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Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

Application of California-American Water Company (U210W) for Authorization to increase its Revenues for Water Service by \$4,134,600 or 2.55% in the year 2011, by \$33,105,800 or 19.68% in the year 2012, by \$9,897,200 or 4.92% in the year 2013, and by \$10,874,600 or 5.16% in the year 2014.	A.10-07-007 (Filed July 1, 2010)
Application of California-American Water Company (U210W) for an Order Authorizing and Imposing a Moratorium on New Water Service Connections in its Larkfield District.	A.11-09-016 (Filed September 23, 2011)

INTERVENOR COMPENSATION CLAIM OF The Utility Reform Network AND DECISION ON INTERVENOR COMPENSATION CLAIM OF The Utility Reform Network

2

Claimant: The Utility Reform Network (TURN)	For contribution to D. 12-11-006
Claimed (\$): \$131,195.21	Awarded (\$):
Assigned Commissioner: Florio	Assigned ALJ: Linda Rochester
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/
Date: 1/14/13	Printed Name: Christine Mailloux

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

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A. Brief Description of Decision:	The Final Decision adopts a rate design settlement for most residential customers of California American Water for the 2011 to 2014 rate cycle. The Decision finds the settlement to be “practical and understandable” and in the public interest. The approved settlement was a joint settlement between Cal-Am, DRA, NRDC and TURN.
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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 (NOI) (§ 1804(a)):		
4	1. Date of Prehearing Conference:	August 26, 2010
	2. Other Specified Date for NOI:	N/A
	3. Date NOI Filed:	September 27, 2010
	4. Was the NOI timely filed?	
Showing of customer or customer-related status (§ 1802(b)):		
5	5. Based on ALJ ruling issued in proceeding number:	A.09-09-013
	6. Date of ALJ ruling:	January 7, 2010
	7. Based on another CPUC determination (specify):	
	8. Has the Claimant demonstrated customer or customer-related status?	
Showing of "significant financial hardship" (§ 1802(g)):		
6	9. Based on ALJ ruling issued in proceeding number:	P.10-08-016
	10. Date of ALJ ruling:	November 22, 2010
	11. Based on another CPUC determination (specify):	
	12. Has the Claimant demonstrated significant financial hardship?	
Timely request for compensation (§ 1804(c)):		
7	13. Identify Final Decision:	D.12-11-006
	14. Date of Issuance of Final Order or Decision:	November 14, 2012
	15. File date of compensation request:	January 14, 2013
	16. Was the request for compensation timely?	

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

#	Claimant	CPUC	Comment
8	XX		TURN understands that the ALJ Division has adopted a practice of only issuing a formal ruling on an intervenor's notice of intent if the intervenor is seeking to demonstrate significant financial hardship, rather than relying on the rebuttable presumption created by an earlier finding of hardship. TURN's showing on financial hardship (relying on the rebuttable presumption) and customer status was contained in our NOI. TURN has previously been found to satisfy these two standards -- for example see ALJ ruling on January 3, 2012 in R.11-11-008.

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

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 the record.)

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Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<p>This was the first state-wide general rate case for California American Water (Cal-Am). This request for compensation covers the issues resolved in the Rate Design phase of the docket in D.12-11-006. TURN submitted testimony addressing several issues related to rate design. In addition, TURN worked with the other active parties in the docket to achieve a settlement on rate design.</p> <p>TURN, DRA, NRDC and Cal-Am submitted a Joint Settlement that develops a residential rate design for the majority of Cal-Am’s districts throughout the state.¹ The Settlement not only sets forth specific tiered rates and meter charges for each district and sub-district, but also sets forth a set of agreed-upon principles that the Joint Parties used to develop the tiered rates. In addition, the Joint Settlement details additional considerations that the parties took into account when setting the specific tiers and breakpoints.</p> <p>TURN was an active and integral part of the Joint Settlement and the Commission should find that the resulting settlement reflects TURN’s substantial contribution on each of the TURN-disputed issues covered by the settlement, as listed below. As is often the case for a GRC settlement, due to the number and range of disputed issues the settlement does not address each and every issue or proposal put forth by</p>	<p>Final Decision at p. 8, Conclusions of Law 2.</p> <p>Direct Testimony of Scott J. Rubin on Behalf of the Utility Reform Network Concerning Rate Design, TURN Exhibit 003, February 4, 2011.</p> <p>Motion of the Natural Resources Defense Council, California-American Water Company, Utility Reform Network and Division of Ratepayer Advocates to Adopt a Settlement on Rate Design Issues, filed July 19, 2012, Exhibit A. (“Joint Settlement”)</p>	

¹ The rate design for Cal-Am’s Monterey and Sacramento districts was not included in the scope of this phase of the docket.

<p>TURN or other parties in any level of detail. In some instances the settled outcome may represent a combination or blending of issues to create a mutually acceptable agreement.</p> <p>D.12-11-006 approves the settlement and declares that the settlement is “reasonable, because it fairly balances the interests of the various districts’ ratepayers with those of Cal-Am to ensure it has the resources it needs to provide service throughout its territory.”</p>		
<p><i>Collaborative Process</i></p> <p>TURN was an active participant in the entire settlement process. While it is often times difficult to reach a substantive, multi-party settlement on these issues, this settlement process followed an unusual procedural path generating several pre-settlement and settlement documents. It took a truly collective effort to generate each document. There were numerous meetings, hours of data analysis and several interim steps before the parties reached a final settlement proposal. At each step TURN provided specific input, through its advocates and witness, on the specifics of a tiered rate design as well as more general principles and parameters used in developing the rate design.</p> <p>The Final Decision notes that the, “proposed settlement is a balance between the original positions as otherwise litigated in the prepared testimony of the parties,” thus demonstrating the active participation of each party.</p>	<p>Joint Proposal Of Natural Resources Defense Council, Division Of Ratepayer Advocates And The Utility Reform Network Regarding Rate Design, Joint Exhibit 001, submitted May 20, 2011 (“Joint Proposal”);</p> <p>Motion Of The Utility Reform Network, Natural Resources Defense Council, California-American Water Company And Division Of Ratepayer Advocates To Adopt A Stipulation On Rate Design, filed August 9, 2011 (“Joint Stipulation”) (December 12th Scoping Memo subsequently ordered parties to file a Joint Settlement upon approval of a Cal-Am revenue requirement);</p> <p>Motion Of The Natural Resources Defense Council, California-American Water Company, Utility Reform Network And Division Of Ratepayer Advocates To Adopt A Settlement On Rate Design Issues, filed July 19, 2012 (“Joint Settlement”)</p> <p>Final Decision, FOF 4.</p>	
<p><i>Principles of Rate Design</i></p> <p>TURN’s witness, Mr. Rubin, prefaced his recommendations with a discussion of proposed rate design principles. He urged the Commission to use these principles to generally guide the adopted rate design and</p>	<p>Rubin Direct Testimony, pg. 6; NRDC Exh 1, Testimony of NRDC, February 4, 2011 at pg. 4 (NRDC Direct Testimony); Joint Proposal at p. 1; Joint Stipulation at p. 4; Joint Settlement at Attachment 1, p.5; Final Decision at p. 3.</p>	

<p>to explicitly set out justifications for decisions made when principles may be in conflict or infeasible to achieve.</p> <p>As part of the settlement process, the parties agreed that a statement of principles should be included in the document to allow the Commission to understand the parties' intent and goals for the proposed rate design. Each party came to the negotiations with different sets of principles as proposed in direct testimony and the parties created a compromise list of principles. The Joint Proposal included a list of principles based on TURN's testimony and the Joint Stipulation adopted those principles. The Joint Settlement's set of principles reflect several of the principles proposed by Mr. Rubin, as well as the other parties, including nondiscrimination, revenue neutrality, conservation, ease of implementation/understanding and gradualism.</p>		
<p><i>Cost of Service</i></p> <p>In testimony, TURN recommended that Cal-Am should be required to perform a cost of service study to ensure a fair allocation of revenue requirement among customer classes. TURN testimony discussed the background and methodology of a cost of service analysis and, used discovery data from Cal-Am to perform a higher-level version of a cost of service analysis for each of the Cal-Am districts.</p> <p>TURN argued that because Cal-Am did not perform a cost of service study, its rate design proposal could not be analyzed against industry standards principles of fairness among customer classes nor could it be determined that the rates would bear a "reasonable relationship" to the cost of service for each customer class.</p> <p>Cal-Am's rebuttal testimony, through Mr. Stephenson, raised procedural and resource</p>	<p>Rubin Direct Testimony pgs 7-9; 14-19; Stephenson Rebuttal, Exhibit 51, page 80 .</p> <p>Joint Settlement, Motion p. 6, Attachment 1, p. 5</p>	

<p>objections to a requirement that Cal-Am perform a cost of service study in this docket. However, Cal-Am agreed, “In principle that ultimately the utilities may need to perform cost of service studies in California for a variety of reasons.” Cal-Am recommended that the Commission open a rulemaking docket to review several elements of the Commission’s current water rate design policies.</p> <p>Subsequently, the settlement itself adopts seven general principles that create a framework for “effective rate design.” One of those principles is that the rate design must “bear a reasonable relationship to the cost of service.” Further the parties highlight the Joint Settlement’s achievement of “appropriately distribute[ing] the costs of providing services through rates and consumption tiers.”</p> <p>Further, parties to the Joint Settlement (and the Joint Proposal and Joint Stipulation) relied on Mr. Rubin’s labor-intensive analysis of copious amounts of data from Cal-Am to create the Cost of Service Analysis for each district to then develop the specific tiered rate proposals in those documents.</p>		
<p><i>Bill Frequency Analysis</i></p> <p>TURN closely analyzed the Bill Frequency Analysis (BFA) performed by Cal-Am and used in its rate design proposal for residential customers. TURN concluded, through Mr. Rubin’s data-intensive analysis, that Cal-Am’s Bill Frequency Analysis contained errors in consumption data and flaws in methodology that result in over-recovery of its proposed revenue requirement from the residential class in each district, totaling over \$2.3 million. Because Cal-Am’s workpapers did not provide enough detail or data to correct the errors, TURN conducted extensive discovery to correct the Bill Frequency</p>	<p>Rubin Direct at p. 20-30; Joint Settlement, Motion at pg. 4; Final Decision, pg 3, COL 2.</p>	

<p>Analysis and identify the over-recovery and propose an alternative rate design structure that would properly allocate the revenue requirement.</p> <p>During settlement discussions, each party conducted their own extensive data analysis to analyze the various tiered rate proposals. TURN relied on Mr. Rubin's analysis to make its proposals. However, all the parties specifically relied upon data analysis from NRDC and TURN witnesses Farenkopf and Rubin, including Mr. Rubin's adjustments to the Bill Frequency Analysis, to ensure that the proposed rate design in the Joint Settlement properly allocated Cal-Am's revenue requirement to ensure it was fair to a diverse group of customers.</p>		
<p><i>Price Elasticity</i></p> <p>TURN, through Mr. Rubin's testimony, objected to Cal-Am's requested price elasticity mechanism arguing that including such a factor is unnecessary to protect Cal-Am against consumption fluctuations based on price because the Commission has adopted other rate adjustment mechanisms. Further, price elasticity would be inappropriate because water consumption fluctuations cannot be attributed solely to price fluctuations and therefore including an elasticity factor could over-compensate Cal-Am.</p> <p>While DRA presented the same position as TURN, NRDC suggested that Cal-Am's -0.2 price elasticity factor is on the low end of the industry standard range and proposes that elasticity should be applied to expenses as well as demand and revenue projections to be fair and consistent and avoid overreliance on other adjustment mechanisms.</p> <p>In the Joint Settlement, parties did not apply a price elasticity factor. The Final</p>	<p>Rubin Direct at 30-31; DRA Exhibit 10, page 2-6; NRDC Exhibit 1, pg. 6.</p>	

Decision is silent on this specific issue.		
<p><i>WRAM Issues</i></p> <p>In its testimony, TURN noted that the Commission has adopted various “adjustment mechanisms” to ensure that Cal-Am recovers its revenue requirement despite actual consumption figures that significantly vary from the forecasted estimates used to develop the revenue requirement. One such adjustment mechanism is the Water Revenue Adjustment Mechanism (“WRAM”). Although not directly addressing WRAM, Mr. Rubin explained that adjustment mechanisms based on price changes fail to take into account other reasons for reductions in consumption that may be wholly unrelated to activities by the Commission or the utility.</p> <p>As noted in the Joint Proposal, Joint Stipulation and Joint Settlement, WRAM balances and the recovery of those balances has a direct impact on the effectiveness of an adopted rate design because the surcharges resulting from recovery of WRAM balances impact the customer’s bill and interfere with the balance created by the rate design to ensure affordability and send a conservation signal.</p> <p>The future of Cal-Am’s WRAM became an important part of the settlement discussions, including WRAM amortization and the impact of resulting from those surcharges on the rate design proposals in the settlement. The Joint Proposal, Joint Stipulation and Joint Settlement each addressed WRAM issues. For example, the Joint Settlement stated that limiting consumption in highest tiers minimizes WRAM balance because consumption is likely to be more variable at the higher rates/tiers. Parties also agreed that minimizing WRAM balances is an important goal to limit the surcharges that make customers’ bills less predictable and</p>	<p>Rubin Direct at pg. 31; Joint Stipulation at pg. 4; Joint Settlement, Attachment 1, pg 6; Final Decision at p. 4</p>	

<p>threaten affordability.</p>		
<p><i>Tiered Rates</i></p> <p>TURN included a detailed residential tiered rate proposal in its Direct Testimony. Mr. Rubin used his cost of service analysis and bill frequency analysis to create a tiered rate proposal for each district in Cal-Am’s territory except Monterey and Sacramento that meets the industry standard rate design principles discussed above. TURN’s proposal included three tiers in most instances with overall lower Tier 1 quantity rates and larger Tier 1 consumption levels than Cal-Am generally proposed. TURN proposed a Tier 1 breakpoint moving toward approximate statewide indoor water consumption, although TURN noted that some districts may not be able to get to that point in this GRC.</p> <p>TURN opposed Cal-Am’s proposed rate design which set out five tiers for most districts with relatively “flat” tiers that, TURN argued, limited the conservation message and recovered significant revenue from lower usage tiers.</p> <p>NRDC provided a detailed tier rate analysis, but did not propose a specific rate design for district. Instead it provided what it termed “illustrative examples” for four districts for the purpose of comparison with Cal-Am’s proposal. DRA provided a detailed analysis, but did not provide a specific rate design proposal for any of the Cal-Am districts. Instead, in all but one district, DRA either recommended adoption of the Cal-Am proposed rate design or, in some districts, recommended the Commission retain the current tier rate structure.</p> <p>NRDC, TURN and DRA created a Joint Proposal that also provided a detailed rate</p>	<p>Rubin Direct at pg. 37, Attachments 13-17; NRDC Direct at pgs 16-26; Joint Proposal at pgs 4-7; Joint Settlement at Attachment 1, Attachment 3; Final Decision at p. 8 and COL 2;</p>	

<p>design based on Cal-Am’s proposed revenue requirement.</p> <p>Subsequently, the parties created the Joint Settlement that encourages water conservation and maintains affordability for low usage customers as well as adhering to other rate design principles, by implementing lower quantity rates at the lower tier levels and overall “wider” Tier 1 breakpoints than originally proposed by Cal-Am to help assure affordability at the lower “indoor” usage levels. The Joint Settlement states that the parameters used, “[are] generally consistent with TURN’s recommendation to move toward having the first tier” at indoor water consumption goals. In addition it sets the rate at slightly less than the Standard Quantity Rate, which rewards those customers who conserve and preserves affordability. The conservation impact of 4 steeper and higher priced tiers, in addition to a winter/summer differential in Los Angeles, also move the Settlement closer to TURN’s proposal that at least 15% of consumption fall within the higher priced tiers.</p> <p>The Final Decision recognized that the Joint Settlement produced a rate design that is a “balance between the original positions as otherwise litigated in the prepared testimony of the parties” and, as a result, “allows Cal-Am to recover its revenue requirement while encouraging water conservation and maintain affordability and revenue neutrality.”</p>		
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	

c. If so, provide name of other parties:

There were several intervenors in this rate case. However, the majority of these intervenors were representing groups from specific Cal-Am serving areas and as such focused on narrow issues relating to those communities. For example, several groups and municipal agencies from the Monterey area intervened in this docket, but did not actively participate in the rate design issues for districts other than Monterey. The Mark West Area Community Services Committee and a representative from the city of San Mario also attended some rate design discussions, but did not actively participate.

The only other intervenor group with a broader interest in the docket was the Natural Resources Defense Council (NRDC) who was an active participant on rate design issues.

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:

In light of the scope of the proceeding and the magnitude of the requested rate increase, TURN worked especially hard to coordinate with NRDC and DRA and, as a result, achieve maximum coverage for ratepayers. Our time records include a number of entries (usually coded as “COORD”) for efforts that were primarily devoted to communicating with NRDC and DRA about procedural strategies and issue area allocation. Also, during settlement discussions (hours coded as “SETT”) parties closely coordinated through phone calls and emails discussing strategy and substantive issues.

TURN worked very closely with NRDC and DRA to avoid undue duplication of effort while maximizing each group’s effectiveness and to ensure consistency and efficiency of work effort. Each of these parties prepared rate design testimony and rate design proposals that significantly varied from each other. TURN filed rate design testimony from a consultant with national experience on rate design and significant experience with American Water in other states. TURN’s testimony focused on general principles of rate design, proposals for the Commission to conduct rate design analyses and an extremely detailed and data intensive analysis of each Cal-Am district and an equally detailed rate design proposal that balanced several competing interests. NRDC’s testimony was also extensive but as they state, “The primary objective of NRDC in this rate case is to illuminate the potential for greater water savings that can result from enhanced conservation rate designs that are at once both fair and efficient.” *NRDC Direct at p. 4*. DRA’s testimony was also extensive, but emphasized prior work with Cal-Am on rate design, the Commission’s policy of tiered rates, and took the position that the Commission should maintain Cal-Am’s current rate design in most districts.

TURN’s staff and witnesses regularly communicated with DRA’s and NRDC’s witnesses to share discovery and avoid duplication of effort. Especially during settlement negotiations, these groups closely coordinated although there was not

<p>necessarily agreement on rate design issues among them. Indeed, these three parties held their own negotiations, without Cal-Am, to produce a Joint Proposal on rate design, submit it as an exhibit and present their witnesses as a panel at the rate design hearing. While this took extensive coordination and preparation, each member of that panel emphasized different points and issues.</p> <p>In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor.</p>	

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

11

#	Claimant	CPUC	Comment

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

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

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<p>a. 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)</p> <p>TURN’s request for \$131,195.21 reflects a significant amount of work in this rate design phase of the docket that produced tangible benefits for Cal-Am ratepayers. In its Phase 1 Request for Compensation, TURN calculated that its work saved ratepayers over \$4 million dollars. As the Commission turned to the rate design phase, ratepayers in every district benefitted from TURN’s advocacy resulting in a fair and balanced rate design and ensured that Cal-Am’s recovery of its revenue requirement through the rate design was accurate.</p> <p>Although the direct impact of the various rate design proposals in the record is difficult to quantify, TURN’s requested compensation represents a fraction of the overall savings produced by the Final Decision’s adoption of the Joint Settlement. TURN compared Cal-Am’s proposed rate design with its rate design proposal from its testimony and, if one also compares the resulting Joint Settlement, it is clear that customers realized benefit from TURN’s participation. Further, Attachment 3 to the Joint Settlement compares the Joint Settlement rate design with the rate design in place in Cal-Am districts in August 2010, adjusted for the adopted revenue requirement from D.12-06-016. Attachment 3 clearly demonstrates the</p>	<p>CPUC Verified</p>
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benefits to consumers, especially lower usage consumers, due to lower rates across the board in Tier 1 usage, a larger Tier 1 consumption allowance and lower meter charges. In addition, by narrowing the tiers in the higher usage categories it minimizes the amount of usage subject to the highest quantity rates. This design should, in turn, minimize the balances in Cal-Am's Water Revenue Adjustment Mechanism and thus stabilize customer's bills by limiting high surcharges for recovery of those balances. *Rubin Direct at pg. 37, Attachments 13-17; Joint Settlement at Attachment 3; Final Decision at p. 8 and COL 2. Joint Settlement, Attachment 1, pg. 7.*

Not only did the resulting settlement create savings for low-usage, TURN's Direct Testimony identifies where Cal-Am's rate design proposal resulted in over-recovery of its proposed revenue requirement by \$2 million. After extensive data analysis and review of the numbers by TURN in its Direct Testimony, the Joint Settlement does not contain the same errors. *Rubin Direct Testimony at pgs. 23-30.*

It is also the case that the Joint Settlement properly balances the Commission's goals of affordability and conservation to comply with the Commission's Water Action Plan. Clearly, the Commission has dedicated significant effort to the goals of conservation because of the benefits to consumers. While those benefits may be difficult to quantify, TURN's work in moving the Joint Settlement toward that goal, in turn, provides benefit to consumers. *Joint Settlement, Attachment 1, pg. 5-6; Final Decision at p. 8.*

The Commission should therefore conclude that TURN's overall request is reasonable in light of the substantial benefits to Cal-Am ratepayers that were directly attributable to TURN's participation in the case.

b. Reasonableness of Hours Claimed

TURN Hours

TURN's attorneys and consultants recorded a significant number of hours for work on this phase of Cal-Am's general rate case. TURN submits that the hours claimed are reasonable in light of the significance of this case. This overall level of work effort is consistent with TURN's work on other rate design phases of general rate cases. Even within the umbrella issue of rate design, we tend to address a broad range of sub-topics typically second only to DRA in terms of breadth of coverage. TURN devotes substantial time and effort to careful issue identification, preparing and reviewing discovery, coordination efforts with other parties, detailed testimony preparation, hearing participation and substantial briefs on rate design issues.

The rate design phase of this docket took some procedural turns and twists that required additional hours to navigate. This process also took extensive coordination with other parties to be able to ultimately reach a settlement. Due to these considerations, it is valuable to understand the chain of events surrounding the settlement in order to understand the settlement itself and effort required of each party.

This GRC began with the expectation that rate design would be part of the revenue requirement phase. Parties began settlement talks on rate design issue at the same time as settlement on the other issues. Indeed, rate design was often mixed in with other issues such as forecasting and WRAM balances. During the initial settlement discussions, parties were unable to reach a settlement and agreed to hold at least a single day of hearings on rate design.

In preparation for the hearing, NRDC, DRA and TURN created a Joint Proposal on rate design to reflect the progress made by these parties toward settlement on rate design. The three parties submitted this Joint Proposal as a Joint Exhibit and presented a panel of experts during the hearing to be crossed on the Joint Proposal. Cal-Am submitted rebuttal testimony in response to the Joint Proposal.

After the hearings, parties again met to attempt settlement on rate design. This time, parties were willing to come to an agreement but only if that agreement would be considered interim pending final revenue requirement figures. DRA, TURN, NRDC and Cal-Am received permission from the ALJ to file a “rate design stipulation” that would serve as an agreement to agree once final numbers are released. The parties, including TURN, assured the ALJ that the Stipulation would help to memorialize the several aspects of the settlement including the principles and tier rate considerations so that once parties were ready to meet to finalize a settlement, that process would be much quicker and more efficient. Parties filed the Stipulation in August 2011. However, on December 12, 2011 the ALJ and Assigned Commissioner denied the parties’ request to enter the Stipulation into the record as moot and made an explicit finding that rate design will be further considered in Phase 2 thus assuring the parties that they could discuss and finalize a settlement at that time.

Finally, after the revenue requirement Proposed Decision was released, the parties to the Joint Stipulation met to work out a final residential rate design settlement. TURN, NRDC, DRA and Cal-Am filed the Joint Settlement on July 19, 2012.

WRAM

As discussed above, the future of Cal-Am’s WRAM mechanism became an important part of the rate design discussions. In addition, TURN addressed Cal-Am’s Special Request 34 in hearing and briefing. The issue of where

to litigate issues relating to WRAM was an ongoing discussion during Phase 1, including settlement talks relating to rate design. Ultimately, the ALJ determined that WRAM issues, including Special Request 34, would be part of Phase 2. The Commission has not yet issued a final decision in Phase 2. TURN has monitored Phase 2, including review of parties' testimony on WRAM and Monterey rate design. After determining that consumer interests were well-represented and due to limited resources, TURN has not participated actively in Phase 2. Therefore, TURN is requesting compensation for the hours it spent on WRAM issues up to the issuance of D.12-11-006. Although there has been no final decision in Phase 2, TURN urges the Commission to find a substantial contribution to WRAM issues, generally as it relates to rate design. TURN will not issue a compensation request in Phase 2 of this docket.

TURN Attorneys and Advocates:

Christine Mailloux was TURN's lead attorney for this phase of the case. She was responsible for coordinating work between the other attorneys and consultants working for TURN. In addition she was primarily responsible for coordinating TURN's work with the other intervenors. She assisted the consultants in discovery preparation and represented TURN in discovery discussions, clarifications and disputes with the Company. For example, Ms. Mailloux's time reflects a discussion with Cal-Am over TURN's request for specific billing data to perform Mr. Rubin's cost of service analysis and bill frequency analysis. Another example of a coordination issue included in Ms. Mailloux's time is the discussion and development of a Joint Stipulation, including discussions with TURN staff and the Administrative Law Judge to understand the procedural effect of the Stipulation. This too took significant time to sort out, including the involvement of not only the assigned ALJ but also the Assigned Commissioner's office. Ms. Mailloux, along with Ms. Suetake and Mr. Rubin, also spent time working on procedural matters such as Cal-Am's Motion to File Supplemental Testimony on Monterey Rate Design and a Joint Motion to Strike Cal-Am testimony. Ms. Mailloux was also an integral part of the settlement process, including spending significant time working with DRA, NRDC and Cal-Am to draft and finalize the settlement documents.

Nina Suetake is a staff attorney with significant general rate case experience on energy issues. Ms. Suetake brought that experience to bear when she participated in several conference calls and discussions about rate design strategy and settlement. Ms. Suetake took the lead role in drafting TURN's response to Cal-Am's procedural Motion. Ms. Suetake also heavily participated in rate design settlement discussions in part to avoid the need for Ms. Mailloux (who lives in San Diego) to travel for the settlement talks. So, on those issues where it was important that TURN

have a person in the room, particularly on those issues where TURN had testimony, Ms. Suetake was TURN's main representative.

Regina Costa is TURN's research director and an integral part of this phase of the case. Her hours reflect that the fact that the main task of working with TURN's consultant to analyze the Cal-Am application and discovery, as well as reviewing ongoing rate design discovery of other parties, fell to her expertise as research director, resulting in a higher level of hours coded as "GP" and "DIS" than the other advocates on this case. Due to her integral role in both settlement and preparation for rate design hearings, Ms. Costa was called upon to be generally familiar with the issues in the phase of the case and to work closely with the consultants on case strategy, settlement and hearing preparation. However, as the issues in this phase narrowed and settlement with Cal-Am became more likely, Ms. Costa minimized her hours to general review of the documents.

Bob Finkelstein: Mr. Finkelstein had a small consulting role in this case, including assisting with this request for compensation. His limited number of hours generally consisted of discussing litigation and settlement strategy with the more active attorneys on the case. His extensive experience in energy GRCs before this Commission made him a valuable resource for such purposes.

Mr. Rubin was indispensable in assisting in TURN's efforts, working with the other parties to the case, ensuring success on TURN's issues, and ultimately benefitting Cal-Am's ratepayers. Mr. Rubin extensively reviewed the Cal-Am Application, including rate design and low income issues and conducted discovery to assist TURN in case strategy and issue identification. TURN relied on his experience with American Water in other states to help identify issues in addition to review and analysis of Cal-Am and California rate design policies. Mr. Rubin drafted testimony and worked closely with TURN staff on all phases of settlement. He was called as a witness to testify, as part of a panel, on the Joint Proposal of TURN, DRA and NRDC in addition to assisting TURN with cross examination questions and other hearing preparation. Mr. Rubin was also a resource during all of the settlement talks. He worked closely with DRA, Cal-Am and especially NRDC and its consultant, to extensively analyze billing data, consumption figures and other data to develop a mutually acceptable rate design for settlement purposes.

There are some hourly entries that reflect meetings attended by two or more of TURN's attorneys and expert witnesses. In past compensation decisions the Commission has on occasion deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. As discussed above, for the

meetings that were among TURN's attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN's strategy for this proceeding. None of the attendees are there in a duplicative role because each advocate and consultant has his or her own expertise and knowledge of certain issues and procedures to bring to the discussion. In addition, due to limited resources and out of town workers, each staff person had to be familiar enough with the issues to attend meetings and conference calls as a lone TURN representative. As a result of this collaborative process, TURN is able to identify new and unique issues and angles that would almost certainly never come to mind individually.

There were also meetings with other parties (particularly in the settlement discussion setting) and hearings at which more than one attorney or advocate represented TURN on occasion. TURN's requested hours do not include any for any TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting's purpose. As discussed above, TURN also has the unique situation where the case manager could not attend many of the meetings in person, leaving those in San Francisco to participate more fully while Ms. Mailloux monitored by phone. The exception was that Ms. Mailloux's in-person attendance at the one day of rate design hearings was critical because she was TURN's lead attorney on rate design issues and was involved in the settlement talks that resulted in the Joint Proposal at issue in the hearings. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

TURN submits that the recorded hours are reasonable, both for each TURN staff member and expert witness and in the aggregate. Given some of the different circumstances present here including the extensive settlement discussions, several "settlement" filings and a day of hearing and several procedural issues that had to be addressed, TURN's hours are reasonable. Therefore, TURN seeks compensation for all of the hours recorded by our staff members and outside consultants as included in this request.

Compensation Request Preparation Time: TURN is requesting compensation for approximately 14 hours devoted to preparation of this request for compensation. While slightly higher than the number of hours TURN tends to seek for compensation-related matters in a proceeding of this magnitude, this is a reasonable figure in light of the size and complexity of the request for compensation itself. Ms. Mailloux was solely responsible for drafting this request with some oversight from Mr. Finkelstein who has extensive knowledge of TURN's intervenor

compensation experience, particularly with GRC compensation requests. TURN took it upon itself to delete some hours that it felt excessive and represented the fact that TURN had a learning curve of sorts in this case (TURN's first water GRC). As a result, while the compensation-related hours are a bit higher than typical for TURN, the Commission should find this amount reasonable under the circumstances.

Hourly Rates of TURN Staff and Consultants

TURN's request for compensation covers work performed in 2010, 2011 and 2012. For Christine Mailloux, the Commission has previously approved continued use of the hourly rate of \$390 first approved for work she performed in 2008 to work she performed in 2010 as well. (D.10-09-040, in R.09-05-006). Consistent with Resolution ALJ-267, TURN seeks compensation for her 2011 work at the same previously-approved hourly rate.

For 2012, TURN is requesting a Cost of Living Adjustment and a step increase. In Res. ALJ-281, the Commission adopted a COLA adjustment of 2.2% for 2012, and continued the previously adopted policy of "step increases" for 2008 and beyond. Res. ALJ-281, p. 6, Finding #2. In D.08-04-010, the Commission had provided for up to two annual 5% "step increases" in hourly rates within each experience level for all intervenor representatives, and specifically explained that an attorney would be eligible for additional step increases upon reaching the next higher experience level. D.08-04-010, pp. 2, 11-12.

Therefore, TURN seeks an hourly rate of \$420 for Ms. Mailloux's work in 2012. This figure represents the hourly rate previously adopted for her work in 2011 (in D.12-03-053) escalated by the 2012 COLA of 2.2% and a 5% step increase (rounded to the nearest \$5 increment). Ms. Mailloux is a 1993 law school graduate. In 2008, TURN sought and was awarded an hourly rate of \$390, in the lower half of the range set for attorneys with 13+ years of experience. D.09-09-024, p. 17 (adopting the requested rate), and D.08-04-010, p. 5 (setting the ranges for 2008). TURN seeks here the first step increase for Ms. Mailloux in the 13+ years experience level.²

Ms. Mailloux's only hours for 2013 relate to work on this compensation request. TURN calculated those hours using half of the hourly rate it is requesting for 2012.

² TURN's showing in support of this requested increase is based on and consistent with the showing TURN made in R.10-02-005 and R.05-06-040 in support of the requested step increase for its attorneys' hourly rates in those proceedings. The Commission approved the requested increase in D.10-12-015 (p. 16) and D.12-05-033 (p. 8), respectively.

For Nina Suetake, the Commission has previously authorized an hourly rate of \$280 for work performed in 2010 (D.11-05-044, in A.08-09-023) and \$295 for work performed in 2011 (D.12-06-036, in R.09-08-009). Ms. Suetake has no hours for 2012.

For Regina Costa, pursuant to Resolution ALJ-247 (in 2010) and Resolution ALJ-267 (in 2011), TURN uses here the previously authorized hourly rate of \$275 that was first adopted for her work in 2008 (D.09-08-020 in R.08-01-005).

This was TURN's first general rate case for a Class A water utility. TURN hired an experienced consultant to assist in case preparation, litigation strategy and testimony on rate design issues. Mr. Rubin does not have a previously approved rate from this Commission. Relative to his level of expertise and years of experience, his hourly rate is extremely reasonable and should be approved.

Mr. Rubin holds a Bachelors Degree from Pennsylvania State University and a Juris Doctorate from George Washington University. Early in his career he worked for the Pennsylvania Office of Consumer Advocate from 1983 to 1994 where he was a supervisory attorney and helped set policy on water and electric matters. He testified as an expert witness on behalf of the Office of Consumer Advocate on rate design and cost of service issues. Since 1994, Mr. Rubin has worked as an independent consultant and attorney on matters affecting the public utility industry.

In addition to extensive expert witness experience on water and electric matters for over twenty years, Mr. Rubin has published and presented on the issues extensively. He has served as faculty for the Institute for Public Utilities at Michigan State University and for the American Water Works Association and he served as chair of the Water Committee for the National Association of State Utility Consumer Advocates. He has also worked at National Regulatory Research Institute.

TURN notes that Mr. Rubin has over 20 years of experience, yet his \$160 hourly rate is on the low end of the \$155 level that represents the bottom of the Commission-approved rate ranges in ALJ-267 for experts with thirteen or more years of experience. His experience level and depth of knowledge are directly on point to this rate case and are unquestionably sufficient for the Commission to approve his hourly rates.

TURN submits that this information is more than sufficient for the Commission to grant the requested hourly rates for these three consultants. However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be informed of the additional information that is necessary and given an opportunity to

provide that information before a draft decision issues on this compensation request.

Reasonableness of Expenses

TURN requests that the Commission approve its expenses associated with its participation in this case. The expenses consist of photocopying expenses, postage, phone and a small charge for legal research conducted via Lexis/Nexis. The phone costs include conference call charges and personal phone expenses due to the lengthy calls for settlement meetings among the parties and coordination efforts among intervenors. The travel expenses cover a trip for Ms. Mailloux to attend the hearing on rate design. The Commission should find TURN’s direct expenses reasonable.

c. Allocation of Hours by Issue

TURN has allocated its time entries asset for in the attachments by the following codes:

- GP **General Preparation-** work that generally does not vary with the number of issues that TURN addresses in the case
- GH **General Hearing-** Hearing related work that was not issue specific. For example, time spent waiting in the hearing room for specific witnesses, time spent discussing witness scheduling, hearing procedure, etc.
- PROC **Procedure-** Procedural motions such as a Motion to Strike or Motion for Supplemental Testimony
- SETT **Settlement-**related work including time spent discussing and coordinating settlement schedules, discussing substantive settlement issues with individual parties and TURN witnesses and attorneys, time in the settlement discussions themselves including issues that were related to TURN’s direct issues
- COOR **Coordination** with other parties beyond settlement including issue coordination, strategy, and some scheduling
- DIS **Discovery-** matters that did not fall into a particular issue area such as work on non-disclosure agreements, discovery disputes, preparation of discovery covering multiple issues, and review of other parties’ discovery
- # **Rate Proposal-** Where ever possible, TURN allocated time to a specific issue area. However, use of this symbol indicates entries where the work on the three substantive issues was so integrated that the time cannot be broken down into individual issue codes. For example, work reviewing and finalizing testimony, certain strategy calls,

	<p>early work identifying issues. TURN limited its use of this code and does not believe further allocation of this time is necessary. However, if the Commission wishes to allocate then it should apportion the time roughly among the following codes: BA- 30%; TR-40%, WRAM-10%; PR-20%</p> <p>PR Principles of Rate Design- Work by consultants and staff to review and analyze the proper principles of rate design to present to the Commission as a basis for its rate design decisions</p> <p>BA Billing Analysis- TURN’s work to generate a cost of service study and bill frequency analysis using extensive Cal-Am data through discovery and to then use those analyses to critique Cal-Am and other rate design proposals</p> <p>TR Tiered Rates- Work to develop and create a tiered rate proposal and analyze other tiered rate proposals including research on Commission rate design policy</p> <p>WRAM Water Revenue Adjustment Mechanisms- time spent analyzing, briefing and discussing the impact of the WRAM and various amortization proposals on the rate design and revenue requirement allocation among tiers</p> <p>COMP Compensation- work on TURN’s compensation request and compensation related activities such as the NOI</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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B. Specific Claim:

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CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Christine Mailloux	2010	9.25	\$390	D.11-07-023	\$ 3,607.50			
Christine Mailloux	2011	98.75	\$390	Res. ALJ-267	\$ 38,512.50			

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Christine Mailloux	2012	14.25	\$420	Res. ALJ-281, D.08-04-010	\$ 5,985.00			
Nina Suetake	2010	1.75	\$280	D.11-05-044	\$ 490.00			
Nina Suetake	2011	52.75	\$295	D.12-06-036, in R.09-08-009	\$15,561.25			
Bob Finkelstein	2011	1.75	\$470	D.10-09-042, Res. ALJ- 267	\$822.50			
Regina Costa	2010	22.00	\$275	D.09-08-020	\$ 6,050.00			
Regina Costa	2011	94.50	\$275	Res. ALJ-267	\$ 25,987.50			
Regina Costa	2012	2.50	\$275	Res. ALJ-267	\$687.50			
Scott J. Rubin	2010	34.00	\$160	See supra, Part III. Sec. A (b)	\$5,440.00			
Scott J. Rubin	2011	131.00	\$160	See supra, Part III. Sec. A (b)	\$20,960.00			
Scott J. Rubin	2012	5.75	\$160	See supra, Part III. Sec. A (b)	\$920.00			
Subtotal:					\$125,023.75	Subtotal:		

OTHER FEES

Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):

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Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Christine Mailloux	2011	7.5	\$195	Travel time for hearings- half hourly rate	\$1,462.50			
[Person 2]								
Subtotal:					\$1,462.50	Subtotal:		

INTERVENOR COMPENSATION CLAIM PREPARATION **

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Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Christine Mailloux	2013	13.25	\$210		\$2,782.50			
Bob Finkelstein	2013	.75	\$240		\$ 180.00			
Subtotal:					\$2,962.50	Subtotal:		

COSTS

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#	Item	Detail	Amount	Amount
	Photocopies	Cal-Am Application and related material, pleadings	\$537.00	
	Atty Travel	Expenses for attendance at hearings	\$675.86	
	Phone/ Conference call	Proceeding-related phone calls and multi-party conference call charges	\$533.60	

Subtotal:	\$1,746.46	Subtotal:	
TOTAL REQUEST \$:	\$131,195.21	TOTAL AWARD \$:	

When entering items, type over bracketed text; add additional rows as necessary.

*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.

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

18	Attachment or Comment #	Description/Comment
	1	Certificate of Service
	2	Time Sheets for Attorneys, Advocates and Experts
	3	TURN Expenses relating to D.12-11-006
	4	Issue Allocation by Percentage

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

19	#	Reason

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

(CPUC completes the remainder of this form)

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

Party	Reason for Opposition	CPUC Disposition

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?	
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If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.
2. The requested hourly rates for Claimant’s representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$_____.

CONCLUSION OF LAW

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

ORDER

1. Claimant is awarded \$_____.

2. Within 30 days of the effective date of this decision, _____ shall pay Claimant the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] 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 _____, 200__, 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/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Attachment 1

Certificate of Service by Customer

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

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

Attachment 2

Contemporaneous Time Sheets for Attorney and Advocate

Date	Atty	Task	Description	Hours	Time Spent
<u>Attorney: BF</u>					
3/18/2011	BF	TR	Discuss conservation rate design strategy issues w/ RC	0.25	0.25
5/16/2011	BF	SEIT	Meeting w/ RC, CM, NS re: strategy for settlement, upcoming hearings	1.00	1.00
7/19/2011	BF	SEIT	p/c w/ CMailoux re: settlement and strategy for options on rev req and rate design being settled in staggered fashion; e-mail w/ RCosta and CM re: same	0.50	0.50
1/13/2013	BF	COMP	Review CMailoux draft of comp request; draft e-mail with feedback on comments and edits	0.75	0.75
<u>Total: BF</u>				2.50	2.50
<u>Attorney: CM</u>					
10/28/2010	CM	GP	Review issue list and consultant services with S. Rubin	0.50	0.50
11/12/2010	CM	GP	Review document and CalAm Application and testimony and forward to Rubin	0.50	0.50
12/1/2010	CM	DIS	Receive and review draft discovery requests from Rubin re: ratedesign Toro and Larkfield; reformat and serve	1.00	1.00
12/3/2010	CM	PROC	DsW S. Rubin re: CalAm request for extension	0.25	0.25
12/6/2010	CM	TR	DW S. Rubin re: Tier break points and additional discovery; review previous GRC decisions re: tiers and forward to Rubin	1.00	1.00
12/7/2010	CM	TR	DW S. Rubin re: discovery and conservation rate design issues; format and send additional discovery on rate design	0.75	0.75
12/8/2010	CM	#	Format and transmit additional rate design discovery	0.50	0.50
12/10/2010	CM	DIS	Review extranet and multiple exchanges with CalAm and rate design witness re: NRDC discovery files	0.75	0.75
12/13/2010	CM	#	Review and forward discovery responses on rate design	0.50	0.50
12/14/2010	CM	BA	DW NRDC re: rate design issues and billing data from discovery; emails re: same; DW S. Rubin	1.00	1.00
12/15/2010	CM	#	Review and forward discovery responses on rate design	0.50	0.50
12/21/2010	CM	TR	Conf call w/ S Rubin re: rate design testimony with R. Costa and N. Suetake re: tiered rate design	0.50	0.50
12/21/2010	CM	BA	Conf call w/ S Rubin re: rate design testimony with R. Costa and N. Suetake re: cost of service and billing issues	0.50	0.50
12/22/2010	CM	BA	DW Cal Am re: billing analysis and other rate design discovery issues;	0.50	0.50
12/22/2010	CM	DIS	DW Cal Am re: billing analysis and other rate design discovery issues; emails with S. Rubin re: problems with discovery and forward responses	0.50	0.50
1/3/2011	CM	DIS	Review rate design discovery; emails to S. Rubin re: status of discovery and contact J. Dana re: discovery status and clarification on substance	1.00	1.00
1/6/2011	CM	BA	Discovery review and clarification emails to J. Dana re: billing analysis and other rate design issues	1.00	1.00
1/8/2011	CM	#	Review several sets of discovery re: rate design and forward to S. Rubin	0.50	0.50
1/12/2011	CM	BA	Review extranet for billing analysis (rate design) discovery materials, follow up with J. Dana and S. Rubin re: same	0.50	0.50
1/14/2011	CM	BA	DW J. Dana re: discovery on billing analysis	0.25	0.25
1/27/2011	CM	COOD	Conf call with DRA and other intervenors on rate design issues; follow up call with R. Costa	1.25	1.25

Date	Atty	Task	Description	Hours	Time Spent
1/31/2011	CM	#	Conf call with RD consultant and TURN team re: testimony preparation process and discovery issues	0.25	0.25
2/2/2011	CM	#	Review Rubin testimony; edits	1.00	1.00
3/11/2011	CM	PROC	DW S. Rubin, E. Osann and O. Para re: Cal Am Motion to include Monterey RD issues; draft substantive email re: same	1.25	1.25
3/18/2011	CM	COOD	Conf call with DRA and other parties re: Rate Design testimony and strategy; DW R. Costa re: prep for rate design call	1.50	1.50
3/28/2011	CM	PROC	DW S. Rubin and N. Suetake re: strategy for response to CalAm Motion re: Monterey Rate Design; review CalAm testimony on Monterey RD and Motion	1.25	1.25
3/29/2011	CM	WRAM	Email and review of ALJ request to address Monterey WRAM amortization issues; review DRA testimony re: same	0.75	0.75
3/31/2011	CM	#	Read rate design testimony to prep for settlement call	0.75	0.75
4/1/2011	CM	TR	Conf Call with Rubin, Costa, Suetake and Smith re: settlement	0.50	0.50
4/15/2011	CM	BA	Conf call with Rubin and TURN team re: rate design for settlement	0.50	0.50
4/18/2011	CM	SETT	Attend settlement talks on rate design issues incl meter charges, consumption forecast, low income program; followup emails on rate design schedule for settlement and strategy; review meter charge doc prepared by Scott	4.50	4.50
4/21/2011	CM	SETT	Emails re: scheduling and strategy for rate design settlement	0.25	0.25
4/26/2011	CM	TR	Review Rubin settlement proposal for Rate Design, conf call with Rubin, Costa and Suetake re: settlement proposal and strategy	1.50	1.50
4/27/2011	CM	PROC	Review ALJ Ruling re: denial of Monterey RD issues	0.25	0.25
4/28/2011	CM	SETT	Attend settlement discussions re: rate design	4.75	4.75
4/29/2011	CM	SETT	Attend settlement discussion re: rate design	3.00	3.00
5/4/2011	CM	TR	Discussion with S. Rubin and team re: rate design settlement in prep for meeting	1.00	1.00
5/5/2011	CM	WRAM	Discussion re: WRAM amortization and issues	1.50	1.50
5/5/2011	CM	SETT	Rate Design settlement conf call; multiple emails and side calls re: strategy; Discussion re: WRAM amortization and issues	3.50	3.50
5/6/2011	CM	COOD	Conf call with DRA re: rate design settlement and proces moving forward	0.75	0.75
5/10/2011	CM	WRAM	review WRAM amortization proposals and issues and draft substantive email to team re: issues	1.25	1.25
5/10/2011	CM	SETT	Review CalAm proposed settlement re: rate design and forecasting; review WRAM amortization proposals and issues and draft substantive email to team re: issues	0.75	0.75
5/12/2011	CM	COOD	Conf call with DRA re: rate design settlement and proces moving forward; follow up discussion with R. Costa	1.00	1.00
5/13/2011	CM	SETT	DsW DRA and NRDC re: rate design proposal and possible hearing dates in late June; emails re: same	0.75	0.75
5/16/2011	CM	SETT	Multiple emails and discussions re: rate design settlement proposal; DWALJ Rochester re: same	2.00	2.00
5/17/2011	CM	TR	DW DRA and NRDC re: rate design settlement proposal; DW B. Finkelstein re: strategy for rate design	2.25	2.25

Date	Atty	Task	Description	Hours	Time Spent
5/18/2011	CM	SEIT	Emails with DRA and TURN team re: RD proposal; Conf call with NRDC and DRA and TURN re: proposal and revisions	1.00	1.00
5/19/2011	CM	SEIT	Attend portion of conf call re: joint rate design proposal and possible changes	0.75	0.75
5/20/2011	CM	SEIT	Multiple emails and phone calls re: joint Rate Design proposal; DsWR, Costa, N suetake, L. Fransen and S. Rubin re: same; Review and edit document; Finalize and submit joint document	3.00	3.00
6/2/2011	CM	BA	DW, J. Farenkopf re: workpapers for joint RD proposal; emails to RD consultants re: same	0.50	0.50
6/6/2011	CM	TR	DW D. Gruen re: rate design workpapers and upcoming hearings	0.25	0.25
6/9/2011	CM	TR	Review rate design workpapers; forward to CalAm; emails re: same and rate design proposal;	0.75	0.75
6/16/2011	CM	GH	DW S. Rubin re: cross strategy for rate design hearings	0.50	0.50
6/22/2011	CM	PROC	DW NRDC and DRA re: response to Mtn to Strike CalAm rebuttal testimony and draft section of Mtn to Strike	2.75	2.75
6/22/2011	CM	COOD	Conf call w/NRDC and DRA re: rate design hearing prep	1.25	1.25
6/22/2011	CM	TR	Review draft cross questions on rate design; Conf call with NRDC and DRA re: rate design hearing prep;	0.50	0.50
6/22/2011	CM	TR	Review CalAm response to joint Proposal on rate design	0.50	0.50
6/23/2011	CM	PROC	Call with NRDC and DRA re: Motion to Strike; revise/edit Motion to Strike CalAm rebuttal	2.25	2.25
6/23/2011	CM	GH	DW ALJ re: rate design hearing logistics	0.50	0.50
6/24/2011	CM	PROC	Final edits to Motion to Strike CalAm rebuttal; emails re: same	0.50	0.50
6/24/2011	CM	TR	DW S. Rubin re: hearings; DW N. Suetake re: rate design hearings and cross; prepare documents for hearings	0.75	0.75
6/27/2011	CM	#	Meeting with S. Rubin; Meeting with DRA re: cross exam strategy; draft and review cross questions; prepare documents; emails re: hearing prep	7.50	7.50
6/27/2011	CM	GH	Travel from San Diego to San Francisco	4.00	4.00
6/28/2011	CM	GH	Travel From SF to San Diego	3.50	3.50
6/28/2011	CM	#	Attend hearings re: rate design	4.50	4.50
6/29/2011	CM	GH	Follow up logistics from hearing and briefing strategy and schedule	0.50	0.50
6/29/2011	CM	WRAM	Draft section of brief on SR. 34; review material in related WRAM docket	2.25	2.25
7/7/2011	CM	WRAM	Review opening brief on WRAM issues, SR 34; draft email to DRA re: reply strategy	2.25	2.25
7/13/2011	CM	SEIT	DW S. Leeper re: rate design discussion and possible settlement	0.25	0.25
7/13/2011	CM	WRAM	Draft reply brief on SR 34	0.75	0.75
7/14/2011	CM	SEIT	Emails re: possible rate design settlement with CalAm	0.25	0.25
7/14/2011	CM	WRAM	Draft reply brief on SR 34.	1.00	1.00
7/18/2011	CM	SEIT	DW D. Gruen re: rate design settlement process and strategy; emails to TURN team and NRDC re: same	0.75	0.75
7/19/2011	CM	SEIT	DsW B. Finkelstein and R. Costa re: rate design settlment; DW ALJ re: rate design process	1.00	1.00
7/21/2011	CM	SEIT	Review ALJ email re: rate design settlement process; multiple substantive emails to NRDC and DRA re: settlement discussions on rate design	0.75	0.75
7/26/2011	CM	SEIT	Conf call with parties re: rate design settlement issues and stipulation; DW ALJ re: same	1.50	1.50

Hours

Date	Atty	Task	Description	Hours	Time Spent
8/1/2011	CM	TR	Receipt and review draft of rate design stipulation from DRA; email discussion re: same to TURN consultant and team including internal deadlines for review and edits	0.50	0.50
8/2/2011	CM	TR	Review and edit proposed rate design stipulation	2.00	2.00
8/3/2011	CM	TR	Conf call re: rate design stipulation; review emails re: data for stipulation and edits	1.25	1.25
8/4/2011	CM	TR	DsW R. Costa and S. Rubin re: stipulation; conf call with NRDC, DRA and CalAM re: changes to stipulation; Draft language and Motion for stipulation	5.50	5.50
8/5/2011	CM	TR	DW NRDC re: rate design stipulation and process, data usage; multiple emails re: edits	1.00	1.00
8/5/2011	CM	SEIT	DsW CalAM and DRA re: extension and scheduling for stipulation; schedule for stipulation	0.75	0.75
8/8/2011	CM	SEIT	Revise rate design stipulation and Motion; review emails and other parties' edits; resend	1.75	1.75
8/9/2011	CM	SEIT	Revise stipulation docs based on emails from group; finalize and file docs with signatures	3.25	3.25
9/3/2011	CM	GP	Emails with DRA and TURN team re: upcoming PHC and rate design issues	0.50	0.50
9/13/2011	CM	WRAM	Analysis of transcript for impact of WRAM issues on rate design stipulation; substantive email with NRDC re: same	0.25	0.25
10/11/2011	CM	GP	Review PHC notice and substantive email discussion re: strategy and participation	0.50	0.50
11/10/2011	CM	GP	DW S. Rubin re: CalAM Phase 2 and Monterey RD	0.25	0.25
12/12/2011	CM	GP	Analysis of Phase 2 Scoping Memo; draft substantive email to team	1.00	1.00
5/2/2012	CM	SEIT	Conf call with M. Perez of DRA, Cal Am (Leeper/Stevenson) and NRDC and TURN consultant Scott Rubin re: rate design stipulation and settlement; DW R. costa re: same	1.00	1.00
5/16/2012	CM	SEIT	DW S. Rubin re: reply to CalAm opening on rate design settlement and impact on PD	0.25	0.25
5/21/2012	CM	SEIT	Revise reply on PD to address impact of rate design settlement on PD	0.25	0.25
5/21/2012	CM	WRAM	Conf Call w/TURN team - Costa, Rubin, Suetake- re: possible testimony on WRAM for Phase 2 CalAm	0.50	0.50
5/23/2012	CM	SEIT	Conf Call with NRDC (Obegi, Osann), CalAm (Stephenson), DRA (Hoglund) and S. Rubin re: settlement for rate design stipulation	0.75	0.75
6/4/2012	CM	SEIT	Conf Call with NRDC, Cal AM and S. Rubin re: rate design stipulation and settlement; follow up email discussion with S. Rubin re: progress/next steps	1.00	1.00
6/17/2012	CM	WRAM	Receipt/review and forward CalAm reply testimony on rate design and WRAM issues to S. Rubin	0.25	0.25
6/19/2012	CM	SEIT	Receipt and review rate design proposals created by S. Rubin and NRDC attorney; DW S. Rubin re: rate design proposal in prep for upcoming settlement call	0.75	0.75
6/20/2012	CM	SEIT	Revise narrative for rate design proposals in prep for group discussion	0.50	0.50
6/21/2012	CM	SEIT	Conf call with NRDC, DRA (Perez, Hoglund), CalAm and consultants re: rate design options and settlement	1.00	1.00
6/27/2012	CM	GP	Conf call with ALJ Rochester re: possible upcoming hearings on rate design	0.25	0.25
6/27/2012	CM	SEIT	Review proposed changes to rate design, email with Scott	0.25	0.25
7/2/2012	CM	SEIT	Emails re: conferece call on settlement	0.25	0.25
7/3/2012	CM	SEIT	Conf call with S. Leeper, D. Obegi (NRDC), D. Stephenson, P. Hoglund (DRA) re: rate design settlement drafting and processes	0.50	0.50
7/9/2012	CM	SEIT	Review and edit draft rate design settlement agreement; forward edits with substantive email	1.00	1.00
7/10/2012	CM	SEIT	Draft Motion for rate design settlement	1.50	1.50

Date	Atty	Task	Description	Hours	Time Spent
7/13/2012	CM	SEIT	DWP. Hoglund (DRA) re: rate design settlement comparison tables and DRA approval process		0.25
7/16/2012	CM	SEIT	Substantive emails and review response re: language concerns in rate design settlement to CalAm and S. Rubin		0.50
7/16/2012	CM	SEIT	Receipt and review latest version of settlement documents and concern over language in settlement; email re: same		0.50
7/18/2012	CM	SEIT	Receipt and review emails re: finalizing settlement; review settlement draft; signature pages		1.00
7/18/2012	CM	SEIT	Meet with NRDC, DRA and CalAm to finalize rate design settlement		0.50
7/19/2012	CM	SEIT	Email and edits to Motion and Settlement re: review of NRDC comparison table for RD settlement		0.75
7/19/2012	CM	SEIT	Receipt and review emails re: rate design settlement attachments and NRDC comparison; DW S. Rubin re: same		0.75
1/3/2013	CM	COMP	Review time sheets for coding and issue allocation		1.50
1/8/2013	CM	COMP	Draft compensation request		2.75
1/10/2013	CM	COMP	Draft compensation request and review hours and expert testimony		2.00
1/12/2013	CM	COMP	Draft compensation request, time sheet coding and analysis		3.50
1/14/2013	CM	COMP	Edit and finalize compensation request, time records and supporting doc for filing		3.50
Total: CM					143.00
<u>Attorney: NS</u>					
12/13/2010	NS	GP	Conference call to discuss issues related to rate design for testimony		0.75
12/21/2010	NS	#	Call w/ Scott Rubin re: rate design issues, direction of discovery, additional issues we may cover		1.00
2/2/2011	NS	#	Edit SR draft of cost allocation/ rate making testimony		2.25
2/24/2011	NS	SEIT	Read emails re: rate design possible settlement		0.25
3/17/2011	NS	PROC	Read CalAm motion for leave to provide supplemental testimony		0.50
3/17/2011	NS	PROC	Call w/ Christine and SR re: response to CalAm motion for leave to provide supp. Testimony		0.50
3/17/2011	NS	#	Review TURN testimony on rate design for conf. call		0.50
3/18/2011	NS	PROC	Review notes on rate design for Monterey for conf. call		0.25
3/18/2011	NS	COOD	Conf. call w/ DRA and NRDC on rate design testimony		1.50
3/25/2011	NS	PROC	Review Cal-Am motion for leave to provide supplemental testimony and read CalAm supplemental testimony		2.50
3/28/2011	NS	PROC	Draft response to motion for leave to provide supplemental testimony		6.50
3/28/2011	NS	PROC	Conf. call w/ Scott and Christine re: Monterey testimony and response to motion		0.75
3/28/2011	NS	PROC	Prep for conf. call re: Monterey rate design testimony (read Monterey testimony)		1.00
4/12/2011	NS	WRAM	Read party comments on OIR on WRAM		0.50
4/14/2011	NS	SEIT	Prep for settlement discussions on revenue and rate design (read testimony, review notes)		2.00
4/18/2011	NS	SEIT	Participate in settlement discussion (revenue/sales forecast and rate design)		4.50
4/22/2011	NS	SEIT	Participate in settlement discussion (revenue/sales forecast)		3.00
4/22/2011	NS	SEIT	Prep for settlement discussions (revenue/sales)		0.50
4/26/2011	NS	TR	Edit TURN rate design proposal hand-out		1.50
4/26/2011	NS	TR	Internal conf. call to discuss TURN rate design proposal		1.50

Date	Atty	Task	Description	Hours	Time Spent
4/28/2011	NS	SEIT	Participate in settlement discussions (rate design)		5.25
5/4/2011	NS	TR	Conf. call w/ Scott re: rate design discussions		0.50
5/5/2011	NS	SEIT	Participate in settlement discussions (rate design, WRAM)		5.50
5/6/2011	NS	TR	Read emails re: rate design and WRAM		0.25
5/6/2011	NS	COOD	Conf. call w/ DRA re: rate design, status of schedule, other global settlements		0.75
5/9/2011	NS	SEIT	Discuss status of settlement on rate design and schedule of negotiations this week w/ Regina		0.75
5/10/2011	NS	SEIT	Review CalAm settlement offer on water consumption and rate adjustments (rate design)		0.50
5/13/2011	NS	SEIT	Read emails re: potential rate design stipulation		0.25
5/17/2011	NS	SEIT	Conf. call w/ NRDC and DRA re: rate design stipulation - procedural approach to filing		1.25
5/17/2011	NS	TR	Conf. call w/ NRDC and DRA re: rate design stipulation - technical details of rates, tiers, dataset questions		1.00
5/17/2011	NS	SEIT	Conf. call w/ TURN legal director to discuss procedural issues wrt DRA/NRDC/TURN stipulation		1.00
5/18/2011	NS	COOD	Conf. call w/ DRA re: rate design settlement proposal		0.50
5/18/2011	NS	TR	Call w/ Regina re: rate design proposal		0.25
5/19/2011	NS	SEIT	Conf. call w/ NRDC and DRA re: rate design stipulation - technical details of rates, tiers, dataset questions		0.75
6/22/2011	NS	COOD	Conf. call w/ DRA and NRDC re: CalAm response to rate design proposal		1.25
6/24/2011	NS	GH	Call w/ Christine re: rate design hearings and brief draft		0.25
7/7/2011	NS	WRAM	Read emails re: CalAm WRAM amortization		0.25
7/11/2011	NS	WRAM	Talk to Christine re: Special Request 34 for reply brief		0.25
9/8/2011	NS	GP	Attend PHC for Phase 2		1.75
12/14/2011	NS	GP	Read Phase 2 scoping memo		0.50
Total: NS					54.50

Attorney: RC

9/15/2010	RC	GP	review CalAm testimony, rate design		6.25
11/1/2010	RC	GP	Cal-Am review rate design testimony		4.00
11/5/2010	RC	TR	research previous CPUC treatment of conservation rate design		4.50
12/6/2010	RC	#	Discovery, rate design		0.50
12/6/2010	RC	#	Research re rate design issues		1.00
12/7/2010	RC	BA	Review TURN DRs re rate design		0.75
12/8/2010	RC	TR	review discovery responses rate design		1.75
12/17/2010	RC	BA	Review rate design discovery responses		2.50
12/21/2010	RC	#	MW Scott R. re testimony		0.75
1/5/2011	RC	TR	Review prior CPUC decisions re rate design		4.75
2/1/2011	RC	COOD	Communicate w DRA re rate design issues		0.50
2/8/2011	RC	#	Review & analyze intervenor testimony, rate design		5.50
2/18/2011	RC	COOD	Coordinate with DRA to set meeting re rate design		0.25

Hours

Date	Atty	Task	Description	Hours	Time Spent
3/18/2011	RC	COOD	CalAm, rate design, prep for call with DRA; conf call	3.00	3.00
3/25/2011	RC	WRAM	Rev Reb test, SR 34, notes re same	1.25	1.25
3/29/2011	RC	WRAM	Review Reb Test, Previous WRAM decisions	3.75	3.75
4/1/2011	RC	SEIT	Prep for TURN meeting re settlement, rate design	0.50	0.50
4/1/2011	RC	SEIT	MW CM/NS, Rubin, discuss settlement, rate design	0.75	0.75
4/3/2011	RC	#	Prepare memo re rate design settlement points, send to CM/NS	2.00	2.00
4/22/2011	RC	SEIT	Settlement meeting, Duarte	1.00	1.00
4/26/2011	RC	SEIT	Settlement, rate design, prep for discussion and participate in meeting	4.00	4.00
4/27/2011	RC	TR	Settlement, review notes, test re rate design	1.00	1.00
4/29/2011	RC	SEIT	Settlement meeting, rate design	3.50	3.50
5/4/2011	RC	SEIT	Settlement, TURN meeting re rate design	0.75	0.75
5/4/2011	RC	TR	Settlement discussions, review DRA, NRDC info re rate design tiers	2.50	2.50
5/5/2011	RC	SEIT	Settlement discussions, rate design	2.50	2.50
5/5/2011	RC	TR	Review DRA data re rate design tiers	1.75	1.75
5/5/2011	RC	COOD	Settlement, MW NRDC re rate design	0.75	0.75
5/5/2011	RC	SEIT	Settlement meeting, rate design	3.00	3.00
5/6/2011	RC	WRAM	Research WRAM issues for settlement consideration	4.00	4.00
5/6/2011	RC	TR	Settlement, review DRA rate design proposal	0.50	0.50
5/12/2011	RC	SEIT	Prep. E-mail to TURN legal director re procedure re poss rate design stipulation	0.50	0.50
5/12/2011	RC	SEIT	Call with DRA, NRDC, re rate design settlement	2.75	2.75
5/12/2011	RC	#	review notes, prep for call w DRA, NRDC re rate design settlement	1.50	1.50
5/12/2011	RC	BA	review CalAm data re rate design	0.75	0.75
5/13/2011	RC	TR	Review e-mails re possible rate design settlement, provide feedback to attys	0.25	0.25
5/16/2011	RC	TR	Review NRDC proposals for Rate Design joint position	4.75	4.75
5/17/2011	RC	SEIT	Call with NRDC/DRA re rate design	1.25	1.25
5/17/2011	RC	SEIT	Prepare notes re NRDC proposal, DRA questions, for S. Rubin	0.75	0.75
5/17/2011	RC	SEIT	prep for meeting with NRDC, DRA re rate design	1.25	1.25
5/17/2011	RC	SEIT	Meet with TURN legal director re rate design issues	0.50	0.50
5/18/2011	RC	COOD	Rate design joint proposal, call with DRA	1.50	1.50
5/18/2011	RC	TR	Rate design joint proposal, review data, coordinate with parties & TURN consultant	5.00	5.00
5/19/2011	RC	SEIT	Rate Design, review revised proposal, narrative, call with NRDC and NRA	3.00	3.00
5/19/2011	RC	WRAM	Review ALJ ruling re WRAM	0.25	0.25
5/20/2011	RC	SEIT	Rate design joint proposal, review prop. Changes to narrative, and to proposal	1.00	1.00
5/24/2011	RC	COOD	Communicate with DRA re rate design hearing, panel testimony	0.50	0.50
6/3/2011	RC	GH	MW CM, NS discuss rate design, case planning, rev notes for call	0.50	0.50
6/20/2011	RC	GH	Review CalAm response to DRA/TURN/NRDC rate design proposal, fw to SR	1.75	1.75
6/22/2011	RC	#	MW DRA, NRDC re rate design proposal, prep for call	1.75	1.75
6/24/2011	RC	PROC	Review motion to strike, e-mails re same	0.75	0.75
6/24/2011	RC	#	Prep for rate design hearing, review test., notes	3.00	3.00

Hours

Date	Atty	Task	Description	Hours	Time Spent
6/27/2011	RC	COOD #	Meet with DRA, NRDC prep for hearing		0.75
6/28/2011	RC	#	prep for hearing		0.50
6/28/2011	RC	#	Hearing re rate design		4.00
7/13/2011	RC	SEIT	TW CM re, rate design settlement		0.25
7/18/2011	RC	TR	CaLAm rate design, review proposals, review DRA proposal for reaching sett.		1.50
7/19/2011	RC	SEIT	Prep for rate design settlement call		0.50
7/19/2011	RC	SEIT	Conference call re rate design settlement		1.00
7/27/2011	RC	TR	TW CM re CalAm, rate design issues		0.50
7/28/2011	RC	TR	Review settlement document		0.50
8/1/2011	RC	TR	Review rate design stipulation info, tw cm re same		0.75
8/3/2011	RC	SEIT	Call with DRA, NRDC, CalAm re rate design stipulation		0.75
9/7/2011	RC	GP	Prep for PHC,		1.00
9/8/2011	RC	GP	Attend PHC		1.75
5/9/2012	RC	WRAM	Review testimony, notes re WRAM		2.00
5/21/2012	RC	WRAM	MW CM, NS and SR, discuss case planning, WRAM		0.50
Total: RC					119.00

Attorney: S
Rubin

11/16/2010	SRubin	GP	Review interrog ansers & filing		2.75
11/17/2010	SRubin	GP	Review interrog ansers & filing		1.25
11/18/2010	SRubin	#	Conf call w/TURN		1.00
11/30/2010	SRubin	#	Conf call w/TURN & DRA; review filing; draft DRs		3.25
12/1/2010	SRubin	#	Draft data requests		0.50
12/3/2010	SRubin	GP	Telecon w/Mailloux		0.25
12/6/2010	SRubin	BA	Review filing; draft data request; telecon w/Mailloux		2.00
12/6/2010	SRubin	TR	Review filing; draft data request; telecon w/Mailloux		0.50
12/7/2010	SRubin	BA	Review filing; draft data request; telecon w/Mailloux		2.00
12/7/2010	SRubin	TR	Review filing; draft data request; telecon w/Mailloux		1.00
12/8/2010	SRubin	TR	Research; review DR answers; draft data request		0.50
12/8/2010	SRubin	BA	Research; review DR answers; draft data request		1.00
12/10/2010	SRubin	BA	Review DR answers		0.75
12/13/2010	SRubin	BA	Review DR answers; analyze data		3.00
12/13/2010	SRubin	TR	Review DR answers; analyze data		0.75
12/14/2010	SRubin	BA	Review DR answers; telecon w/Mailloux		0.75
12/15/2010	SRubin	BA	Review DR answers		0.25
12/16/2010	SRubin	BA	Review DR answers		0.25
12/17/2010	SRubin	BA	Review DR answers		0.25

Date	Atty	Task	Description	Hours	Time Spent
12/21/2010	SRubin	#	Conf call w/TURN		1.00
12/21/2010	SRubin	BA	Analyze data		1.50
12/22/2010	SRubin	BA	Review DR answers		1.00
12/26/2010	SRubin	BA	Telecon & email w/Mailloux; telecon w/Farnkopf;		2.25
12/31/2010	SRubin	BA	Prepare COSS		6.25
1/5/2011	SRubin	BA	Prepare COSS; draft progress report		1.75
1/10/2011	SRubin	BA	Prepare COSS.		1.50
1/12/2011	SRubin	TR	Review documents		0.25
1/17/2011	SRubin	TR	Review DR answers		0.25
1/18/2011	SRubin	COOD	Conference call w/DRA		1.50
1/20/2011	SRubin	BA	Review DR answers; prepare COSS		2.50
1/21/2011	SRubin	BA	Review DR answers; analyze billing data		3.50
1/23/2011	SRubin	TR	Review DRA testimony		1.00
1/25/2011	SRubin	BA	Analyze billing data; emails w/TURN		0.50
1/26/2011	SRubin	TR	Design rates		2.25
1/26/2011	SRubin	BA	Finalize COSS		2.00
1/27/2011	SRubin	TR	Prepare rate design		1.25
1/27/2011	SRubin	COOD	Conf call w/DRA & NRDC		1.00
1/27/2011	SRubin	BA	Analyze billing data; telecon w/Chew;		1.00
1/30/2011	SRubin	#	Review DR answers; draft testimony		1.50
1/31/2011	SRubin	#	draft testimony; conf call w/TURN		3.00
1/31/2011	SRubin	BA	Analyze billing data; draft testimony; conf call w/TURN		2.50
2/1/2011	SRubin	BA	Draft testimony on coss and bill analysis		5.25
2/1/2011	SRubin	TR	Draft testimony rate design		3.00
2/2/2011	SRubin	TR	Draft testimony; prepare attachments		1.00
2/2/2011	SRubin	BA	Draft testimony; prepare attachments		3.00
2/3/2011	SRubin	TR	Draft testimony; prepare attachments		1.00
2/3/2011	SRubin	BA	Draft testimony; prepare attachments		2.00
2/4/2011	SRubin	TR	Review DR answers		0.25
2/18/2011	SRubin	TR	Compile workpapers; draft answer to DRA email		0.75
2/21/2011	SRubin	TR	Review NRDC testimony		1.00
3/4/2011	SRubin	TR	Emails w/TURN; review orders		0.50
3/10/2011	SRubin	BA	Review and analyze data - LA production cost		0.50
3/11/2011	SRubin	PROC	Telecon w/Mailloux re Monterey rate design		0.50
3/17/2011	SRubin	PROC	Telecon w/TURN (Monterey RD)		0.50
3/17/2011	SRubin	COOD	Telecon w/DRA (COSS)		1.00
3/18/2011	SRubin	TR	Telecon w/Costa		0.50
3/18/2011	SRubin	COOD	conf call w/DRA, NRDC		1.25
3/23/2011	SRubin	BA	Review rebuttal testimony		0.50

Date	Atty	Task	Description	Hours	Time Spent
3/25/2011	SRubin	PROC	Review supplemental testimony		0.50
3/28/2011	SRubin	PROC	Conf call w/TURN - Monterey rate design		0.75
4/1/2011	SRubin	TR	Prepare rate design summary		2.75
4/1/2011	SRubin	#	conf call w/TURN to prepare for settlement meetings		0.50
4/4/2011	SRubin	SEIT	Settlement conf call; conf call w/TURN		2.25
4/15/2011	SRubin	TR	Telecon w/Fransen		0.50
4/18/2011	SRubin	SEIT	Rate design settlement conf call		3.00
4/18/2011	SRubin	BA	telecon w/TURN		0.50
4/20/2011	SRubin	COORD	Email w/DRA		0.25
4/22/2011	SRubin	SEIT	Settlement conf call (revenue forecast)		1.50
4/25/2011	SRubin	TR	Prepare settlement proposal		3.50
4/26/2011	SRubin	TR	Prepare for & attend conf call w/TURN		2.00
4/27/2011	SRubin	COORD	Email and telecon w/DRA		1.00
4/28/2011	SRubin	SEIT	Attend settlement conference call		5.75
4/29/2011	SRubin	SEIT	Attend settlement conference call		4.00
5/2/2011	SRubin	BA	Compile and email data		0.50
5/4/2011	SRubin	TR	Review proposals; telecon w/TURN		1.50
5/5/2011	SRubin	SEIT	Review proposals; attend settlement conf call		2.75
5/13/2011	SRubin	SEIT	Conf call w/TURN; email w/NRDC		1.75
5/18/2011	SRubin	TR	telecon w/Franzen; emails; conf call w/TURN & DRA		1.00
5/18/2011	SRubin	BA	Analyze data;		1.00
5/18/2011	SRubin	SEIT	draft settlement memo; emails; conf call w/TURN & DRA		2.25
5/19/2011	SRubin	TR	Prepare settlement proposal		2.75
5/19/2011	SRubin	SEIT	prepare settlement proposals; conf call w/TURN, DRA, NRDC		3.00
5/20/2011	SRubin	SEIT	Prepare settlement proposals and drafts; emails and telecons		3.25
5/20/2011	SRubin	BA	Analyze data; prepare billing analysis; emails & telecons		0.75
6/16/2011	SRubin	GH	Telecon w/Mailloux		0.75
6/21/2011	SRubin	GH	Review CalAm testimony		0.50
6/22/2011	SRubin	TR	Draft cross qns: conf call w/TURN, DRA NRDC		3.00
6/24/2011	SRubin	#	Meet w/TURN and DRA; prepare for hearing		8.00
6/24/2011	SRubin	GH	Prepare for hearing; telecon w/Mailloux		1.75
6/26/2011	SRubin	#	Prepare for hearing		2.00
6/28/2011	SRubin	#	Prepare for and attend hearing		8.00
7/18/2011	SRubin	SEIT	Review staff workpapers; email w/ TURN		0.50
7/19/2011	SRubin	SEIT	Conf call w/ parties and ALJ		0.50
8/3/2011	SRubin	TR	Review draft stipulation		0.75
8/3/2011	SRubin	SEIT	Review draft stipulation; conference call		0.75
8/4/2011	SRubin	TR	Review data		2.00
8/4/2011	SRubin	SEIT	conf calls w/ TURN, parties		1.75

Date	Atty	Task	Description	Time Spent
8/5/2011	SRubin	SEIT	Review stipulation; emails	0.25
8/17/2011	SRubin	TR	Review NRDC settlement spreadsheets	1.50
5/2/2012	SRubin	SEIT	Conf call w/ parties	0.50
5/7/2012	SRubin	SEIT	Telecon w/ Fahrnkopf	0.50
5/15/2012	SRubin	#	Review brief	0.25
5/16/2012	SRubin	SEIT	Telecon w/ Mailloux; review DR answers	1.00
5/22/2012	SRubin	SEIT	Telecon w/ Fahrnkopf	0.25
5/23/2012	SRubin	SEIT	Review and analyze data; conf call w/ parties	1.50
7/17/2012	SRubin	SEIT	Review draft settlement agreement	0.50
7/18/2012	SRubin	SEIT	Review rate comparison	0.25
7/19/2012	SRubin	SEIT	Prepare rate comparison; telecon w/ Mailloux	1.00
Total: SRubin				170.75
Grand Total				489.75

Attachment 3
Expense Detail

Date	Atty	Case	Task	Description	Amount
<u>Activity: \$Atty Travel</u>					
6/27/2011	CM	A10-07-007_2	\$Atty Travel	San Diego and Oakland round trip.	\$394.40
6/27/2011	CM	A10-07-007_2	\$Atty Travel	Bart to/from airport	\$9.80
6/28/2011	CM	A10-07-007_2	\$Atty Travel	Taxi w/Reg to CPUC	\$10.00
6/28/2011	CM	A10-07-007_2	\$Atty Travel	Bart to/from airport	\$6.80
Total: \$Atty Travel					\$421.00
<u>Activity: \$Auto/Park/Toll</u>					
6/28/2011	CM	A10-07-007_2	\$Auto/Park/Toll	San Diego Parking (Amex)	\$34.00
Total: \$Auto/Park/Toll					\$34.00
<u>Activity: \$Copies</u>					
6/24/2011	CM	A10-07-007_2	\$Copies	Scott Rubin's Attachments. 134pp x 1!	\$402.00
6/24/2011	CM	A10-07-007_2	\$Copies	Testimony of Scott Rubin. 45pp x 15c	\$135.00
Total: \$Copies					\$537.00
<u>Activity: \$Lodging</u>					
6/28/2011	CM	A10-07-007_2	\$Lodging	Crescent Hotel, SF (Amex)	\$149.00
Total: \$Lodging					\$149.00
<u>Activity: \$Meals</u>					
6/27/2011	CM	A10-07-007_2	\$Meals	Starbucks (Amex)	\$12.90
6/27/2011	CM	A10-07-007_2	\$Meals	Meal (Amex)	\$19.80
6/27/2011	CM	A10-07-007_2	\$Meals	Meal	\$7.05
6/28/2011	CM	A10-07-007_2	\$Meals	Meal (Amex)	\$14.78
6/29/2011	CM	A10-07-007_2	\$Meals	Meal (Amex)	\$17.33
Total: \$Meals					\$71.86
<u>Activity: \$Phone</u>					
12/21/2010	CM	A10-07-007_2	\$Phone	Conference Call	\$58.99
4/26/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$78.23
4/28/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$10.86
5/12/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$96.53
5/17/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$85.67
5/18/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$85.28
6/22/2011	CM	A10-07-007_2	\$Phone	Conference Call	\$118.04
Total: \$Phone					\$533.60
Grand Total					\$1,746.46

Attachment 4

Allocation of Time by Issue

ATTORNEY/EXPERT	YEAR	ACTIVITY CODE/HOURS											TOTAL			
		#	BA	TR	COMP	PR	COOD	DIS	WRAM	GH	GP	PROC		SETT		
Christine Mailloux (TURN)	2010	1.50	2.00	2.25	0.00	0.00	0.00	2.25	0.00	0.00	0.00	0.00	1.00	0.25	0.00	9.25
Christine Mailloux (TURN)	2011	14.50	2.75	18.25	0.00	0.00	5.75	1.00	10.00	9.00	8.25	34.50	2.25	8.25	106.25	
Christine Mailloux (TURN)	2012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	0.00	0.00	13.25	0.25	0.00	14.25	
Christine Mailloux (TURN)	2013	0.00	0.00	0.00	13.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.25	
Robert Finkelstein (TURN)	2011	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.50	0.00	0.00	1.75	
Robert Finkelstein (TURN)	2013	0.00	0.00	0.00	0.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	
Nina Suetake (TURN)	2010	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	0.00	1.75	
Nina Suetake (TURN)	2011	2.75	0.00	5.00	0.00	0.00	4.00	0.00	1.00	0.25	12.00	25.50	2.25	12.00	52.75	
Regina Costa (TURN)	2010	2.25	3.25	6.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.25	0.00	22.00	
Regina Costa (TURN)	2011	18.25	0.75	23.75	0.00	0.00	7.25	0.00	9.25	2.25	0.75	29.50	2.75	0.75	94.50	
Regina Costa (TURN)	2012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.50	0.00	0.00	0.00	0.00	0.00	2.50	
Scott J. Rubin, Expert	2010	5.75	21.25	2.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.25	0.00	34.00	
Scott J. Rubin, Expert	2011	23.00	29.25	34.25	0.00	0.00	6.00	0.00	0.00	3.00	2.25	33.25	0.00	2.25	131.00	
Scott J. Rubin, Expert	2012	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.50	0.00	0.00	5.75	
TOTAL BY CODE	TOTAL	69.25	59.25	92.75	14.00	0.00	23.00	3.25	23.50	14.50	23.50	143.00	23.75	23.50	489.75	
CODE HOURS AS % TOTAL HOURS CLAIMED	%	14.1%	12.1%	18.9%	2.9%	0.0%	4.7%	0.7%	4.8%	3.0%	4.8%	29.2%	4.8%	4.8%	100.0%	

Activity Codes Defined

=
BA =
PR =
COMP =
COOR =
DIS =
WRAM =
GH =
GP =
TR =
PROC =
SETT =