

Decision 09-07-016 July 9, 2009

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Address the Needs of Telecommunications Customers Who Have Limited English Proficiency.	Rulemaking 07-01-021 (Filed January 11, 2007)
-------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------

**DECISION GRANTING REQUEST OF THE UTILITY REFORM NETWORK FOR
INTERVENOR COMPENSATION FOR SUBSTANTIAL CONTRIBUTIONS TO
DECISION (D.) 07-07-043 AND D.08-10-016**

Claimant: The Utility Reform Network	For contribution to D.07-07-043, D.08-10-016
Claimed (\$): \$79,104.15	Awarded (\$): \$79,104.15
Assigned Commissioner: Peevey	Assigned ALJ: Richard Smith

PART I: PROCEDURAL ISSUES

- A. Brief Description of Decision:** D.07-07-043 (the Phase 1 Decision) found that current carrier marketing and customer service practices were not adequate to serve customers with limited English proficiency (LEP). The Commission adopted a set of disclosure rules applicable to carriers who market services “in-language.” The Phase 1 Decision also deferred issues related to complaint tracking, fraud education and market trials to a Phase 2 of the docket. D.08-10-016 (the Phase 2 Decision) set rules for carriers conducting in-language market trials, in addition to ordering an LEP customer satisfaction survey, public disclosure of carrier-specific CAB complaints, the return of the Resolution Complaint Forum and compliance reports from carriers who trigger the Phase 1 LEP Rules.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (§ 1804(a)):		
1. Date of Prehearing Conference:	N/A	Yes (no Prehearing Conference held).
2. Other Specified Date for NOI:	See Note	
3. Date NOI Filed:	March 22, 2007 November 14, 2007	Yes (Phase 1 NOI; Phase 2 NOI).
4. Was the notice of intent timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.07-01-021	Yes
6. Date of ALJ ruling:	December 28, 2007	Yes
7. Based on another CPUC determination (specify):	N/A	Yes
8. Has the claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	I.06-06-014	Yes
10. Date of ALJ ruling:	November 15, 2006	Yes
11. Based on another CPUC determination (specify):	N/A	
12. Has the claimant demonstrated significant financial hardship?		Yes, based on the rebuttable presumption [of significant financial hardship] created by November 15, 2006 Ruling in I.06-06-014.

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.07-07-043 D.08-10-016	Yes. Phase 1: D.07-07-043; Phase 2: D.08-10-016.
14. Date of Issuance of Final Decision:	August 01, 2007 October 06, 2008	Yes. Phase 1 and Phase 2 decisions, respectively.
15. File date of compensation request:	November 26, 2008	Yes
16. Was the request for compensation timely?		Yes

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

#	Claimant	CPUC	Comment
2	TURN		There was no prehearing conference in this docket and, in Phase 1, the ALJ did not specify any date for filing of NOIs. Parties filed their NOIs approximately 30 days from the filing of the first round of substantive pleadings. In his Phase 2 scoping memo, the assigned Commissioner set November 14, 2007 as the date for the filing of NOIs. Although TURN's eligibility from Phase 1 would have applied for Phase 2, in light of the new compensation rules and in an abundance of caution, TURN filed a supplemental NOI on November 14, 2007. On December 28, 2007 ALJ Smith issued a Ruling finding all intervenors, including TURN, eligible to claim compensation for both Phase 1 and Phase 2 of the docket.
15		CPUC	On May 1, 2009, TURN filed its amended request for compensation that included copies of the receipts for TURN's direct expenses related to the travel.
16	TURN		TURN did not file a Request for Compensation for D.07-07-043. As explained in its Supplemental Notice of Intent, D.07-07-043 clearly contemplated a second phase of this docket. TURN knew that it would be involved in Phase 2. Therefore, consistent with the Commission's long-standing practice of awarding compensation for work in multiple phases in response to a single compensation request, TURN is filing its Request for Compensation together for both Decisions in the proceeding.

PART II: SUBSTANTIAL CONTRIBUTION**A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059)**

Contribution	Citation to Decision or Record ¹	Showing Accepted by CPUC
<p>1. The OIR requested comment on the need for LEP Rules generally and specifically asked whether existing statutes protect LEP customers. TURN argued that existing statutes do not protect LEP customers, pointing to the Staff Report finding current abuses of LEP customers. The carriers argued that additional regulations were not necessary. The Phase 1 Decision cites to TURN’s discussion on this point and determines that existing statutes did not offer adequate protection.</p>	<p>TURN Opening Comments on OIR, filed February 16, 2007, pp. <u>8-9</u>. D.07-07-043 at p. 30.</p>	<p>Yes</p>
<p>2. During the proceeding, TURN and other consumer groups advocated for carriers to provide in-language, live, customer support. The Proposed Decision did not contain this requirement. In comments on the PD, TURN once again pushed for in-language, live, customer support. The Final Decision cites specifically to TURN’s comments and was revised to order carriers to provide in language customer support, “our review of the comments on the PD convince us that efficient, timely customer support requires person-to-person communication.”</p>	<p>D.07-07-043 at p. 78; TURN Opening Comments on the Proposed Decision, filed, July 5, 2007 at pp.7-8.</p>	<p>Yes</p>
<p>3. TURN and other consumer groups discussed problems with third party agents and urged the Commission to address the business practices of these entities. The Decision cites to TURN’s arguments, “TURN and Greenlining recommend third-party agents be required to comply with the same rules as may be established for carriers,” and then determines that, “Therefore, to the extent this Decision imposes in-language requirements on carriers, their agents must comply with those requirements and both the carrier and the agent may be held liable for non-compliance. Similarly, where this Decision provides that in-language representations must be consistent with the terms and conditions of applicable tariffs or contracts, this provision applies to in-language representations</p>	<p>D.07-07-043 at pp. <u>102 and 105</u>; TURN Opening Comments on OIR, filed February 16, 2007, pp. <u>12-13</u></p>	<p>Yes</p>

¹ Minor additions to TURN’s information are highlighted and underlined.

<p>made by agents of carriers.”</p>		
<p>4. TURN advocated for the extension of LEP Rules to small business customers, arguing that small businesses are owned and operated by LEP customers and should be protected. All of the carriers strongly opposed this proposal. The Decision contains a discussion of TURN’s argument and the record on the need for protection of LEP small businesses. Despite the carriers’ strong opposition, the Commission did not dismiss the possibility of protecting small business out of hand. But the Decision notes that, “Except for TURN’s Reply Comments, the record contains little information on the need for in-language rules to protect wholesale customers or small businesses.” The Commission ultimately determined that the record is insufficient to address this issue and declined to apply the LEP protections to small business.</p>	<p>D.07-07-043 at pp.49-51; TURN Reply Comments on the OIR, filed March 2, 2007 at pp. 13-14.</p>	<p>Yes</p>
<p>5. A central issue was whether carriers should be required to track and report LEP complaints and the language preference of their customers. TURN advocated for this requirement, while the carriers opposed it. The Phase 1 PD contained complaint tracking requirements. The Final Decision contains a lengthy discussion of the need to gather information on carrier complaints and specifically notes TURN’s support of the PD’s complaint tracking requirements. Although the Final Decision maintains the strong language supporting complaint tracking and rejecting the carriers’ cost arguments (which TURN also urged) the Commission determined that it needs more information to impose a complaint tracking requirement and defers this issue to a second phase stating, “Carriers have not provided substantiated cost data supporting their contentions that LEP consumer complaint and language preference tracking is too costly. However, in order to yield useful information, several critical issues must be resolved before requiring carriers to track LEP consumer complaint and language preference tracking.”</p>	<p>D.07-07-043 at p. 95; TURN Opening Comments on OIR, filed February 16, 2007, p. 13; TURN Reply Comments on the OIR, filed March 2, 2007 at pp. 3-5; TURN Opening Comments on the Proposed Decision, filed, July 5, 2007 at pp.12-13.</p>	<p>Yes</p>
<p>6. TURN and the other consumer advocates opposed the PD’s menu approach to offering information to LEP customers. One point of opposition was that the menu allowed carriers to satisfy the disclosure obligations solely by relying on website disclosures. TURN’s Opening Comments on the PD states, “If the</p>	<p>D.07-07-043 at p. 79; TURN Opening Comments on the Proposed Decision, filed, July 5, 2007 at p.7.</p>	<p>Yes</p>

<p>Commission does not adopt TURN’s proposed revision to require carriers to employ all outreach methods listed in Appendix C, then at a minimum this website-only loophole must be closed before the decision is adopted.” The Final Decision, which notes TURN’s position, revises the menu approach to allow a website disclosure method to only satisfy one of the two required menu options.</p>		
<p>7. The Scope of Phase 2 requested comment on whether the carriers should receive an exemption of the LEP Rule requirements if they were conducting limited in-language market trials. The carriers all advocated that they should not be subject to the Rules during a market trial. The consumer advocates argued for continuing application of the Rules, but each intervenor filed slightly different proposals. The Decision determines that rules are required for market trials, citing to TURN’s comments in several places. The market trial rules reflect TURN’s proposal in several ways: limit market trials to six months, not allow a new market trial in the same area within two years, provide in-language customer service, require certain disclosures to market trial participants via web and phone, and notice when market trial ends, no need for approval of market trials, no need to geographically limit market trials, and no detailed reporting on results of the market trial.</p>	<p>D.08-10-016 at pp. 30-31, 37-38, 41, 46-47, 61-62; Reply Comments of TURN on Market Trial Issues, Filed November 1, 2007 at pp.4-10</p>	<p>Yes</p>
<p>8. The Scoping Memo also asked for comment on whether carriers should be required to track and report complaints by LEP customers. TURN participated heavily in the tracking workshop, filed extensive comments and worked closely with other consumer groups on this issue. During the proceeding Commissioner Chong requested that parties attempt to negotiate to reach a settlement on several issues, including complaint tracking, and made a call directly to TURN to request their participation. As a result of discussions with the carriers, TURN along with other consumer groups filed a proposal with a revised complaint tracking position, including the request that the Commission administer a customer survey paid for by the carriers in addition to tracking. Although the carriers initially were receptive to the idea of a survey, they opposed the survey as proposed by the Joint Consumers. The Final Decision rejects the suggestion that carriers be required to track and report complaints,</p>	<p>D.08-10-016, pp. 129-132, 136; Phase II-B Comments of Joint Consumers Opening Comments, filed January 7, 2008 at p. 29; Phase II-B Reply Comments, filed January 22, 2008 at p. 26; Phase II-B Proposal of Joint Consumer Groups, filed April 2, 2008 at p. 5.</p>	<p>Yes</p>

<p>but orders the Communications Division to conduct a survey that will be paid for by the carriers. The Final Decision states, “A consumer satisfaction survey of in-language communities like that proposed by CDT-Joint Consumer Groups will help the Commission better understand how LEP customers are treated by carriers and to identify the concerns of LEP consumers who may not file complaints.”</p>		
<p>9. The carriers opposing the complaint tracking requirement argued that such a requirement was unnecessary because the Commission had its own complaint tracking database. TURN argued that the Commission’s CIMS database, from the Consumer Affairs Branch, was insufficient because it did not capture a significant number of customer complaints. However, the Joint Consumers did suggest that the CIMS database would be much more useful if the data was made public and disaggregated to show carrier-specific complaint numbers. The Final Decision agrees, “We believe that carrier-specific information about the number of LEP consumer contacts with CAB will assist LEP consumers make more informed choices.”</p>	<p>D.08-10-016 at p.153; Phase II-B Proposal of Joint Consumer Groups, filed April 2, 2008 at p. 9.</p>	<p>Yes</p>
<p>The Phase 2 Scoping Memo requested comments on a number of issues deferred from Phase 1. Not only did the Scoping Memo raise general topics such as market trials, complaint tracking and fraud education, but it included a detailed list of very specific questions for each general issue area. TURN, as part of the Joint Consumer Group, addressed each question raised in the Scoping Memo. As discussed above, the Commission adopted several of the Joint Consumer Group’s recommendations and in other instances took a compromise position between that of the carries and the consumer groups. However, on other issues, such as the need for additional consumer education by the carriers, the Final Decision discussed the Joint Consumers’ positions but chose not to adopt them. In a quasi-legislative proceeding, where the Commission requests input on several interrelated policy issues even where the Commission ultimately decides not to address the topic in the final decision, or addresses a topic in a manner different than recommended by the intervenor, the Commission may still find that the intervenor’s efforts made a substantial contribution to its decision. Where, as here, the intervenor presented</p>		<p>Yes</p>

<p>cogent analysis that presented its constituents view on such matters, the Commission can and should recognize that the effort assisted the decision-making process, even if the effort did not result in a favorable decision (from the intervenor’s perspective). As the Commission has recognized previously, “Even where the Commission does not adopt any of the customer’s recommendations, compensation may be awarded if, in the judgment of the Commission, the customer’s participation substantially contributed to the decision or order. For example, if a customer provided a unique perspective that enriched the Commission’s deliberations and the record, the Commission could find that the customer made a substantial contribution.” (D.04-12-054, R.00-02-004)</p>		
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

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

	Claimant	CPUC Verified
<p>a. Was DRA a party to the proceeding? (Y/N)</p>	Y	Yes
<p>b. Were there other parties to the proceeding? (Y/N)</p>	Y	Yes
<p>c. If so, provide name of other parties: Several wireline and wireless carriers, the Consumer Federation of California, the Greenlining Institute, and the Latino Issues Forum.</p>		Yes
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>TURN coordinated very closely with DRA and the other intervenors during both Phases of the proceeding. During Phase 1, the intervenors each filed separate sets of comments but coordinated on prioritization of issues and strategy. Parties supported each other in reply and in some cases revised positions on main issues to create a coordinated response to opposing parties. In addition, as the time entries reflect, TURN did not heavily participate in negotiations with the carriers on the Phase 1 LEP Rule proposals. In order to avoid duplication, TURN relied on the other consumer groups to take the lead and instead monitored and discussed with other consumer groups off-line. The opportunities for coordination were slightly limited, though, because the intervenors also had slightly different positions on smaller issues and strategy. This demonstrates that each intervenor added to the record with its own information and strategy. For example, TURN and LIF differed in Phase 1 on some of the carrier reporting requirements necessary to protect LEP customers. This issue was ultimately deferred to Phase 2.</p> <p>In Phase 2 the coordination became more formal and efficient. Except for comments on market trial rules where the intervenors had varying proposals (Consumer Federation for example argued no exemption from any of the Rules for market trials), most of the Phase 2 filings were made jointly among of the consumer groups. Greenlining did not heavily participate in most of Phase 2. Latino Issues Forum and Consumer Federation of</p>		Yes

<p>California filed separately at times to emphasize a more stringent or extreme position on complaint tracking or fraud reporting.</p> <p>TURN’s work with the other intervenors allowed TURN’s advocates to be very effective and efficient. TURN shared the work load of drafting and filing several sets of pleadings and proposals, in addition to coordinating efforts for the discussions with carriers in Phase 2. As a result, TURN’s hours are extremely reasonable considering the large and successful presence TURN and the other intervenors had in this proceeding.</p>	
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

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

#	Claimant	CPUC	Comment

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

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

Concise explanation as to how the cost of claimant’s participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
<p>This rulemaking is similar to previous proceedings (such as the Telecommunications Bill of Rights proceeding, R.00-02-004) where the overall benefits are difficult to quantify, yet the Commission should not hesitate to conclude that they exceed the aggregate amount of all intervenor compensation by a wide margin. (D.04-12-054 (issued in R.00-02-004), pp. 23-25; D.06-11-009 (issued in R.00-02-004), pp. 31-32.) As in those proceedings, the Commission should find TURN’s costs bore a reasonable relationship to the realized benefits, even though it is difficult to assign a dollar value to those benefits.</p> <p>As discussed above, TURN’s work in the Joint Consumer’s coalition allowed its advocates to be extremely effective, resulting in a reasonable number of hours considering the significant substantial contribution made to the two decisions in this docket. Although the Final Decision did not adopt all of the consumer groups’ proposals, the benefits for Limited English Proficient Californians from the Final Decision are very tangible. The entire set of LEP Rules requiring carriers to provide disclosure material in-language through a variety of methods and to provide in-language customer service will go a long way to preventing fraud against LEP customers, thereby saving significant expense to both the customer and the carrier. Further, the Commission’s decision to further investigate LEP customer satisfaction, to make CAB complaint data public, to protect LEP customers in market trials and other customer “wins” in this docket will also help prevent fraud and allow LEP customers to make informed choices for their telecommunications services also saving money and enhancing customer welfare.</p>	<p>Yes</p>

B. Specific Claim:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Christine Mailloux	2007	96.95	\$ 360	D.08-04-037, p.16	\$34,902	2007	96.95	\$360	\$34,902
Christine Mailloux	2008	91.40	\$390	D.08-04-010; principles; 3% COLA plus 5% "step increase" applied to 2007 authorized rate of \$360, rounded to the nearest \$5	\$35,646	2008	91.40	\$390 ²	\$35,646
Bob Finkelstein	2007	4.25	\$435	D.07-12-026, p. 24	\$ 1,848.75	2007	4.25	\$435	\$ 1,848.75
Bob Finkelstein	2008	2.0	\$470	D.08-08-027, p. 5.	\$ 940	2008	2.0	\$470	\$ 940.0
Subtotal:					\$73,336.75	Subtotal: \$73,336.75			
EXPERT FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
[Expert 1]									
Subtotal:						Subtotal:			
OTHER FEES ³									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Christine Mailloux	2007	4.5	\$360	D.08-04-037, p.16, reduced time entry by 50% for travel time	\$ 1,620	2007	9.00	\$180	\$1,620
Subtotal:					\$ 1,620	Subtotal: \$1,620⁴			

² Christine Mailloux's 2008 hourly rate has been approved in D.09-04-029.

³ The awarded travel hours and costs are based on the actual travel time as shown in TURN's timesheet and Mailloux professional hourly rate reduced by 50%, rather than on the 50% reduced travel time at the full hourly rate indicated in TURN's claim.

⁴ The Commission finds that Christine Mailloux's travel is properly identified by TURN as non-routine and approves the travel costs and direct expenses.

INTERVENOR COMPENSATION CLAIM PREPARATION **										
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$	
Christine Mailloux	2007	3.5	\$180	D.08-04-037, p.16, reduced by 50%	\$ 630	2007	3.5	\$180	\$ 630	
Christine Mailloux	2008	12.0	\$195	D.08-04-010; principles; 3% COLA plus 5% "step increase" applied to 2007 authorized rate of \$360, rounded to the nearest \$5 and reduced 50%	\$2,340	2008	12.0	\$195	\$2,340	
Bob Finkelstein	2007	.25	\$215	D.07-12-026, p. 24, reduced by 50%	\$ 53.75	2007	0.25	\$215	\$ 53.75	
Bob Finkelstein	2008	1.75	\$235	D.08-08-027, p. 5, reduced by 50%	\$ 411.25	2008	1.75	\$235	\$ 411.25	
Subtotal:					\$3,435	Subtotal: \$3,435				
COSTS										
#	Item	Detail			Amount	Amount				
	Copies	Various Pleadings			\$ 60.00	Copies			\$ 60.00	
	Phone	Conference Calls			\$ 179.25	Phone			\$ 179.25	
	Attorney Travel	Hotel			\$ 112.86	Attorney Travel			\$ 112.86	
	Attorney Travel	Meals			\$ 22.79	Attorney Travel			\$ 22.79	
	Attorney Travel	Airfare			\$ 282.80	Attorney Travel			\$ 282.80	
	Attorney Travel	Parking/ Tolls/ BART			\$ 54.70	Attorney Travel			\$ 54.70	
Subtotal:					\$ 712.40	Subtotal: \$ 712.40				
TOTAL REQUEST \$:					\$79,104.15	TOTAL AWARD \$: \$79,104.15				

C. CPUC Disallowances & Adjustments (CPUC completes):

#	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))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the claim (Y/N)?

No

If so:

Party	Reason for Opposition	CPUC Disposition

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

Yes

If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant has made a substantial contribution to Decision (D.)07-07-043 and D.08-10-016.
2. The claimed fees and costs are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$79,104.15.

CONCLUSION OF LAW

1. The claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Claimant is awarded \$79,104.15.
2. Within 30 days of the effective date of this decision, The Utility Reform Network's award shall be paid from the intervenor compensation program fund, as described in D.00-01-020. Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release

H.15, beginning February 9, 2009, the 75th day after the filing of claimant's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.
4. This proceeding is closed.
5. This decision is effective today.

Dated July 9, 2009, at San Francisco, California.

MICHAEL R. PEEVEY
President
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D0907016	Modifies Decision? No
Contribution Decision(s):	D0707043 and D0810016	
Proceeding(s):	R0701021	
Author:	ALJ Richard Smith	
Payer(s):	CPUC Intervenor Compensation Fund	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	11/26/2008	\$79,104.15	\$79,104.15	No	n/a

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Christine	Mailloux	Attorney	The Utility Reform Network	\$360	2007	\$360
Christine	Mailloux	Attorney	The Utility Reform Network	\$390	2008	\$390
Robert	Finkelstein	Attorney	The Utility Reform Network	\$435	2007	\$435
Robert	Finkelstein	Attorney	The Utility Reform Network	\$470	2008	\$470

(END OF APPENDIX)