Decision 06-10-018 October 5, 2006

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) For Authority to, Among Other Things, Increase Its Authorized Revenues For Electric Service in 2006, And to Reflect That Increase in Rates.	Application 04-12-014 (Filed December 21, 2004)
Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Service and Facilities of Southern California Edison Company.	Investigation 05-05-024 (Filed May 26, 2005)

OPINION GRANTING INTERVENOR COMPENSATION AWARDS TO AGLET CONSUMER ALLIANCE, GREENLINING INSTITUTE, AND THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 06-05-016

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OPINION GRANTING INTERVENOR COMPENSATION TO AGLET CONSUMER ALLIANCE, GREENLINING INSTITUTE, AND THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 06-05-016

1. Summary

This decision awards Aglet Consumer Alliance (Aglet) $87,909.21, Greenlining Institute (Greenlining) $132,601.60, and The Utility Reform Network (TURN) $487,946.04, in compensation for their substantial contributions to Decision (D.) 06-05-016, which resolved Southern California Edison Company's (SCE) test year 2006 general rate case (GRC). From the amounts requested, the intervenor compensation awards represent a $73.50 decrease for Aglet, a $8,882.75 decrease for Greenlining,[1] and a $7,114.25 decrease for TURN. These proceedings are closed.

2. Background

On December 21, 2004, SCE requested a $568,773,000 (16.29%) revenue requirement increase for test year 2006 and authority to implement estimated revenue requirement increases of $224,829,000 (5.54%) for post-test year 2007 and $207,273,000 (4.85%) for post-test year 2008. SCE provided the testimony of over 80 witnesses, which covered the need and reasonableness of its proposed 2006 generation, transmission, distribution, customer service, customer accounting and general administration operations, all of which SCE claims are necessary to serve its forecasted customers and loads for that year. The testimony also detailed the forecasted operating expenses and capital-related costs of these

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[1] The decrease for Greenlining is based on its revised request of $141,484.35 as specified in its August 25, 2006 supplemental filing.

operations, which were the foundation for SCE's base revenue requirement request for test year 2006 and post-test years 2007 and 2008.

On May 26, 2005, Investigation (I.) 05-05-024 was instituted to allow the Commission to hear proposals other than those of SCE and to enable the Commission to enter orders on matters not proposed by SCE. A.04-12-014 and I.05-05-024 were consolidated for these purposes.

Prehearing conferences were held on February 18, 2005, May 6, 2005, and June 6, 2005. During May, 2005, public participation hearings were held in Rosemead, Fullerton, San Bernardino, Palm Springs, and Visalia. There were 23 days of evidentiary hearings held from June 7, 2005 to July 14, 2005. An additional day of hearing was held on September 12, 2005. Opening briefs were filed on August 12, 2005 and reply briefs were filed on September 2, 2005. An evidentiary update hearing was held on October 11, 2005. Update-related briefs were then filed on October 21, 2005. The proceeding was submitted for decision on November 30, 2005. Final oral argument before the Commission was held on April 4, 2006. Aglet, Greenlining and TURN each actively participated in this proceeding by conducting discovery, sponsoring expert testimony, cross-examining utility witnesses, filing briefs and comments on the proposed decision, and participating in the final oral argument.

D.06-05-016 resolved numerous disputed revenue, expense and rate base issues related to SCE's GRC request and closed this consolidated proceeding. For test year 2006, SCE was authorized a revenue requirement increase of $333,115,000 (9.75%). The adopted methodology for calculating post-test year revenue requirements resulted in additional estimated revenue requirement increases of $143,350,000 (3.82%) for post-test year 2007 and $192,573,000 (4.95%) for post-test year 2008. In summary, the decision also:

- Assumed a temporary shutdown of the Mohave Generating Station (Mohave) and reflected costs for this scenario, as forecasted by SCE. All costs will be booked to a two-way balancing account and will be subject to reasonableness review.
- Ordered SCE to establish a Mohave Sulfur Credit Sub-Account to accumulate revenues from the sale of any sulfur credits created by the December 31, 2005 Mohave closure. Funds should not be disbursed from this sub-account without specific Commission authorization to do so. The issue of the distribution of revenues accumulated in the account will be addressed in a separate proceeding.
- Excluded costs for SCE's proposed Project Development Division in rates, but allowed SCE to establish a memorandum account to track those costs that support new generation not associated with proposed projects. SCE can seek to include those supportive costs in future rates.
- Approved a stipulation regarding maintenance activities. Such activities will continue to be performed on an opportunity basis, while SCE and the Commission's Consumer Protection and Safety Division work-out details to implement a new maintenance program.
- Modified SCE's Results Sharing request by requiring SCE to credit ratepayers for any difference between the authorized level for Results Sharing and the recorded level.
- Adopted TURN's recommendation to recognize, for ratemaking purposes, the regulatory liability associated with plant removal costs that do not meet the definition of an Asset Retirement Obligation.
- Adopted the Division of Ratepayer Advocates' (DRA) proposed net salvage rates for calculating depreciation expense, with the exception of Account 364, distribution poles, towers and fixtures. For Account 364, the decision adopts a compromise net salvage rate proposed by SCE.

- Accepted SCE's forecasted plant additions for 2004 and 2005, subject to a truing up process if the recorded additions are less than forecasted.
- Rejected proposals to determine the post-test year revenue increases by applying a consumer price index factor to the adopted 2006 revenue requirement. The decision also rejected SCE's proposal to reflect its proposed capital budgets for 2007 and 2008 in determining the revenue increases for the post-test years. Plant additions were instead determined by taking the adopted 2006 test year plant additions and escalating that amount to 2007 and 2008 post-test year dollars.
- Rejected the proposal of San Diego Gas & Electric Company (SDG&E) to establish a Cost Control Incentive Mechanism for the San Onofre Nuclear Generating Station (SONGS).
- Approved a settlement regarding a Reliability Investment Incentive Mechanism (RIIM).
- Approved a settlement regarding bill calculation services for submetered mobile home parks.

3. Requirements for Awards of Compensation

The intervenor compensation program, enacted in Public Utilities Code Sections 1801-1812, requires California jurisdictional utilities to pay the reasonable costs of an intervenor's participation, if the intervenor makes a substantial contribution to the Commission's proceedings. The statute provides that the utility may adjust its rates to collect the amount awarded from its ratepayers. (Subsequent statutory references are to the Public Utilities Code unless otherwise indicated.)

All of the following procedures and criteria must be satisfied for an intervenor to obtain a compensation award:

1. The intervenor must satisfy certain procedural requirements including the filing of a sufficient notice of intent (NOI) to claim compensation within 30 days of the prehearing conference (PHC), or in special circumstances at other appropriate times that we specify. (§ 1804(a).)

2. The intervenor must be a customer or a participant representing consumers, customers, or subscribers of a utility subject to our jurisdiction. (§ 1802(b).)

3. The intervenor should file and serve a request for a compensation award within 60 days of our final order or decision in a hearing or proceeding. (§ 1804(c).)

4. The intervenor must demonstrate "significant financial hardship." (§§ 1802(g), 1804(b)(1).)

5. The intervenor's presentation must have made a "substantial contribution" to the proceeding, through the adoption, in whole or in part, of the intervenor's contention or recommendations by a Commission order or decision. (§§ 1802(i), 1803(a).)

6. The claimed fees and costs are reasonable (§ 1801), necessary for and related to the substantial contribution (D.98-04-059), comparable to the market rates paid to others with comparable training and experience (§ 1806), and productive (D.98-04-059).

For discussion here, the procedural issues in Items 1-4 above are combined, followed by separate discussions on Items 5-6.

4. Procedural Issues

The first PHC in this matter was held on February 18, 2005. Greenlining filed its NOI on March 4, 2005; Aglet on March 7, 2005; and TURN on March 17, 2005. Each was timely filed, and also asserted financial hardship.

Section 1802(b)(1) defines a "customer" as: A) A participant representing consumers, customers or subscribers of a utility; B) A representative who has been authorized by a customer; or C) A representative of a group or organization authorized pursuant to it articles of incorporation or bylaws to represent the interests of residential or small business customers.

On April 8, 2005, Administrative Law Judge (ALJ) Fukutome ruled that Aglet, Greenlining and TURN are each customers pursuant to § 1802(b)(1)(C), and meet the financial hardship condition, pursuant to § 1802(g).

Aglet filed its request for compensation on July 13, 2006. Greenlining and TURN each filed requests for compensation on July 17, 2006. The requests were filed within 60 days of D.06-05-016 being issued.[2] In view of the above, we find that Aglet, Greenlining and TURN have each satisfied all of the procedural requirements necessary to claim compensation in this proceeding.

5. Substantial Contribution

In evaluating whether a customer made a substantial contribution to a proceeding we look at several things. First, did the ALJ or Commission adopt one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer? (See § 1802(i).) Second, if the customer's contentions or recommendations paralleled those of another party, did the customer's participation materially supplement, complement, or contribute to the presentation of the other party or to the development of a fuller record that assisted the Commission in making its decision? (See §§ 1801.3(f) and 1802.5.) As described in § 1802(i), the assessment of whether the customer made a substantial contribution requires the exercise of judgment.

> In assessing whether the customer meets this standard, the Commission typically reviews the record, composed in part of

[2] No party opposes any of the requests.

> pleadings of the customer and, in litigated matters, the hearing transcripts, and compares it to the findings, conclusions, and orders in the decision to which the customer asserts it contributed. It is then a matter of judgment as to whether the customer's presentation substantially assisted the Commission.[3]

Should the Commission 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 on a complex issue of great public import thus enriching the Commission's deliberations and the record, the Commission could find that the customer made a substantial contribution. With this guidance in mind, we turn to the claimed contributions to the proceeding made by Aglet, Greenlining and TURN.

5.1. Aglet

Aglet claims substantial contribution for each of the issues that it addressed in this proceeding, as summarized in the following sections.

5.1.1. Financial Health

SCE requested approval of its proposed post-test year ratemaking mechanism for 2007 and 2008 in order to "continue SCE's return to financial health." Aglet was the only party to focus on SCE's claims regarding financial health. Consistent with Aglet's position, the Commission found that SCE had substantially recovered from the financial effects of the 2000-2001 crisis, and it was not necessary to consider further financial recovery in resolving specific issues in this proceeding.

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3 D.98-04-059, 79 CPUC2d, 628 at 653.

5.1.2. SONGS Refueling

SCE requested approval of $61,190,000 in refueling expenses per outage at SONGS, Units 1 and 2. Aglet recommended an expense level of $56,808,000, based on elimination of an unjustified non-labor escalation premium, and removal of Unit 3 main generator rotor repair costs from historical recorded costs. The Commission adopted Aglet's positions regarding the non-labor escalation premium and the main generator rotor repair.

5.1.3. Uncollectibles

SCE originally requested a test year 2006 uncollectible factor of 0.288%. DRA recommended a factor of 0.271%. Aglet recommended a factor of 0.220%, equal to a two-year average of 2002 and 2003 recorded adjusted uncollectibles. The Commission found, "Aglet's proposal to average the 2002 and 2003 recorded uncollectible factors is reasonable and will be adopted." (D.06-05-16, mimeo., p. 104.)

5.1.4. Economic and Business Development

SCE requested $2,499,000 in test year expenses for economic and business development (E&BD) expenses. Aglet was the only party that specifically addressed SCE's proposed expenses and recommended disallowance of ratepayer funding. Aglet repeated points that it made in A.04-04-008 and A.04-06-018, the consolidated applications of SCE and PG&E for approval of economic development rate discounts.

Aglet states that, at the time this general rate case was submitted for decision, the Commission had not acted in A.04-04-008 and A.04-06-018. (Reply briefs were filed September 2, 2005.) The Commission later approved a joint proposal submitted by SCE and Pacific Gas and Electric Company (PG&E) in A.04-04-008 and A.04-06-018. (D.05-09-018, reversing the ALJ proposed decision, signed September 8, 2005.) The joint proposal allowed full ratepayer funding of

E&BD discounts. In response to Aglet's application for rehearing, the Commission granted limited rehearing of D.05-09-018. (D.06-05-042, signed May 25, 2006.) Consistent with the rate recovery allowed for E&BD costs in D.05-09-018, the Commission in the GRC rejected Aglet's recommendation and adopted SCE's funding request.

Although Aglet did not prevail, it argues that it made a contribution to the adopted outcome. First, it assisted in developing a full record on the issue. DRA's decision not to participate encouraged Aglet to litigate E&BD expenses. Second, Aglet's participation was completed prior to Commission policy determinations made in A.04-04-008 and A.04-06-018, and some of those issues remain unresolved pending rehearing. (Specifically, floor prices for E&BD discounts, and shareholder benefits from utility efforts to promote economic development.) Third, Aglet's participation was efficient in that it was based on testimony and arguments made in A.04-04-008 and A.04-06-018.

For these reasons, Aglet requests compensation for its efforts related to E&BD issues at one-half of the professional hours allocated to E&BD expenses from its compensation request. This request is reasonable.

5.1.5. Energy Centers

SCE requested approval of $1,817,000 in expenses for a Customer Technology Application Center and an Agricultural Technology Application Center. The test year request was $500,000 more than recorded 2003 expenses of $1,317,000. Aglet opposed rate recovery of the additional $500,000 requested by SCE. The Commission adopted Aglet's position.

5.1.6. Customer Deposits

SCE used a five-year average of recorded customer deposits, for the years 1999 through 2003, to estimate this offset to rate base. SCE's test year estimate was $114,919,000. Aglet recommended an estimate of $139,979,000, based on

2004 recorded deposits as a percent of test-year lagged revenues. Aglet cited the increasing trend of customer deposits as justification for reliance on recent data. If the Commission continued to rely on a five-year average, Aglet and TURN jointly recommended updating SCE's average to cover the years 2000 through 2004. The resulting back-up recommendation was for test year deposits of $127,433,000. Citing "the continuing upward trend" in recorded deposits, the Commission adopted test year customer deposits of $159,650,000, equal to recorded 2004 deposits without consideration of the relationship between recorded deposits and lagged revenues.

The Commission also revised the discussion of customer deposits in the proposed decision, in response to comments filed by Aglet. The proposed decision discussed a distinction between "total" and "permanent" customer deposits, and recommended the back-up position of Aglet and TURN. (Proposed decision, p. 264, Finding of Fact 174 at 379.) Aglet argued that there is no meaningful distinction between those terms. The final decision rejected the "total" and "permanent" analysis, eliminated proposed Finding of Fact 174, and adopted a level of customer deposits even higher than that recommended by Aglet or TURN.

5.1.7. Attrition

SCE requested approval of an attrition mechanism that built on the mechanism approved in SCE's test year 2003 general rate case. It included adjustment of operating and maintenance expenses based on utility-specific labor and nonlabor escalation factors, adjustment of capital-related revenue requirements based on budgeted construction expenditures, adjustment of SONGS costs based on the expected number of refueling outages in each year, and allowance of adjustments following major exogenous events. DRA proposed adjustment of prior year revenue requirements by forecast changes to the CPI, a method that Aglet introduced in a previous general rate case for PG&E. Aglet also recommended reliance on CPI changes.

The final decision approved SCE's request for escalation of expenses, but adopted attrition year adjustments to capital-related revenue requirements based on escalation of adopted test year plant additions. The Commission limited capital escalation to 2.5% based on evidence that included Aglet's showing on use of the CPI. Aglet did not prevail, but asserts that its showing on use of the CPI substantially contributed to the record.

Aglet states that the Commission rejected SCE's request for budget-based capital attrition adjustments, in part because no party other than SCE had the resources to analyze SCE's 2007 and 2008 capital budgets. This point was argued by DRA, Aglet and TURN. The Commission also mentioned Aglet's point that SCE supported only $40 million of post-test year capital spending with cost-effectiveness analysis, compared to more than $1.8 billion of capital additions for each of the years 2007 and 2008.

Aglet also asked the Commission to disregard SCE's one-sided study of the benefits of SCE capital spending on the economy in its service territory. D.06-05-016 does not address the study.

5.1.8. Reliability Incentives

SCE first proposed no reward or penalty for system reliability performance during the test year 2006 rate case cycle. SCE later stipulated to the adopted RIIM, with TURN and the Coalition of California Utility Employees. The RIIM will have the effect of requiring SCE to spend certain minimum amounts on electric system reliability and to add electric linemen and groundmen to its work force. The RIIM does not include specific financial rewards or penalties. DRA and Aglet opposed the stipulation. Aglet's opposition was based on policy considerations and the complexity of the RIIM.

The Commission adopted the RIIM. In doing so, the Commission found that "it is reasonable to discontinue the use of a reliability incentive mechanism that is based on rewards and penalties." (D.06-05-016, Finding of Fact 192.) Aglet states that the Commission responded to its concern about complexity by: (1) indicating that the RIIM "does add a level of complexity;" (2) requiring the settling parties to determine attrition year expenditure levels, and (3) ordering that SCE's compliance filing "should include … jointly determined information, with supporting workpapers." (D.06-05-016, mimeo., pp. 34-35.)

Aglet submits that it made a substantial contribution to resolution of reliability incentive issues by providing record support for Finding of Fact 192, on which Aglet prevailed, and by highlighting the complexity of the RIIM, which led to the requirement for attrition calculations and workpapers.

5.1.9. Other Issues

Aglet also addressed several other issues, which it considered to be of lesser importance. Aglet asserts substantial contribution in varying degree as explained below:

<u>Customer Accounts Nonlabor Costs</u>: DRA and Aglet opposed SCE's reliance on a three-year trend of nonlabor costs for various customer accounts expenses. The Commission rejected use of the trend for some but not all related expenses. Aglet's showing supplemented and complemented DRA's showing by pointing out additional reasons why the use of a three-year trend was incorrect.

<u>SONGS Cost Allocation</u>: Aglet pointed out the uncertainty of the ownership share of SONGS by SDG&E. No party disputed the uncertainty, and the Commission did not explicitly discuss it.

<u>Four Corners Attrition</u>: Aglet opposed a specific attrition provision that would allow SCE to recover forecast costs for a major overhaul at the Four Corners Generating Station in 2008. Aglet argued that there is no precedent for

such a mechanism, and the amount at stake is not large. The Commission agreed with Aglet that the amount at risk does not justify a new mechanism, although it allowed SCE to recover the costs at issue by amortizing them over the entire rate case cycle.

Project Development Expense: Along with several other parties, Aglet opposed rate recovery of $4,950,000 of project development expenses. Late in the proceeding, Aglet argued that project development costs should be separated into general costs and costs related to specific projects. The proposed decision would have included project development costs in rates, subject to refund. The final decision excluded the costs from rates, but allowed SCE to record them in a memorandum account. Aglet argues that its comments on the proposed decision caused the revision.

Public Affairs Expense: Aglet supported DRA's proposed 25% disallowance of administrative and general expenses for public affairs activities. The Commission rejected the 25% disallowance, but disallowed 14% of incremental expenses over the 2003 recorded adjusted level.

Depreciation: Aglet supported TURN's position regarding protection of current revenues collected for future costs of removal of certain assets. The Commission agreed with TURN, and recognized collected funds as a regulatory liability.

Escalation Factors: The proposed decision would have authorized attrition year escalation of prior year plant additions "escalated for inflation." (Proposed Decision, p. 285.) Aglet commented that without further specification the proposed decision was vague and ambiguous. SCE commented that there was no support for capital escalation rates that the proposed decisions used in results of operation tables. SCE argued for escalation rates in the range of 2.8% to 3%. Aglet recommended use of Consumer Price Index (CPI) forecasts and states that the adopted value of 2.5% appears to be a compromise of SCE and Aglet positions. Aglet asserts that it made a substantial contribution to the adopted outcome as it was the only party other than SCE to comment on this issue.

Minor Corrections and Revisions: Aglet suggested 13 minor corrections and revisions to the proposed decision. The Commission adopted 10 of them, and rejected two. One became moot when the underlying text was deleted.

5.1.10. Discussion

A review of the record confirms Aglet's assertions regarding its substantial contributions to D.06-05-016, including that related to E&BD expenses. As Aglet indicates, it was the only party to address SCE's E&BD request, although D.06-05-016 did not adopt any factual or legal contentions, or specific policy or procedural[4] recommendations put forward by Aglet. For E&BD issues, D.06-05-016 merely reflected the outcome of D.05-09-018 in A.04-04-008/A.04-06-018, wherein Aglet did not prevail. For theses reasons, Aglet reduced its request by 50% of its estimated costs related to this issue. We note that Aglet estimated those costs by allocating time to specific issues based on the number of pages of testimony, briefs and comments for each issue compared to the total pages for all issues. In general, this is a reasonable method for allocating time to specific issues, and we will reflect Aglet's self imposed reduction in determining its award.

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4 Aglet did alternatively recommend that the Commission defer ruling on SCE's funding request until the Commission acted on E&BD policy issues in A.04-04-008/A.04-06-018. While D.06-05-016 did reflect the outcome of that consolidated proceeding, Aglet's contribution cannot be considered substantial solely for that reason, since such action would have occurred as a matter of course.

5.2. Greenlining

Greenlining indicates that its role in this proceeding focused on four issues, all related to corporate responsibility. The issues are: supplier diversity, management diversity, philanthropy, and transparency of executive compensation. Greenlining did not ask the Commission to take punitive action against SCE on any of these issues, but instead urged the Commission to highlight SCE deficiencies and Commission policy in regard to these matters.

Greenlining's claims regarding substantial contribution are summarized below.

5.2.1. Supplier Diversity

D.06-05-016 cites Greenlining throughout the discussion in Section 15.51.3. For example, Greenlining recommended that SCE be urged, but not ordered, to demonstrate its commitment to supplier diversity by honoring its 1989 General Order (GO) 156 diversity target of 22.5%. As evidence of its contribution, Greenlining cites the following:

> During the proceeding, Greenlining provided a copy of its annual supplier diversity report for major utilities regulated by this Commission. The 2004 report, rates utility efforts with respect to contracting practices with Minority Business Enterprises (MBEs). With 16.4% of its contracts going to minorities, SCE ranked 5th with a C+ rating. When compared to [the ratings for other utilities], SCE's efforts are *barely adequate. We urge SCE to increase its efforts in this area, and will look favorably at performance and ratings that demonstrate greater SCE leadership in contracting with minorities. Consideration of the 1989 22.5% contracting goal for MBEs, even though the conditions regarding exclusions have changed, would be a significant step in that direction.* While utilization of MBE suppliers may be dependent on the utilities' needs and the availability of MBE vendors to fulfill those needs, the variance in MBE utilization between utilities does suggest that there may be MBE opportunities that some utilities are overlooking. Practices and plans related to

> the utilization of [diverse] suppliers are the subject of annual utility and Commission reports required by GO 156. If potential improvements in supplier diversity can be identified through this process, they should be considered for implementation. (D.06-05-016, mimeo., pp. 180-181, emphasis added.)
>
> In its opening brief, Greenlining proposes that SCE be required to track its supplier diversity achievements for small and medium sized minority businesses and to report to its [management] the dollar amount of its supplier diversity that is awarded to minority owned businesses with revenues of $10,000,000 or less …. If deemed appropriate, such a requirement can be developed generically, in the future. (D.06-05-016, mimeo., pp. 181-182.)

5.2.2. Management Diversity

Greenlining claims substantial contribution to the Commission's determinations regarding SCE's management diversity, citing the following:

> During the proceeding, Greenlining developed information that showed among SCE's top 100 managers, 10% were African American, 4% were Latino and 4% were Asian American. While Greenlining commends SCE for its achievements regarding African Americans, it criticizes that for Latinos and Asian Americans whose population is larger than that of African Americans by six times and two times, respectively. We agree in both respects. SCE has shown that it can achieve significant African American representation in its management through internal development and outside hiring. SCE also recognizes the need to make solid progress in the workforce diversity and cites its strategies and programs to do so. *We urge SCE to immediately implement such mechanisms to increase the representation of Latino and Asian American managers and look forward to seeing the results of its efforts. As part of its next GRC filing, SCE should provide information on its workforce diversity achievements, similar to that provided by Greenlining in Exhibit 505.* (D.06-05-016, mimeo, p. 182, emphasis added)

5.2.3. Philanthropy

Greenlining raised the issue of philanthropy, particularly in the context of executive compensation packages, with a focus on underserved communities. In 2004, Greenlining noted, $1,300,000 in philanthropy was given by SCE to the poor, versus $10,300,000 in compensation given to SCE's Chief Executive Officer. With regard to its contribution to the issue of philanthropy, Greenlining cites the following:

> During the proceeding, Greenlining developed information that compared SCE's philanthropy to bonuses to top executives. For example, in 2004, while bonuses to the CEO amounted to approximately $8,700,000 and bonuses to the top 30 executives amounted to approximately $30,200,000, SCE's philanthropy consisted of $80,000 to African Americans, $237,000 to Latinos, $142,000 to Asian Americans, and $1,266,000 to the poor. According to SCE, it has committed to a philanthropy goal of 1% of pre-tax income with 60% going to nonprofit and community based organizations that support the underserved community. While Greenlining would commend that goal, it urges SCE to consider President Peevey's urging of utilities to develop strategic long-term philanthropic programs where cash philanthropy equals or exceeds 2% of pre-tax profits and at least 80% is committed to underserved and poor communities.
>
> For many reasons, including good corporate citizenship, social responsibility, and public perception, philanthropy is an important consideration for SCE/EIX [Edison International – parent company of SCE] and corporations in general. … *We urge EIX/SCE to give due consideration to President Peevey's stated opinions and preferences in this area when determining its philanthropic goals.* (D.06-05-016, mimeo., pp. 182-183, emphasis added.)

5.2.4. Transparency of Executive Compensation

Greenlining also urged that SCE be ordered to provide full executive compensation transparency, as provided by PG&E, and transparent and understandable information on the present and future market value of retirement severance benefits of its top executives. As evidence of its contribution, Greenlining cites the following:

> For purposes of the General Order 77-L report, SCE should follow the PG&E model for reporting executive compensation. *Also, in its next GRC, SCE should provide full transparent and understandable information on the present and future market value of the retirement severance benefits of its top executives.* (D.06-05-016, mimeo., p. 184, emphasis added.)

5.2.5. Other Issues

Greenlining also recommended that the Commission urge SCE to consider linking large top executive bonuses ($73 million over the last three years to the top 30 executives) to issues of concern to this Commission, including philanthropy to the poor, supplier diversity, management diversity and quality consumer services. As evidence of its contribution, Greenlining cites the following:

> … in order to enhance its efforts in these areas, we encourage SCE to consider the inclusion of supplier diversity, workforce diversity and quality consumer service results in determining incentive compensation for the responsible employees or executives. (D.06-05-016, mimeo., p. 184.)

Finally, Greenlining recommended that SCE be put on notice that top executive compensation, even if technically absorbed by the shareholders, directly affects ratepayer costs (since unions now carefully monitor top executive compensation packages). According to Greenlining, while the Commission did not take action on this recommendation, it is cited in the final decision.

5.2.6. Discussion

Greenlining was the only party that addressed the issues of supplier diversity, management diversity, philanthropy and transparency of executive compensation. As indicated above, D.06-05-016 incorporated much of the information provided by Greenlining in developing discussions that urged SCE to perform at a higher level in each of the areas, as recommended by Greenlining. We find that Greenlining substantially contributed in each of the areas as previously described.

5.3. TURN

As support for its compensation request, TURN provided the following table that shows, by issue, the resolution and dollar impact of each of its positions in this case.

Table 1: Summary of TURN positions and Commission decision

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Generation				
Mohave Generating Station	Provided evidence that plant operation would not continue past 2005. Recommended an interim shutdown scenario but only allowed $10.11 million in capital additions and an O&M budget of $12 million. Ex. 356 Marcus Direct) pp. 18-28; TURN Brief pp. 13-26.	Rejected TURN's capital additions and O&M recommendations but rejected SCE's continuing operations scenario due to evidence indicating continued operations would not occur. Pp. 16-18.		

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
SONGS capital - used fuel storage and marine mitigation	Recommend continuation of 50/50 sharing of costs and reductions $32.9 million in 2006-08 due to lower spending in 2004 and 2005. Ex. 356 (Marcus Direct) p. 57; TURN Brief pp. 10-11.	Affirms policy that ratepayers have contributed in past but adopts SCE's proxy approach to measure ratepayer contribution. P. 221.		$16,951,000
SONGS O&M - NEI Funding	Disallow 50% of dues due to political advocacy work of NEI. Ex. 356 (Marcus Direct) p. 32; TURN Brief p. 12.	Adopt TURN recommendation. P. 35.	$326,000	
SONGS O&M - leases (Acct. 525)	Adjustment to nuclear lease payments and escalation. Ex. 356 (Marcus Direct) p. 33; TURN Brief p.11.	Accepted by SCE.	$102,000	
SONGS O&M - nuclear workers' comp (Acct. 528)	Adjustment due to different estimation method for past workers' compensation. Ex. 356 (Marcus Direct) pp. 33-35; TURN Brief p. 11.	Accepted by SCE.	$1,354,000	
Palo Verde O&M - refueling cost (Acct. 530)	Reduce forecast. Ex. 356 (Marcus Direct) p. 36; TURN Brief pp. 12-13.	Accepted by SCE.	$451,000	
Palo Verde O&M - Redhawk water sales (Acct. 519)	Reduce forecast. Ex. 356 (Marcus Direct) p. 37; TURN Brief pp. 12-13.	Accepted by SCE.	$127,000	
Palo Verde O&M - SCE oversight (Acct. 517)	Reduce forecast. Ex. 356 (Marcus Direct) p. 37; TURN Brief pp. 12-13.	Accepted by SCE.	$263,000	
Hydro Capital - Florence Dam repairs	Recommend that the $1.545 million of Florence Dam Buttress Repair costs not be recovered in rate base. Ex. 356 (Marcus Direct) p. 58; TURN Brief p. 26.	Adopt TURN recommendation. P. 225.		$1,545,000
Transmission and Distribution				

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Various accounts	TURN recommended a reduction of $5.228 million in seven accounts.	SCE agreed with several recommendations to reduce T&D O&M expenses. See TURN Opening Brief, p. 28 for citations to comparison exhibit.	$5,228,000	
Acct. 586.100 - Service Turn on/off	Recommends different method for CSBU portion of labor and non-labor costs, resulting in recommended reduction of $876,000. Exh. 356 (Marcus Direct) pp. 43-44.	Rejects TURN's proposal for labor costs, but adopts TURN's recommendation for non-labor costs. P. 84.	$674,000	
Acct. 593.300 - supply	TURN recommends lower increase due to unreasonable increase.	Adopts TURN's forecast. PP. 93-94.	$333,000	
Acct. 586.400 - Meter Testing	Recommends lower forecast for training expenses (labor and non-labor) based on historical training costs and meter tests. Exh. 356 (Marcus Direct) p. 44-45.	Reduces labor forecast based on DRA recommendation, which overlaps with TURN's recommendation. Does not adopt TURN recommendation for non-labor. PP. 86-87.		
O&M - Priority 5 maintenance	Recommends that SCE's request be rejected as premature. Exh. 350 (Schilberg Direct) p. 5-10. Supports stipulation withdrawing SCE request.	Adopts joint stipulation between SCE, DRA and TURN, withdrawing SCE funding request. PP. 62-63.	$40,800,000	
O&M - Priority 5 maintenance	Recommends that SCE's request for P5 maintenance, if adopted, be reduced by 90%. Exh. 350 (Schilberg Direct) pp. 10-23.	Rendered moot due to stipulation.		
Acct. 590.980 - division overheads	Recommends reallocation from O&M to capital with adoption of Priority 5 proposal. Exh. 356 (Marcus Direct) pp. 41-43.	SCE agrees with adjustment. Decision reduces amount reallocated by 40% to account for other T&D expense reductions. PP. 92-93.		
Acct. 597.400 - electric meter repair	Opposes SCE's use of 2003 recorded due to nonrecurring TOU meter reprogramming and reduced repair of real time energy meters. Exh. 356 (Marcus Direct) pp. 45-46.	Adopts TURN's recommendation. PP. 94-95.	$130,000	

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Acct. 456.900 - Added facilities OOR	Recommends excluding 1999 from historical average, resulting in a forecast increase of $233,000.	States that "not clear" which average period most appropriate and uses five-year average without 1999, resulting in an increase of $98,000. p. 95.		
Customer Accounts Expenses				
Acct. 901-903 - Direct Access Cost Growth	Forecast of 2006 DA costs should be capped at the 2003 recorded/adjusted level with no increase to 2006. Ex. 336 (Nahigian Direct) pp.1-3; TURN Brief pp. 81-83.	Reject TURN proposal. P. 109.		
Acct. 456 - Direct Access Fees	Increase discretionary DA service fees by 25% to account for inflation. Ex. 336 (Nahigian Direct) p. 3-4.; TURN Brief pp. 90-91.	Adopt TURN recommendation. P. 110.		
Customer Service				
Acct. 586.100	See T&D above.			
Acct. 586.400	See T&D above.			
Acct. 597.400	See T&D above.			
Service Establishment Charge and Field Assignment Charge.	TURN recommends no increase in these charges.	Rejects TURN's recommendations. PP. 118-119.		
Administrative & General				
Corporate Real Estate	Expenses should be removed from GRC because subject to OOR mechanism adopted in D.99-09-070. Ex. 356 (Marcus Direct) pp. 28-29; TURN Brief pp. 99-101.	Accepted by SCE, utility testimony withdrawn 21 RT 2037-2039.	$3,212,000	
	Called for audit of OOR mechanism for review in next GRC. Ex. 356 (Marcus Direct) pp. 28-29; TURN Brief pp. 99-101.	Accepted by SCE 21 RT 2037-2039. D.06-05-016, p. 96, also Ordering Para. 17.		

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Human Resource Service center		Accepted by SCE.	$37,000	
Capitalized A&G		Accepted by SCE.	$3,226,000	
Results Sharing	Supported 50/50 sharing of the incentive program compensation	Rejects DRA position but adopts memorandum account to ensure no overpayment above recorded costs. P. 131.		
In-House Legal Expenses	Recommends time tracking legal expenses by proceeding or project. Ex. 356 (Marcus Direct) pp. 91-93;TURN Brief pp. 91-93.	Rejects TURN recommendation but requires SCE to provide study of costs and benefits of implementing time-tracking in next GRC. P. 148.		
Workers' Compensation Reserve	Recommends using 2004 recorded escalated by 10% due to passage of SB 899 and other potential legislation. Ex. 356 (Marcus Direct) pp. 46-47; TURN Brief pp. 93-99.	Adopts average of 2001 and 2002, which is slightly lower than 2004 recorded (as adjusted for claims), thus even slightly lower than TURN proposal p. 169.	$5,966,000	
Workers' Compensation Reserve	Recommends two-way balancing account due to significant uncertainties. Ex. 356 (Marcus Direct) pp. 46-47; TURN Brief pp. 93-99.	Rejects TURN proposal. P. 169.		
Compliance with Affiliate Rules	Recommends reduction to Accounts 920/921 for costs for complying with affiliate transaction rules. TURN Brief p. 93.	Adopts TURN's recommendation. P. 159.	$225,000	
Rate Base				
Working cash - Other Accounts Receivable	Reduction of $2.6 million due to inclusion of uncollectible reserve for other accounts receivable. Ex. 356 (Marcus Direct) pp. 72-74; TURN Brief pp. 110.	Rejects TURN position. P. 289.		

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Working Cash - various	Nine reductions due to recommendations concerning prepayments, other accounts receivable, participant billings, etc. Summarized in TURN opening brief, Sec. 8.4.1, Table 8-2.	Accepted by SCE.		$115,758,000
Customer Advances for Construction	Recommends higher level by using more recent 2004 recorded data. Ex. 356 (Marcus Direct) p. 67; TURN Brief pp. 103-106.	Adopts TURN method and forecast. P. 278.		$6,813,000
Customer Deposits	Supports Aglet's position or alternative based on 5-year average. Ex. 356 (Marcus Direct) p. 68.	Adopts last year recorded based on upward trend; thus adopting number even higher than recommended by Aglet.		
Working Cash - Workers' Compensation Reserve Funds	Recommends that reserve for workers' compensation claims offset rate base. Ex. 356 (Marcus Direct) p. 77; TURN Brief pp. 111-114.	Originally adopted in proposed decision, but revised final decision rejects TURN's primary proposal. Pp. 284-289.		
Working Cash - Workers' Compensation Reserve Funds	Recommends as alternative that reserve for workers' compensation should not be included in lead-lag study. Ex. 356 (Marcus Direct) p. 77; TURN Brief pp. 111-114.	Accepted by SCE.		$8,395,000
Working Cash - Reserves for Injuries and Damages	Recommends that reserve for injuries and damages other than workers' compensation claims offset rate base. Ex. 356 (Marcus Direct) p. 78; TURN Brief pp. 111-114.	Adopts TURN position. P. 288.		$32,822,000
T&D Meter Set Costs	Adjust Edison's forecast of capital investment in new customer connections to reflect little or no customer growth over the 2004-2008 forecast period. Ex. 336 (Nahigian Direct) pp.5-7; TURN Brief p. 67.	SCE corrected the escalation rate used to calculate the forecast of capital investment for new service connections due to TURN's testimony, which reduced the forecast by $18.121 million. Decision adopts DRA's proposal. PP. 198-199.		$18,121,000

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
Line Extension allowances for existing customers	Recommended that no line extension allowances be provided for upgrading electric panel boxes, house remodels or undergrounding service. Also recommended changes to the language of Rule 16, F. Recommended that the calculation of the allowances be considered in the separate line extension proceeding. Ex. 336 (Nahigian Direct) pp.8-10; TURN Brief pp. 68-73.	Rejects TURN's position but recognizes that TURN's concerns can be addressed in the separate line extension proceeding. P. 202.		
Leased Meters		Rejects TURN position. P. 231		
Plant in Service - CAC to CIAC	Recommend transfers reflected in recorded data be incorporated in forecast of future plant. Ex. 356 (Marcus Direct) p. 65; TURN Brief p. 76.	Adopts TURN position. P. 219.		$2,619,000
Depreciation				
Regulatory Liability for Costs of Removal	Recommended establishment of regulatory liability for ratemaking purposes for $2.1 billion of costs of removal collected but not yet spent. Ex. 348 (Majoros), pp. 13-20; TURN Brief pp. 117-133	Adopted TURN position -- pp. 204-205		
Reporting Requirements	Recommended separate tracking of non-ARO removal costs -- Ex. 348 (Majoros), p. 20.	Deemed not in dispute in light of SCE rebuttal clarifying that utility already tracks separately -- p. 205.		
Calculation of costs of removal	Questioned whether SCE approach is reasonable, particularly assumption under TIFCA that future inflation is likely to mirror historical inflation -- Ex. 348 (Majoros), pp. 23-39; TURN Brief pp. 136-150	Required SCE, as part of its account-by-account analysis, to analyze the effects of past inflation on its cost of removal rates and justify the implicit inflation rate -- p. 208.		

Issue	TURN Position	Resolution in D.06-05-016	Resulting Reduction in Expense	Resulting Reduction in Capital
	Recommended net present value methodology for calculating inflation impact -- Ex. 348 (Majoros), p. 43; TURN Brief, pp. 150-160.	Adopted DRA position of approximately $75 million less than SCE request, with one adjustment favoring SCE. While did not adopt TURN position, generally conservative approach was consistent with concerns raised by TURN. Also called for a more thorough record in next GRC, including a more detailed analysis from SCE justifying the reasonableness of applying its recommended method on a going forward basis -- p. 210.		
Results of Operations				
Income Taxes	Proposed to disallow for ratemaking purposes the non-deductibility of individual employee salaries in excess of $1 million. Ex.356 (Marcus Direct) p. 54; TURN Brief p. 173.	SCE accepted TURN's proposal.	$2,300,000	
Income Taxes	Proposed to calculate the deduction for dividends paid to the ESOP using Edison International's stock dividend increase starting in the first quarter of 2005 and proposes to increase the deduction by 4% in 2006. Ex. 356 (Marcus Direct) p. 55; TURN Brief p. 173.	SCE accepted these adjustments	$4,300,000	
Sales Forecast	TURN proposes residential sales forecast increase of 946 GWH by using method that incorporates impact of energy crisis. Exh. 356 (Marcus Direct) pp. 4-6.	SCE does not adopt TURN method but updates forecast with recent data resulting in increase in residential sales of 1070 GWH. Exh. 105, p. 1.		
TOTAL DISALLOWANCES ADOPTED			**$69,054,000**	**$203,024,000**
TOTAL REV REQ IMPACT (assume 15% carrying charge)				**$99,507,600**

5.3.1. Discussion

As described in the above table, TURN substantially contributed to the resolution of a large number of issues in D.06-05-016. Where SCE agreed to certain TURN proposals and where the decision specifically adopted other TURN proposals, at least in part, the "substantial contribution" requirement as stated in § 1802(i) has been met.

Also, in most cases where TURN's proposals were not adopted, TURN provided a substantial contribution in the form of information and analysis that assisted the Commission in the decision process. For instance, regarding Mohave expenses and capital costs, TURN demonstrated the potential for excessive and unnecessary spending while Mohave is shut down. The Commission, while not specifically adopting TURN's Mohave cost forecasts, noted TURN's concerns and adopted Mohave expenses and capital costs subject to memorandum account treatment and reasonableness review. (D.06-05-016, Ordering Paragraph 8.) Similarly, TURN's depreciation proposals for calculating cost of removal rates were not adopted, but TURN did provide information and analysis which demonstrated the sensitivity of historic and future cost inflation in calculating the cost of removal rates. D.06-05-016 concluded:

> In its next GRC, SCE should, as part of its account-by-account analysis for depreciation, analyze the effects of past inflation on its proposed cost of removal rates and justify the implicit inflation rates reflected in its proposed rates. (D.06-05-016, Conclusion of Law 32.)

Also, for workers' compensation reserve, TURN's forecast using 2004 recorded data plus 10% as well as its recommendation for a two-way balancing account were not adopted. However, TURN's analysis of 2004 recorded costs, including its argument that 2004 was the only recorded year that reflected certain workers' compensation reform, provided useful information in deciding this issue. The

Commission adopted an average of 2001 and 2002 recorded costs, specifically indicating the adopted amount is close to that recorded in 2004, which to a certain extent reflects recent workers' compensation reforms. (D.06-05-016, mimeo., p. 169.)

There are, however, three instances where TURN's proposals were not adopted, and the Commission did not incorporate TURN's analyses or provided information in deciding the issues. First, TURN noted that the current pool of direct access (DA) customers can decrease but cannot increase under the Commission's current rulings. For customer accounts expenses related to DA customers, TURN therefore recommended that the 2006 DA costs be capped at the 2003 recorded/adjusted level with no increase to 2006. The Commission rejected TURN's proposal noting costs can increase for reasons other than customer growth. (D.06-05-016, mimeo., p. 109.) The Commission also found:

> Since DA-related costs in Accounts 901, 902 and 903 are no longer tracked separately, the forecast of those DA-related costs are embedded in SCE's forecasts for all customers. Forecasting separate DA-related costs is not appropriate at his time due to the uncertainties associated with such estimates. (D.06-05-016, Finding of Fact 65.)

Second, TURN recommended that costs of leased meters be excluded from plant-in-service and rate base, since the costs should either be paid for through special facilities agreements or should be paid up front by the customer. Based on evidence that meter leasing revenue is reflected in rates through several operating revenue accounts, TURN's recommendation to exclude leased meter costs from rate base was rejected. (D.06-05-016, mimeo., p. 231.) Third, TURN recommended the inclusion of uncollectible reserves for other accounts receivable aside from claims to reduce working cash. However, the Commission found:

> It is reasonable to exclude atypical uncollectible accounts receivable for non-claims as an offset to working cash, since this particular uncollectible account is not funded in rates. (D.06-05-016, Finding of Fact 182.)

We find that TURN did not substantially contribute to the resolution of these three issues, specifically, limiting customer account costs for DA customers, excluding leased meters from plant-in-service and rate base, and including uncollectible reserves for other accounts receivable aside from claims to reduce working cash. TURN should not be compensated for the costs it incurred with respect to theses three issues. As a result, we reduce the TURN's award by 21.5 hours for Nahigian, 1.3 hours for Marcus, 4.25 hours for Suetake and 9.75 hours for Hawiger.[5] For all other issues contained in the table above, we find that TURN made substantial contributions to D.06-05-016.

6. Reasonableness of Requested Compensation

In general, the components of these intervenor compensation requests must constitute reasonable fees and costs of each customer's preparation for and participation in a proceeding that resulted in a substantial contribution. In order

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[5] Reductions assume the following:

For DA customer accounts - Suetake 1 page of 177 page opening brief (0.56%) and total attorney time of 754.75 hours (excluding compensation) and Nahigian 2 pages of 18 pages of testimony (11.11%) and 193 total hours.

For leased meters – Hawiger 2 pages of 177 page opening brief (1.13%) and total attorney time of 754.75 hours (excluding compensation) and Marcus 0.5 pages of 78 pages of testimony (0.64%) and 136.81 total hours.

For uncollectible reserves - Hawiger 0.3 pages of 177 page opening brief (0.17%) and total attorney time of 754.75 hours (excluding compensation) and Marcus 0.25 pages of 78 pages of testimony (0.32%) and 136.81 total hours.

to determine reasonableness, we first assess whether the hours claimed for the customer's efforts that resulted in substantial contributions to Commission decisions are reasonable by determining to what degree the hours and costs are related to the work performed and necessary for the substantial contribution. We next take into consideration whether the claimed fees and costs are comparable to the market rates paid to experts and advocates having comparable training and experience and offering similar services. We next consider productivity. D.98-04-059 directed customers to demonstrate productivity by assigning a reasonable dollar value to the benefits of their participation to ratepayers. The costs of a customer's participation should bear a reasonable relationship to the benefits realized through their participation. This showing assists us in determining the overall reasonableness of the request. Lastly, we consider the reasonableness of direct expenses such as travel, photocopying, postage, telephone/fax, and messenger services.

6.1. Aglet

Aglet requests $87,982.71 for the participation of James Weil, its director, in this proceeding, as follows:

Advocate	Year	Rate	Hours	Total
Weil	2005	$250	278.4	$69,600.00
Weil (Travel & Compensation)	2005	$125	56.1	$ 7,012.50
Weil	2006	$262	28.5	$ 7,467.00
Weil (Travel & Compensation)	2006	$131	16.5	$ 2,161.50
Subtotal				$86,241.00
Photocopies				$ 459.33
Postage & FedEx				$ 196.06
FAX Charges				$ 2.00
Travel Costs				$ 1,084.32
Subtotal				$ 1,741.71
Total Request				$87,982.71

6.1.1. Hours and Costs Related to and Necessary for Substantial Contribution

Aglet documented its claimed hours by presenting a daily breakdown of Weil's hours accompanied by a brief description of each activity. The hourly breakdown, including the 50% reduction of time on E&BD issues, reasonably supports the claim for total hours.

6.1.2. Market Rate Standard

Aglet seeks an hourly rate of $250 for work performed by Weil in 2005. We previously approved this rate in D.05-10-009, and adopt it here. For 2006 Aglet requests a rate of $262 for Weil which represents a 4.8% increase over the 2005 rate of $250. Aglet cites a 4.2% increase in the CPI– All Urban Consumers, and the 5.3% three-month commercial paper rate that California utilities apply to short term balancing accounts as justification. We decline to adopt the requested 4.2% increase. Consistent with the guidance provided in the Order Instituting Rulemaking (R.) 06-08-019, we instead adopt an hourly rate of $260 for Weil in 2006, which represents an increase of 3% over the 2005 rate, rounded to the nearest $5 increment.

6.1.3. Productivity

Aglet's participation was productive in that the impact of that participation far exceeded fees and other costs. In its request, Aglet details cost savings due to its efforts and estimates total rate case cycle revenue requirement savings of approximately $34,400,000. This includes $17,500,000 for reduced costs related to four SONGS refueling outages, $6,300,000 due to the adoption of a lower uncollectible factor, $1,500,000 for energy center cost reductions, $5,800,000 for customer deposits and $3,300,000 related to the effects of the lower adopted attrition year capital escalation. We find that Aglet's efforts have been productive.

6.1.4. Direct Expenses

The itemized direct expenses submitted by Aglet include costs for travel, photocopying, postage, telephone/fax, and messenger services and total $1,741.71. The cost breakdown included with the request shows these miscellaneous expenses to be commensurate with the work performed. We find these costs reasonable.

6.2. Greenlining

Greenlining requests $141,484.35[6] for its participation in this proceeding, as follows:

Advocate	Year	Rate	Hours	Total
Robert Gnaizda – attorney	2005	$490	146.9	$ 71,981.00
Gnaizda	2006	$490	17.8	$ 8,722.00
Itzel Berrio – attorney	2005	$325	120.0	$ 39,000.00
Carrie Camarena - attorney	2006	$275	16.0	$ 4,400.00
Camarena (Compensation)	2006	$137.50	4.0	$ 550.00
Chris Vaeth – expert	2005	$180	28.75	$ 5,175.00
Noelle Abastillas – paralegal	2005	$125	13.85	$ 1,731.25
Millie Lapidario – paralegal	2005	$125	2.3	$ 287.50
Lapidario	2006	$125	5.0	$ 625.00
John Gamboa – expert	2005	$360	14.25	$ 5,130.00
Michael Phillips – expert	2005	$360	10.5	$ 3,780.00
Subtotal				$141,381.75
Photocopies				$ 102.60
Total Request				$141,484.35

6 In its July 17, 2006 filing, Greenlining requested $151,234.35. That amount was reduced in the August 25, 2006 supplemental filing.

6.2.1. Hours and Costs Related to and Necessary for Substantial Contribution

With one exception, Greenlining documented its claimed hours by presenting a daily breakdown of each advocate's hours accompanied by a brief description of each activity.

The one exception relates to Berrio's time. In its July 17, 2006 compensation request, Greenlining estimated a total of 150 hours for her time in this proceeding. Greenlining was unable to determine Berrio's exact hours because she was no longer employed by Greenlining and was then currently traveling. On August 25, 2006, Greenlining filed a supplement to its request that revised Berrio's total hours to 120. The supplement contained statements from Greenlining's Special Projects Director (Vaeth) and General Counsel (Gnaizda), but still did not precisely identify the number of total hours for Berrio.

We have no specific documentation of the exact number of hours that Berrio spent on this proceeding. From the available information, it is evident that she participated in the review of SCE's testimony, represented Greenlining at the first prehearing conference, reviewed Greenlining's prepared testimony, met with Greenlining's general counsel and witnesses on related matters, and cross examined SCE's main policy witness Fohrer. Greenlining should be reasonably compensated for her time on these activities. However, Berrio did not participate in Greenlining's cross examination of SCE witnesses Grigsby, Quevedo, Aldrete or Cogan and she did not prepare the briefs, prepare comments on the proposed decision, present oral argument, or prepare the intervenor compensation request, all of which were performed by other counsel for Greenlining.

Documentation in the form of a log of time spent on specific activities is generally done as a matter of course and is the starting point for determining the reasonableness of requested compensated hours. Greenlining's situation in this case is unusual in that this information is not available due to the circumstances of Berrio's departure. Greenlining's original estimate of 150 hours of time for Berrio appears high considering the extent of her participation and the fact that she incurred 173.7 hours for full participation in the prior SCE GRC proceeding (test year 2003) wherein essentially the same issues were litigated. While Greenlining subsequently reduced its request for Berrio to 120 hours, that number is also not substantiated by logs or similar documentation. Whether it reasonably represents the time that Berrio spent on this proceeding is not clear.

In the absence of more precise information, we determine the number of compensable hours for Berrio in this GRC by assuming a total level of Greenlining attorney time that is equal to that incurred in SCE's test year 2003 GRC, noting that Greenlining's issues and activities are similar in both cases. A review of the available information indicates the activities performed by Gnaizda and Berrio in SCE's test year 2003 GRC are comparable to the activities performed by Gnaizda, Berrio, and Camarena in the test year 2006 GRC. For the test year 2003 GRC, Gnaizda and Berrio logged a total of 280.3 hours.[7] Use of that number results in 97.6 hours for Berrio,[8] which we will consider a reasonable proxy for this proceeding.

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7 D.05-06-031, mimeo., p. 34, shows 106.6 hours for Gnaizda and 173.7 hours for Berrio.

8 For the test year 2006 GRC, Greenlining has provided documentation that substantiates 164.70 hours for Gnaizda and 18.00 hours for Camarena for a total of 182.70 hours. 280.3 hours less 182.70 hours equals 97.60 hours.

6.2.2. Market Rate Standard

Greenlining seeks an hourly rate of $490 for work performed by Gnaizda in 2005 and 2006. We previously approved this rate in D.06-09-011, and adopt it here.

Greenlining seeks an hourly rate of $325 for work performed by Berrio in 2005. We previously approved this rate in D.05-08-015, and adopt it here

Greenlining seeks an hourly rate of $275 for work performed by Camarena in 2006. We previously approved a rate of $250 for Camarena for 2005 work in D.06-09-008. Consistent with the guidelines provided in R. 06-08-019, we adopt an hourly rate of $260 for Camarena for 2006 work, an increase of 3% above the 2005 rate, rounded to the nearest $5.

Greenlining seeks an hourly rate of $180 for work performed by Vaeth in 2005. We previously approved a rate of $150 for Vaeth for 2005 work in D.06-09-008, and adopt that rate here

Greenlining seeks an hourly rate of $150 for paralegal work performed by Abastillas in 2005. We previously adopted a rate of $110 for Abastillas for 2005 work in D.06-09-011, and adopt that rate here.

Greenlining seeks an hourly rate of $125 for paralegal work performed by Lapidario in 2005 and 2006. We previously approved this same rate in D.06-09-008 for 2005 work, and adopt it here for both years.

Greenlining seeks an hourly rate of $360 for work performed by both Gamboa and Phillips in 2005. For Gamboa, we previously approved this rate in D.06-09-008, and adopt it here. In the same decision, we adopted a 2005 rate of $335 for Phillips and adopt that rate here.

6.2.3. Productivity

Greenlining has not attempted to quantify savings related to the issues that it addressed in this proceeding. Due to the nature of its issues, such an exercise would be difficult at best, if not impossible. Certainly a more diverse base of suppliers will ultimately result in reduced costs of materials and services that will be reflected in rates. Appropriate diversity in management and transparency in reporting may ultimately result in reduced costs, but at least as important, all four of the issues addressed by Greenlining have policy implications that we feel should be addressed on a periodic basis. We therefore find that the substantial contributions by Greenlining in these areas were productive.

6.2.4. Direct Expenses

Greenlining requests minimal direct expenses amounting to $102.60 for photocopying. We find these costs reasonable.

6.3. TURN

TURN requests $495,060.29 for the participation in this proceeding of its own staff, and for representatives from two consulting firms (JBS Energy, Inc. (JBS), and Snavely King Majoros O'Connor & Lee, (Snavely/King)), it engaged, as follows:

Advocate	Year	Rate	Hours	Total
TURN Staff				
Marcel Hawiger – attorney	2004	$270	3.0	$ 810.00
Hawiger	2005	$270	342.5	$ 92,475.00
Hawiger (Compensation)	2005	$135	0.25	$ 33.75
Hawiger	2006	$280	28.75	$ 8,050.00
Hawiger (Compensation)	2006	$140	14.0	$ 1,960.00
Robert Finkelstein – attorney	2005	$395	232.75	$ 91,936.25
Finkelstein	2006	$410	6.0	$ 2,460.00
Finkelstein (Compensation)	2006	$205	5.5	$ 1,127.50
Nina Suetake – attorney	2004	$190	6.0	$ 1,140.00
Suetake	2005	$190	105.75	$ 20,092.50
Suetake	2006	$200	1.0	$ 200.00
Suetake (Compensation)	2006	$100	8.0	$ 800.00

Hayley Goodson – attorney	2005	$190	23.5	$ 4,465.00
Matt Freedman – attorney	2006	$280	5.5	$ 1,540.00
JBS				
William Marcus	2004	$195	3.25	$ 633.75
Marcus	2005	$210	133.56	$ 28,047.60
Marcus	2006	$210	3.33	$ 699.30
Jeffrey Nahigian	2005	$155	192.5	$ 29,837.50
Nahigian	2006	$155	0.5	$ 77.50
Gayatri Schilberg	2005	$165	297.73	$ 49,125.45
Schilberg	2006	$165	1.0	$ 165.00
Greg Ruszovan	2005	$155	4.88	$ 756.40
James Helmich	2005	$160	82.75	$ 13,240.00
Snavely/ King				
Charles King	2005	$240	1.5	$ 360.00
David Geissler	2005	$160	234.0	$ 37,440.00
Margaret Kenney	2005	$160	184.0	$ 29,440.00
Mike Majoros	2005	$240	304.0	$ 72,960.00
Majoros	2006	$240	2.0	$ 480.00
Trenise Kelly	2005	$75	33.5	$ 2,512.50
Subtotal				$492,865.00
Expenses				
Photocopies				$ 1,012.45
FedEx				$ 168.25
FAX Charges				$ 27.90
Travel Costs				$ 87.00
Telephone				$ 110.52
Postage				$ 15.49
Lexis Research				$ 516.53
Meals				$ 37.40
Consultant - Travel				$ 142.80
" - Parking/Tolls				$ 76.95
Subtotal				$ 2,195.29
Total Request				$495,060.29

6.3.1. Hours and Costs Related to and Necessary for Substantial Contribution

TURN documented its claimed hours by presenting a daily breakdown of its representatives' hours accompanied by a brief description of each activity. The hourly breakdown reasonably supports the claim for total hours.

6.3.2. Market Rate Standard

We have previously approved all of the 2004 and 2005 rates TURN requested for its own staff, and for JBS consultants Marcus, Nahigian and Schilberg (D.06-04-012, D.06-04-065, and D.06-06-018), and adopt those rates here.

For 2006 work, TURN requests for its own staff a general 4% increase from previously adopted 2005 rates. Instead, consistent with the guidance provided in R.06-08-019, we adopt hourly rates for 2006 for TURN's staff of 3% above previously approved 2005 rates, rounded to the nearest $5. The 2006 rate for attorney Freedman is based on the $270 rate adopted in D.06-04-012 for 2005.

For JBS consultant Helmich, TURN requests a rate of $160 for work performed in 2005. We previously approved this same rate in D.05-06-049 for his 2004 work, and adopt it here for 2005.

TURN requests an hourly rate of $155 for JBS consultant Ruszovan for 2005, the same rate JBS billed TURN. While D.06-04-012 adopted a 2005 hourly rate of $135 for Ruszovan for 2005, TURN requests we reconsider the appropriateness of such a rate in light of the following:

- JBS rarely bills TURN for the time Ruszovan devotes to CPUC-related work, since his work is typically for other clients of the firm. Prior to 2006, the last award of intervenor compensation that addressed his hourly rate covered 2001 work. In 1999, 2000 and 2001 the Commission awarded intervenor compensation for his work using the same hourly rate approved for Jeff Nahigian's work during the same periods -- $95, $100 and $115, respectively. The Commission approved new rates for Nahigian's work in 2003, 2004 and 2005 -- $125, $140 and $155. TURN states it seems fair to assume that had TURN also sought fees for Mr. Ruszovan's work during those same years, they would have continued tracking the approved rates for Mr. Nahigian. Instead, because there was no decision adopting an hourly rate for Mr. Ruszovan in 2002 or 2003, the decision in the PG&E Phase 2 proceeding (D.06-04-012, in A.04-06-024) awards $130 for his work in 2004 and $135 for 2005, using the 3% escalator applied to the $115 rate from 2001.[9]

- Ruszovan is the firm's Senior Energy Analyst, with over 16 years of experience in energy conservation, advanced computer analysis, database programming and utility production simulation modeling. Since joining JBS in 1989, he has performed energy-related computer analysis of utility operations, energy data analysis, and major utility customer data base design and development. He has designed and developed a multi-relational database, including a customized data entry program for each major utility, to process and analyze individual facility energy use data. He has built models to integrate analysis of hourly market pricing data and hourly load data for individual customers or customer classes. He has provided consulting services on computer systems, both in hardware design and software operation, for a variety of clients and for the internal operations of JBS.

We agree with TURN and adopt a 2005 hourly rate of $155 for Ruszovan.

For depreciation related issues, TURN engaged the services of Snavely/King, a consulting firm of economists, accountants, engineers and cost

[9] TURN indicates that did not seek formal Commission review of this aspect of D.06-04-012 because the impact was relatively small in that decision (about $500). The impact here would also be quite small. However, according to TURN, using a lower rate will likely have a large impact on upcoming requests for compensation because Mr. Ruszovan has put in a large number of hours on TURN-related work in 2006 (mostly on the PG&E AMI and PG&E billing proceedings, to date).

analysts. We have not established previous hourly rates for Snavely/King representatives. TURN's request is based on the actual rates billed by Snavley/King.

TURN seeks an hourly rate of $240 for work performed by Majoros in 2005 and 2006, and King in 2005.

Majoros is the Vice President and Treasurer of Snavely/King. He has more than two decades experience with the firm, specializing in accounting, financial and management issues. He has testified as an expert witness or negotiated on behalf of clients in more than 130 federal and state regulatory proceedings involving telephone, electric, gas, water, and sewerage companies, on a wide array of complex issues including taxation, divestiture accounting, revenue requirements, rate base, nuclear decommissioning, plant lives, and capital recovery. Majoros has been responsible for developing the firm's consulting services on depreciation and other capital recovery issues into a major area of practice.

King is another partner and the firm's President. He has more than 30 years experience in regulatory economics. He has appeared more than 300 times as an expert witness in more than 30 states, and before federal regulatory agencies in both the United States and Canada. In this proceeding, he devoted a few hours to consulting with Majoros about the development of his testimony and recommendations in this proceeding.

Majoros's and King's qualifications and experience compare favorably with the most senior and principal consultants relied upon by the utilities or intervenors to address such issues. In D.05-11-031, the Commission established an hourly rate range of $110 to $360 for experts for 2005 work. Majoros's and King's rate of $240 falls near the mid-point of that range. In light of their qualifications and experience, a rate of $240 is reasonable and we adopt that rate here.

TURN seeks an hourly rate of $160 for work performed by Kenney and Geissler in 2005. Kenney was recently made a Senior Consultant and Analyst at Snavely/King, after approximately ten years at the firm. Kenney provides project management, analytical, litigation and operations support. Her responsibilities include cost modeling, operations simulation, financial analysis and reporting, database management and research. Kenney also provides analytical support for company witnesses and prepares exhibits for use in the depreciation aspects of regulatory proceedings. This includes analysis of plant lives, retirement patterns, net salvage and reserves. In addition, Kenney has analyzed fuel and power purchases, storm damages, and other revenue requirement issues.

Like Kenney, Geissler is a Senior Consultant with Snavely/King. He joined the firm in 2001 with nearly 20 years experience in software development and system engineering. Geissler is an information technologies expert, who has developed and implemented telecommunications upgrades, database management systems, and data tracking software. He assisted in the upgrade of Snavely King's depreciation software and provides assistance in the firm's depreciation engagements.

Kenney's and Geissler's qualifications and experience compare favorably with other experts with comparable experience. The $160 requested for Kenney's and Geissler's work in 2005 is consistent with the low end of the range of rates outlined in D.05-11-031, and we adopt that rate here.

TURN seeks an hourly rate of $75 for work performed by Kelly in 2005. Kelly provided technical and analytical assistance in the development of expert testimony. TURN states that the range of rates described in D.05-11-031 includes work performed in a "witness support" or "analyst" function similar to the work in an entry-level position similar to Kelly. The $75 rate is below the $110 rate that is the bottom of the range deemed reasonable in D.05-11-031. The $75 hourly rate requested for Kelly is reasonable, and we adopt it here.

6.3.3. Productivity

TURN's participation was productive in that the impact of that participation far exceeded fees and other costs. In its request, TURN details cost savings due to its efforts on 26 separate issues and estimates total revenue requirement savings of approximately $99,507,000 for test year 2006. This includes $69,054,000 in expense related reductions and $203,024,000 in adjustments to capital related expenditures. We find that TURN's efforts have been productive.

6.3.4. Direct Expenses

The itemized direct expenses submitted by TURN include costs for travel, photocopying, postage, telephone/fax, messenger services, and research and total $2,195.29. The cost breakdown included with the request shows these miscellaneous expenses to be commensurate with the work performed. We find these costs reasonable.

7. Awards

As set forth in the tables below, we award intervenor compensation as follows:

Aglet

Advocate	Year	Rate	Hours	Total
Weil	2005	$250.00	278.4	$69,600.00
Weil (Travel & Compensation)	2005	$125.00	56.1	$ 7,012.50
Weil	2006	$260.00	28.5	$ 7,410.00
Weil (Travel & Compensation)	2006	$130.00	16.5	$ 2,145.00
Subtotal				$86,167.50

Photocopies				$ 459.33
Postage & FedEx				$ 196.06
FAX Charges				$ 2.00
Travel Costs				$ 1,084.32
Subtotal				$ 1,741.71
Total Award				$87,909.21

Greenlining

Advocate	Year	Rate	Hours	Total
Gnaizda	2005	$490.00	146.9	$ 71,981.00
Gnaizda	2006	$490.00	17.8	$ 8,722.00
Berrio	2005	$325.00	97.6	$31,720.00
Camarena	2006	$260.00	16.0	$ 4,160.00
Camarena (Compensation)	2006	$130.00	4.0	$ 520.00
Vaeth	2005	$150.00	28.75	$ 4,312.50
Abastillas	2005	$110.00	13.85	$ 1,523.50
Lapidario	2005	$125.00	2.3	$ 287.50
Lapidario	2006	$125.00	5.0	$ 625.00
Gamboa	2005	$360.00	14.25	$ 5,130.00
Phillips	2005	$335.00	10.5	$ 3,517.50
Subtotal				$132,499.00
Photocopies				$ 102.60
Total Award				$132,601.60

TURN

Advocate	Year	Rate	Hours	Total
Hawiger	2004	$270.00	3.0	$ 810.00
Hawiger	2005	$270.00	342.5	$ 89,842.50
Hawiger (Compensation)	2005	$135.00	0.25	$ 33.75
Hawiger	2006	$280.00	28.75	$ 8,050.00
Hawiger (Compensation)	2006	$140.00	14.0	$ 1,960.00
Finkelstein	2005	$395.00	232.75	$ 91,936.25
Finkelstein	2006	$405.00	6.0	$ 2,430.00
Finkelstein (Compensation)	2006	$202.50	5.5	$ 1,113.75
Suetake	2004	$190.00	6.0	$ 1,140.00

Suetake	2005	$190.00	105.75	$ 19,285.00
Suetake	2006	$195.00	1.0	$ 195.00
Suetake (Compensation)	2006	$ 97.50	8.0	$ 780.00
Goodson	2005	$190.00	23.5	$ 4,465.00
Freedman	2006	$280.00	5.5	$ 1,540.00
Marcus	2004	$195.00	3.25	$ 633.75
Marcus	2005	$210.00	133.56	$ 27,774.60
Marcus	2006	$210.00	3.33	$ 699.30
Nahigian	2005	$155.00	192.5	$ 26,505.00
Nahigian	2006	$155.00	0.5	$ 77.50
Schilberg	2005	$165.00	297.73	$ 49,125.45
Schilberg	2006	$165.00	1.0	$ 165.00
Ruszovan	2005	$155.00	4.88	$ 756.40
Helmich	2005	$160.00	82.75	$ 13,240.00
King	2005	$240.00	1.5	$ 360.00
Geissler	2005	$160.00	234.0	$ 37,440.00
Kenney	2005	$160.00	184.0	$ 29,440.00
Majoros	2005	$240.00	304.0	$ 72,960.00
Majoros	2006	$240.00	2.0	$ 480.00
Kelly	2005	$75.00	33.5	$ 2,512.50
Subtotal				$485,750.75
Photocopies				$ 1,012.45
FedEx				$ 168.25
FAX Charges				$ 27.90
Travel Costs				$ 87.00
Telephone				$ 110.52
Postage				$ 15.49
Lexis Research				$ 516.53
Meals				$ 37.40
Consultant - Travel				$ 142.80
" - Parking/Tolls				$ 76.95
Subtotal				$ 2,195.29
Total Award				$487,946.04

Consistent with previous Commission decisions, we order that interest be paid on Aglet's award amount (at the earned on prime, three month commercial paper, as reported in Federal Reserve Statistical Release H.5) commencing on

September 26, 2006, the 75th day after Aglet filed its compensation request. Similarly, we order that such interest be paid on the awarded amounts for Greenlining and TURN commencing on September 30, 2006, the 75th day after both Greenlining and TURN filed their compensation requests. Interest should be paid to each party until full payment of its award is made.

We remind all intervenors that Commission staff may audit their records related to awards and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. The records of Aglet, Greenlining and TURN should identify specific issues for which compensation is requested, the actual time spent by each employee or consultant, the applicable hourly rate, fees paid to consultants, and any other costs for which compensation was claimed.

8. Waiver of Comment Period

This is an intervenor compensation matter. Accordingly, as provided by Rule 14.6(c)(6) of our Rules of Practice and Procedure, we waive the otherwise applicable 30-day comment period for this decision.

9. Assignment of Proceeding

Geoffrey F. Brown is the Assigned Commissioner and David K. Fukutome is the assigned ALJ.

Findings of Fact

1. Aglet, Greenlining and TURN have each satisfied all procedural requirements necessary to claim compensation in this proceeding.

2. Aglet, Greenlining and TURN have each made a substantial contribution to D.06-05-016 as described herein.

3. Aglet, Greenlining and TURN each requested hourly rates for its representatives that, as adjusted herein, are reasonable when compared to the market rates for persons with similar training and experience.

4. Aglet, Greenlining and TURN requested related expenses that are reasonable and commensurate with the work performed.

5. The total of the reasonable compensation for Aglet is $87,909.21.

6. The total of the reasonable compensation for Greenlining is $132,601.60.

7. The total of the reasonable compensation for TURN is $487,946.04.

8. The appendix summarizes today's awards.

Conclusions of Law

1. Aglet, Greenlining and TURN have each fulfilled the requirements of Pub. Util. Code §§ 1801-1812, which govern awards of intervenor compensation, and are entitled to intervenor compensation for their claimed compensation, as adjusted herein, incurred in making substantial contributions to D.06-05-016.

2. Aglet should be awarded $87,909.21 for its contribution to D.06-05-016.

3. Greenlining should be awarded $132,601.60 for its contribution to D.06-05-016.

4. TURN should be awarded $487,946.04 for its contribution to D.06-05-016

5. Per Rule 14.6(c)(6), the comment period for this compensation decision may be waived.

6. This order should be effective today so that Aglet, Greenlining and TURN may be compensated without further delay.

O R D E R

IT IS ORDERED that:

1. Aglet Consumer Alliance is awarded $87,909.21 as compensation for its substantial contributions to Decision (D.) 06-05-016.

2. Greenlining Institute is awarded $132,601.60 as compensation for its substantial contributions to D.06-05-016.

3. The Utility Reform Network is awarded $487,946.04 as compensation for its substantial contributions to D.06-05-016.

4. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay the total awards ordered in Ordering Paragraphs 1, 2, and 3. Payment of the awards shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning the 75th day after the requests were filed. Payment of interest shall commence on September 26, 2006 for Aglet and September 30, 2006 for Greenlining and TURN, and shall continue until full payment is made.

5. The comment period for today's decision is waived.

6. Application 04-12-014 and Investigation 05-05-024 are closed.

This order is effective today.

Dated October 5, 2006, at San Francisco, California.

MICHAEL R. PEEVEY
President
GEOFFREY F. BROWN
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
Commissioners

APPENDIX A

Compensation Decision Summary Information

Compensation Decision:	D0610018	**Modifies Decision? N**
Contribution Decision:	D0605016	
Proceeding(s):	A0412014/I0505024	
Author:	ALJ Fukutome	
Payer(s):	Southern California Edison Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Aglet Consumer Alliance	7/13/06	$ 87,982.71	$ 87,909.21	No	Failure to justify hourly rates
Greenlining Institute	7/17/06	$141,484.35	$132,601.60	No	Failure to substantiate hours charged, failure to justify hourly rates
The Utility Reform Network	7/17/06	$495,060.29	$487,946.04	No	Failure to make substantial contribution, failure to justify hourly rates

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
James	Weil	Policy Expert	Aglet Consumer Alliance	$250	2005	$250
James	Weil	Policy Expert	Aglet Consumer Alliance	$262	2006	$260
Robert	Gnaizda	Attorney	Greenlining Institute	$490	2005	$490
Robert	Gnaizda	Attorney	Greenlining Institute	$490	2006	$490
Itzel	Berrio	Attorney	Greenlining Institute	$325	2005	$325
Carrie	Camarena	Attorney	Greenlining Institute	$275	2006	$260
Chris	Vaeth	Expert	Greenlining Institute	$180	2005	$150
Noelle	Abastillas	Paralegal	Greenlining Institute	$125	2005	$110
Millie	Lapidario	Paralegal	Greenlining Institute	$125	2005	$125
Millie	Lapidario	Paralegal	Greenlining Institute	$125	2006	$125
John	Gamboa	Policy Expert	Greenlining Institute	$360	2005	$360
Michael	Phillips	Policy Expert	Greenlining Institute	$360	2005	$335
Marcel	Hawiger	Attorney	The Utility Reform Network	$270	2004	$270
Marcel	Hawiger	Attorney	The Utility Reform Network	$270	2005	$270
Marcel	Hawiger	Attorney	The Utility Reform Network	$280	2006	$280
Robert	Finkelstein	Attorney	The Utility Reform Network	$395	2005	$395
Robert	Finkelstein	Attorney	The Utility Reform Network	$410	2006	$405
Nina	Suetake	Attorney	The Utility Reform Network	$190	2004	$190
Nina	Suetake	Attorney	The Utility Reform Network	$190	2005	$190

Nina	Suetake	Attorney	The Utility Reform Network	$200	2006	$195
Haley	Goodson	Attorney	The Utility Reform Network	$190	2005	$190
Matthew	Freedman	Attorney	The Utility Reform Network	$280	2006	$280
William	Marcus	Economist	The Utility Reform Network	$195	2004	$195
William	Marcus	Economist	The Utility Reform Network	$210	2005	$210
William	Marcus	Economist	The Utility Reform Network	$210	2006	$210
Jeffrey	Nahigian	Economist	The Utility Reform Network	$155	2005	$155
Jeffrey	Nahigian	Economist	The Utility Reform Network	$155	2006	$155
Gayatri	Schilberg	Economist	The Utility Reform Network	$165	2005	$165
Gayatri	Schilberg	Economist	The Utility Reform Network	$165	2006	$165
Greg	Ruszovan	Computer Modeling	The Utility Reform Network	$155	2005	$155
James	Helmich	Economist	The Utility Reform Network	$160	2005	$160
Charles	King	Economist	The Utility Reform Network	$240	2005	$240
David	Geissler	Engineer	The Utility Reform Network	$160	2005	$160
Margaret	Kenney	Analyst	The Utility Reform Network	$160	2005	$160
Mike	Majoros	Accountant	The Utility Reform Network	$240	2005	$240
Mike	Majoros	Accountant	The Utility Reform Network	$240	2006	$240
Trenise	Kelly	Engineer	The Utility Reform Network	$75	2005	$75

(END OF APPENDIX A)