



Decision \_\_\_\_\_

**FILED**

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

02/12/24

04:59 PM

A2010018

Application of Southern California Edison Company (U338E) for Authority to Increase Rates for its Class C Catalina Water Utility and Recover Costs from Water and Electric Customers.	Application 20-10-018 (Filed October 30, 2020)
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**INTERVENOR COMPENSATION CLAIM OF  
THE UTILITY REFORM NETWORK  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF  
THE UTILITY REFORM NETWORK**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [lcompcoordinator@cpuc.ca.gov](mailto:lcompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> The Utility Reform Network ("TURN")	<b>For contribution to Decision (D.) 23-12-007</b>
<b>Claimed:</b> \$97,401.25	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> Genevieve Shiroma	<b>Assigned ALJs:</b> Garrett Toy
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).	
<b>Signature:</b>	/s/
<b>Date:</b> 02/12/2024	<b>Printed Name:</b> Robert Finkelstein

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

<b>A. Brief description of Decision:</b>	In D.23-12-007, the Commission addressed the general rate case application of Southern California Edison Company (SCE) for its water utility operations on Catalina Island. The decision declined to adopt SCE's proposal to assign approximately \$29 million of water utility costs for recovery from the utility's electric utility customers. For several key elements of SCE's request for a very substantial revenue
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	requirement increase for its water utility operations, the Commission amortized recovery over a ten and fifteen year period in order to mitigate the rate impacts for Catalina water utility customers. The decision also addressed a host of forecasts of the costs of providing water utility service to island residents and businesses.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	1/7/21	
2. Other specified date for NOI:		
3. Date NOI filed:	2/8/21	
4. Was the NOI timely filed?		
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.19-01-011, R.20-08-021	
6. Date of ALJ ruling:	7/26/19, 12/11/20	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.19-01-011, R.20-08-021	
10. Date of ALJ ruling:	7/26/19, 12/11/20	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		

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

<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.23-12-007	
14. Date of issuance of Final Order or Decision:	12/20/23	
15. File date of compensation request:	2/12/24	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
B5, B6, B9, B10	California Public Utilities Code § 1804(b)(1) provides, “[a] finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in another commission proceeding commencing within one year of the date of that finding.” This proceeding commenced in the window of time between the expiration on July 26, 2020, of TURN’s finding of significant financial hardship made by ALJ Ruling in R.19-01-011 on July 26, 2019, and the finding of significant financial hardship made by ALJ Ruling in this proceeding, R.20-08-021, on December 11, 2020. TURN accordingly refers the Commission to TURN’s annual showing of financial hardship presented in the NOI filed by TURN on July 9, 2020, in A.20-03-004, where no ruling has issued. This is the same showing that formed the basis for the financial hardship finding made in R.20-08-021. ( <i>See Administrative Law Judge’s Ruling on The Utility Reform Network’s Showing of Significant Financial Hardship</i> (R.20-08-021), issued December 11, 2020, at pp. 6-7.)	

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

- A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
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<p><b>1. Denial of SCE request for electric customer subsidy of water utility costs:</b> TURN’s primary focus in this GRC proceeding was convincing the Commission to reject SCE’s proposal to assign to its electric utility customers approximately \$30.5 million of costs associated solely with the provision of water utility service to Catalina Island. From TURN’s protest through the initial round of briefing devoted to this specific element of SCE’s GRC request, then testimony, hearings and a final round of briefing, TURN addressed the factual, legal and policy reasons why SCE’s proposal for such a blatant subsidy was unreasonable and must not be adopted. For example, TURN’s “Limited Opening Brief” on issues related to the proposed subsidy addressed the Commission’s lack of authority to include water utility costs in electric utility rates and bills, and challenged SCE’s assertions that there was a sufficient nexus among electric utility and water utility customers to support treating Catalina Island’s water utility service as a “high cost” area of the utility’s electric utility service territory. TURN’s prepared testimony further established the factual basis for TURN’s position and challenged the factual basis for SCE’s request. And the final round of post-hearing briefing distilled the arguments why, on both a legal and a policy basis, the Commission should not require SCE’s electric utility customers to subsidize its water utility operations.</p> <p>In D.23-12-007, the Commission adopted outcomes consistent with TURN’s recommendations regarding SCE’s proposed subsidy. The initial response to these disputed issues appeared in a ruling issued by Administrative Law Judge Toy on May 27, 2021 (referred to as the “Cross-subsidy Ruling” in the decision). While that ruling declined to take a final position on the cross-subsidy at the time, it stated that there “are numerous barriers to implementation of the cross-subsidy, and [] SCE would face a significant burden in showing that it would be reasonable to impose such a charge onto its electric ratepayers.” The final decision that followed notes that, as discussed in the Cross-subsidy Ruling, “no Commission policy or statute supports the proposed cross-subsidy, and SCE has not provided sufficient justification to authorize the cross-subsidy.” The Commission also recognized, as argued by TURN and Cal Advocates, that</p>	<p>TURN Protest (12/1/2020), pp. 1-4; TURN “Concurrent Limited Opening Brief” (March 5, 2021), pp. 2-13; “Concurrent Limited Reply Brief” (March 19, 2021), pp. 2-8; Prepared Testimony of Robert Finkelstein (Ex. TURN-01) (October 19, 2021), pp. 2-8; TURN Opening Brief (May 13, 2022), pp. 3-16; and TURN Reply Brief (June 10, 2022), pp. 5-14.</p> <p>D.23-12-007, p. 67 (citing Cross-subsidy Ruling at 11), and 71.</p> <p>D.23-12-007, pp. 71-72, Findings of Fact 98 and 101, and Conclusions of Law 82-85.</p>	
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<p>it had never previously approved a cross-subsidy across multiple industries and between two distinct and separate populations, other than in a prior SCE Catalina water GRC, and then only as part of a settlement that is non-precedential. As a result, the Commission concluded that SCE should not be authorized to recover rates from SCE mainland electric ratepayers to pay for Catalina water utility costs.</p>		
<p><b>2. Alternative Cost Recovery Approaches:</b> TURN also addressed alternative cost recovery approaches throughout the proceeding. TURN’s protest criticized SCE’s showing for inadequately considering and analyzing alternative approaches. The initial scoping memo identified the consideration and potential adoption of alternatives to SCE’s original proposal as issues within the scope of the proceeding, and directed the parties to the alternatives that should be considered as part of the initial round of briefing. The Cross-subsidy Ruling directed SCE to submit supplemental testimony that would propose additional cost recovery options or methods, and emphasized “it is SCE’s responsibility to present cost recovery proposals that are just and reasonable.” Consistent with the Scoping Memo, TURN’s testimony addressed SCE’s supplemental showing, and focused on a “boat fee” charged to ferry passengers traveling to Catalina Island as a potentially viable alternative funding source. TURN’s post-hearing brief further addressed the topic of alternatives, explaining that based on the record developed in this proceeding, the Commission should neither adopt nor reject any alternative cost recovery method (other than SCE’s flawed subsidy proposal).</p> <p>In D.23-12-007, the Commission generally agreed that the alternative cost recovery methods were either impractical to implement in this GRC, or required counterparties that were not readily apparent at this time. The Commission encouraged SCE to seriously consider such alternative sources, especially the visitor boat fee.</p>	<p>TURN Protest, p. 3.</p> <p>Scoping Memo, pp. 3 and 5.</p> <p>Cross-subsidy Ruling, pp. 11-12.</p> <p>Prepared Testimony of Robert Finkelstein (Ex. TURN-01)8-10; TURN Opening Brief, pp. 16-22.</p> <p>D.23-12-007, pp. 69-70.</p>	

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

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocates Office (formerly Office of Ratepayer Advocates) a party to the proceeding?<sup>2</sup></b>	Yes	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	No	
<b>c. If so, provide name of other parties:</b>		
<b>d. Intervenor's claim of non-duplication:</b>  <p>TURN and Cal Advocates were both active in this proceeding, with Cal Advocates addressing the full range of reasonableness issues regarding SCE's recorded and forecasted costs as well as the cost recovery issues that were the focus of TURN's more limited participation. TURN coordinated with Cal Advocates on the cost recovery issues from the early stages of the proceeding. While both parties took similar positions on those issues, TURN's narrower focus in the proceeding enabled it to devote significant attention and explore the related issues in depth.</p> <p>The Commission should find that TURN's participation was reasonably coordinated with the participation of Cal Advocates under the circumstances so as to avoid undue duplication, and to ensure that, whenever duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenors. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.</p>		

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

<b>#</b>	<b>Intervenor's Comment</b>	<b>CPUC Discussion</b>

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

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

<sup>2</sup> The Office of Ratepayer Advocates was renamed Public Advocates Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	CPUC Discussion
<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>TURN’s request for intervenor compensation seeks an award of just under \$100,000 as the reasonable cost of our participation in the proceeding specific cost recovery issues. The Commission should conclude that the amount requested is reasonable under the circumstances here. As is more fully described in the substantial contribution section above, TURN’s participation in the proceeding helped ensure that SCE’s electric utility customers were not assigned approximately \$30 million of costs associated with SCE’s water utility operations on Catalina Island. The amount of compensation requested here represents approximately one-third of 1% of the requested amount. In light of this clear and very substantial financial benefit to SCE’s electric utility customers, the Commission should conclude that the requested amount of compensation is reasonable.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>The Commission should find reasonable the hours that TURN’s attorneys and consultant recorded for their work in this matter. The total hours of professional time included in this request for compensation (approximately 120 hours, excluding compensation-related entries) is the equivalent of three weeks of full time work had the work been performed by a single professional.</p> <p>TURN submits that the Commission should find the total number of hours reasonable particularly in light of the procedural course this proceeding followed. TURN’s work on the cost recovery issues fell into three general stages. The first stage consisted of the development and presentation of TURN’s initial work on the cost recovery issue through the development of the scope of the proceeding and the initial briefing ordered on the cost recovery issues, and covers approximately one-third of TURN’s claimed hours (41.5 hours). Had the Commission seen fit to rule at that time that it would not adopt SCE’s request to have its electric utility customers subsidize its water utility operations, TURN’s participation in the remainder of the proceeding would have likely been far more limited. However, as TURN described in the substantial contribution section above, the “Cross-subsidy Ruling” instead did not rule out the cross-subsidy proposal altogether, though it did emphasize the “significant barriers to its approval.” Cross-subsidy Ruling, p. 11. It also called for SCE to submit further testimony on cost recovery options. Therefore, the Cross-subsidy Ruling represents a useful demarcation in assessing TURN’s hours. After May 27, 2021 (the ruling’s issuance date), TURN’s continued participation in the proceeding was warranted in order to continue to address the cost recovery issues, including the expanded discussion of such issues in SCE’s supplemental testimony, followed by preparation of TURN’s testimony,</p>	



and then through the evidentiary hearings and opening and reply briefs. This second stage from the Cross-subsidy Ruling through filing of reply briefs on June 10, 2022, represents approximately 57% of TURN’s total hours included in this request for compensation (69.75 hours). The final portion (11.25 hours, approximately 10% of TURN’s total hours) covers the period from issuance of the Proposed Decision and covers TURN’s work on opening and reply comments.

In conclusion, the Commission should find TURN’s non-compensation hours reasonable here, whether viewed on an overall basis, or if considered based on the work conducted during each of the three stages of TURN’s efforts on the cost recovery and related issues in this GRC.

Compensation Request Preparation Time: TURN is requesting compensation for 6 hours for preparation of this request for compensation. Mr. Finkelstein prepared this request for compensation because of his dual role as TURN’s attorney and witness in this proceeding, leading to a familiarity with the proceeding’s record which enabled him to prepare the request in a far more efficient manner than if it were prepared by any other TURN attorney.

TURN submits that the recorded hours are reasonable. Therefore, TURN seeks compensation for all of the hours recorded by our attorney that are included in this request.

**c. Allocation of hours by issue:**

TURN typically allocates all attorney and consultant time by issue area or activity in support of a request for compensation. Here, all of the recorded hours would be allocated to a single issue area – cost recovery proposals. Therefore, TURN is taking a different approach to allocation here.

As described in the preceding sections on substantial contribution and reasonableness of hours included, TURN’s work on this issue fell into three general categories. The first category covered TURN’s work from its initial review of SCE’s application and supporting testimony through the issuance of the Cross-subsidy Ruling in mid-2021. The second category covers TURN’s work on discovery, testimony preparation, participation in evidentiary hearings, and briefing the cost recovery issues consistent with the Scoping Memo and the Cross-subsidy Ruling. The third category covers TURN’s work on opening and reply comments on the Proposed Decision.

Category/Code	Dates Covered	Percentage of total hours
Cat 1	11/2/20-5/27/21	34%
Cat 2	5/29/21-6/10/22	57%
Cat 3 (PD)	11/10/23-12/13/23	9%



TURN submits that this is a reasonable approach to allocation under the circumstances here. Should the Commission determine that a different sort of further allocation is necessary here, TURN requests that we be given the opportunity to supplement this request for compensation with the necessary information.

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein	2020	12.75	\$555	D.20-11-042	\$7,706.25			
Robert Finkelstein	2021	49.5	\$780	D.22-06-018	\$38,610.00			
Robert Finkelstein	2022	49.0	\$805	D.23-04-022	\$39,445.00			
Robert Finkelstein	2023	11.25	\$840	See Comment 1	\$9,450.00			
Subtotal: \$94,581.25						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Robert Finkelstein	2021	0.5	\$390	½ of 2021 rate	\$195.00			
Robert Finkelstein	2024	6.0	\$437.5	½ of 2024 rate – See Commt 1	\$2,625.00			
Subtotal: \$2,820.00						Subtotal: \$		
COSTS								

#	Item	Detail	Amount	Amount
			<b>Subtotal: \$0</b>	<b>Subtotal: \$</b>
			<b>TOTAL REQUEST: \$97,401.25</b>	<b>TOTAL AWARD: \$</b>
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>				
<b>ATTORNEY INFORMATION</b>				
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>3</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>	
Robert Finkelstein	June 1990	146391	No	

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

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN's Attorney
Attachment 3	TURN Hours Allocated by Issue
Comment 1	<p><b>Hourly Rates for TURN Staff</b></p> <p><u>2023 Rate:</u> TURN requests that the Commission apply the annual escalation methodology adopted in Res. ALJ-393 to determine the 2023 hourly rate for Robert Finkelstein. This annual escalation methodology is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index, Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations." (Res. ALJ-393, p. 4; Intervenor Compensation Market Rate Study, Final Report, p. 8). The percent change for this occupational group for the 12-months ended December 2022 is 4.5%. See <a href="https://www.bls.gov/news.release/eci.t05.htm">https://www.bls.gov/news.release/eci.t05.htm</a>.</p>

<sup>3</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>Therefore, TURN's requested 2023 rate for Mr. Finkelstein reflects a 4.5% increase over the amount authorized for work in 2022, rounded to the nearest \$5 increment.</p> <p><u>2024 Rate:</u> TURN requests that the Commission apply the annual escalation methodology adopted in Res. ALJ-393 to determine the 2024 hourly rate for Mr. Finkelstein. Based on the same BLS index described above, the percent change for this occupational group for the 12-months ended December 2023 is 4.1%. Therefore, TURN's requested 2024 rate for Mr. Finkelstein reflects a 4.1% increase over the amount requested for work in 2023, rounded to the nearest \$5 increment.</p>
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**D. CPUC Comments, Disallowances, and Adjustments *(CPUC completes)***

Item	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))**

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

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	
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If not:

Party	Comment	CPUC Discussion

**(Green items to be completed by Intervenor)**

### **FINDINGS OF FACT**

1. The Utility Reform Network (TURN) [has/has not] made a substantial contribution to D.23-12-007.
2. The requested hourly rates for The Utility Reform Network'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 compensation is \$\_\_\_\_\_.

### **CONCLUSION OF LAW**

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

### **ORDER**

1. The Utility Reform Network shall be awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay The Utility Reform Network the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay The Utility Reform Network 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. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."]  
Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of The Utility Reform Network'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.

## APPENDIX

### Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.23-12-007		
Proceeding(s):	A.20-10-018		
Author:			
Payer(s):			

### Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
<b>The Utility Reform Network</b>	2/12/24	\$97,401.25		N/A	

### Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	\$555	2020	
Robert	Finkelstein	Attorney	\$780	2021	
Robert	Finkelstein	Attorney	\$805	2022	
Robert	Finkelstein	Attorney	\$840	2023	
Robert	Finkelstein	Attorney	\$875	2024	

(END OF APPENDIX)

**Attachment 1**  
**Certificate of Service**

(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**

Daily Time Records for Attorneys and Experts



**A.20-10-018 (Class C Catalina Water Utility) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Robert Finkelstein	A20-10-018	Cat 1	Review SCE application, supporting testimony; e-mail re: ratemaking elements of SCE Catalina app	11/2/20	1.25
Robert Finkelstein	A20-10-018	Cat 1	Draft e-mail to SShek re: Pub Adv plans for Catalina GRC	11/19/20	0.25
Robert Finkelstein	A20-10-018	Cat 1	Prep for and call w/ PubAdvs Office re: application, positions, potential coordination	11/24/20	1.00
Robert Finkelstein	A20-10-018	Cat 1	Review SCE testimony, materials from Catalina web site cited in testimony, other materials	11/30/20	2.25
Robert Finkelstein	A20-10-018	Cat 1	Prepare protest; review materials, prepare DR 1	12/1/20	3.75
Robert Finkelstein	A20-10-018	Cat 1	Final review and edit of DR 1	12/2/20	0.25
Robert Finkelstein	A20-10-018	Cat 1	Review SCE reply to protests	12/14/20	0.25
Robert Finkelstein	A20-10-018	Cat 1	Review SCE proposed NDA, compare to GRC version; execute NDA	12/15/20	0.25
Robert Finkelstein	A20-10-018	Cat 1	Prep for call w/ parties for PHC; call w/ parties	12/23/20	1.00
Robert Finkelstein	A20-10-018	Cat 1	Begin drafting edits to PHC stmt; draft e-mail to Cal Advocates re: its issue list	12/28/20	0.75
Robert Finkelstein	A20-10-018	Cat 1	Complete initial edits to PHC stmt; draft e-mail to Cal Advocates and Catalina Parties seeking feedback	12/29/20	1.25
Robert Finkelstein	A20-10-018	Cat 1	Final draft of PHC stmt, circulate to other parties	12/30/20	0.50
Robert Finkelstein	A20-10-018	Cat 1	Review SCE draft, file materials; draft e-mail to Cal Adv and Catalina Parties re: proposed edits to SCE draft of PHC stmt	1/3/21	0.75
Robert Finkelstein	A20-10-018	Cat 1	Prep for and call with parties on PHC statement; further review of revised drafts	1/4/21	1.25
Robert Finkelstein	A20-10-018	Cat 1	Draft additional language for PHC statement to respond to new SCE language	1/5/21	0.75
Robert Finkelstein	A20-10-018	Cat 1	Continue review of DR responses; draft DR 2	1/6/21	2.25
Robert Finkelstein	A20-10-018	Cat 1	Prep for and participate in PHC; final edits to DR 2	1/7/21	2.25
Robert Finkelstein	A20-10-018	Cat 1	Review scoping memo; draft e-mail to TLong re: same	1/29/21	0.50
Robert Finkelstein	A20-10-018	Cat 1	Review file materials; initial review of SCE responses to DR set 2; draft e-mails to EFisher and NBishton re: supp'l testimony from SCE and interim briefing issues	2/3/21	1.50
Robert Finkelstein	A20-10-018	Comp	Draft NOI	2/8/21	0.50
Robert Finkelstein	A20-10-018	Cat 1	Review SCE responses to DR 2; begin research for brief on electric subsidies	3/2/21	2.50
Robert Finkelstein	A20-10-018	Cat 1	Review DR responses, other file materials; begin outline of interim brief	3/3/21	2.75
Robert Finkelstein	A20-10-018	Cat 1	Further development of outline, arguments; begin drafting interim brief	3/4/21	3.00
Robert Finkelstein	A20-10-018	Cat 1	Draft and edit interim brief	3/5/21	2.00
Robert Finkelstein	A20-10-018	Cat 1	Review opening briefs of Cal Adv, Catalina parties, and SCE; initial research into cited decisions	3/16/21	2.25
Robert Finkelstein	A20-10-018	Cat 1	Further research of SCE and Catalina-cited decisions; review of other file materials; begin drafting reply brief	3/17/21	3.00
Robert Finkelstein	A20-10-018	Cat 1	Draft reply brief	3/18/21	2.00
Robert Finkelstein	A20-10-018	Cat 1	Final review and edit of reply brief; initial review of other parties' reply briefs	3/19/21	1.50
Robert Finkelstein	A20-10-018	Cat 1	Review ALJ ruling on ltd issues briefed, scoping memo	5/27/21	0.50
Robert Finkelstein	A20-10-018	Cat 2	Draft e-mail to EFisher of Cal Advocates re: procedural questions	5/29/21	0.25
Robert Finkelstein	A20-10-018	Cat 2	E-mail exchange w/ Cal Adv and Catalina parties re: procedural steps	6/22/21	0.50
Robert Finkelstein	A20-10-018	Cat 2	E-mails w/ Cal Adv and Catalina re: need to adjust procedural schedule; draft e-mail to SCE re: same	6/24/21	0.75
Robert Finkelstein	A20-10-018	Cat 2	Call w/ parties about need for schedule changes; draft e-mail to Cal Adv and Catalina Parties re: next steps	6/28/21	0.75
Robert Finkelstein	A20-10-018	Cat 2	Review supplemental testimony on alternative sources of revenues; begin drafting DRs	9/7/21	1.50
Robert Finkelstein	A20-10-018	Cat 2	Continue drafting DRs on supp'l testimony	9/8/21	1.75
Robert Finkelstein	A20-10-018	Cat 2	Finish drafting and final edit of DRs on supp'l test	9/9/21	0.50
Robert Finkelstein	A20-10-018	Cat 2	Begin review of DR responses on suppl testimony	9/30/21	2.25
Robert Finkelstein	A20-10-018	Cat 2	Review DR responses on supp'l testimony; draft e-mail to other intervenors	10/1/21	1.50
Robert Finkelstein	A20-10-018	Cat 2	Draft memo to TLong re: various options and strategies for Catalina water GRC	10/13/21	1.00
Robert Finkelstein	A20-10-018	Cat 2	Finish reviewing DR responses; review file materials; draft and edit testimony	10/19/21	5.00
Robert Finkelstein	A20-10-018	Cat 2	Initial review of Catalina Parties and Cal Advocates testimony	11/11/21	1.50
Robert Finkelstein	A20-10-018	Cat 2	Draft e-mail to parties proposing seeking extension for cmmts until after rebuttal served	11/15/21	0.50
Robert Finkelstein	A20-10-018	Cat 2	Draft e-mail to ALJ Toy re: revising date for comments on evid'y hrgs	11/16/21	0.25
Robert Finkelstein	A20-10-018	Cat 2	Initial review of SCE rebuttal; review other file materials for response to ALJ Ruling; draft e-mail to Cal Advs and Catalina Parties re: same	12/9/21	1.50
Robert Finkelstein	A20-10-018	Cat 2	Call w/ EFisher and NBishton re: upcoming hearings, coordination; draft joint language for comments on hearings	12/13/21	0.75
Robert Finkelstein	A20-10-018	Cat 2	Review draft comments; e-mail exchange w/ EFisher and NBishton, then all active parties on upcoming hearings and COVID	12/14/21	0.50
Robert Finkelstein	A20-10-018	Cat 2	Begin preparing hearing materials; begin review of SCE testimony for cross prep	1/12/22	2.00
Robert Finkelstein	A20-10-018	Cat 2	Continue review of SCE testimony, related materials for hearing prep; develop initial cross estimates	1/13/22	1.75
Robert Finkelstein	A20-10-018	Cat 2	Prep for and participate in Status Conference	1/19/22	1.25
Robert Finkelstein	A20-10-018	Cat 2	Prep for and call with parties re: upcoming hearings, responses to ALJ rulings	2/7/22	1.00
Robert Finkelstein	A20-10-018	Cat 2	Review draft witness and hearing schedule, Rule 13.9 notice; respond to other parties	2/8/22	0.25
Robert Finkelstein	A20-10-018	Cat 2	Begin prep for hearings	2/21/22	1.50
Robert Finkelstein	A20-10-018	Cat 2	Review testimony, workpapers, discovery for hearing prep; prepare errata testimony	2/22/22	1.50
Robert Finkelstein	A20-10-018	Cat 2	Further hearing prep for cross of Barcinas; prep x exhibit	2/23/22	1.50
Robert Finkelstein	A20-10-018	Cat 2	Prep for hearing; participate in hearing for Barcinas cross	2/24/22	3.75

**A.20-10-018 (Class C Catalina Water Utility) TURN Compensation Claim**  
**Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Robert Finkelstein	A20-10-018	Cat 2	E-mails re: hearing plans, status	2/28/22	0.50
Robert Finkelstein	A20-10-018	Cat 2	Prep for and attend hearing -- Fox of Raftelis on recovery options	3/2/22	2.50
Robert Finkelstein	A20-10-018	Cat 2	Prep for and attend hearing -- Cal Adv's witnesses, my cross	3/7/22	3.00
Robert Finkelstein	A20-10-018	Cat 2	Review Cal Adv's and SCE competing CBOs; draft e-mail to EFisher	3/29/22	0.25
Robert Finkelstein	A20-10-018	Cat 2	Prep for call; call w/ EFisher re: strategies and potential arguments on cost shifting issue	4/28/22	1.00
Robert Finkelstein	A20-10-018	Cat 2	Draft initial rough outline on cost recovery issues; draft e-mail to EFisher re: same	5/5/22	2.25
Robert Finkelstein	A20-10-018	Cat 2	Review file materials, work on outline for opening brief	5/9/22	2.25
Robert Finkelstein	A20-10-018	Cat 2	Draft opening brief sections on CPUC authority; work on outline on remaining issues	5/10/22	3.00
Robert Finkelstein	A20-10-018	Cat 2	Continue drafting brief sections on CPUC authority; begin drafting arguments on policy reasons to deny subsidy	5/11/22	2.50
Robert Finkelstein	A20-10-018	Cat 2	Continue drafting arguments on policy reasons; review file materials re: boat fee, other issues; begin drafting on alternatives	5/12/22	3.25
Robert Finkelstein	A20-10-018	Cat 2	Final drafting and editing of opening brief; initial review of other briefs	5/13/22	2.75
Robert Finkelstein	A20-10-018	Cat 2	Begin review of opening briefs, related materials	6/1/22	2.25
Robert Finkelstein	A20-10-018	Cat 2	Review file materials, research decisions cited in other parties' opening briefs, begin drafting reply brief	6/7/22	3.00
Robert Finkelstein	A20-10-018	Cat 2	Continue drafting reply brief; further research to support	6/8/22	2.50
Robert Finkelstein	A20-10-018	Cat 2	Draft reply brief	6/9/22	1.50
Robert Finkelstein	A20-10-018	Cat 2	Draft and final edit of reply brief	6/10/22	2.00
Robert Finkelstein	A20-10-018	Cat 3 - PD	Initial review of PD	11/10/23	0.75
Robert Finkelstein	A20-10-018	Cat 3 - PD	Review PD, file materials; draft comments on PD	11/28/23	1.50
Robert Finkelstein	A20-10-018	Cat 3 - PD	Finish opening comments; review opening comments of other parties; research record re: SCE comments	11/29/23	2.50
Robert Finkelstein	A20-10-018	Cat 3 - PD	Review File materials, outline reply comments, begin drafting reply comments	12/2/23	3.50
Robert Finkelstein	A20-10-018	Cat 3 - PD	Complete drafting reply comments	12/3/23	2.50
Robert Finkelstein	A20-10-018	Cat 3 - PD	Review SCE ex parte notice	12/11/23	0.25
Robert Finkelstein	A20-10-018	Cat 3 - PD	Review Revised PD	12/13/23	0.25
Robert Finkelstein	A20-10-018	Comp	Review file materials for drafting comp request	2/7/24	1.5
Robert Finkelstein	A20-10-018	Comp	Draft comp request	2/9/24	4.5
<b>Substantial Total</b>					<b>122.50</b>
<b>Comp Total</b>					<b>6.50</b>
<b>Grand Total</b>					<b>129.00</b>

**Attachment 3**

TURN Hours Allocated by Issue

**A.20-10-018 (Class C Catalina Water Utility) TURN Compensation Claim**  
**TURN Hours Allocated by Issue**

			Cat 1	Cat 2	Cat 3 - PD	Substantive Hours	Substantive \$	Comp	Compensation (iComp)
	Billing Period	Hourly Rate							1/2 of hourly rate
Robert Finkelstein	2020	\$555	12.75	-	-	12.75	\$ 7,076.25	-	\$ -
Robert Finkelstein	2021	\$780	28.75	20.75	-	49.50	\$ 38,610.00	0.50	\$ 195.00
Robert Finkelstein	2022	\$805	-	49.00	-	49.00	\$ 39,445.00	-	\$ -
Robert Finkelstein	2023	\$840	-	-	11.25	11.25	\$ 9,450.00	-	\$ -
	2024	\$875						6.00	\$ 2,625.00
<b>TOTAL</b>			41.50	69.75	11.25	122.50	\$ 94,581.25	6.50	\$ 2,820.00
TOTAL % HOURS ALLOCATED			34%	57%	9%				

<b>Substantial Contribution</b>	<b>\$ 94,581.25</b>
<b>Intervenor iComp Compensation</b>	<b>\$ 2,820.00</b>
<b>Grand Total</b>	<b>\$ 97,401.25</b>