

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's
Own Motion to Assess and Revise the Regulation of
Telecommunications Utilities.

Rulemaking 05-04-005
(Filed April 7, 2005)

**DECISION GRANTING INTERVENOR COMPENSATION
TO THE UTILITY REFORM NETWORK
FOR SUBSTANTIAL CONTRIBUTIONS TO D.08-09-015**

Claimant: The Utility Reform Network	For contribution to D.08-09-015
Claimed (\$): \$191,347.92	Awarded (\$): \$182,201.82 (reduced 9.5%)
Assigned Commissioner: Chong	Assigned ALJ: Karl Bemederfer

PART I: PROCEDURAL ISSUES

- A. Brief Description of Decision:** This is the third decision issued in Phase 2 of the Commission's Uniform Regulatory Framework docket. This Decision concludes work on issues regarding carrier requirements to submit monitoring reports to the Commission; pricing flexibility for retail special access services; and, the need for additional consumer disclosure 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:	NA	Yes
2. Other Specified Date for NOI:	ALJ Ruling at Workshop on 6-3-05	Yes
3. Date NOI Filed:	July 5, 2005	Yes
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.05-04-005	Yes
6. Date of ALJ ruling:	October 11, 2006	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:	R.05-04-005	Yes
10. Date of ALJ ruling:	October 11, 2006	Yes
11. Based on another CPUC determination (specify):	ALJ Ruling cited ruling in R.04-04-003 (on 7/27/2004) for a rebuttable presumption of eligibility	Yes
12. Has the claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.08-09-015	Yes
14. Date of Issuance of Final Decision:	September 9, 2008	Yes
15. File date of compensation request:	November 10, 2008	Yes
16. Was the request for compensation timely?		Yes

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

#	Claimant	CPUC	Comment
13	TURN		TURN filed a previous compensation request for time spent on other URF Phase 2 issues on June 27, 2008. TURN filed a revision to that compensation request on August 12, 2008. Much of the work on issues covered by this compensation request was done during the same period as work covered by that previous compensation request and as such the requests are interrelated. This request relates to work on carrier monitoring report requirements and customer disclosure issues. The manner in which the hours were broken out by issue is described in detail in TURN’s June 27, 2008 compensation request and further discussed below.

PART II: SUBSTANTIAL CONTRIBUTION (completed by Claimant)

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) (For each contribution, support with specific reference to final or record.)

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p>1. The Commission requested that parties submit proposals for the types of monitoring reports that should be required in an URF environment. In preparing its proposal, TURN realized that the Commission staff and parties needed more information and clarification as to the current reporting requirements for the URF LECs. At the November 7, 2006 PHC, TURN and DRA both pushed for a requirement that all parties submit an accounting of their current CPUC and FCC reporting requirements to help parties prepare monitoring proposals. The carriers strongly opposed the request. The Assigned Commissioner and ALJ agreed with TURN and not only required the carriers to submit reports but also scheduled a workshop to allow parties to discuss the existing reports and ask questions. In the Decision, the Commission clarified, at TURN's request that the carriers must continue to file all reports not explicitly eliminated in D.06-08-030.</p>	<p>Reply Comments of TURN, March 30, 2007 at p. 2; November 9, 2006 Assigned Commissioner's Ruling; D.08-09-015 at p. 16.</p>	<p>Yes</p>
<p>2. After receipt of the carriers' accounting of their various reporting requirements, TURN requested that the Assigned Commissioner extend the deadline for submission of monitoring proposals. Also, citing language in D.06-08-030, TURN requested that the Assigned Commissioner schedule a workshop to allow parties to discuss the required cost/benefit analysis of the monitoring proposals two weeks after</p>	<p>See, letter from TURN to Assigned Commissioner Chong dated December 7, 2006; Assigned Commissioner's Ruling and Scoping Memo, December 11, 2006 at p. 4.</p>	<p>Yes</p>

the proposals are filed. The Assigned Commissioner agreed and granted TURN's request thereby significantly modifying the schedule to allow for a more reasoned and rational analysis of issues.		
3. Only two parties, TURN and DRA, submitted monitoring proposals. Although the Commission declined to adopt either proposal in full, these proposals framed the debate for the rest of the proceeding. The Decision critically analyzes TURN's proposal and created a record allowing the Commission to examine costs and benefits of monitoring and carrier reporting requirements.	See, Proposal of The Utility Reform Network for Additional and Reinstated Monitoring Reports and Response to the January 18, 2007 Report of the December 12, 2006 Monitoring Report Workshop, February 2, 2007 ("TURN Monitoring Proposal"); D.08-09-015 at pp.12-13, 17.	Yes
4. One of the central issues in the monitoring discussion was whether the Commission could rely exclusively on FCC ARMIS data to satisfy its requirements and promises to monitor the California marketplace. In its comments and in a letter to the Assigned Commissioner, TURN made sure that the Commission was aware that the FCC was considering changes to its ARMIS reporting requirements and the impact of those changes on this Commission. In its Decision, the Commission acknowledged TURN's comments and letter and explicitly stated its intention to monitor the FCC's decisions on ARMIS reporting and reserved the right to revisit the issue at any time. It also required the carries to continue to file ARMIS data with the Commission if the FCC eliminates those reports.	Reply Comments of the Utility Reform Network, March 30, 2007 at p. 13; Letter from TURN to Assigned Commissioner Chong, April 4, 2008; D.08-09-015 at pp. 15, 24, 39.	Yes
5. In addition to specific monitoring reports TURN emphasized the need to gather information on the affordability of service and the availability of competitive alternatives. The Commission agreed with TURN and	TURN Monitoring Proposal at pp. 16-20, 23-24; Reply Comments of the Utility Reform Network, March 30, 2007 at p. 3-4; D.08-09-015 at p. 17-18.	Yes

<p>DRA that “affordability and competition are areas that we may have an interest in reviewing periodically.” While the Decision adopts no new requirements, in response to TURN’s concerns, the Commission clarified that existing information and new website posting requirements will provide what the Commission needs to monitor the industry and satisfy TURN’s concerns.</p>		
<p>6. The Decision notes, “DRA and TURN were also concerned as to whether consumers had access to information about the various service providers and services that are offered in a given area within the state.” It then declares, “We believe that this information may be useful to consumers and therefore(?), the Commission has updated its website to include information regarding the various service providers that are offering ‘residential voice service’ within an area code or county.” Although the Commission will use existing data instead of a new reporting requirement, the call for data on competitive alternatives by TURN spurred the Commission to action to create this website functionality.</p>	<p>D.08-09-015 at pp. 20-21.</p>	<p>Yes</p>
<p>7. The Phase 2 Scoping Memo also requested comment on whether “there is any continuing need for customer disclosure rules in addition to the customer disclosure rules adopted in D.06-06-013?” In its comments on this issue, as noted by the Decision, TURN expressed concern that the Commission’s inquiry could be interpreted to suggest eliminating existing disclosure rules not contained in G.O. 168. Citing specifically to</p>	<p>Opening Comments of the Utility Reform Network, March 2, 2007 at p. 13; Reply Comments of the Utility Reform Network, March 30, 2007 at p. 26; D.08-09-015 at pp. 31, 45.</p>	<p>No-TURN’s comment was noted in the decision, as requiring clarification, but did not contribute to this issue. As such, we disallow 1/3 of the “MD”¹ time logged for all participants.</p>

¹ TURN classifies its activities listed as “MD” as being those hours attributed to work on issues related to market disclosure.

TURN's concerns, the Decision clarifies the scope of the Commission's intent and assured parties that, "we do not alter the framework of the rules currently in place," and that "We find that it is not necessary at this time to establish new consumer protection disclosure requirements...."		These hours are broken down by participant on pgs. 11-12.
8. TURN also urged the Commission to consider the needs of customers in a detariffed environment when looking at customer disclosure requirements. In this Decision the Commission notes that "to the extent parties expressed concerns about the lack of information and protection that consumer may experience in a detariffed environment, in D.07-09-018 we established specific rules and conditions for detariffing."	Opening Comments of the Utility Reform Network, March 2, 2007 at p. 15; D.08-09-015 at p. 32.	Yes
9. In TURN's comments on the advice letter process, TURN urged the Commission to require carriers to send their 30-day price increase notices to the CD Staff at the same time as they send them out to customers so that Staff can prepare for the subsequent one-day advice letter filing officially notifying the Commission of the price increase. The Decision echoes this recommendation when the Commission "encourages" carriers to provide these 30-day notices, so that the Commission "can respond to consumer inquiries more adequately."	Opening Comments of the Utility Reform Network, March 2, 2007 at p. 20; Reply Comments of the Utility Reform Network, March 30, 2007 at p. 30; D.08-09-015 at p. 37.	Yes

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

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y/N)	Y	Yes
b. Were there other parties to the proceeding? (Y/N)	Y	Yes
c. If so, provide name of other parties: All four URF LECs, multiple wireless companies, several competitive wireline carriers. The Disability Rights Advocates was the only other consumer representative active on		Yes

these issues.	
<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 and DRA worked very closely together on these issues. As the time entries reflect, the two organizations coordinated efforts for each workshop and PHC. TURN worked with DRA on discovery matters to minimize duplication in that area as well. Although TURN and DRA filed separate monitoring proposals and separate comments, that work was also coordinated to avoid duplication to the extent possible. The two monitoring proposals reflected differences in strategy on third party survey issues and the reporting of price data. But subsequent comments on the proposals from both DRA and TURN demonstrate the complementary way in which our filings and strategies supported each other to further customer interests. On the marketing disclosure issue, the two organizations' strategies differed significantly. TURN took a more general approach arguing for the status quo while DRA made detailed proposals for new disclosure laws. The positions taken were not mutually exclusive however and in subsequent comments both parties' supported the other.</p>	Yes

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

#	Claimant	CPUC	Comment

PART III: REASONABLENESS OF REQUESTED COMPENSATION (completed by Claimant)

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>As with many quasi-legislative proceedings, the precise benefits to consumers from TURN's participation in this docket are difficult to quantify. However, the defense of consumer interests in the face of strong opposition from carriers resisting any type of reporting requirements provided significant benefits that far out-shadow the amount of compensation claimed here.</p> <p>TURN has consistently argued that this Commission has a duty to monitor the marketplace and the industry and that this duty is even more important in a deregulated environment. The Commission has stated on several occasions that they will continue to monitor price and competitive alternatives. This is a vital consumer protection issue. If the Commission does not have adequate data to analyze and predict potential market failures such as unreasonable rates, discriminatory service offerings and monopoly behavior by unregulated entities before it is too late, widespread consumer harm is certain. Because of the importance of this safeguard in a deregulated environment, TURN dedicated</p>	Yes

significant resources to developing a concrete monitoring proposal that would be appropriate in an era of “light” regulation. The process created by the Assigned Commissioner in this docket proved to be extremely resource intensive, involving several workshops, extensive discovery, and voluminous comments, all serving to create and defend the proposal invited by the Commission. TURN and DRA were the only parties to recognize the importance of monitoring to consumers and place proposals in the record. Although the Commission did not adopt TURN’s monitoring proposal, as discussed above, our participation and submission of a proposal pushed the Commission to add to the record with listings of current reporting requirements, acknowledge it must constantly monitor the industry for affordability and competition in the marketplace and it made the Commission weaken its stance on relying solely on FCC ARMIS data in light of possible changes to that requirement.

TURN’s compensation request includes approximately 500 hours of consultant and policy analyst time, and 160 hours of attorney time. The 500 hour figure is reasonable given the resources necessary to provide a meaningful response to the Commission’s invitation to bring forward a fully-developed monitoring proposal, as well as to analyze the other matters covered in this part of the proceeding. The time entries for these advocates describe numerous hours spent preparing for and attending workshops with detailed presentations, significant and contentious discovery issues and work on several filings. Similarly, the 160 hours of attorney time is reasonable in light of the magnitude of the undertaking, including supporting the policy analyst work on discovery matters, and the importance to consumers of the underlying issues. Therefore, TURN requests an award of the full amount of requested intervenor compensation even though our monitoring proposal was not ultimately adopted.

B. Specific Claim:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
William Nusbaum	2006	43.50	375	D.06-11-009	16,312.50	2006	38.50	375	14,437.50
William Nusbaum	2007	42.75	405	D.08-04-019	17,313.75	2007	41.50	405	16,807.50
William Nusbaum	2008	32.65	435	D.08-04-010 principles; 3% COLA plus 5% “step increase” applied to 2007 authorized rate of \$405, rounded to the nearest \$5	14,202.75	2008	27.15	435	11,810.25
Christine Mailloux	2006	25.75	335	D.06-11-009	8,626.25	2006	24.25	335	8,123.75

Christine Mailloux	2007	34.45	360	D.08-04-037	12,402.00	2007	30.12	360	10,843.20
Christine Mailloux	2008	5.00	390	D.08-04-010 principles; 3% COLA plus 5% “step increase” applied to 2007 authorized rate of \$360, rounded to the nearest \$5	1,950.00	2008	4.07	390	1,587.30
Regina Costa	2006	132.50	235	D.07-04-032	31,137.50	2006	129.50	235	30,432.50
Regina Costa	2007	225.70	255	D.08-04-037	57,553.50	2007	224.28	255	57,191.40
Regina Costa	2008	7.75	275	D.08-04-010 principles; 3% COLA plus 5% “step increase” applied to 2007 authorized rate of \$255, rounded to the nearest \$5	2,131.25	2008	7.75	275	2,131.25
	Subtotal:				\$161,629.50	Subtotal:			\$153,364.65
EXPERT FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Trevor Roycroft	2006	28.50	160	D.08-04-037	4,560.00	2006	26.00	160	4,160.00
Trevor Roycroft	2007	85.25	175	D.08-04-037	14,918.75	2007	82.50	175	14,437.50
Trevor Roycroft	2008	6.75	190	D.08-04-010 principles; 3% COLA plus 5% “step increase” applied to 2007 authorized rate of \$255, rounded to the nearest \$5	1,282.50	2008	6.75	190	1,282.50
	Subtotal:				\$ 20,761.25	Subtotal:			\$19,880.00

OTHER FEES									
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Carry over of monitoring and market disclosure allocation (see description below)					4,637.81				4,637.81
Travel & Miscellaneous					1,500.61				1,500.61
	Subtotal:				\$ 6,138.42	Subtotal:			\$6,138.42
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
Christine Mailloux	2008	13.25	195	50% reduction to 2008 rate described above	\$2,583.75	2008	13.25	195	2,583.75
Bob Finkelstein	2008	1.00	235	D.08-08-027, p. 5, reduced by 50%	\$ 235.00	2008	1.00	235	235.00
	Subtotal:				\$ 2,818.75	Subtotal:			\$2,818.75
TOTAL REQUEST \$:					\$191,347.92	TOTAL AWARD \$:			\$182,201.82
<p>When entering items, type over bracketed text; add additional rows as necessary.</p> <p>*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.</p> <p>**Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>									

C. Attachments or Comments Documenting Specific Claim (completed by claimant):

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Time sheets detailing attorney and consultant hours
3	Travel and Miscellaneous expenses
Comment	In its previous URF Phase 2 compensation request, filed June 27, 2008, TURN included all of its hours coded as General Preparation (GP) and its direct expenses incurred for work on all Phase 2 issues. Those amounts are not included in this request. However, as calculated and described in the June 27 compensation request, TURN determined that 15% of the hours coded as # (indicating that the entry includes work on multiple issues) could be attributed to work on issues related to monitoring (MN) and market disclosure (MD). Therefore, we deducted 15% of the # hours total from that previous request to be included here. The original 15% allocation

	was also revised in our August 12, 2008 response to Verizon's protest of our Phase II compensation request. In addition, all of the hours coded exclusively as MN and MD were omitted from the previous compensation request and are included here.
Comment (Ref. Part III Section B)	TURN's outside consultant traveled twice from Massachusetts to San Francisco to attend two Commission-sponsored workshops on monitoring proposals. Dr. Roycroft, along with Ms. Costa was the main author of TURN's monitoring proposal and Dr. Roycroft participated extensively in the workshops including giving a presentation. TURN seeks recovery of the costs of that trip. The trips meet the criteria set forth in D.07-10-014: the amount of travel time and expense was reasonable, both when considered in isolation (two trips to San Francisco with moderate expenditures) and in the context of this compensation request of nearly \$200,000; the travel was not routine commuting, but rather a trip that would not have occurred but for TURN's participation in this proceeding; the expenses were reasonably incurred; and there was no less expensive way to participate in the proceeding. Even if Bay Area-based TURN consultant had been available to cover this workshop, the costs associated with the time that TURN's staff and that new consultant would have devoted to getting him or her prepared would have greatly exceeded the amount of travel expenses. Therefore, the Commission should grant compensation for the requested travel time and expenses.

D. CPUC Disallowances & Adjustments (CPUC completes):

#	Reason
2006-Nusbaum	Hours spent preparing a time-extension request are excessive given the scope of the work (reduced 5.0 hrs).
2007-Nusbaum	"MD" hours reduced by 1.25 for lack of substantial contribution, see page 5, Item #7.
2006-Mailloux	Disallowance of workshop attendance by multiple staff members-unproductive participation (reduced 1.5 hrs).
2007-Mailloux	"MD" hours reduced by 4.33 for lack of substantial contribution, see page 5, item #7.
2008-Mailloux	"MD" hours reduced by .83 for lack of substantial contribution, see page 5, Item #7.
2006-Costa	Disallowance of workshop attendance by multiple staff members-unproductive participation (reduced 3.0 hrs).
2007-Costa	"MD" hours reduced by .92 for lack of substantial contribution, see page 5, Item #7.
2006-Roycroft	Time spent for attendance at workshop reduced to reflect the same time billed by TURN's lead attorney (Nusbaum). No justification provided for time billed in excess of other staff members (reduced 2.5 hrs).
2007-Costa	Time billed for teleconference on 2/9/07 reduced to reflect the same time billed by other staff members in attendance (reduced .5 hrs).
2007-Roycroft	Time spent revising, reviewing and editing Nusbaum's draft is duplicative of efforts with Mailloux (reduced 2.75 hrs).

2008-Nusbaum	Hours spent on URF2 Monitoring (drafting/editing) letter to Commissioner Chong are excessive given the scope of the work (reduced 4.0 hrs).
2008-Nusbaum	Hours spent on PD comments (drafting/editing) are duplicative of Mailloux's hours (reduced 1.5 hrs).
2008-Mailloux	Time billed for conference call on 7/3/08 reduced to reflect the same time billed by other staff members in attendance (reduced .1 hrs).

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)?

Yes

If so:

Party	Reason for Opposition	CPUC Disposition
Verizon California Inc. and its Certified California Affiliates	<p>Excessive hours billed for; multiple staff attendance at a 2006 workshop, preparation of TURN's time extension request, and the time associated with the preparation of a letter to Commissioner Chong seeking expedition of the approved decision. Verizon also objected to what it categorizes as "improper repetition of policy disagreements in comments on the proposed decision, which the Commission's rules plainly limit to errors of fact or law".²</p> <p>TURN filed a reply to Verizon's Response to its Request for Intervenor Compensation in support of its initial claim and justification for compensation. TURN submits that Verizon's response should be "dismissed as unsubstantiated and in many regards disingenuous"³ and renews its request for full compensation as filed in its November 10, 2008 claim.</p>	We have considered both Verizon's oppositions and TURN's reply to Verizon's objections in this award and have made adjustments where appropriate. These adjustments along with others, are listed in Section D.

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

Yes

² Response of Verizon California Inc. (U 1002 C) and its Certified California Affiliates to Request for Intervenor Compensation of TURN Related to Decision 08-09-015, December 10, 2008 at 1-2.

³ Reply of The Utility Reform Network to Response of Verizon to TURN's Request for Intervenor Compensation for Work Related to D.08-09-015, December 18, 2008 at 6.

FINDINGS OF FACT

1. Claimant has made a substantial contribution to D.08-09-015.
2. The claimed fees and costs, as adjusted herein, 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 \$182,201.82.

CONCLUSION OF LAW

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

ORDER

1. Claimant is awarded \$182,201.82.
2. Within 30 days of the effective date of this decision, the Intervenor Compensation Fund shall pay claimant the total award. 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 January 24, 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 remains open to address other related matters.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision? No
Contribution Decision(s):	D0809015	
Proceeding(s):	R0504005	
Author:	ALJ Karl Bemesserfer	
Payer(s):	CPUC Intervenor Compensation Fund	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	11-10-08	\$191,347.92	\$182,201.82	No	excessive hours, duplication or unproductive efforts, and lack of substantial contribution.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	The Utility Reform Network	\$470	2008	\$470
William	Nusbaum	Attorney	The Utility Reform Network	\$375	2006	\$375
William	Nusbaum	Attorney	The Utility Reform Network	\$405	2007	\$405
William	Nusbaum	Attorney	The Utility Reform Network	\$435	2008	\$435
Christine	Mailloux	Attorney	The Utility Reform Network	\$335	2006	\$335
Christine	Mailloux	Attorney	The Utility Reform Network	\$360	2007	\$360
Christine	Mailloux	Attorney	The Utility Reform Network	\$390	2008	\$390
Regina	Costa	Expert	The Utility Reform Network	\$235	2006	\$235
Regina	Costa	Expert	The Utility Reform Network	\$255	2007	\$255
Regina	Costa	Expert	The Utility Reform Network	\$275	2008	\$275
Trevor	Roycraft	Expert	The Utility Reform Network	\$160	2006	\$160
Trevor	Roycraft	Expert	The Utility Reform Network	\$175	2007	\$175
Trevor	Roycraft	Expert	The Utility Reform Network	\$190	2008	\$190

(END OF APPENDIX)