

Decision 24-08-021 August 1, 2024

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

Application of AT&T Corp. (U5002C) to  
Discontinue Providing Residential Service in  
Frontier Territory and Relinquish Eligible  
Telecommunications Carrier Designation.

Application 21-05-007

**DECISION GRANTING COMPENSATION TO  
CENTER FOR ACCESSIBLE TECHNOLOGY  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 22-08-006**

<b>Intervenor:</b> Center for Accessible Technology	<b>For contribution to Decision (D.) 22-08-006</b>
<b>Claimed:</b> \$60,858.00	<b>Awarded:</b> \$31,290.20
<b>Assigned Commissioner:</b> Darcie L. Houck	<b>Assigned ALJ:</b> Jason Jungreis

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.22-08-006 authorizes AT&T Corp. to discontinue providing residential service in the service territory of Frontier California.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	6/23/2021	Verified
2. Other specified date for NOI:	N/A	

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
3. Date NOI filed:	7/21/2021	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	No ruling has been issued on CforAT's NOI in this proceeding. CforAT's most recent finding of eligible customer status was issued in R.21-06-017 (High DER OIR).	R.20-01-007
6. Date of ALJ ruling:	11/8/21	May 29, 2020
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
<b>Showing of "significant financial hardship" (§ 1802(h) or § 1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.20-01-007	Verified
10. Date of ALJ ruling:	4/29/2020	May 29, 2020
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.22-08-006	Verified
14. Date of issuance of Final Order or Decision:	8/8/2022	Verified
15. File date of compensation request:	10/6/2022	Verified
16. Was the request for compensation timely?		Yes

**PART II: SUBSTANTIAL CONTRIBUTION****A. Did the Intervenor substantially contribute to the final decision  
(see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):**

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>1. General</p> <p>This proceeding focused on AT&amp;T Corp.'s Application to Discontinue Providing Residential Service in Frontier Territory and Relinquish Its Eligible Telecommunications Carrier Designation. CforAT participated in this proceeding to ensure not only that AT&amp;T Corp. fully complied with the Commission's Mass Migration Guidelines, but also to ensure that the AT&amp;T Corp. customers (particularly those customers with disabilities) were not disproportionately harmed by the migration.</p>		<p>Noted. The Commission's Mass Migration Guidelines (Guidelines), which were set forth in D.10-07-024 (Attachment 3), are the basic standards by which the Application was determined to succeed or fail. The additional measure to the Guidelines requested from CforAT was to "ensure that customers with disabilities who would be affected by the transition will not be harmed." The Guidelines are premised on ensuring the public interest is met when migrating services, the decision recognizes this and the Commission has an obligation to ensure the public interest is served in all its decisions there for the decision adopts CforAT's premise to ensure customers with disabilities not be harmed by the migration.</p> <p>The Commission found that AT&amp;T complied with the Guidelines as reasonably necessary for this proceeding. CforAT provides analysis here that</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
		<p>substantially contributed to the proceeding's outcome.</p> <p><i>See</i> CPUC comment in Part III.D [4].</p>
<p>In response to AT&amp;T Corp.'s argument that granting the application was a ministerial act, CforAT argued that the Commission could not approve the application without doing so based on a fact-specific public interest determination considering factors in the mass migration guidelines: (1) progress of customer migrations, (2) availability of alternative providers, and (3) the nature of the customer base. CforAT Response to ALJ Ruling at pp. 5-6 (July 9, 2022).</p>	<p>D.22-08-006 found that "the record reflects that AT&amp;T complied with the Guidelines." D.22-08-006 at p. 19.</p>	<p>Noted. CforAT repeats the language here set forth in the Guidelines and D.22-08-006, which verifies AT&amp;T complied with all Guidelines.</p> <p>Additionally, in their Response to ALJ Ruling dated July 9, 2021, CforAT claims "there is currently insufficient evidence for the Commission to make a determination about the mass migration factors." However, in D.22-08-006, the Commission states "All of AT&amp;T's (migration) steps were undertaken with the review, oversight, and approval of the Commission Staff, and were determined to be in full compliance with the Guidelines."</p> <p>CforAT provides analysis here that substantially contributed to the proceeding's outcome.</p> <p><i>See</i> CPUC comment in Part III.D [4].</p> <p>(Note: CforAT's Response to the ALJ Ruling</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
		referenced here was dated July 9, 2021, not July 9, 2022.)
CforAT argued that 47 U.S.C. § 214(e)(4) mandates that the Commission must require any remaining ETCs to ensure that they can serve AT&T Corp.'s customers. CforAT Response to ALJ Ruling at pp. 6-7 (July 9, 2022).	D.22-08-006 found that that AT&T Corp. was using Frontier's network to provide service to the customers that were impacted by the application, and that Frontier would be able to serve AT&T Corp.'s customers. D.22-08-006 at p. 21.	<p>Noted, however, CforAT, in their July 9, 2021 Response, cite 47 U.S.C. § 214(e)(4), stating that the Commission must require any remaining ETCs (Eligible Telecommunications Carriers) to ensure service to AT&amp;T's existing customers (while AT&amp;T is requesting to relinquish service). In its Application, AT&amp;T cited this same U.S.C. as part of their efforts to relinquish its designation as an ETC in California. D.22-08-006 verifies that AT&amp;T cited and complied with this same U.S.C. in their Application.</p> <p>CforAT references D.22-08-006, which verifies that AT&amp;T was using Frontier's network to provide service to customers. D.22-08-006 states that "...Frontier, the Arranged Carrier, was already the underlying Network Service Provider in the territory, meaning that, while the customers were receiving service from AT&amp;T, the actual</p>

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		<p>equipment, wiring, and hardware all belonged to Frontier, and AT&amp;T was in effect using the Frontier network to provide service to its customers.” CforAT provides limited analysis here that substantially contributed to the proceeding’s outcome.</p> <p><i>See</i> CPUC comment in Part III.D [4].</p> <p>(Note: CforAT’s Response to the ALJ Ruling referenced here was dated July 9, 2021, not July 9, 2022.)</p>
<p>2. Contributions to Commission’s Informed Judgment</p> <p>“A substantial contribution includes evidence or argument that supports part of the decision, even if the CPUC does not adopt a party's position in total.” D.02-03-033 at p. 3.</p> <p>“The Commission has provided compensation when it found that a party has made a substantial contribution in certain unusual circumstances even though the position advanced by the intervenor was rejected in its entirety.” D.02-11-070 at pp 8-9, citing D.89-03-063 (“awarding San Luis Obispo Mothers For Peace and Rochelle Becker</p>		<p>Noted</p>

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>compensation in the Diablo Canyon Rate Case because their arguments, while ultimately unsuccessful, forced the utility to document thoroughly the safety issues involved”).</p> <p>An intervenor's efforts can make a substantial contribution even when that intervenor's recommendations are not adopted by the Commission, provided information and argument that allowed the Commission to consider the full range of positions, thereby assisting the Commission's informed judgment based on a more complete record. D.12-01-031 at p. 8.</p>		
<p>While the Commission ultimately rejected some of CforAT's recommendations, the Commission repeatedly solicited information and recommendations from CforAT. The information and recommendations allowed the Commission to consider the full range of positions.</p> <p>CforAT's responses to specific requests for information and recommendations include:</p>		Noted
<ul style="list-style-type: none"> <li>• CforAT's response to the July 1, 2021 ALJ Ruling requesting further information;</li> </ul>	The Decision notes that the ALJ Ruling directed, i.e., <i>required</i> , that CforAT respond to the request for further information.	Noted. The purpose of the Joint PHC Statement is to gather information, thoughts, and concerns from all parties prior to the

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	<p>D.22-08-006 at p. 3; ALJ E-Mail Ruling Requesting Additional Information of Movants Seeking Party Status and Other Additional Information of AT&amp;T at p. 3 (July 1, 2021) (“Cal Advocates, TURN, and [CforAT] are directed to respond by 5 pm on July 9, 2021, individually and without consultation with other movants, to the following questions,” “Movants are also <i>directed</i> to each serve and file with the Docket Office by 5 pm on July 9, 2021, a Statement addressing all of its thoughts and concerns regarding the proceeding, and specifically responding to the 18 expressly identified questions set forth in the June 8, 2021”) (emphasis added). The Commission presumably would not have mandated CforAT’s responses to those questions if it did not believe those responses were necessary to the resolution of this proceeding.</p>	<p>PHC. Since there was no PHC statement from CforAT, the Commission directed CforAT (and other movants) to provide a response to the questions posed in the July 1, 2021 Ruling referenced here, in order to better understand the timeline of movant knowledge of AT&amp;T’s Application and a prior June 8, 2021 Ruling.</p> <p>CforAT responded to the ruling which provided value to the proceeding and insisted in informing the Commission regarding the potential issues to be addressed.</p> <p>See CPUC comment in Part III.D [4].</p>
<ul style="list-style-type: none"> <li>• CforAT’s Opening Comments on Third Customer Notice (September 17, 2021); and</li> <li>• TURN, CforAT, and Cal Advocates’ Joint Redline of</li> </ul>	<p>In a September 20, 2021 E-Mail Ruling Directing Parties to Propose the Final Form of the Third Customer Notice, the Assigned ALJ ruled that “[i]n light of received opening comments</p>	<p>Verified, in part.</p> <p>CforAT, along with TURN and Cal Advocates, filed Joint Redline of AT&amp;T’s Third Customer Notice on September 22, 2021, with</p>



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AT&T's Third Customer Notice (Sept. 22, 2021).	<p>[on the Third Customer Notice], this Ruling now directs parties who have not produced a specific proposed Third Customer Notice to do so by September 22, 2021." Sept. 20, 2021 E-Mail Ruling at p. 2. The ALJ would not have requested a proposed Notice from CforAT if he were not considering the information and arguments in CforAT's comments.</p> <p>The Decision notes that Commission Staff approved the Third Customer Notice only after parties, including CforAT, had an opportunity to provide input regarding the content of that notice. D.22-08-006 at pp. 19, 21.</p>	<p>recommendations for further edits. Some of the edits in this Redline were ultimately adopted by the Commission. In this proceeding, it was proposed to enable Intervenor's to address questions and concerns regarding the Guidelines. The final Third Customer Notice adopted some of CforAT's suggestions.</p> <p><i>See</i> CPUC comment in Part III.D [4].</p>
<p>3. Procedural Contributions:</p> <p>To be compensable work, an intervenor's claimed contribution "need not be on the merits; it may have been an interim decision that was adopted as part of the final resolution of the proceedings; and it may be on 'procedural' matter[s] only." <i>New Cingular Wireless PCS, LLC v. Pub. Utils. Comm'n</i>, 21 Cal.App.5th 1197, 1202-1203 (Cal. Ct. App. 2018).</p> <p>CforAT provided input on a number of procedural matters and the Commission ultimately</p>		Noted

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
took procedural steps based on that input:		
<ul style="list-style-type: none"> <li>CforAT argued that the Commission could require that AT&amp;T Corp. serve its progress reports on the service list, and that the Commission should do so. CforAT Response to ALJ Ruling at p. 9 (July 9, 2022).</li> </ul>	The Scoping Memo ruled that "AT&T is directed to serve its Application on the Service List in proceeding R.20-02-008." Scoping Memo, p. 7.	Verified  (Note: CforAT's Response to the ALJ Ruling referenced here was dated July 9, 2021, not July 9, 2022.)
<ul style="list-style-type: none"> <li>CforAT argued that a decision in the proceeding did not have to be made by September 27, 2021. CforAT Response to ALJ Ruling at pp. 4-5 (July 9, 2022).</li> </ul>	The Commission issued D.22-08-006 on August 8, 2022.	Verified, in part.  In their Response dated July 9, 2021, CforAT questions whether a decision in this proceeding could be issued before the migration of all customers, as AT&T requested the Commission to issue a final decision in this proceeding by September 23, 2021 (in order to then complete customer migration by September 27, 2021).  D.22-08-006 only states that AT&T sought to complete the migration of its customers to Frontier by September 27, 2021. Also, in a Scoping Memo and Ruling issued on August 2, 2021, the Commission states "...there is no basis to speedily decide this proceeding."

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
		<p>CforAT's analysis partially contributed to the proceeding.</p> <p><i>See</i> CPUC comment in Part III.D [4].</p> <p>(Note: CforAT's Response to the ALJ Ruling referenced here was dated July 9, 2021, not July 9, 2022.)</p>
<ul style="list-style-type: none"> <li>CforAT requested that the Commission hold a public participation hearing to clear up customer confusion regarding the application. Joint Motion of CforAT, TURN and Cal Advocates for Public Participation Hearings at p. (Sept. 30, 2021).</li> </ul>	<p>The Commission granted the request, noting that "[i]n part, the granting of the Joint Motion for a PPH was reflective of the Commission's desire to correct this erroneous understanding of the events concerning this AT&amp;T Application and migration." D.22-08-006 at pp. 4-5, note 3; E-Mail Ruling Granting Motion and Setting Public Participation Hearing at p. 3 (Oct. 19, 2021).</p>	Verified
<ul style="list-style-type: none"> <li>CforAT, jointly with the other parties, requested admission of all submitted party testimony and evidence. Joint Motion to Admit Opening Testimony Served on September 29, 2021 and Reply Testimony Served on December 10, 2021 (Dec. 22, 2021).</li> </ul>	<p>"Regarding testimony and evidence, on December 22, 2021, parties filed a Joint Motion requesting admission of all submitted party testimony and evidence, and that Joint Motion is hereby granted." D.22-08-006 at p. 5.</p>	Verified

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

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?</b>	Yes	Verified
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Verified
<b>c. If so, provide name of other parties:</b> The Utility Reform Network (TURN)		Noted
<b>d. Intervenor's claim of non-duplication:</b>  CforAT represents the interests of telecommunications customers with disabilities, who are dependent on reliable and affordable access to telecommunications to support their ability to live independently and to participate in activities of daily living. Because of the unique interests of this customer group, it is important for their perspective to be directly represented.  While focusing on the unique interests of our constituency, CforAT also coordinated with TURN and the Public Advocates Office to work cooperatively where our interests overlapped and to avoid duplication of effort. CforAT prepared filings in conjunction with TURN and Cal Advocates when possible. Additionally, CforAT coordinated with The Utility Reform Network and Cal Advocates on procedural matters.  Overall, CforAT worked effectively to avoid duplication and to ensure that our input served to complement or supplement the input of other parties that share interests similar to our own. With our joint filings, CforAT and the other advocates coordinated internally, assigning various sections of document preparation to each organization with an eye to effectively relying on the varied experience of counsel, and then harmonizing the drafts into unified documents. This was more efficient than would have been the case for separate filings. Overall, our work was efficient and effective, and conducted reasonably in conjunction with other stakeholders and advocates, without unreasonable duplication of effort.  To the extent that CforAT took similar positions to other parties on issues, this reflects the substantial shared concerns of impacted stakeholders. In these areas of shared concern, CforAT worked to represent the perspective of our constituency of persons with disabilities. In order to effectively address these important issues on behalf of our constituency and California consumers more generally, CforAT worked diligently to act effectively to		Noted

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
	<p>prepare material that often required intensive and expedited effort. This was facilitated by the coordination among the consumer advocates. To the extent that there was any modest duplication of effort in the various filings that took place during a notably short proceeding schedule, it does not reach the level where CforAT's compensation should be reduced.</p> <p>It should be noted that the Commission not only prohibited joint filings in response to its July 1 E-Mail Ruling Requesting Additional Information of Movants Seeking Party Status and Other Additional Information of AT&amp;T, but also expressly prohibited CforAT, TURN, and Cal Advocates from even communicating about their responses. E-Mail Ruling Requesting Additional Information at p. 3. In other words, the Commission mandated that each of those organizations work individually, and made it impossible for CforAT to affirmatively coordinate or seek to avoid duplication with other parties (<i>see</i> Cal. Pub. Util. Comm'n, Intervenor Compensation Program Guide at p. 21 (April 2017), available at <a href="https://www.cpuc.ca.gov/media/cpuc-website/divisions/administrative-law-judge-division/documents/icom-materials/updated-icom-program-guide-april-2017.pdf">https://www.cpuc.ca.gov/media/cpuc-website/divisions/administrative-law-judge-division/documents/icom-materials/updated-icom-program-guide-april-2017.pdf</a> (last accessed Oct. 4, 2022)). Presumably, the Commission would not have prohibited joint filings or communications about those joint filings unless it considered each intervenor's independent analysis uniquely valuable. Accordingly, CforAT's time spent on responding to the E-Mail Ruling Requesting Additional Information was not duplicative of the work of other intervenors.</p>	

### PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>As a result of CforAT’s advocacy in this proceeding, affected customers received sufficient notice of the application and information regarding the impact of the application on their telephone service. Additionally, CforAT’s advocacy helped clear up customer confusion regarding which customers were affected. It may be difficult to quantify exactly what financial benefits consumers might receive from the Commission’s determination of this matter. However, it is safe to assume that the “savings” experienced by customers will greatly exceed CforAT’s claim.</p>	<p>Noted, but see CPUC disallowances and adjustments in Section III.D. After the adjustments and disallowances made to this claim, the remainder of the claim of cost reasonableness is verified.</p>
<p><b>b. Reasonableness of hours claimed:</b></p> <p>CforAT’s hours were reasonable given the highly technical and legally complex issues being considered in this proceeding, including the application of the Commission’s Mass Migration Guidelines. Additionally, CforAT coordinated with Cal Advocates and TURN throughout this proceeding. Each organization came into the proceeding possessing different, complementary areas of expertise, and each stuck to these areas throughout the proceeding, which reduced the risk of overlapping efforts and ensured that each person was efficient, by working on the areas of his or her expertise.</p> <p>Additionally, CforAT has recorded a number of hours in the “coordination” category. CforAT spent substantial time coordinating with Cal Advocates, and TURN. This time helped avoid duplicative work and improved efficiency among the parties.</p>	<p>Noted, but see CPUC disallowances and adjustments in Section III.D. After the adjustments and disallowances made to this claim, the remainder of the claim of cost reasonableness is verified.</p>
<p><b>c. Allocation of hours by issue:</b></p> <p style="text-align: center;"><b>2021 Time—Goodman (73 hours total)</b></p> <p><b>Procedural: 20.9 hours (29.1%)</b></p> <p>The issue area “Procedural” includes time spent on procedural issues including party status, motions, and responses to Commission requests for information.</p>	<p>Noted; but see allocation of hours totals below:</p> <p>Goodman’s 2021 Hours total 99.9%</p> <p>Goodman’s 2022 Hours total 100%</p>

	CPUC Discussion
<p><b>Guidelines: 39.3 hours (54.8%)</b></p> <p>The issue area “Guidelines” includes the applicability of the Mass Migration Guidelines and the public interest impacts of the application. The issue area “Guidelines” also includes time spent on matters that do not fall under other issue categories. CforAT provides the following estimate of the overall breakdown of time allocated to Guidelines: (1) applicability of the Mass Migration Guidelines—45%, (2) public interest impacts—55%.</p> <p><b>Coordination: 11.5 hours (16.0%)</b></p> <p>The issue area “Coordination” includes time spent conferring with other parties, coordinating joint filings, and otherwise avoiding duplication of effort.</p> <p style="text-align: center;"><b>2022 Time—Goodman (73 hours total)</b></p> <p><b>Guidelines: 2 hours (39.2%)</b></p> <p><b>Coordination: 0.2 hours (3.9%)</b></p> <p><b>PD: 2.9 hours (56.9%)</b></p> <p>The issue area “PD” includes time spent on coordinating, researching, and drafting comments on the proposed decision.</p> <p style="text-align: center;"><b>2021 Time—Kasnitz (11.4 hours total)</b></p> <p><b>Procedural: 2.7 hours (23.7%)</b></p> <p><b>General Participation: 7.7 hours (67.5%)</b></p> <p><b>Coordination: 1 hour (8.8%)</b></p>	<p>Kasnitz’s 2022 Hours total 100%</p>

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Paul Goodman	2021	71.7	\$650.00	Comment A	\$46,605	42.33 [2, 4]	\$530.00 [1]	\$22,434.90
Paul Goodman	2022	5.1	\$675.00	Comment A	\$3,442.50	3.17 [2, 4]	\$550.00 [1]	\$1,743.50
Melissa W. Kasnitz	2021	11.4	\$670.00	D.22-07-023	\$7,638	6.44 [3, 4]	\$670.00	\$4,314.80
Subtotal: \$57,685.50						Subtotal: \$28,493.20		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Paul Goodman	2021	0.8	\$325.00	Comment A	\$260	0.80	\$265.00 [1]	\$212.00
Paul Goodman	2022	9.4	\$337.50	Comment A	\$3,172.50	9.40	\$275.00 [1]	\$2,585.00
Subtotal: \$3,432.50						Subtotal: \$2,797.00		
TOTAL REQUEST: \$60,858.00						TOTAL AWARD: \$31,290.20		
<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. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR <sup>2</sup>		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Melissa W. Kasnitz		1992		162679		No		
Paul Goodman		2002		219086		No		

<sup>2</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.



**C. Attachments Documenting Specific Claim and Comments on Part III:**

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
1	Certificate of Service
Comment A	<p><b>Goodman 2021 Rate:</b> On October 22, 2021, CforAT filed an intervenor compensation claim in R.20-10-002 that included a request that the Commission adopt an hourly rate of \$650 for CforAT’s Legal Counsel, Paul Goodman, based on the Market Rate Study and guidance adopted in Resolution ALJ-393, issued on December 22, 2020. The Commission has not yet acted on that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mr. Goodman, CforAT refers the Commission to the showing presented in R.20-10-002.</p> <p><b>Goodman 2022 Rate:</b> CforAT requests that the Commission apply the annual escalation methodology adopted in Res. ALJ-393 to determine the 2022 hourly rate for Mr. Goodman. This annual escalation methodology is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group “Management, Professional, and Related excluding Incentive Paid Occupations.” (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2021 is 3.3%. See <a href="https://www.bls.gov/news.release/eci.t05.htm">https://www.bls.gov/news.release/eci.t05.htm</a>.</p>

**D. CPUC Comments, Disallowances, and Adjustments**

<b>Item</b>	<b>Reason</b>
[1] Paul Goodman (Goodman) 2021 & 2022 Hourly Rates	<p>D.23-06-048 approved the 2021 hourly rate of \$530 for Goodman.</p> <p>D.23-03-030 approved the 2022 hourly rate of \$550 for Goodman.</p>
[2] Goodman 2021 & 2022 Hours	Time records submitted for Goodman for 2021 & 2022 excessively label hours in the category of “General Participation.” Normally, the “general work” category includes work for which allocation by issue is almost impossible. Per Intervenor Compensation Program Guide at 26, “time records must not excessively label work as of a “General” issue type (general work on the proceeding). Most of the professional work on the proceeding can and must be associated with the proceeding’s substantive issues.

Item	Reason
	<p>For 2021, we note that Goodman claimed a total of 71.70 hours. 39.30 of these hours are labeled as general participation. We assess a 20% reduction on these hours, which equals 7.86. Goodman's 2021 hours now total 63.84.</p> <p>For 2022, we note that Goodman claimed a total of 5.10 hours. 2.00 of these hours are labeled as general participation. We assess a 20% reduction on these hours, which equals 0.40. Goodman's 2022 hours now total 4.70.</p>
[3] Melissa Kasnitz (Kasnitz) 2021 Hours	<p>Time records submitted for Kasnitz for 2021 excessively label hours in the category of "General Participation." Normally, the "general work" category includes work for which allocation by issue is almost impossible. Per Intervenor Compensation Program Guide at 26, "time records must not excessively label work as of a "General" issue type (general work on the proceeding). Most of the professional work on the proceeding can and must be associated with the proceeding's substantive issues.</p> <p>For 2021, we note that Kasnitz claimed a total of 11.40 hours. 7.70 of these hours are labeled as general participation. We assess a 20% reduction on these hours, which equals 1.54. Kasnitz's 2021 hours now total 9.86.</p>
[4] Failure to Make a Substantial Contribution	<p>CforAT does not meet substantial contribution standards of Section 1802(j) or Section 1802.5 regarding parts of its comments on issues related to General Participation (or "Guidelines", as noted above in section Part III.C), Procedural, Coordination, and PD (Proposed Decision), as CforAT's arguments regarding these issues were deemed to have made a substantial contribution to a Commission decision at a reduced level, as described previously.</p> <p>The Commission compensates efficient effort that contributes to the proceeding's outcomes; however, the Commission also disallows inefficient participation that is not contributory to the underlying issues. In their time records, CforAT claims a total of 49.00 hours associated with "General Participation". We deduct 30% from these hours for failure to substantially contribute to Decision 22-08-006, which equals 14.70 hours.</p> <p>The following hours are deducted accordingly for each individual below:</p>

Item	Reason
	<p>Paul Goodman = 39.30 hours claimed regarding General Participation issue, 30% of these hours disallowed equals 11.79 hours. With the disallowances noted here and above in item [2], Goodman's 2021 hours now total 52.05.</p> <p>For 2022, Goodman = 2.00 hours claimed regarding General Participation issue, 30% of these hours disallowed equals 0.60 hours. With the disallowances noted here and above in item [2], Goodman's 2022 hours now total 4.10.</p> <p>Melissa Kasnitz = 7.70 hours claimed regarding General Participation issue, 30% of these hours disallowed equals 2.31 hours. With the disallowances noted here and above in item [3], Kasnitz's 2021 hours now total 7.55.</p> <p>CforAT claims a total of 23.60 hours associated with "Procedural". We deduct 30% from these hours for failure to uniquely contribute to Decision 22-08-006, which equals 7.08 hours.</p> <p>The following hours are deducted accordingly for each individual below:</p> <p>Paul Goodman = 20.90 hours claimed regarding Procedural issue, 30% of these hours disallowed equals 6.27 hours. With the disallowances noted here and above in item [2], Goodman' 2021 hours now total 45.78.</p> <p>Melissa Kasnitz = 2.70 hours claimed regarding Procedural issue, 30% of these hours disallowed equals 0.81 hours. With the disallowances noted here and above in item [3], Kasnitz's 2021 hours now total 6.74.</p> <p>CforAT claims a total of 12.70 hours associated with "Coordination". We deduct 30% from these hours for failure to uniquely contribute to Decision 22-08-006, which equals 3.81 hours.</p> <p>The following hours are deducted accordingly for each individual below:</p> <p>Paul Goodman = 11.50 hours claimed regarding Coordination issue, 30% of these hours disallowed equals 3.45 hours. With the disallowances noted here and above in item [2], Goodman' 2021 hours now total 42.33.</p>

Item	Reason
	<p>For 2022, Goodman = 0.20 hours claimed regarding Coordination issue, 30% of these hours disallowed equals 0.06 hours. With the disallowances noted here and above in item [2], Goodman's 2022 hours now total 4.04.</p> <p>Melissa Kasnitz = 1.00 hours claimed regarding Coordination issue, 30% of these hours disallowed equals 0.30 hours. With the disallowances noted here and above in item [3], Kasnitz's 2021 hours now total 6.44.</p> <p>CforAT claims a total of 2.90 hours associated with "PD (Proposed Decision)". We deduct 30% from these hours for failure to uniquely contribute to Decision 22-08-006, which equals 0.87 hours.</p> <p>The following hours are deducted accordingly for each individual below:</p> <p>Paul Goodman = 2.90 hours claimed regarding PD (Proposed Decision) issue, 30% of these hours disallowed equals 0.87 hours. With the disallowances noted here and above in item [2], Goodman' 2022 hours now total 3.17.</p>

#### **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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	Yes
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If so:

Party	Reason for Opposition	CPUC Discussion
AT&T Corporation (AT&T)	<p>AT&amp;T claims that CforAT's Compensation Claim did not substantially contribute to D.22-08-006, and in turn, the Commission should deny CforAT's claim for intervenor compensation.</p> <p>AT&amp;T states that previously adopted Mass Migration</p>	Pursuant to Section 1801.3(d), the Commission must determine that the intervenor's presentation and participation constituted a "substantial contribution" to the proceeding. This term is defined in Section 1802(j) to mean that in the judgement of the Commission, the presentation substantially assisted the Commission in making its decision because the decision

Party	Reason for Opposition	CPUC Discussion
	<p>Guidelines provide step-by-step directions for migration which AT&amp;T followed with the Commission's approval, with no additional input needed from CforAT or any other Intervenor. AT&amp;T also argues that CforAT and other Intervenors recommended a series of additional modifications be made to the Mass Migration Guidelines, in which the Commission determined were unsupported arguments and measures that were not required to meet the public interest.</p> <p>AT&amp;T also argues that CforAT's claimed contributions to the issue areas of General, Contributions to Informed Judgement, and Procedural Contributions lack specificity and are not supported by the record. Additionally, AT&amp;T asserts that CforAT's allocation of hours by issue are not supported by the record and lacked contribution. AT&amp;T also states that hours claimed by CforAT for working on matters relating to the Proposed Decision should be denied, as "the Decision acknowledges that only one party submitted substantive comments on the proposed decision. CforAT was not that party."</p>	<p>adopted in whole or in part one or more factual, legal, or policy contentions advanced by the intervenor.</p> <p>The Legislature has further provided that the Commission is to avoid awarding fees for unproductive, unnecessary, or duplicative presentations of interests that are adequately represented. Intervenors must demonstrate that participation is "productive, necessary, and needed for a fair determination of the proceeding". (Section 1801.3(f) and D.98-04-059 at 31-33.) On the other hand, fees may be awarded for participation that "materially supplements, complements, or contributes to the presentation of another party," if the intervenor's participation makes a substantial contribution to the decision. (Section 1802.5.)</p> <p>AT&amp;T's argument that CforAT did not substantially contribute to the issue areas of "General (also noted as the issue area 'Guidelines' by CforAT)", "Contributions", "Procedural Contributions", and "Proposed Decision" in this proceeding are not supported by the CPUC Discussion in Part II.A, however, for the reasons noted above reductions to the amount requested by CforAT have been made.</p> <p>Given the totality of the circumstances described above, we find the reduction of 30% to the hours claimed to the issue areas noted above assessed to CforAT, (assessed in Part III.D, item [4]) to be reasonable, as compared to the value CforAT brought to this proceeding.</p>

Party	Reason for Opposition	CPUC Discussion
Center for Accessible Technology (CforAT)	<p>CforAT asserts that the Commission should broadly reject AT&amp;T's arguments that request the Commission to oppose any award of compensation to CforAT due to AT&amp;T's arguments relying on an "incorrect legal standard."</p> <p>CforAT argues that although the Commission did not adopt all their arguments in this proceeding, their contribution enriched the record and allowed a more complete understanding of issues addressed by the Commission. CforAT states not awarding intervenor compensation solely on the basis of rejecting Intervenor's arguments is the "an improper legal standard", noted above.</p> <p>CforAT also disagrees with AT&amp;T that they provided information in this proceeding that are misleading, and have operated within the Commission's Rules of Practice and Procedure. CforAT cites a September 1, 2021 Status Conference, quoting the ALJ in that conference stating that "The intervenors argue that AT&amp;T's migration is not, ministerial, but broader. And I think the point is well taken. The application is not</p>	<p>Pursuant to Section 1801.3(d), the Commission must determine that the intervenor's presentation and participation constituted a "substantial contribution" to the proceeding. This term is defined in Section 1802(j) to mean that in the judgement of the Commission, the presentation substantially assisted the Commission in making its decision because the decision adopted in whole or in part one or more factual, legal, or policy contentions advanced by the intervenor.</p> <p>The Legislature has further provided that the Commission is to avoid awarding fees for unproductive, unnecessary, or duplicative presentations of interests that are adequately represented. Intervenors must demonstrate that participation is "productive, necessary, and needed for a fair determination of the proceeding". (Section 1801.3(f) and D.98-04-059 at 31-33.) On the other hand, fees may be awarded for participation that "materially supplements, complements, or contributes to the presentation of another party," if the intervenor's participation makes a substantial contribution to the decision. (Section 1802.5).</p> <p>For the reasons discussed above, this decision finds that while CforAT did substantially contribute to the overall decision, CforAT's contribution to the proceeding warrants a 30% reduction in the areas discussed above.. We do acknowledge that CforAT did contribute to parts of the "General (also noted as the issue area 'Guidelines' by CforAT)", "Contributions", "Procedural Contributions", and "Proposed Decision" issues</p>

Party	Reason for Opposition	CPUC Discussion
	<p>purely ministerial.” CforAT references this quote as the basis for asserting that additional consumer protections might be justified or requested in this proceeding.</p> <p>CforAT concludes that their contributions to this proceeding allowed the Commission to consider a full range of position and to make a more informed judgement. CforAT claims their procedural contributions assisted in developing the record and proceeding, and that the Commission should reject AT&amp;T’s arguments.</p>	<p>The burden of demonstrating substantial contribution and avoiding duplication is the responsibility of the intervenor. On the issues noted above, CforAT did provide distinctive analyses that enriched the final decision or other representatives’ contributions to the final decision. A mere fact of appearance on behalf of certain interests does not entitle an intervenor to full compensation. Here CforAT has made a substantial contribution that warrants payment as discussed above.</p> <p>Given the totality of the circumstances described above, we find the reduction of 30% to the hours claimed to the issue areas noted above, (assessed in Part III.D, item [4]) to be reasonable, as compared to the value CforAT brought to this proceeding.</p>

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	No
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If not:

Party	Comment	CPUC Discussion
AT&T Corporation (AT&T)	<p>AT&amp;T filed Opening Comments to both the Proposed Decision and Alternate Proposed Decision granting compensation to CforAT for substantial contribution to Decision (D.) 22-08-006. AT&amp;T argues that the Commission should deny CforAT’s claim for intervenor compensation in its entirety because CforAT did not substantially contribute to D.22-08-006.</p> <p>AT&amp;T argues their Application is governed by the Commission’s (Mass Migration) Guidelines and conformance with the Guidelines was the central issue in this proceeding, and the Commission delegated Commission Staff (Commission Telecommunications</p>	<p>The Commission disagrees with AT&amp;T and concludes that CforAT provided support and analysis that substantially contributed to the proceeding’s outcome for the reason discussed</p>

	<p>Division staff) the responsibility to oversee adherence of these Guidelines. AT&amp;T states their Application involved migrating AT&amp;T residential service customers to Frontier California, and the steps taken to ensure this migration were approved by Commission Staff and complied with all requirements set forth by the Commission and the Guidelines.</p> <p>AT&amp;T cites language in the Proposed Decision and Alternate Proposed Decision, which states CforAT did not “provide any analysis here that contributed to the proceeding’s outcome” and “did not provide distinctive analyses that enriched the final decision or other representatives’ contributions to the final decision.” AT&amp;T further claims that CforAT should be denied compensation due to legal standards, as the California Public Utilities Code states the Commission must “avoid awarding fees for unproductive, unnecessary, or duplicative presentations of interests that are adequately represented or participation that is not necessary for a fair determination of the proceeding.” AT&amp;T argues that the Commission errors in providing CforAT compensation, and without justification, the Alternate Proposed Decision only disallows 30% instead of the 60% disallowed by the Proposed Decision.</p> <p>AT&amp;T states CforAT’s claimed contributions to the three categories of: General, Contributions to Informed Judgement, and Procedural Matters (AT&amp;T cites this category as Procedural Matters and as Procedural Contributions in their comments) should be fully denied. Regarding the General category, AT&amp;T states the Commission should decline to award any intervenor compensation for this category because AT&amp;T complied with the Guidelines as reasonably necessary for this proceeding and did not have to comply with any additional demands to these Guidelines, and that both the Proposed Decision and Alternate Proposed Decision find that CforAT does not provide any analysis here that substantially contributed to the proceeding’s outcome.</p> <p>AT&amp;T claims that CforAT’s arguments for recommendations in the Contributions to Informed</p>	<p>in Part II, section A above. Given the totality of the circumstances described above, we find the reductions made to be reasonable, as compared to the value CforAT brought to this proceeding.</p>
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	<p>Judgement category are beyond the Guidelines and should not be compensated. AT&amp;T argues CforAT's recommendations here were an improper attempt to add requirements to the Guidelines, which the Commission ultimately determined that they were not warranted. AT&amp;T further states CforAT's filed response to the July 1 ALJ Ruling provided no substantial contribution, citing both the Proposed Decision and Alternate Proposed Decision, which state, "CforAT does not provide any analysis here."</p> <p>AT&amp;T also disagrees with CforAT's contribution to the Third Customer Notice. AT&amp;T states that the Guidelines do not require a Third Customer Notice, as the Guidelines delegate authority onto Commission Staff to review and approve the customer notices. AT&amp;T states CforAT failed to follow the ruling to propose any redline alternatives to the Third Customer Notice letter in its opening comments, and when given a second opportunity, CforAT and other intervenors proposed redline edits which attempted to add new requirements to the Guidelines. AT&amp;T states Commission Staff ultimately rejected CforAT's proposals and approved AT&amp;T's draft Third Customer Notice with minor modifications.</p> <p>In challenging AT&amp;T's contributions to the Procedural Matters (Contributions) category, AT&amp;T discusses filings submitted by CforAT regarding: Progress Reports, Schedule, Consumer Advocates Motion for Public Participation Hearings, and Joint Motion to Admit Testimony. Regarding Progress Reports, AT&amp;T states both the Proposed Decision and Alternate Proposed Decision erroneously award intervenor contribution to CforAT. AT&amp;T argues that the Guidelines require an exiting Competitive Local Exchange Carrier (CLEC) to provide Commission Staff and the Arranged Carrier with progress reports, as Commission Staff must oversee and approve the steps to migrate customers to the Arranged Carrier. AT&amp;T argues that the Guidelines do not require an exiting CLEC to serve the progress reports on the service list or file the progress reports in a proceeding. AT&amp;T also disagrees with CforAT's arguments regarding Schedule. AT&amp;T states both the Proposed Decision and Alternate Proposed Decision find that "CforAT's analysis here does little to</p>	
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	<p>contribute to the proceeding”, that AT&amp;T did not request an expedited or consolidated schedule at any point during this proceeding, and that the timeline in AT&amp;T Application and Exit Plan were based on the timeline and milestones required by the Guidelines.</p> <p>Regarding Consumer Advocates Motion for Public Participation Hearings, AT&amp;T disagrees with the Proposed Decision and Alternate Proposed Decision’s finding that this category was verified. AT&amp;T states parties made the unsupported statement that there was significant customer confusion and therefore, Public Participation Hearings were necessary. AT&amp;T argues that no party presented any evidence that eighteen e-mails and letters (from the public expressing concern with this Application) were received, that this fact is not included in the record, and cannot be relied upon for compensation. AT&amp;T claims CforAT presented no evidence that the written comments in the Public Comments tab (in this proceedings docket card) were written by affected AT&amp;T customers. AT&amp;T states CforAT could have compared cities and zip codes provided in the Public Comments to “reveal” that city and zip code combinations show that none of the written comments are from AT&amp;T residential service customers affected by this Application. AT&amp;T also states that none of the four public comments received by callers at the Public Participation Hearing were of customers who would be impacted by AT&amp;T’s Application. Touching on Joint Motion to Admit Testimony, AT&amp;T states that while CforAT reviewed the two-page motion, AT&amp;T drafted the motion with minimal party input. AT&amp;T states CforAT did not demonstrate how it substantially contributed or that its participation was necessary here.</p> <p>AT&amp;T argues that a Proposed Decision or Alternate Proposed Decision regarding this Application has been delayed. AT&amp;T states that Public Utilities Code §1804(e) requires the Commission to issue a decision that determines whether or not the intervenor has made a substantial contribution to the final order or decision in the hearing or proceeding within 75 days after the filing of a request for compensation. AT&amp;T states there is no justification provided by the Commission as to why there</p>	
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	<p>has been a year and half delay in issuing its Proposed Decision, as CforAT filed its request for compensation on October 6, 2022. AT&amp;T argues that CforAT is not entitled to any intervenor compensation, and any (potential) award should not include compound interest.</p> <p>Lastly, AT&amp;T argues that CforAT's participation in this proceeding was unproductive and unnecessary. AT&amp;T states (D.) 22-08-006 supports this conclusion by repeatedly rejecting CforAT's proposals. AT&amp;T states CforAT should not be rewarded for merely "participating" and that the Commission should deny CforAT's intervenor compensation claim in its entirety.</p>	
Center for Accessible Technology (CforAT)	<p>CforAT filed Reply Comments to both the Proposed Decision and Alternate Proposed Decision granting compensation to CforAT for substantial contribution to Decision (D.) 22-08-006. CforAT states the Commission should reject AT&amp;T's arguments and approve the Alternate Proposed Decision.</p> <p>CforAT states that AT&amp;T repeats the same arguments made in AT&amp;T's comments filed on CforAT's original compensation claim. CforAT argues that AT&amp;T falsely claims that in both the Proposed Decision and Alternate Proposed Decision, CforAT did not, "provide any analysis here that contributed to the proceeding's outcome." CforAT states that AT&amp;T fails to acknowledge that both the Proposed Decision and Alternate Proposed Decision verify some of CforAT's substantial contribution claims, and additionally note that, "CforAT did substantially contribute to the overall decision." CforAT states that AT&amp;T's comments identify no errors and per Rule 14.3, are not appropriate for consideration, as AT&amp;T's Opening Comments ineffectively identified factual, legal or technical errors.</p> <p>CforAT states that the Commission's thoughtful stewardship of the Intervenor Compensation fund is appreciated, however, CforAT believes the Proposed Decision does not accurately reflect CforAT's contribution to this proceeding. CforAT concludes that the Alternate</p>	<p>The Commission agrees that CforAT substantially contributed to the proceeding's outcome for the reason discussed in Part II, section A above. Given the totality of the circumstances described above, we find the reductions to be reasonable, as compared to the value CforAT brought to this proceeding.</p>

	Proposed Decision more accurately reflects CforAT's contribution, and requests the Commission to approve the Alternate Proposed Decision.	
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### **FINDINGS OF FACT**

1. Center for Accessible Technology has made a substantial contribution to D.22-08-006.
2. The requested hourly rates for Center for Accessible Technology's representatives 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 \$31,290.20.

### **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

### **ORDER**

1. Center for Accessible Technology is awarded \$31,290.20.
2. Within 30 days of the effective date of this decision, AT&T Corporation shall pay Center for Accessible Technology the total award. 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 December 20, 2022, the 75<sup>th</sup> day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.

This decision is effective today.

Dated August 1, 2024, at San Francisco, California.

ALICE REYNOLDS  
President  
DARCIE L. HOUCK  
JOHN REYNOLDS  
KAREN DOUGLAS  
Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>	D2408021	<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D2208006		
<b>Proceeding(s):</b>	A2105007		
<b>Author:</b>	ALJ Jungreis		
<b>Payer(s):</b>	AT&T Corporation		

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/ Disallowance</b>
Center for Accessible Technology	October 6, 2022	\$60,858.00	\$31,290.20	N/A	Excessive general participation hours, failure to make substantial contribution

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Melissa	Kasnitz	Attorney	670	2021	\$670.00
Paul	Goodman	Attorney	650	2021	\$530.00
Paul	Goodman	Attorney	675	2022	\$550.00

**(END OF APPENDIX)**