Green, TURN Attorney	2025	9.00	\$275.00	D.25-05-025	\$2,475.00			
Alexandra Green, TURN Attorney	2026	8.50	\$300.00	Res. ALJ-393, 2025 rate plus 3.35% COLA and 5% step increase. See Comment 2.	\$2,550.00			
Ashley Salas, TURN Attorney	2023	2.50	\$455.00	D.24-09-018	\$1,137.50			
Ashley Salas, TURN Attorney	2024	0.25	\$475.00	D.24-09-018	\$118.75			
Brenda Villanueva, TURN Managing Attorney	2024	8.55	\$505.00	D.24-11-020	\$4,317.75			
Christine Mailloux, TURN Managing Attorney	2024	56.00	\$770.00	D.25-01-052	\$43,120.00			
Kori Cordero, TURN Managing Attorney	2026	7.25	\$540.00	Res. ALJ-393, 2025 requested rate plus 3.35% COLA plus 5% step increase. See Comment 1.	\$3,915.00			
Leo Fitzpatrick, TURN	2023	2.75	\$300.00	D.24-11-020	\$825.00			

CLAIMED						CPUC AWARD		
Telecommunications Policy Analyst								
Leo Fitzpatrick, TURN Telecommunications Policy Analyst	2024	70.50	\$325.00	D.25-01-024	\$22,912.50			
Leo Fitzpatrick, TURN Telecommunications Policy Analyst	2025	2.75	\$350.00	D.25-07-035	\$962.50			
Leo Fitzpatrick, TURN Telecommunications Policy Analyst	2026	48.25	\$360.00	Res. ALJ-393, 2025 rate plus 3.35% COLA. See Comment 3.	\$17,370.00			
Stephen Raher, Amalgamated Policy Research	2022	40.94	\$350.00	See Comment 4.	\$14,329.00			
Stephen Raher, Amalgamated Policy Research	2023	9.10	\$350.00	See Comment 4.	\$3,185.00			
Stephen Raher, Amalgamated Policy Research	2024	12.90	\$350.00	See Comment 4.	\$4,515.00			

CLAIMED						CPUC AWARD		
Stephen Raher, Amalgamated Policy Research	2025	1.40	\$350.00	See Comment 4.	\$490.00			
<i>Subtotal: \$135,143.00</i>						<i>Subtotal: \$</i>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Kori Cordero	2026	10.50	\$270	Half of 2026 requested rate. See Comment 3.	\$2,835.00			
<i>Subtotal: \$2,835.00</i>						<i>Subtotal: \$</i>		
COSTS								
#	Item	Detail			Amount	Amount		
1.								
2.								
<i>Subtotal: \$</i>						<i>Subtotal: \$</i>		
<i>TOTAL REQUEST: \$137,978.00</i>						<i>TOTAL AWARD: \$</i>		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								

CLAIMED		CPUC AWARD	
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ⁴	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet for TURN’s Advocates
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	Resume for Stephen Raher, Amalgamated Policy Research
Attachment 5	Consultant Agreement for Stephen Raher, Amalgamated Policy Research
Attachment 6	Invoices Supporting Stephen Raher, Amalgamated Policy Research 2022, 2023, 2024, 2025 Billing Rates
Comment 1	<p>2026 Rate for Kori Cordero</p> <p>For 2026, TURN requests that the Commission adopt an hourly rate of \$540 for Kori Cordero. TURN previously requested this rate in an intervenor compensation claim filed in A.24-10-006 on March 23, 2026. The Commission has yet to decide on that claim. Rather than repeat the same showing here for the requested hourly rate for Mx. Cordero, TURN refers the Commission to the showing TURN previously presented in A.24-10-006.</p>
Comment 2	<p>2026 Rate for Alexandra Green</p> <p>For 2026, TURN requests that the Commission adopt an hourly rate of \$300 for Alexandra Green. TURN previously requested this rate in an intervenor compensation claim filed in R.20-02-008 on January 23, 2026. The Commission has yet to decide on that claim. Rather than repeat the same showing here for the requested hourly rate for Ms. Green, TURN refers the Commission to the showing TURN previously presented in R.20-02-008.</p>

⁴ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
Comment 3	<p>2026 Rate for Leo Fitzpatrick</p> <p>For 2026, TURN requests that the Commission adopt an hourly rate of \$360 for Leo Fitzpatrick. TURN previously requested this rate in an intervenor compensation claim filed in A.24-10-006 on March 23, 2026. The Commission has yet to decide on that claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Fitzpatrick, TURN refers the Commission to the showing TURN previously presented in A.24-10-006.</p>
Comment 4	<p><u>2022 Hourly Rate for Stephen A. Raher, Legal and Expert Consultant</u></p> <p>Pursuant to the requirements of ALJ-393, TURN hereby submits its first request for an hourly rate for Stephen A. Raher. Mr. Raher served as TURN’s Legal and Expert Consultant in this proceeding in 2022-2025.</p> <p>Intervenor Representative: Stephen A. Raher Labor Role: Legal - Attorney Level: IV 2022 Hourly Rate Range: \$398.27 - \$635.75 Requested Hourly Rate: \$350 Current Resume: See Attachment 5 and 6 Justification for the Requested Hourly Rate:</p> <p>Stephen A. Raher received a J.D. <i>summa cum laude</i> in 2009 from Lewis & Clark Law School and was admitted to the Oregon State Bar in October 2009. He received a Master of Public Administration in 2002 from the University of Colorado – Graduate School of Public Affairs. He also holds a B.A. in Music from Colorado College.</p> <p>Mr. Raher has a long history of cutting-edge research and advocacy concerning the intersection of consumer law and the criminal justice system, including financial exploitation of justice-involved people, telecommunications in correctional facilities, and privatization of correctional activities.</p> <p>Since 2022, Mr. Raher has worked at the Tabor Law Group, where he represents trustees, debtors, creditors, and committees in bankruptcy and commercial litigation, and also represents public interest organizations seeking to bring fairness to the incarcerated peoples' communications services industry. His work includes regulatory advocacy before the Federal Communications Commission, state utility agencies, the Consumer Financial Protection Bureau, the Federal Trade Commission, and the Postal Regulatory Commission.</p>

Attachment or Comment #	Description/Comment
	<p>Prior to joining the Tabor Law Group, Mr. Raher served as general counsel for the non-profit Prison Policy Initiative from 2021-2022. From 2009-2021, he clerked for two Oregon bankruptcy judges and worked as a bankruptcy and commercial litigation attorney at a large international law firm, Perkins Coie LLP. During this time, Mr. Raher continued to stay active on issues at the intersection of consumer law and the criminal justice system, publishing articles and giving presentations at conferences, as his resume shows. Prior to attending law school, Mr. Raher served as the Co-Director and Senior Policy Analyst for five years at the Colorado Criminal Justice Reform Coalition.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an Attorney in Level IV should have a J.D. or equivalent degree, 10-15 years of experience, and be licensed to practice law. The Hourly Rate Chart further suggests, “Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters, such as environmental law or utility regulation.” Mr. Raher readily satisfies all of these requirements for a Level IV Attorney. As of September 2022, when Mr. Raher began providing legal and expert consulting services to TURN in this proceeding, he had 13 years of experience practicing law, plus 5 additional years before law school working on criminal justice public policy issues. He has both a J.D. and a Master of Public Administration. His specific expertise as an attorney and policy expert focusing on the incarcerated peoples' communications services industry, among other consumer protection issues germane to incarcerated people, is extremely relevant to the issues presented in this proceeding.</p> <p>Mr. Raher charged TURN an hourly rate of \$350 for his work in this proceeding in 2022. (See Attachment 5 and 6). This rate is below the bottom of the 2022 market rate range established in Res. ALJ-393 for the Attorney – Level IV labor role. Given Mr. Raher’s professional experience and education, TURN submits that the Commission should readily find a 2022 hourly rate of \$350 reasonable for Mr. Raher.</p> <p>2023-2025 Hourly Rates for Stephen A. Raher</p> <p>TURN requests that the Commission adopt the same hourly rate of \$350 requested for Mr. Raher’s work in 2022 for his work in 2023, 2024, and 2025. This is the rate Mr. Raher charged TURN for legal and expert consulting services in this proceeding from 2022 through 2025.</p>

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

Item	Reason

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

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

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
--	--

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.26-04-004.
2. The requested hourly rates for THE UTILITY REFORM NETWORK’s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

1. **THE UTILITY REFORM NETWORK** is awarded \$ _____.
2. Within 30 days of the effective date of this decision, _____ shall pay **THE UTILITY REFORM NETWORK** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **THE UTILITY REFORM NETWORK** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data 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 **THE UTILITY REFORM NETWORK**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.26-04-004		
Proceeding(s):	R.20-10-002		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	June 12, 2026	\$137,978.00		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Alexandra	Green	Attorney	\$220	2023	
Alexandra	Green	Attorney	\$240	2024	
Alexandra	Green	Attorney	\$275	2025	
Alexandra	Green	Attorney	\$300	2026	
Ashley	Salas	Attorney	\$455	2023	
Ashley	Salas	Attorney	\$475	2024	
Brenda	Villanueva	Attorney	\$505	2024	
Christine	Mailloux	Attorney	\$770	2024	
Kori	Cordero	Attorney	\$540	2026	
Leo	Fitzpatrick	Analyst	\$300	2023	
Leo	Fitzpatrick	Analyst	\$325	2024	
Leo	Fitzpatrick	Analyst	\$350	2025	
Leo	Fitzpatrick	Analyst	\$360	2026	

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Stephen	Raheer	Outside Consultant	\$350	2022	
Stephen	Raheer	Outside Consultant	\$350	2023	
Stephen	Raheer	Outside Consultant	\$350	2024	
Stephen	Raheer	Outside Consultant	\$350	2025	

(END OF APPENDIX)

Revised March 2023

Attachment 1
Certificate of Service

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

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

Revised March 2023

Attachment 2
Timesheet for TURN's Advocates

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Stephen Raher	R20-10-002	TEST	Draft Phase II testimony re video-calling billing practices	9/15/22	0.40
Stephen Raher	R20-10-002	TEST	Prepare Phase II testimony exhibits re billing practices and site commissions	9/15/22	0.40
Stephen Raher	R20-10-002	TEST	Draft Phase II testimony re carrier terms and conditions	9/15/22	0.50
Stephen Raher	R20-10-002	TEST	Prepare testimony exhibits	9/15/22	0.50
Stephen Raher	R20-10-002	TEST	Research re carrier terms and conditions, test GTL video scheduling system	9/15/22	0.40
Stephen Raher	R20-10-002	TEST	Research re reading-ease scores and research methodology	9/15/22	0.20
Stephen Raher	R20-10-002	TEST	Draft Phase II testimony re carrier terms & conditions and service quality	9/15/22	1.10
Stephen Raher	R20-10-002	TEST	Review Kiteworks documents for confidentiality designations	9/15/22	0.20
Stephen Raher	R20-10-002	TEST	Review & revise Phase II testimony	9/15/22	0.80
Stephen Raher	R20-10-002	TEST	Review & revise Phase II testimony	9/16/22	0.40
Stephen Raher	R20-10-002	TEST	Research video-calling rates and compile demonstrative exhibit re same	9/16/22	1.00
Stephen Raher	R20-10-002	TEST	Update Phase II testimony exhibit of contract terms	9/16/22	1.20
Stephen Raher	R20-10-002	TEST	Review contractual provisions re site commissions and prepare demonstrative exhibit re same of site-commission structures	9/16/22	2.30
Stephen Raher	R20-10-002	TEST	call w/ B. Villanueva re: review of draft testimony; strategy re confidentiality designations; drafting & filing procedures	9/16/22	1.10
Stephen Raher	R20-10-002	TEST	Draft TURN Motion for Leave to Seal the Record as to Confidential Information Submitted by NCIC Inmate Communications Contained in Intervenor Testimony Exhibit 5	9/16/22	0.50
Stephen Raher	R20-10-002	TEST	Review B. Villanueva edits and revise opening testimony accordingly	9/16/22	0.30
Stephen Raher	R20-10-002	TEST	Finalize contract-bundling summary	9/17/22	1.10
Stephen Raher	R20-10-002	TEST	Draft Phase II testimony re procurement practices	9/17/22	0.90
Stephen Raher	R20-10-002	TEST	Revise demonstrative exhibit re procurement practices	9/17/22	0.70
Stephen Raher	R20-10-002	TEST	Finalize procurement summary for Phase II testimony	9/17/22	1.10
Stephen Raher	R20-10-002	TEST	Review and revise analysis of site-commission structures (.9)	9/17/22	0.90
Stephen Raher	R20-10-002	TEST	Review and revise Phase II testimony re procurement issues	9/17/22	0.04
Stephen Raher	R20-10-002	TEST	Email B. Villanueva re status of Phase II testimony	9/17/22	0.20
Stephen Raher	R20-10-002	TEST	Review and revise Phase II testimony	9/18/22	3.60
Stephen Raher	R20-10-002	GP	Emails to B. Villanueva re proceeding update and next steps	9/18/22	0.10
Stephen Raher	R20-10-002	TEST	Finalize Phase II testimony exhibits and upload to OneDrive	9/18/22	0.40
Stephen Raher	R20-10-002	TEST	Review and revise testimony to incorporate feedback from B. Villanueva	9/19/22	1.30
Stephen Raher	R20-10-002	TEST	Emails w/ B. Villanueva re status of testimony	9/19/22	0.30
Stephen Raher	R20-10-002	TEST	Telephone call w/ B. Villanueva re status of Phase II testimony, filing procedure, and review of exhibits	9/19/22	1.30
Stephen Raher	R20-10-002	TEST	Prepare exhibits for Phase II testimony	9/19/22	0.40
Stephen Raher	R20-10-002	TEST	draft Phase II testimony	9/19/22	2.00
Stephen Raher	R20-10-002	TEST	Emails & phone calls w/ B. Villanueva re filing testimony	9/19/22	0.20
Stephen Raher	R20-10-002	TEST	Compile Phase II testimony exhibits	9/19/22	0.50
Stephen Raher	R20-10-002	TEST	Draft service email for testimony filing	9/19/22	0.10
Stephen Raher	R20-10-002	NFA	Email to S. Merrill (Cal Advocates), P. Goodman (Ctr for Accessible Tech), and B. Villanueva re Senate Bill 1008	9/30/22	0.10
Stephen Raher	R20-10-002	TEST	Review exhibits from opening testimony & respond to B. Villanueva email re same	10/3/22	0.10
Stephen Raher	R20-10-002	TEST	Review ALJ ruling re reply testimony	10/20/22	0.10
Stephen Raher	R20-10-002	TEST	Email to Brenda re intervenor reply testimony	10/20/22	0.20
Stephen Raher	R20-10-002	TEST	Review providers reply testimony.	10/21/22	0.50
Stephen Raher	R20-10-002	PROC	Email B. Villanueva re intervenor reply testimony strategy and procedure.	10/21/22	0.10
Stephen Raher	R20-10-002	TEST	Draft intervenor reply testimony.	10/24/22	1.70
Stephen Raher	R20-10-002	TEST	Draft intervenor reply testimony.	10/26/22	0.60
Stephen Raher	R20-10-002	NFA	Review CPUC docket (n/c). Email to Brenda re reply testimony and SB 1008 (.2)	10/28/22	0.20
Stephen Raher	R20-10-002	TEST	Draft reply testimony re cross-subsidies	11/11/22	0.80
Stephen Raher	R20-10-002	TEST	Draft reply testimony re SB 1008	11/11/22	0.50
Stephen Raher	R20-10-002	TEST	Draft reply testimony regarding cross-subsidies	11/18/22	0.90
Stephen Raher	R20-10-002	TEST	Draft reply testimony regarding bundling (1.4)	11/18/22	1.40
Stephen Raher	R20-10-002	TEST	Email to B. Villanueva (TURN) re status of intervenor reply testimony and proposed drafting schedule	11/22/22	0.30
Stephen Raher	R20-10-002	TEST	Draft reply testimony re per-session billing.	11/26/22	0.60
Stephen Raher	R20-10-002	TEST	Draft reply testimony re service quality.	11/30/22	0.50
Stephen Raher	R20-10-002	TEST	Draft reply testimony regarding customer satisfaction and billing issues (1.2).	11/30/22	1.20
Stephen Raher	R20-10-002	TEST	Review and revise reply testimony; send draft to Brenda with questions about procedure.	11/30/22	2.00
Stephen Raher	R20-10-002	TEST	Call with B. Villanueva re revisions to reply testimony and strategy	12/2/22	0.30
Stephen Raher	R20-10-002	TEST	Revise reply testimony to incorporate feedback from reviewers (1.0).	12/6/22	1.00
Stephen Raher	R20-10-002	TEST	Assemble exhibits for reply testimony (0.6).	12/6/22	0.60
Stephen Raher	R20-10-002	TEST	Revise reply testimony and send to B. Villanueva for review.	12/7/22	0.80
Leo Fitzpatrick	R20-10-002	PROC	Incarcerated calling - transition meeting b/t B.Villanueva, A.Salas, A.Green & S.Raher (consultant)	7/6/23	0.50
Alexandra Green	R20-10-002	GP	check-in meeting w/ S. Raher, B. Villanueva, A. Salas, and L. Fitzgerald	7/12/23	0.25
Leo Fitzpatrick	R20-10-002	GP	Incarcerated calling - call w/ B.Villanueva re: ICS proceeding case transition	7/28/23	0.25
Stephen Raher	R20-10-002	COOR	Conference call with D. Rodarmel, C. Cohn, A. Nelson, and S. Kavanaugh (NCLC) re California Dept of Corrections tablet and video call service-quality issues.	10/2/23	1.00
Stephen Raher	R20-10-002	SQ	Email to A. Salas regarding California Dept. of Corrections service quality issues.	10/6/23	0.40
Ashley Salas	R20-10-002	SQ	Service Quality - call w/ LF re next steps	10/6/23	0.25
Ashley Salas	R20-10-002	SQ	Service Quality - email disc w/ Stephen Raher, LF re strategy, next steps	10/6/23	0.25
Leo Fitzpatrick	R20-10-002	SQ	New Service Quality - call w/ A.Salas re: next steps	10/6/23	0.25
Stephen Raher	R20-10-002	SQ	Meeting with A. Salas, L. Fitzpatrick, and A. Green re service quality issues and CPUC procedural alternatives (.5).	10/11/23	0.50
Alexandra Green	R20-10-002	GP	prep for update & strategy meeting w/ S. Raher	10/11/23	0.25
Alexandra Green	R20-10-002	GP	call w/ L. Fitzpatrick re coordination on IPCS CPUC proceeding	10/11/23	0.25
Ashley Salas	R20-10-002	SQ	Service Quality - call w/ LF, AG, Stephen Raher re next steps	10/11/23	0.50
Ashley Salas	R20-10-002	SQ	Service Quality - email disc w/ LF, AG re coordinating with PAO, next steps	10/11/23	0.25
Leo Fitzpatrick	R20-10-002	GP	IPCS - call w/ A. Green re: next steps in proceeding & division of labor	10/11/23	0.50
Leo Fitzpatrick	R20-10-002	GP	IPCS - meeting w/ A. Green, A. Salas, S. Raher (consultant) re: next steps in proceeding	10/11/23	0.50
Stephen Raher	R20-10-002	TEST	Search California state procurement database for Dept. of Corrections & Rehabilitation IPCS RFP documents.	10/24/23	0.10
Stephen Raher	R20-10-002	SQ	Email to D. Rodarmel re service-quality issues at Calif. Dept. of Corrections & Rehabilitation.	10/24/23	0.30
Alexandra Green	R20-10-002	GP	review TURN interoffice memo for IPCS proceeding re proceeding history	10/24/23	0.25
Stephen Raher	R20-10-002	SQ	Meeting with A. Salas, L. Fitzpatrick, and A. Green (all of TURN) re CDCR service quality issues and digital discrimination.	10/27/23	0.80
Alexandra Green	R20-10-002	GP	review prior docket filings and TURN's prior testimony (by S. Raher) & hearing transcripts for background	10/27/23	1.50
Alexandra Green	R20-10-002	COOR	call w/ L. Fitzpatrick re outreach to Cal Advocates, prep for 10/27 call w/ S. Raher	10/27/23	0.50
Alexandra Green	R20-10-002	GP	meeting w/ S. Raher re state and federal updates, next steps re CPUC outreach	10/27/23	0.75
Ashley Salas	R20-10-002	SQ	Service Quality - call w/ LF, AG, Stephen Raher re strategy, next steps	10/27/23	0.75
Leo Fitzpatrick	R20-10-002	COOR	IPCS - call w/ C.Hockema (Cal Advocates) re: next steps in proceeding	10/27/23	0.25
Leo Fitzpatrick	R20-10-002	GP	IPCS - call w/ A. Green re: next steps in proceeding	10/27/23	0.50
Alexandra Green	R20-10-002	COOR	review Cal Advocates' prior testimony re service quality for background & prep for outreach to new Cal Advocates proceeding lead	10/31/23	0.50
Ashley Salas	R20-10-002	SQ	Service Quality - email disc w/ AG, Stephen Raher re upcoming meeting	11/2/23	0.25
Stephen Raher	R20-10-002	NFA	Pull historical files to find FCC contact information. Email Bill Kehoe at FCC to request ex parte meeting with Wireline Competition Bureau staff to discuss intersection of federal/state law.	11/3/23	0.80
Stephen Raher	R20-10-002	NFA	Emails with W. Kehoe (FCC) re scheduling ex parte meeting.	11/8/23	0.10
Stephen Raher	R20-10-002	NFA	Email to L. Fitzpatrick and A. Green (TURN) re addressing CPUC proceeding and related issues during ex parte meeting with FCC.	11/9/23	0.10

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Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Stephen Raher	R20-10-002	TEST	Meeting with A. Nelson and C. Cohn (of NCLC) and A. Rice (Empowering Women Impacted by Incarceration) regarding details of connection problems at Calif. Dept. of Corrections facilities and potential remedies.	11/9/23	0.70
Stephen Raher	R20-10-002	TEST	Email to L. Fitzpatrick and A. Green (TURN) re summary of CDCR connection problems and potential remedies.	11/9/23	0.20
Alexandra Green	R20-10-002	COOR	e-mail discussion w/ CforAT (P. Goodman) and Cal Advocates (A.M. Johnson, C. Hockema) re scheduled meeting with the FCC	11/9/23	0.50
Alexandra Green	R20-10-002	GP	e-mail to A. Salas and L. Fitzpatrick re IPCS interconnection issue	11/9/23	0.25
Ashley Salas	R20-10-002	GP	Email disc w/ LF, AG re cell phone connectivity issue	11/9/23	0.25
Alexandra Green	R20-10-002	NFA	prep for FCC meeting re MWRA implementation proceeding	11/13/23	0.25
Stephen Raher	R20-10-002	NFA	Draft agenda for FCC ex parte meeting and emails to potential attendees re same.	11/14/23	0.80
Alexandra Green	R20-10-002	NFA	call and emails w/ L. Fitzpatrick re scheduling prep meeting for FCC meeting	11/14/23	0.25
Alexandra Green	R20-10-002	NFA	prep for FCC meeting re MWRA implementation proceeding	11/15/23	1.00
Stephen Raher	R20-10-002	COOR	Meeting with L. Fitzpatrick, A. Green (both of TURN), P. Goodman of Center for Accessible Technology, and A. Johnson and other staff from Cal Advocates re preparation for FCC ex parte meeting.	11/16/23	0.50
Stephen Raher	R20-10-002	COOR	Prepare for meeting with TURN, CforAT, Cal Advocates for FCC ex parte meeting	11/16/23	0.10
Stephen Raher	R20-10-002	NFA	Email to W. Kehoe (FCC) with written materials for ex parte meeting.	11/16/23	0.10
Stephen Raher	R20-10-002	NFA	Attend joint ex parte presentation to FCC staff, with TURN staff, Cal Advocates, and Center for Accessible Technology, focused on service quality issues and California	11/16/23	0.80
Stephen Raher	R20-10-002	NFA	Debrief with L. Fitzpatrick & A. Green (TURN) and A. Johnson (Cal Advocates) following FCC ex parte meeting.	11/16/23	0.50
Stephen Raher	R20-10-002	NFA	Draft notice of FCC ex parte meeting.	11/16/23	0.40
Alexandra Green	R20-10-002	COOR	prep for planning meeting w/ S. Raher, L. Fitzpatrick, CforAT (P. Goodman), and Cal Advocates (A.M. Johnson & C. Hockema)	11/16/23	0.25
Alexandra Green	R20-10-002	NFA	attend planning meeting w/ S. Raher, L. Fitzpatrick, CforAT (P. Goodman), and Cal Advocates (A.M. Johnson, C. Hockema) re strategy, talking points for meeting w/	11/16/23	0.50
Alexandra Green	R20-10-002	COOR	attend meeting w/ S. Raher, L. Fitzpatrick, CforAT, Cal Advos, FCC Staff on IPCS state and federal proceedings, service quality, preemption	11/16/23	0.75
Stephen Raher	R20-10-002	NFA	Draft notice of FCC ex parte meeting and send to participants for review.	11/17/23	0.90
Brenda D. Villanu	R20-10-002	GP	write case notes and ICS strategy for AG	1/11/24	0.25
Brenda D. Villanu	R20-10-002	NFA	email w/ S. Raher, AG, re: federal updates and impact to CPUC proceeding	1/31/24	0.25
Brenda D. Villanu	R20-10-002	SQ	read FCC ex parte on service quality and other issues	2/26/24	0.25
Brenda D. Villanu	R20-10-002	NFA	read Decision and state service quality requirements	3/6/24	0.50
Brenda D. Villanu	R20-10-002	NFA	call w/ S. Raher, re: next steps and strategy for CPUC advocacy	3/6/24	0.40
Brenda D. Villanu	R20-10-002	GP	emails w/ CSP, LF, AG, re: strategy for state and PUC advocacy	3/7/24	0.25
Brenda D. Villanu	R20-10-002	GP	email w/ AG, re: strategy for PUC advocacy	3/7/24	0.25
Alexandra Green	R20-10-002	GP	meeting w/ B. Villanueva, L. Fitzpatrick, K. Bailey, C. Slider Pierre re CPUC strategy on service quality and equity, broadband, voice	3/13/24	0.75
Brenda D. Villanu	R20-10-002	SQ	call w/ L. Fitzpatrick, A. Green, CSP, KB, re: CPUC strategy on service quality and equity, broadband, voice	3/13/24	0.75
Brenda D. Villanu	R20-10-002	NFA	email w/ L. Fitzpatrick, re: review for state preemption arguments at FCC	3/13/24	0.25
Brenda D. Villanu	R20-10-002	FRC	read FCC data collection for ICS	3/18/24	0.25
Alexandra Green	R20-10-002	FRC	review and analyze Georgetown Law Communications & Technology Law Clinic memo, Model Quality Assurance Bill for Communications Access for Incarcerated People	3/22/24	0.50
Brenda D. Villanu	R20-10-002	NFA	read SB 1008, re: service quality requirements for CPUC	3/25/24	0.25
Brenda D. Villanu	R20-10-002	COOR	email w/ KB, re: letter to CPUC on PPH	3/26/24	0.25
Brenda D. Villanu	R20-10-002	NFA	read Louisiana and Minnesota legislative actions on video ICS	4/5/24	0.50
Brenda D. Villanu	R20-10-002	PROC	call w/ L. Fitzpatrick, re: meeting with CD staff and next steps for service quality issues	4/9/24	0.25
Leo Fitzpatrick	R20-10-002	PROC	ICPS - call w/ B. Villanueva re: meeting w/ CD staff & next steps for service quality issues	4/9/24	0.25
Alexandra Green	R20-10-002	PROC	draft e-mails to assigned CD staff re scheduling meeting to discuss status of proceeding	4/12/24	0.25
Alexandra Green	R20-10-002	GP	review prior updates from Stephen Raher	4/15/24	0.25
Alexandra Green	R20-10-002	PROC	e-mail discussion w/ L. Fitzpatrick, B. Villanueva, and CD re scheduling meeting to discuss proceeding	4/16/24	0.25
Leo Fitzpatrick	R20-10-002	PROC	ICPS - emails w/ A. Green, B. Villanueva re: strategy for CD meeting	4/16/24	0.25
Brenda D. Villanu	R20-10-002	PROC	emails w/ A. Green, re: prep for CD meeting and strategy for TURN	4/17/24	0.50
Alexandra Green	R20-10-002	PROC	meeting w/ B. Villanueva, L. Fitzpatrick, and C. Slider Pierre re prep for meeting w/ CD	4/22/24	0.50
Alexandra Green	R20-10-002	PROC	prepare for meeting w/ CD	4/22/24	0.25
Alexandra Green	R20-10-002	PROC	attend meeting w/ B. Villanueva, L. Fitzpatrick, C. Slider Pierre, and CD Staff (K. Campbell, B. Menzies, B. Jolley) re CPUC proceeding status, readout from Fall 2023 FCC	4/22/24	1.00
Brenda D. Villanu	R20-10-002	PROC	call w/ CD, re: service quality and next steps	4/22/24	1.00
Brenda D. Villanu	R20-10-002	PROC	call w/ AG and LF, CSP, re: prep for CD call - service quality	4/22/24	0.50
Leo Fitzpatrick	R20-10-002	PROC	ICPS - call w/ A. Green, B. Villanueva, C. Pierre re: prep for CD call - service quality	4/22/24	0.50
Brenda D. Villanu	R20-10-002	COOR	call w/ CforAT (PG), re: coordination and strategy	4/23/24	0.40
Brenda D. Villanu	R20-10-002	NFA	call w/ L. Fitzpatrick, re: video calling strategy and broadband jurisdiction	5/7/24	0.25
Leo Fitzpatrick	R20-10-002	NFA	ICPS - review FCC dig. discrim. rules for implications on ICPS	6/5/24	0.75
Leo Fitzpatrick	R20-10-002	NFA	ICPS - review FCC net neutrality order for implications on ICPS	6/5/24	1.50
Stephen Raher	R20-10-002	PROC	Review CPUC proposed procedural order (1)	7/3/24	0.10
Stephen Raher	R20-10-002	NFA	Prepare and send analysis to TURN team re potential impact of FCC draft report & order on Phase II of CPUC rulemaking (7)	7/3/24	0.70
Alexandra Green	R20-10-002	NFA	review and analyze draft FCC Report and Order on Implementing the Martha Wright-Reed Act re state preemption, new rate caps, commission fees	7/3/24	2.00
Brenda D. Villanu	R20-10-002	NFA	(incarcerated calling) email w/ S. Raher, re: FCC draft order and changes to state rates	7/3/24	0.25
Alexandra Green	R20-10-002	NFA	review and analyze draft FCC Report and Order on Implementing the Martha Wright-Reed Act re security costs, ancillary service fees, alternative pricing plans	7/5/24	2.75
Alexandra Green	R20-10-002	NFA	review and analyze draft FCC FNPRM on Implementing the Martha Wright-Reed Act /incarcerated calling rates	7/5/24	0.75
Alexandra Green	R20-10-002	NFA	review and analyze party comments re draft FCC rules	7/15/24	0.50
Brenda D. Villanu	R20-10-002	NFA	read forthcoming FCC order for state discussion	7/16/24	0.50
Brenda D. Villanu	R20-10-002	GP	analyze next steps and TURN strategy	7/16/24	0.50
Alexandra Green	R20-10-002	NFA	call w/ L. Fitzpatrick re federal and CPUC updates	7/19/24	0.25

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Alexandra Green	R20-10-002	NFA	e-mail disc w/ L. Fitzpatrick, C. Mailloux, and S. Rahe re federal and CPUC updates	7/19/24	0.25
Stephen Rahe	R20-10-002	NFA	Review relevant provisions of FCC draft order and prepare analysis in preparation for meeting with TURN (.4).	7/21/24	0.40
Stephen Rahe	R20-10-002	NFA	Meeting with TURN C. Mailloux, L. Fitzpatrick, and A. Green (all of TURN) re status of CPUC proceeding and impact of FCC order on Phase II (.8).	7/22/24	0.80
Alexandra Green	R20-10-002	NFA	prep for update meeting w/ S. Rahe, L. Fitzpatrick, C. Mailloux	7/22/24	0.25
Alexandra Green	R20-10-002	NFA	call w/ S. Rahe, L. Fitzpatrick, C. Mailloux re updates on FCC/ICS rules, options for TURN participation in federal litigation, CPUC updates and next steps	7/22/24	0.75
Christine Mailloux	R20-10-002	NFA	Meeting with A. Green, L. Fitzpatrick and S. Rahe re: FCC/ICS Report and Order, FNPRM, and CPUC Ruling re: extension of deadline and discussion of next steps for Phase II and prep for upcoming staff report	7/22/24	0.25
Stephen Rahe	R20-10-002	NFA	Review final FCC report & order and analyze implementation timeline and impact on state rate caps (.4).	7/24/24	0.40
Stephen Rahe	R20-10-002	NFA	Prepare analysis for TURN re new FCC rules, potential litigation, and resulting effect on CPUC proceeding	7/24/24	0.50
Alexandra Green	R20-10-002	GP	draft e-mail to C. Mailloux re proceeding NDAs	8/27/24	0.25
Alexandra Green	R20-10-002	SP	review and analyze Staff Proposal	10/1/24	0.50
Alexandra Green	R20-10-002	SP	call w/ L. Fitzpatrick re strategy, drafting assignments for Staff Proposal Opening Comments	10/2/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: strategy for opening comments and drafting on data collection issues	10/2/24	0.25
Christine Mailloux	R20-10-002	SP	Analysis of IPCS record at the CPUC, review FCC work and draft substantive email with strategy for opening comments	10/2/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review C. Mailloux email disc. re: planning/next steps	10/2/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Opening Comments) draft e-mail to C. Mailloux and L. Fitzpatrick re staff proposal, proceeding history and strategy	10/3/24	1.00
Christine Mailloux	R20-10-002	SP	Analysis of A. Green responses to questions on ICS Staff Proposal and strategy and next steps for TURN to response to ALJ Ruling questions, including role for S. Rahe and strategy for response to rate caps and affordability; review ALJ Ruling and email response to A. Green re: same	10/4/24	0.50
Christine Mailloux	R20-10-002	SP	Email and meeting request to S. Rahe and A. Green and L. Fitzpatrick re: developing strategy and issues for comments on Staff Proposal; review ruling and Staff Proposal to develop agenda and possible discussion topics for call	10/4/24	0.25
Alexandra Green	R20-10-002	SP	call w/ L. Fitzpatrick and C. Mailloux re Incarcerated Calling Staff Proposal strategy	10/7/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: competition in ICS facilities and strategy for opening comments	10/7/24	0.25
Alexandra Green	R20-10-002	SP	prep for call re IPCS Staff Proposal Comments strategy	10/8/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Opening Comments) attend meeting w/ C. Mailloux, L. Fitzpatrick, and S. Rahe re interplay between recent FCC Order and Staff Proposal	10/8/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Opening Comments) attend meeting w/ C. Mailloux, L. Fitzpatrick, and S. Rahe re position on methodology for setting rates	10/8/24	0.50
Christine Mailloux	R20-10-002	SP	Meeting with S. Rahe, A. Green and L. Fitzpatrick re: strategy for opening comments on FCC Order issues and permanent rate caps	10/8/24	0.25
Christine Mailloux	R20-10-002	SP	Meeting with S. Rahe, A. Green and L. Fitzpatrick re: strategy for opening comments on data collection	10/8/24	0.25
Christine Mailloux	R20-10-002	SP	Meeting with S. Rahe, A. Green and L. Fitzpatrick re: strategy for opening comments on affordability issues	10/8/24	0.25
Christine Mailloux	R20-10-002	SP	Meeting with S. Rahe, A. Green and L. Fitzpatrick re: strategy for opening comments on strategy and staffing and document structure	10/8/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(VoIP Status, PD opening comments) call w/ A. Green re: revisions to draft opening PD comments	10/8/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) prep for meeting w/ C. Mailloux, A. Green, S. Rahe (consultant)	10/8/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) meeting w/ C. Mailloux, A. Green, S. Rahe (consultant) re: issue spotting/division of labor/next steps	10/8/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) research FCC Order re: preemption issues	10/9/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) research FCC Order re: alternative plans	10/9/24	1.25
Christine Mailloux	R20-10-002	SP	Meeting with L. Fitzpatrick re: strategy and outline for opening comments on Staff Proposal and review of docket materials	10/10/24	0.25
Christine Mailloux	R20-10-002	SP	Analysis of Staff Proposal and draft outline for opening comments on Staff Proposal	10/13/24	3.00
Christine Mailloux	R20-10-002	SP	Meeting with L. Fitzpatrick re: strategy and outline for opening comments on Staff Proposal	10/14/24	0.25
Christine Mailloux	R20-10-002	SP	Revise and update incarcerated calling outline and draft email to S. Rahe re: FCC issues	10/14/24	1.25
Christine Mailloux	R20-10-002	SP	Analysis of Staff Proposal re: FCC Order and rules	10/14/24	0.25
Christine Mailloux	R20-10-002	SP	email to S. Rahe re: drafting on FCC Order issues	10/14/24	0.25
Ashley Salas	R20-10-002	COOR	Disc w/ Cal Advocates (TF), CM, LF re strategy	10/15/24	0.25
Christine Mailloux	R20-10-002	COOR	Meeting with P. Goodman re: strategy for opening comments on Staff Proposal and possible collaboration	10/15/24	0.25
Christine Mailloux	R20-10-002	SP	Draft outline for comments on Staff Proposal; review record, scoping memos and prior filings	10/15/24	1.25
Christine Mailloux	R20-10-002	SP	review record, scoping memos and prior filings for outline for comments on Staff Proposal	10/15/24	1.00
Christine Mailloux	R20-10-002	COOR	Email discussion with CalAdvocates re: coordination and preparation of opening comments on staff proposal	10/15/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review email disc from C. Mailloux re: next steps	10/15/24	0.50
Christine Mailloux	R20-10-002	SP	Strategy session discussion with L. Fitzpatrick re: TURN recommendation for comments on Staff Proposal re: rate structure, automatic adjustments and methodology	10/16/24	1.00
Christine Mailloux	R20-10-002	SP	Strategy session discussion with L. Fitzpatrick re: TURN recommendation for comments on Staff Proposal re: affordability and equity issues	10/16/24	0.50
Christine Mailloux	R20-10-002	SP	Strategy session discussion with L. Fitzpatrick re: TURN recommendation for comments on Staff Proposal re: alternative proposals, and data gathering	10/16/24	0.50
Christine Mailloux	R20-10-002	SP	Analysis and update of outline for opening comments on Staff Proposal	10/16/24	1.00
Christine Mailloux	R20-10-002	SP	review L. Fitzpatrick's edits and updates for Staff Proposal	10/16/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise outline	10/16/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review preliminary outline from C. Mailloux	10/16/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) meeting w/ C. Mailloux re: discuss preliminary outline	10/16/24	1.00
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: opening comments and next steps in proceeding	10/17/24	0.25
Christine Mailloux	R20-10-002	COOR	Meeting with L. Fitzpatrick and P. Goodman re: ICS strategy and opening comments on permanent voice rates	10/17/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review party comments re: data	10/17/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) draft competition section	10/17/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) draft alternative plan section	10/17/24	1.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) draft SB 1008 section	10/17/24	1.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review party comments re: equity	10/17/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) research re: data	10/18/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) research re: equity	10/18/24	1.75
Christine Mailloux	R20-10-002	COOR	Meeting with L. Fitzpatrick and T. Floyd from CalAdvocates re: strategy for opening comments including permanent voice rates	10/21/24	1.25
Christine Mailloux	R20-10-002	SP	Meeting with L. Fitzpatrick re: opening comments strategy on equity and outreach	10/21/24	0.25
Christine Mailloux	R20-10-002	SP	Meeting with C. Pierre and A. Tinnin and L. Fitzpatrick re: equity and outreach issues for opening comments and prior positions on equity and affordability issues	10/21/24	0.50

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Christine Mailloux	R20-10-002	SP	Meeting with C. Pierre and A. Tinnin and L. Fitzpatrick re: equity and outreach issues for opening comments and prior positions on elements of permanent voice rate including site commissions and ancillary fees	10/21/24	0.50
Christine Mailloux	R20-10-002	SP	Meeting with C. Pierre and A. Tinnin and L. Fitzpatrick re: equity and outreach issues for opening comments and other rate structures including overlap with SB1008	10/21/24	0.50
Christine Mailloux	R20-10-002	COOR	Discussion with P. Goodman and L. Fitzpatrick re: strategy for opening comments on rates and FCC preemption	10/22/24	0.50
Christine Mailloux	R20-10-002	COOR	Discussion with P. Goodman and L. Fitzpatrick re: strategy for opening comments on ancillary fees and site commissions	10/22/24	0.25
Leo Fitzpatrick	R20-10-002	COOR	(IPCS opening comments) call w/ C. Mailloux, P. Goodman, M. Kasnitz (CforAT) re: IPCS draft	10/22/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Opening Comments) review outline, S. Rahr's draft sections re FCC rules	10/23/24	0.50
Christine Mailloux	R20-10-002	SP	Draft opening comments on Staff Proposal related to permanent rate methodology	10/23/24	2.00
Christine Mailloux	R20-10-002	SP	Draft opening comments on Staff Proposal related to affordability issues	10/23/24	2.00
Christine Mailloux	R20-10-002	SP	Draft opening comments on Staff Proposal related to automatic adjustment mechanisms	10/23/24	1.50
Christine Mailloux	R20-10-002	PROC	Email discussion with L. Fitzpatrick re: incarcerated calling re: other groups and status of filing, next steps	10/23/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review email disc from C. Mailloux re: rates	10/23/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review C. Mailloux sections re: affordability & adjustment mechanisms	10/23/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review S. Rahr (consultant) re: methodology section	10/23/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) meeting w/ C. Mailloux, S. Rahr (consultant) re: methodology section	10/23/24	0.50
Christine Mailloux	R20-10-002	SP	Draft opening comments on staff proposal re: introduction, summary and transitions	10/24/24	0.75
Christine Mailloux	R20-10-002	SP	Draft opening comments on affordability analysis for IPCS rates	10/24/24	2.00
Christine Mailloux	R20-10-002	SP	Draft opening comments on staff proposal re: automatic rate review mechanisms	10/24/24	1.00
Christine Mailloux	R20-10-002	SP	Draft opening comments on staff proposal re: rate reasonableness and structure of rate elements	10/24/24	2.50
Christine Mailloux	R20-10-002	SP	Meeting with S. Rahr and L. Fitzpatrick re: strategy for opening comments and rate reasonableness and rate elements	10/24/24	1.00
Christine Mailloux	R20-10-002	COOR	Discussion with P. Goodman re: strategy for comments on staff proposal re: rate setting and reasonableness	10/24/24	0.25
Christine Mailloux	R20-10-002	PROC	Analysis of the protective order, prior TURN filings, and email re: signatures	10/24/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review email disc from C. Mailloux re: combined draft	10/24/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise intro section	10/24/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise alternative plan section	10/24/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise competition section	10/24/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise SB 1008 section	10/24/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) draft equity section	10/24/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise data sources section	10/24/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review & revise combined draft	10/25/24	2.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) draft competition section	10/25/24	1.00
Christine Mailloux	R20-10-002	SP	Analysis of edits, updates and revisions for opening comments on Staff Proposal	10/27/24	1.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Opening Comments) review draft opening comments	10/28/24	0.50
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: strategy and drafting for opening comments on staff proposal	10/28/24	0.75
Christine Mailloux	R20-10-002	SP	Analysis and edit draft opening comments on staff proposal; update to incorporate edits from S. Rahr re: FCC order and rate reasonableness	10/28/24	2.50
Christine Mailloux	R20-10-002	SP	Analysis and edit draft opening comments on staff proposal; update to incorporate edits from L. Fitzpatrick re: updates and revisions to sections on alternative	10/28/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) review & revise combined draft	10/28/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) meeting w/ C. Mailloux re: finalizing draft	10/28/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review and issue spot NCI's opening comments	10/29/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review final TURN opening comments on staff proposal	10/29/24	1.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review and issue spot Cal Advocates' opening comments	10/29/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: strategy for final edits and updates to opening comments	10/29/24	0.25
Christine Mailloux	R20-10-002	COOR	Discussion with P. Goodman re: IPCS proposals and revisions to draft	10/29/24	0.25
Christine Mailloux	R20-10-002	SP	Review and revise draft opening comments on Staff Proposal	10/29/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) call w/ C. Mailloux re: IPCS draft	10/29/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise intro section	10/29/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise alternative plan section	10/29/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise equity section	10/29/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS opening comments) revise data section	10/29/24	1.00
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review and issue spot GTL's opening comments	10/30/24	0.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review and issue spot Securus' opening comments	10/30/24	0.75
Alexandra Green	R20-10-002	SP	prep for meeting re Staff Proposal Reply Comments	10/31/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) research re CPUC jurisdiction over non-interconnected VoIP	10/31/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ L. Fitzpatrick and C. Mailloux re topics, strategy for replies	10/31/24	0.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ L. Fitzpatrick re drafting outline for replies	10/31/24	0.25
Alexandra Green	R20-10-002	SP	review and sign protective order	10/31/24	0.25
Christine Mailloux	R20-10-002	SP	Meeting with A. Green and L. Fitzpatrick re: strategy for reply comments on Staff Proposal	10/31/24	0.50
Christine Mailloux	R20-10-002	SP	Analysis of Protective Order rules	10/31/24	1.00
Christine Mailloux	R20-10-002	SP	Draft pleading for protective order acknowledgments	10/31/24	0.50
Stephen Rahr	R.20-10-002	SP	Reply to email from A. Green re process for drafting reply comments (.1).	11/1/24	0.10
Stephen Rahr	R.20-10-002	SP	Review GTL opening comments (.2).	11/1/24	0.20
Alexandra Green	R20-10-002	SP	(Staff proposal replies) draft e-mail to Securus counsel re receiving copy of confidential version of Securus' opening comments	11/1/24	0.25
Alexandra Green	R20-10-002	SP	(Staff proposal replies, non-interconnected VoIP) research record re providers' prior statements on/discussion of non-interconnected VoIP jurisdiction	11/1/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for rate adjustment section	11/1/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for workshop section	11/1/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for alt rate plan section	11/1/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for affordability section	11/1/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for data section	11/1/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for methodology section	11/1/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis of opening comments for jurisdiction section	11/1/24	0.50
Stephen Rahr	R.20-10-002	SP	Review opening comments of NCI	11/3/24	0.20
Stephen Rahr	R.20-10-002	SP	Review opening comments of Cal Advocates	11/3/24	0.20
Stephen Rahr	R.20-10-002	SP	Review opening comments of Securus	11/3/24	0.40
Stephen Rahr	R.20-10-002	PROC	Research procedural history of discovery and data production in current proceeding (.2)	11/3/24	0.20
Stephen Rahr	R.20-10-002	SP	Outline rate-setting section of Joint Consumers reply comments (.2).	11/3/24	0.20
Christine Mailloux	R20-10-002	SP	Discussion with L. Fitzpatrick re: reply comments on Staff Proposal and outline of issues	11/4/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with A. Green re: strategy for reply comments on staff proposal	11/4/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for rate adjustment section	11/4/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for workshop section	11/4/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for alt rate plan section	11/4/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for affordability section	11/4/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for data section	11/4/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for methodology section	11/4/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) research & analysis for jurisdiction section	11/4/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) discussion with C. Mailloux re: strategy for reply comments and outline for drafting	11/4/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: workshop section	11/4/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: affordability section	11/4/24	0.75
Alexandra Green	R20-10-002	SP	review outline for staff proposal reply comments	11/5/24	0.25
Alexandra Green	R20-10-002	SP	(Staff proposal replies) research re Smart Communications, statutory definitions for non-interconnected VoIP jurisdiction section	11/5/24	0.50
Christine Mailloux	R20-10-002	COOR	Discussion with P. Goodman re: reply comments for incarcerated calling and outline review	11/5/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: data section	11/5/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: rate adjustment section	11/5/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: alt rate plan section	11/5/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: methodology section	11/5/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) draft outline re: jurisdiction section	11/5/24	1.25
Stephen Rahr	R.20-10-002	SP	Review Securus confidential data (.1).	11/6/24	0.10
Stephen Rahr	R.20-10-002	SP	Meeting with P. Goodman (C4AT) and L. Fitzpatrick, A. Green, and C. Mailloux (all of TURN) re outline of reply comments and division of labor (.1.6).	11/6/24	1.60
Alexandra Green	R20-10-002	SP	(Staff proposal replies) review prior docket filings for non-interconnected VoIP jurisdiction section	11/6/24	0.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ C. Mailloux, L. Fitzpatrick, S. Rahr, and CforAT (P. Goodman) re data analysis section for filing	11/6/24	0.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ C. Mailloux, L. Fitzpatrick, S. Rahr, and CforAT (P. Goodman) re strategy for non-interconnected VoIP section	11/6/24	0.75
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ C. Mailloux, L. Fitzpatrick, S. Rahr, and CforAT (P. Goodman) re strategy for alternative pricing plans section	11/6/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ L. Fitzpatrick re drafting non-interconnected VoIP jurisdiction section	11/6/24	0.25
Christine Mailloux	R20-10-002	COOR	Meeting with P. Goodman, S. Rahr, A. Green and L. Fitzpatrick re: strategy for reply comments on rate reasonableness	11/6/24	0.50
Christine Mailloux	R20-10-002	COOR	Meeting with P. Goodman, S. Rahr, A. Green and L. Fitzpatrick re: strategy for reply comments on jurisdiction issues	11/6/24	0.75
Christine Mailloux	R20-10-002	COOR	Meeting with P. Goodman, S. Rahr, A. Green and L. Fitzpatrick re: strategy for reply comments on alternative payment methods	11/6/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) prep for meeting w/ A. Green, C. Mailloux, S. Rahr (consultant), P. Goodman (CforAT) re: writing assignments	11/6/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ A. Green, C. Mailloux, S. Rahr (consultant), P. Goodman (CforAT) outline, and strategy for drafting on jurisdiction issues	11/6/24	0.25

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ A. Green, C. Mailloux, S. Raheer (consultant), P. Goodman (CforAT) outline, strategy for drafting on alternative rate structure	11/6/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ A. Green, C. Mailloux, S. Raheer (consultant), P. Goodman (CforAT) outline, strategy for drafting on rate adjustments	11/6/24	0.50
Stephen Raheer	R.20-10-002	SP	Further review of Securus confidential data and compare to FCC analysis of carrier cost data (.5)	11/7/24	0.50
Stephen Raheer	R.20-10-002	SP	Draft rate section of joint reply comments (.9)	11/7/24	0.90
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies, non-interconnected VoIP) review prior filed briefs re video calling jurisdiction	11/7/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies, non-interconnected VoIP) research re limitations on inbound calling for IPCS in general	11/7/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies, non-interconnected VoIP) draft non-interconnected VoIP jurisdiction section	11/7/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) draft affordability analysis section	11/7/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies, non-interconnected VoIP) draft non-interconnected VoIP jurisdiction section	11/8/24	2.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Reply comments) research IPCS providers that have left California market	11/8/24	0.75
Stephen Raheer	R.20-10-002	SP	Draft section of opening comments re rate-cap methodology (1.3)	11/10/24	1.30
Stephen Raheer	R.20-10-002	SP	Further review of Securus confidential data, analyze consumer demand trend over time (.9)	11/10/24	0.90
Stephen Raheer	R.20-10-002	SP	Finish demand elasticity analysis (.4) and draft reply comment section on Securus cost data (.4)	11/11/24	0.80
Stephen Raheer	R.20-10-002	SP	Meeting with L. Fitzpatrick and A. Green (of TURN) and P. Goodman (CforAT) re reply comments, procedural issues, and data analysis (.8)	11/12/24	0.80
Stephen Raheer	R.20-10-002	SP	Finalize and format analysis of demand data from Securus confidential filing (.8)	11/12/24	0.80
Stephen Raheer	R.20-10-002	SP	Finish reply comment section on rate-setting methodology (.3)	11/12/24	0.30
Stephen Raheer	R.20-10-002	SP	Review and edit SAR section of reply comments; send to team for integration into filing (.5)	11/12/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) draft section re IPCS providers' exits from California market	11/12/24	1.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) research re PayTel market exit in California	11/12/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) attend drafting check-in meeting w/ L. Fitzpatrick, S. Raheer, and CforAT (P. Goodman) re data analysis and recommendations re Commission data gathering	11/12/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) attend drafting check-in meeting w/ L. Fitzpatrick, S. Raheer, and CforAT (P. Goodman) re filing confidential version of comments	11/12/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ L. Fitzpatrick re next steps in drafting	11/12/24	0.25
Alexandra Green	R20-10-002	PROC	review protective order re disclosure requirements/need for advanced notice re using confidential data from another party	11/12/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ A. Green, S. Raheer (consultant), P. Goodman (CforAT) coordinating drafting	11/12/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) review S. Raheer draft re: methodology section	11/12/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) drafting rate adjustment section	11/12/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) drafting alt rate plan section	11/12/24	1.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review confidential version of Securus' opening comments	11/13/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) review and revise draft section re provider data	11/13/24	1.00
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) research Protective Order, Rule 11.4, GO 66-D re requirements for filing and serving confidential documents	11/13/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) draft e-mail to C. Mailloux and L. Fitzpatrick re components of motion to file under seal, filing and serving confidential version of reply comments	11/13/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise non-interconnected VoIP section	11/13/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise market exit section	11/13/24	0.25
Christine Mailloux	R20-10-002	PROC	Analysis of rules re: motion to file under seal and use of confidential information	11/13/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) drafting workshop section	11/13/24	0.75
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) drafting data section	11/13/24	1.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise L. Fitzpatrick's section re IPCS market exits	11/14/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise L. Fitzpatrick's section re alternative pricing plans	11/14/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise L. Fitzpatrick's section re rate adjustments	11/14/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise S. Raheer section re rates	11/14/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) research re contents of motion to file under seal	11/14/24	0.25
Alexandra Green	R20-10-002	SP	call w/ L. Fitzpatrick re edits to draft Replies	11/14/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) draft motion to file under seal	11/14/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) review P. Goodman (CforAT) edits to full draft	11/15/24	0.75
Christine Mailloux	R20-10-002	SP	Analysis, comments and edits on reply comments re: jurisdiction issues	11/17/24	1.25
Christine Mailloux	R20-10-002	SP	analysis and research re: jurisdiction issues in Interim rate decision, VoIP framework decision and parties' comments	11/17/24	0.75
Christine Mailloux	R20-10-002	SP	Analysis, comments and edits on reply comments re: data collection issues	11/17/24	1.00
Christine Mailloux	R20-10-002	SP	analysis of parties comments and interim order	11/17/24	0.50
Christine Mailloux	R20-10-002	SP	Analysis, comments and edits on reply comments re: FCC Order and resetting issues	11/17/24	2.00
Christine Mailloux	R20-10-002	COOR	Email to A. Green, L. Fitzpatrick and P. Goodman and S. Raheer re: edits, strategy and next steps	11/17/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) review C. Mailloux edits to full draft	11/17/24	1.00
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) e-mail disc w/ L. Fitzpatrick, C. Mailloux, and CforAT (P. Goodman) re revisions to non-interconnected VoIP section	11/18/24	2.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) research re "non-interconnected" services providers discussed in opening comments	11/18/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) w/ L. Fitzpatrick, C. Mailloux, and CforAT (P. Goodman) re revisions to non-interconnected VoIP jurisdiction section	11/18/24	1.00
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise non-interconnected VoIP jurisdiction section	11/18/24	2.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call w/ L. Fitzpatrick re next steps on editing non-interconnected VoIP section	11/18/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with A. Green and L. Fitzpatrick re: reply comments on IPCS VoIP jurisdiction issues	11/18/24	1.00
Christine Mailloux	R20-10-002	SP	Analysis of revised VoIP jurisdiction sections and further edit and update jurisdiction analysis for reply comments on Staff Proposal;	11/18/24	1.75
Christine Mailloux	R20-10-002	SP	emails re: next steps for VoIP jurisdiction sections	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ C. Mailloux, A. Green re: jurisdiction section	11/18/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) review email disc from S. Raheer re: methodology citations	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise workshop section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise alt rate plan section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise affordability section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise data section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise methodology section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise jurisdiction section	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) calls w/ A. Green re: finalizing draft	11/18/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) calls w/ C. Mailloux re: strategy for further updates and revisions on jurisdiction issues	11/18/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) calls w/ R. Yanagiba re filing confidential version	11/19/24	0.50
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) calls w/ L. Fitzpatrick re revisions to non-interconnected VoIP section	11/19/24	0.50
Alexandra Green	R20-10-002	PROC	e-mail disc w/ C. Mailloux re serving confidential version to protective order signatories	11/19/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) revise data analysis section	11/19/24	0.25
Alexandra Green	R20-10-002	SP	(Staff Proposal Replies) call and e-mail disc w/ L. Fitzpatrick re edits to public version of replies	11/19/24	0.25
Christine Mailloux	R20-10-002	COOR	Meeting with P. Goodman and discussion for strategy on reply comments Incarcerated Calling	11/19/24	0.25
Christine Mailloux	R20-10-002	SP	Discussion with Leo on IPCS; emails to team re: pleading and confidential information issues	11/19/24	0.50
Christine Mailloux	R20-10-002	SP	Analysis, edit and update draft of reply comments and Motion to File Under Seal	11/19/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise workshop section	11/19/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise alt rate plan section	11/19/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise affordability section	11/19/24	1.00
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise data section	11/19/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise methodology section	11/19/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) revise jurisdiction section	11/19/24	1.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) calls w/ A. Green re: filing confidential info	11/19/24	0.50
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) calls w/ C. Mailloux re: strategy for revising and updating jurisdiction section	11/19/24	0.25
Leo Fitzpatrick	R20-10-002	SP	(IPCS reply comments) call w/ A. Green, R. Yanagiba re: filing confidential data (arrived late)	11/19/24	0.25
Alexandra Green	R20-10-002	PROC	(Staff Proposal Replies) e-mail disc w/ L. Fitzpatrick and C. Mailloux re service of confidential version to protective order signatories	11/20/24	0.50
Alexandra Green	R20-10-002	COOR	(Staff Proposal Replies) draft e-mail to Securus re service list for confidential version of IPCS replies	11/20/24	0.25
Leo Fitzpatrick	R20-10-002	PROC	(IPCS reply comments) review email disc re: service of confidential filing	11/20/24	0.25
Alexandra Green	R20-10-002	PROC	(Staff Proposal Replies) phone & e-mail disc w/ R. Yanagiba re serving confidential IPCS replies	11/21/24	0.25
Leo Fitzpatrick	R20-10-002	COOR	(IPCS reply comments) call w/ P. Goodman (CforAT) re: rejected motion to file under seal & refiling	12/4/24	0.25
Alexandra Green	R20-10-002	NFA	review FCC grant of waiver to Securus for per-minute video calling rates	12/20/24	0.25
Leo Fitzpatrick	R20-10-002	NFA	(IPCS reply comments) review FCC Securus waiver re: video calling rates	12/20/24	0.50
Leo Fitzpatrick	R20-10-002	GP	(IPCS) check in call w/ C. Mailloux, A. Green, S. Raheer (consultant) re: next steps	1/28/25	0.50
Alexandra Green	R20-10-002	GP	prep for call w/ K. Campbell re data sources on start and endpoints of IPCS calls	2/3/25	1.50
Stephen Raheer	R.20-10-002	NFA	Review FCC docket and prepare summary for TURN re developments at federal level and impact on CPUC proceeding	2/5/25	0.80
Alexandra Green	R20-10-002	GP	call w/ K. Campbell re data on start and endpoints of IPCS calls	2/5/25	0.25
Alexandra Green	R20-10-002	GP	draft follow-up e-mail to K. Campbell re data on start and endpoints of IPCS calls	2/5/25	0.25
Stephen Raheer	R.20-10-002	NFA	Finalize memo on FCC developments and impact on CPUC proceeding (.3)	2/9/25	0.30
Alexandra Green	R20-10-002	NFA	review S. Raheer memo re Video Calling NPRM	2/10/25	0.25
Alexandra Green	R20-10-002	COOR	call w/ Cal Advocates (A. Floyd) & A. Salas re video IPCS rates	2/25/25	0.25
Alexandra Green	R20-10-002	NFA	review FCC video calling NPRM filings re cost of video calling	2/26/25	0.50
Alexandra Green	R20-10-002	NFA	call w/ L. Fitzpatrick re video calling rates research	2/26/25	0.25
Alexandra Green	R20-10-002	NFA	e-mail disc. w/ S. Raheer re video IPCS rates	2/26/25	0.25
Stephen Raheer	R.20-10-002	VCR	Reply to A. Greene with responses CalAdvocates questions concerning video calling rates (.3)	2/28/25	0.30
Alexandra Green	R20-10-002	NFA	call w/ L. Fitzpatrick re strategy for CPUC rulemaking	6/2/25	0.25
Alexandra Green	R20-10-002	COOR	call w/ P. Goodman re next steps in CPUC proceeding	6/6/25	0.25

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Leo Fitzpatrick	R20-10-002	NFA	(IPCS) email disc w/ B. Finkelstein re: impact of FCC waiver order on rate cap proceeding	7/2/25	0.25
Alexandra Green	R20-10-002	PROC	call w/ L. Fitzpatrick re Motion for official notice re FCC/PCS waiver order	7/3/25	0.75
Alexandra Green	R20-10-002	PROC	review FCC/PCS waiver order	7/3/25	0.50
Alexandra Green	R20-10-002	PROC	call w/ L. Fitzpatrick re strategy for MFON on FCC Waiver Order	7/8/25	0.25
Alexandra Green	R20-10-002	PROC	outline motion for official notice of FCC waiver order	7/8/25	0.25
Alexandra Green	R20-10-002	PROC	draft motion for official notice of FCC waiver order	7/8/25	1.25
Alexandra Green	R20-10-002	PROC	revise Motion for Official Notice re 2025 Waiver Order	7/9/25	0.50
Alexandra Green	R20-10-002	PROC	call w/ L. Fitzpatrick re edits to motion for official notice for FCC 2025 waiver order	7/10/25	0.25
Leo Fitzpatrick	R20-10-002	PROC	(IPCS) review/revise Motion for Official Notice	7/18/25	0.75
Alexandra Green	R20-10-002	PROC	revise draft Motion for Official Notice re FCC/PCS 2025 Waiver Order	7/25/25	0.75
Leo Fitzpatrick	R20-10-002	PROC	(IPCS) analyze FCC waiver motion for Motion for Official Notice	7/25/25	1.00
Leo Fitzpatrick	R20-10-002	PROC	(IPCS) review Motion for Official Notice	7/25/25	0.25
Alexandra Green	R20-10-002	PROC	revise Motion for Official Notice re 2025 Waiver Order	7/30/25	0.25
Alexandra Green	R20-10-002	NFA	call w/ L. Fitzpatrick re revisions to 2025 FCC Waiver Order MFON	7/30/25	0.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re IPCS PD strategy and next steps	2/12/26	0.50
Kori Cordero	R20-10-002	PD	Review and analysis of PD	2/12/26	1.00
Kori Cordero	R20-10-002	PD	Emails with LF and AG regarding strategy for PD opening comments.	2/12/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) issue spotting PD for PD opening	2/12/26	1.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ A. Green re: issue spotting PD for PD opening	2/12/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ A. Green re: strategy, division of labor for PD opening	2/12/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) email disc w/ A. Green, K. Cordero re: preliminary strategy for PD opening	2/12/26	0.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re IPCS PD strategy	2/17/26	0.25
Alexandra Green	R20-10-002	PD	review and issue spot PD	2/17/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) outline Phase III section for PD opening	2/17/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) outline service quality section for PD opening	2/17/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, ex parte) call w/ A. Green re: PD opening comments, ex parte strategy	2/17/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) outline rates section for PD opening	2/17/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) outline VolP jurisdiction section for PD opening	2/17/26	0.25
Alexandra Green	R20-10-002	PD	review and issue spot PD	2/18/26	0.75
Alexandra Green	R20-10-002	PD	research for IPCS PD comments	2/18/26	0.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick and K. Cordero re strategy, division of labor for PD opening comments	2/18/26	0.75
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re next steps on IPCS PD opening comments	2/18/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of Staff Proposal comments to prep for call on preliminary issues	2/18/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ K. Cordero, A. Green on preliminary issues & timing for outline	2/18/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ S. Raher re: rates for PD opening	2/18/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of interim rate cap & staff proposal comments to prepare PD opening	2/19/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of R.22-03-016 record re: applicability of general SQ to IPCS	2/19/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of 2024/2025 FCC rate report and order	2/20/26	1.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) revise outline, all issues, con't	2/20/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research service quality section for PD opening	2/20/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research Phase III section for PD opening	2/20/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research rates section for PD opening	2/20/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research VolP jurisdiction section for PD opening	2/20/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research FCC docket for rates section	2/21/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) draft VolP juris. for PD opening	2/21/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) draft PD opening comments Phase III section	2/23/26	1.00
Alexandra Green	R20-10-002	COOR	call w/ L. Fitzpatrick, Cal Advocates (A. Floyd and C. Villarreal) re PD	2/24/26	0.50
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re review of PD opening comments	2/24/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research on applicability of current service quality rules for PD opening comments service quality section	2/24/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research on 2025 FCC rate changes for PD opening comments rates section	2/24/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) drafting PD opening comments Phase III section, con't	2/24/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) drafting PD opening comments rates section	2/24/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ A. Green, T. Floyd (Cal Advocates) on PD strategy, coordination	2/24/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ A. Green on PD comments and its proposed advice letter process	2/24/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of PHC/PPH transcripts	2/25/26	1.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) research R.22-03-016 service quality proceeding record for service quality section	2/25/26	1.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) draft PD opening comments service quality section	2/25/26	1.00
Kori Cordero	R20-10-002	PD	Review and provide edits to LF draft PD opening comments	2/26/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of OIR/interim rate cap comments	2/26/26	2.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) finalize draft PD opening comments for Kori's review	2/26/26	1.00
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re review of PD comments	2/27/26	0.25
Alexandra Green	R20-10-002	PD	review and revise PD opening comments re voice rate caps	2/27/26	0.25
Alexandra Green	R20-10-002	PD	review and revise PD opening comments re service quality	2/27/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) revising PD comments, per feedback from Kori/Alexandra	2/27/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ A. Green on the PD comments and proceeding strategy, service quality issues	2/27/26	1.00
Kori Cordero	R20-10-002	PD	Review and Revise AF Opening Comment on Feb. 10, 2026 PD	3/2/26	2.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) analysis of R.26-02-017 OIR for IPCS service quality issues	3/2/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) prepare ToA/ToC	3/2/26	1.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) finalize PD opening comments, all sections	3/2/26	1.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD opening) call w/ S. Raher (consultant) re: rates section	3/2/26	0.25
Kori Cordero	R20-10-002	PD	Review IPCS Opening Comments and consider reply strategy	3/3/26	2.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) issue spotting PD opening comments	3/3/26	1.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) prepare issue spotting memo for K. Cordero	3/3/26	1.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re strategy for PD reply comments	3/4/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) call w/ A. Green re: PD reply comment issues/strategy	3/4/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) research for jurisdiction sections	3/4/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) research for data sections	3/4/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) drafting outline, jurisdiction sections	3/4/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) drafting outline, data sections	3/4/26	0.50
Kori Cordero	R20-10-002	PD	Review and revise TURN reply comment for LF	3/5/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) analysis of icomp issues for reply comments	3/5/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) drafting icomp section	3/5/26	0.50
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) drafting data section	3/5/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) drafting jurisdiction section	3/5/26	1.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) revise PD reply comments, all sections per K. Cordero feedback	3/6/26	0.75
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) finalizing PD reply comments, all sections	3/9/26	1.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) call w/ S. Raher (consultant) re: next steps in proceeding	3/11/26	0.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re PD ex parte strategy	3/12/26	0.25
Alexandra Green	R20-10-002	PD	review IPCS PD Rev.1	3/16/26	0.25
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re PD Rev.1	3/16/26	0.25
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) call w/ A. Green re: PD revisions, next steps	3/16/26	1.00
Leo Fitzpatrick	R20-10-002	PD	(IPCS, PD reply) review changes to PD	3/17/26	0.50
Alexandra Green	R20-10-002	PD	call w/ L. Fitzpatrick re IPCS PD strategy	3/24/26	0.25
Alexandra Green	R20-10-002	EX	draft pre-ex parte meeting notice for meeting with Houck's and Harada's offices	3/25/26	0.25
Alexandra Green	R20-10-002	EX	call w/ L. Fitzpatrick re IPCS PD ex parte	3/26/26	0.25
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) calls w/ A. Green re: ex parte strategy	3/26/26	0.75
Alexandra Green	R20-10-002	EX	call w/ L. Fitzpatrick re Securans and NCI's pre-ex parte meeting notice	3/27/26	0.50
Alexandra Green	R20-10-002	EX	call w/ L. Fitzpatrick re scheduling ex parte meetings on PD	3/27/26	0.25
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) calls w/ A. Green re: ex parte strategy	3/27/26	1.00
Alexandra Green	R20-10-002	EX	prep for IPCS ex parte meeting	3/30/26	0.25
Alexandra Green	R20-10-002	EX	ex parte strategy meeting w/ L. Fitzpatrick & P. Goodman	3/30/26	0.50
Alexandra Green	R20-10-002	EX	call w/ L. Fitzpatrick re post-ex parte meeting notices	3/30/26	0.25
Alexandra Green	R20-10-002	EX	revise talking points for ex parte meetings re PDs	3/30/26	0.25
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) calls w/ A. Green re: ex parte notices	3/30/26	0.25
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) draft 3 day advance notice for Douglas	3/30/26	0.25
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) draft 3 day advance notice for Houck, Harada	3/30/26	0.50
Leo Fitzpatrick	R20-10-002	EX	(IPCS, ex parte) call w/ A. Green, P. Goodman (CofAT) re: ex parte meeting presentation, division of labor	3/30/26	0.25
Kori Cordero	R20-10-002	COMP	Draft Comp Claim	6/9/26	4.50

**R.20-10-002 (IPCS) TURN Compensation Claim
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Kori Cordero	R20-10-002	COMP	Draft Comp Claim	6/11/26	6.00
Substantial Total					335.14
Comp Total					10.50
Grand Total					345.64

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Attachment 3
TURN Hours Allocated by Issue

R.20-10-002 (PCS) TURN Compensation Claim
TURN Hours Allocated by Issue

	Billing Period	Hourly Rate	TEST	GP	NFA	PROC	COOR	SQ	FRC	SP	VCR	PD	EX	Substantive Hours	Substantive \$\$\$	Comp	Compensati on (1Comp)	Travel	Compensation (Travel)
																	1/2 of hourly rate		1/2 of hourly rate
Alexandra Green	2023	\$220	-	3.50	2.00	-	2.50	-	-	-	-	-	-	8.00	\$ 1,760.00	-	\$ -	-	\$ -
Alexandra Green	2024	\$240	-	1.25	7.75	3.50	0.25	-	0.50	33.25	-	-	-	46.50	\$ 11,160.00	-	\$ -	-	\$ -
Alexandra Green	2025	\$275	-	2.00	1.75	4.75	0.50	-	-	-	-	-	-	9.00	\$ 2,475.00	-	\$ -	-	\$ -
Alexandra Green	2026	\$300	-	-	-	-	0.50	-	-	-	-	5.50	2.50	8.50	\$ 2,550.00	-	\$ -	-	\$ -
Ashley Salas	2023	\$455	-	0.25	-	-	-	2.25	-	-	-	-	-	2.50	\$ 1,137.50	-	\$ -	-	\$ -
Ashley Salas	2024	\$475	-	-	-	-	0.25	-	-	-	-	-	-	0.25	\$ 118.75	-	\$ -	-	\$ -
Brenda D. Villanueva	2024	\$505	-	1.25	3.15	2.25	0.65	1.00	0.25	-	-	-	-	8.55	\$ 4,317.75	-	\$ -	-	\$ -
Christine Mailloux	2024	\$770	-	-	0.25	1.00	6.25	-	-	48.50	-	-	-	56.00	\$ 43,120.00	-	\$ -	-	\$ -
Leo Fitzpatrick	2023	\$300	-	1.75	-	0.50	0.25	0.25	-	-	-	-	-	2.75	\$ 825.00	-	\$ -	-	\$ -
Leo Fitzpatrick	2024	\$325	-	-	2.75	1.25	0.75	-	-	65.75	-	-	-	70.50	\$ 22,912.50	-	\$ -	-	\$ -
Leo Fitzpatrick	2025	\$350	-	0.50	0.25	2.00	-	-	-	-	-	-	-	2.75	\$ 962.50	-	\$ -	-	\$ -
Leo Fitzpatrick	2026	\$360	-	-	-	-	-	-	-	-	-	45.25	3.00	48.25	\$ 17,370.00	-	\$ -	-	\$ -
Kori Cordero	2026	\$540	-	-	-	-	-	-	-	-	-	7.25	-	7.25	\$ 3,915.00	10.50	\$ 2,835.00	-	\$ -
Stephen Raher	2022	\$350	40.44	0.10	0.30	0.10	-	-	-	-	-	-	-	40.94	\$ 14,329.00	-	\$ -	-	\$ -
Stephen Raher	2023	\$350	1.00	-	4.50	-	1.60	2.00	-	-	-	-	-	9.10	\$ 3,185.00	-	\$ -	-	\$ -
Stephen Raher	2024	\$350	-	-	2.80	0.30	-	-	-	9.80	-	-	-	12.90	\$ 4,515.00	-	\$ -	-	\$ -
Stephen Raher	2025	\$350	-	-	1.10	-	-	-	-	-	-	-	-	1.40	\$ 490.00	-	\$ -	-	\$ -
TOTAL			41.44	10.60	26.60	15.65	13.50	5.50	0.75	157.30	0.30	58.00	5.50	335.14	\$ 135,143.00	10.50	\$ 2,835.00	-	\$ -
TOTAL % HOURS ALLOCATED			12.36%	3.16%	7.94%	4.67%	4.03%	1.64%	0.22%	46.94%	0.09%	17.31%	1.64%	100.00%					

Substantial Contribution	\$ 135,143.00
Intervenor/Compensation	\$ 2,835.00
Travel Time Compensation	\$ -
Expenses Compensation	\$ -
Grand Total	\$ 137,978.00

Revised March 2023

Attachment 4
Resume for Stephen Rahe, Amalgamated Policy Research

STEPHEN A. RAHER

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(503) 208-6392 • stephen@amalgamatedpolicy.com

EDUCATION

Lewis & Clark Law School, Portland, OR – Juris Doctor, *summa cum laude*, 2009

University of Colorado - Graduate School of Public Affairs, Colorado Springs, CO – Master of Public Administration, 2002

Colorado College, Colorado Springs, CO – Bachelor of Arts in Music, 1998

EMPLOYMENT

Tabor Law Group, Portland, OR – Attorney/Managing Partner	2022 – present
Prison Policy Initiative, Northampton, MA (<i>remote work from Portland, OR</i>) – General Counsel	2021 – 2022
Judge Trish M. Brown, U.S. Bankruptcy Court for the District of Oregon, Portland, OR – Law Clerk	2015 – 2021
Perkins Coie LLP, Portland, OR – Associate Attorney	2011 – 2015
Judge Elizabeth L. Perris, U.S. Bankruptcy Court for the District of Oregon, Portland, OR – Law Clerk	2009 – 2011
KRCC-FM, Colorado Springs, CO – Associate News Producer	2004 – 2006
Colorado Criminal Justice Reform Coalition, Colorado Springs, CO – Co-Director/Senior Policy Analyst	1999 – 2004

SELECTED PUBLICATIONS

- *Data Privacy in Carceral Settings: The Digital Panopticon Returns to its Roots*, 119 NW U.L. Rev. Online 73 (2024).
- “Insufficient funds: How prison and jail ‘release cards’ perpetuate the cycle of poverty,” Prison Policy Initiative Blog (May 2022).
- “Captive Consumers: How government agencies and private companies trap and profit off incarcerated people and their loved ones,” *Inquest* (Harvard Law Institute to End Mass Incarceration, Mar. 19, 2022) (co-authored with Ariel Nelson).
- “Best practices for prison and jail tablet procurement,” Prison Policy Initiative briefing (rev. Jul. 14, 2022).
- “Show me the money: Tracking the companies that have a lock on sending funds to incarcerated people,” Prison Policy Initiative Blog (Nov. 2021) (co-authored with Tiana Herring).
- “Prison Retail,” chapter in *Commercialized (In)Justice Litigation Guide: Applying Consumer Laws to Commercial Bail, Prison Retail, and Private Debt Collection* (Nat’l Consumer Law Ctr, Jun. 2020).
- *The Company Store and the Literally Captive Market: Consumer Law in Prisons and Jails*, 17 Hastings Race & Poverty L.J. 3 (2020).
- “The Wireless Prison: How Colorado’s tablet computer program misses opportunities and monetizes the poor,” Prison Policy Initiative Blog (Jul. 6, 2017).
- “Neither Snow Nor Rain Nor Graft: Oregon’s Supporting Role in the Star Route Scandals,” *Oregon Benchmarks* (fall 2016).
- “Slow Down, You Move Too Fast: When is an Acceleration Clause Unenforceable under Federal Law,” *Oregon State Bar Debtor-Creditor Newsletter* (summer 2016).
- *You’ve Got Mail: The Promise of Cyber Communication in Prisons and the Need for Regulation*, Prison Policy Initiative (Jan. 2016).
- “Phoning Home: Prison Telecommunications in a Deregulatory Age,” chapter in *Prison Privatization: The Many Facets of a Controversial Industry* (Praeger Press, 2012).
- *The Business of Punishing: Impediments to Accountability in the Private Corrections Industry*, 13 Richmond J. of Law & the Public Interest 209 (2010).
- “Interpreting Initiatives and Referenda,” chapter in *Interpreting Oregon Law* (Oregon State Bar, 2009) (co-authored with Steven J. Johansen).
- *Incarceration and Correctional Spending in Colorado: A Legislator’s Handbook on Criminal Justice Policy, 2003*, Colorado Criminal Justice Reform Coalition (Feb. 2003).
- *Private Prisons and Public Money: Hidden Costs Borne by Colorado’s Taxpayers*, Colorado Criminal Justice Reform Coalition (Sept. 2002).

SELECTED PRESENTATIONS

- “Financial Data Privacy in the Carceral Landscape,” presentation to the Consumer Financial Protection Bureau’s Cross-Bureau Working Group on Justice Involved Individuals (online: Jan. 2025).

- “Keeping Families Connected: Developments in Communication Services for Incarcerated People” (panelist), Federal Communications Bar Association (online: Mar. 2023).
- “Data Privacy in Carceral Settings,” Consumer Law Scholars Conference, Berkeley Law Center for Consumer Law and Economic Justice (Berkeley: Mar. 2023).
- “Current Issues in Correctional Telecommunications,” presentation to Colorado Utility Consumer Advocate Advisory Board (online: Sep. 2022).
- “Communications Networks in the Carceral State,” Law & Society Association Annual Meeting (online: May 2021).
- “Commercialized (In)Justice: Protecting Prisoners and their Loved Ones from Financial Exploitation” (panelist), National Consumer Law Center Consumer Rights Litigation Conference (Boston: Nov. 2019).
- “Recent Developments in Ninth Circuit Case Law,” Oregon State Bar, Debtor-Creditor Section Annual Meeting (*annually*, 2015 through 2019).
- “Consumer Finance and Bankruptcy Basics,” Coffee Creek Correctional Facility (*annually*, 2015 through 2020) (co-taught with Hon. Trish M. Brown).
- “Consumer Law in Prisons and Jails,” Consumer Law Scholars Conference, Berkeley Law Center for Consumer Law and Economic Justice (Berkeley: Feb. 2019).
- “The Immigrant Incarceration Complex: How Criminal Prosecution of Migrants is Growing the Prison Population and Enriching Private Prison Corporations” (panelist), Rights Working Group National Membership Meeting (Seattle: Nov. 2012).
- “Special Accommodations: Lessons Learned from the Disposition of Surplus Institutional Buildings,” Blue Mountain Center (Blue Mountain Lake, NY: Oct. 2011).
- “Commercialization of Justice” (panelist), The International Prison Privatization Experience: A Transatlantic and Transpacific Dialogue, Texas Southern University (Houston: Aug. 2009).
- “Judicial Review of Legislative Procedure: Determining Who Determines the Rules of Proceedings,” Midwest Political Science Association Spring Conference (Chicago: Apr. 2009).
- “Fast Food and Prisons for Profit: The United States’ Contributions to the Developing World,” University of Sussex, Institute for Development Studies (Brighton, England: May 2003).
- “Rural Prison Siting: The Effects of Prison Construction in Three Rural Colorado Communities,” San Luis Valley Welfare Advocates (Alamosa, CO: Oct. 2000).

REGULATORY ADVOCACY

- In the Matter of Rates for Interstate Inmate Calling Services (WC Dkt. 12-375) and Incarcerated People’s Communications Services; Implementation of the Martha Wright-Reed Act (WC Dkt. 23-62) Federal Communications Commission rulemaking. Submitted numerous comments and *ex parte* presentations from 2013 through the present as an individual party, on behalf of Prison Policy Initiative, and with the National Association of State Utility Consumer Advocates; arguments cited in several Commission rulings.
- Unfair or Deceptive Fees (Proceeding R207011), Federal Trade Commission. Testifying witness at evidentiary hearing on behalf of public interest commenters (Feb. 2024).
- Proposed Amendments to Inmate Financial Responsibility Program Rules (Federal Bureau of Prisons). Co-authored comments (Mar. 13, 2023) in opposition to proposal to seize portions of funds sent to people incarcerated in federal prison (with National Consumer Law Center).
- Prepaid Accounts Under the Electronic Fund Transfer Act (Regulation E), Consumer Financial Protection Bureau rulemaking. Drafted comments (Mar. 18, 2015) and supplemental comments (Aug. 14, 2017) on behalf of Prison Policy Initiative concerning the need for increased protections for people receiving prepaid debit cards upon release from prisons and jails.
- Proposed Rule Regarding Inmate Commissary Account Deposit Procedures (Federal Bureau of Prisons). Drafted comments (Sept. 1, 2015) on behalf of an ad hoc coalition of organizations successfully opposing proposed rule based on violations of the Right to Financial Privacy Act. Rule subsequently abandoned by agency.

BAR ADMISSIONS AND PROFESSIONAL ASSOCIATIONS

- Oregon State Bar – admitted October 2009
- Washington Star Bar – admitted December 2013
- U.S. District Courts : District of Oregon, Western District of Washington
- U.S. Courts of Appeals: First Circuit, Ninth Circuit, District of Columbia Circuit

Revised March 2023

Attachment 5
Consultant Agreement for Stephen Raher, Amalgamated Policy Research



Lower bills. Livable planet.

Northern California

785 Market Street, Suite 1400
San Francisco, CA 94103

415 929-8876 • www.turn.org

Southern California

1620 Fifth Avenue, Suite 810
San Diego, CA 92101

619 398-3680 • www.turn.org

September 15, 2022

Stephen Raher
Amalgamated Policy Research, LLC
P.O. Box 15189
Portland, OR 97293

Re: Consulting Agreement

Dear Stephen,

This letter is to confirm the terms of the consulting agreement between The Utility Reform Network (“TURN”) and Stephen Raher of Amalgamated Policy Research, LLC. The primary intent is for Mr. Raher to provide TURN with legal and expert consulting services. These services will be for TURN’s work related to the California Public Utilities Commission (“CPUC”) proceeding R.20-10-002, and any subsequent or related CPUC proceedings. In addition, the legal and expert consulting services may include assistance with federal or state legislation or related projects on a case-by-case basis.

TURN and Stephen Raher acknowledge that Mr. Raher’s work subject to this agreement began on September 15, 2022. This agreement will end upon the mutual agreement of both TURN and Stephen Raher.

Scope of Work

Working in conjunction with and under the direction of TURN's attorneys, Stephen Raher will provide legal and expert consulting services on issues related to TURN's participation in designated CPUC proceedings or related matters, with the exact scope of services to be determined by mutual agreement between TURN and Mr. Raher on a case-by-case basis. The services to be provided by Mr. Raher include identification and analysis of issues, preparation of pleadings, preparation of data requests and analysis of data request responses, working with other TURN consultants, preparation and sponsorship of expert witness testimony, and cross examination of other parties' witnesses.

More specifically, the legal and expert consulting services to be provided by Mr. Raher, at TURN’s direction, may include any of the following primary activities:

- Analyzing CPUC documents, including party CPUC filings such as applications, comments, and testimony as well as CPUC Assigned Commissioner, Administrative Law

Judge, or CPUC Staff proposals, reports, and proposed decisions. This work includes identifying issues and preparing a narrative or other response.

- Assisting with the preparation of TURN's CPUC comments, testimony, or affidavits in response to CPUC filings such as applications, comments, and testimony as well as CPUC Assigned Commissioner, Administrative Law Judge, or CPUC Staff proposals, reports, and proposed decisions.
- Preparing for and participating in CPUC workshops, including possible presentations.
- Participating in *ex parte* meetings with CPUC Commissioners or their staff, or with CPUC Communications Division Staff.
- Participating in meetings with other parties in CPUC proceedings or FCC proceedings.
- Drafting discovery requests or requests for information for the CPUC or CPUC parties, reviewing the related responses, and assisting with TURN's response to the related request sent by the CPUC or CPUC parties.

Stephen Raher may also provide legal and expert consulting services, at TURN's direction, for these activities:

- Reviewing and analyzing state legislative proposals sponsored by TURN.
- Assisting with the development of TURN's position regarding state or federal legislative proposals.

The scope of issues to be addressed by Stephen Raher and scope of work tasks as described above is subject to reconsideration and amendment upon request by either party and based on mutual agreement and further negotiation between Stephen Raher and TURN's representatives in each case or project. Both parties agree to revisit the scope and hours per project should a project take more than 20 hours in a month.

Hourly Rates

Category I:

For work completed for CPUC proceedings under the CPUC Intervenor Compensation Program, Stephen Raher agrees to provide expert consulting services at \$350.00 per hour. Additional charges may be authorized by TURN if needed by Stephen Raher to complete the scope of work that is mutually agreed to by TURN and Stephen Raher.

Category II:

For work completed for other CPUC proceedings not under the CPUC Intervenor Compensation Program, or for state or federal legislation, or for other TURN projects, Stephen Raher agrees to provide expert consulting services at \$245.00 per hour. Additional charges may be authorized by TURN if needed by Stephen Raher to complete the scope of work that is mutually agreed to by TURN and Stephen Raher.

Stephen Raher
[September 15, 2022]
p. 3

Billing and Payment and Deferred Compensation

Stephen Raher will provide each month, a monthly invoice that tracks each project, and a cumulative billing total in each monthly invoice to assist with cost tracking. The monthly invoice and the cumulative billing should distinguish the work completed for CPUC proceedings under the CPUC Intervenor Compensation Program (Category I) and the rest of the projects (Category II). Along with the monthly invoice, Stephen Raher will submit each month a daily timesheet for his expert consulting services on behalf of TURN, with entries that describe sufficient details to identify the nature of the work and the issues addressed. TURN and Stephen Raher will discuss and mutually agree on the treatment of any substantial expenses, should such expenses arise in Category I or Category II work.

Category I:

For work completed for CPUC proceedings under the CPUC Intervenor Compensation Program, upon receipt of a monthly invoice from Stephen Raher, TURN will pay 50% of the hourly billing and 100% of billed expenses in accordance with the billing terms. The remaining 50% of the hourly billing for proceeding work will be deferred until the CPUC awards Intervenor Compensation to TURN and payment is received by TURN.

Stephen Raher and TURN understand that the CPUC may not fully reimburse TURN for work performed by Stephen Raher or for the hourly rate set out in this agreement. In this situation, TURN will reimburse Stephen Raher for all of the deferred invoiced amounts except half of the amount the CPUC does not reimburse. When and if intervenor compensation is received, TURN will promptly remit payment to Stephen Raher.

Category II:

For work completed for other CPUC proceedings not under the CPUC Intervenor Compensation Program, or for state or federal legislation, or for other TURN projects, TURN will pay 100% of the hourly billing and 100% of the billed expenses associated with legislative consulting and other projects as mutually agreed to by both parties.

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

Sincerely,

Richard A. Perez
Chief Financial Officer

Agreement to the terms described above:

Stephen Raher
Member, Amalgamated Policy Research, LLC

Revised March 2023

Attachment 6
Invoices Supporting Stephen Raher, Amalgamated Policy Research 2022, 2023, 2024, 2025
Billing Rates



INVOICE

Invoice Number: 104
Invoice Date: 12/2/22
Page: 1

Bill To:
The Utility Reform Network 1620 Fifth Ave. #810 San Diego, CA 92101

Customer ID: TURN

Customer PO	Payment Terms
	Due on receipt

Description	Amount
November consulting for CPUC proceeding R.20-10-002 - 8.5 hrs @ \$350/hr (time records attached)	2,975.00

Check/Credit Memo N

Subtotal	2,975.00
Sales Tax	
Total Invoice Amount	2,975.00
Payment/Credit Applied	
TOTAL	2,975.00



INVOICE

Invoice Number: 108
Invoice Date: 11/1/23
Page: 1

Bill To:
The Utility Reform Network 1620 Fifth Ave. #810 San Diego, CA 92101

Customer ID: TURN

Customer PO	Payment Terms
	Net Due

Description	Amount
October consulting for CPUC proceeding R.20-10-002 - 3.1 hrs @ \$350/hr (time records attached)	1,085.00

Check/Credit Memo N

Subtotal	1,085.00
Sales Tax	
Total Invoice Amount	1,085.00
Payment/Credit Applied	
TOTAL	1,085.00



INVOICE

Invoice Number: 110

Invoice Date: 8/2/24

Page: 1

Bill To:
The Utility Reform Network 1620 Fifth Ave. #810 San Diego, CA 92101

Customer ID: TURN

Customer PO	Payment Terms
	Net Due

Description	Amount
July consulting for CPUC proceeding R.20-10-002 - 2.9 hrs @ \$350/hr (time records attached)	1,015.00

Check/Credit Memo N

Subtotal	1,015.00
Sales Tax	
Total Invoice Amount	1,015.00
Payment/Credit Applied	
TOTAL	1,015.00



INVOICE

Invoice Number: 113

Invoice Date: 3/2/25

Page: 1

Bill To:
The Utility Reform Network 1620 Fifth Ave. #810 San Diego, CA 92101

Customer ID: TURN

Customer PO	Payment Terms
	Net Due

Description	Amount
February consulting for CPUC proceeding R.20.10.002 - 1.4 hrs @ \$350/hr (time records attached)	490.00

Check/Credit Memo N

Subtotal	490.00
Sales Tax	
Total Invoice Amount	490.00
Payment/Credit Applied	
TOTAL	490.00