Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Frameworks.	Rulemaking 93-04-003 (Filed April 7, 1993)
Investigation on the Commission's Own Motion Into Open Access and Network Architecture Development of Dominant Carrier Networks.	Investigation 93-04-002 (Filed April 7, 1993)
Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service.	Rulemaking 95-04-043 (Filed April 26, 1995)
Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service.	Investigation 95-04-044 (Filed April 26, 1995)

OPINION ON REQUEST FOR INTERVENOR COMPENSATION

This decision grants The Utility Reform Network (TURN) an award of $84,104.84 in compensation for substantial contributions to Decision (D.) 02-09-050 and D.02-12-081, and for preliminary work in D.98-12-069. Those decisions paved the way for Pacific Bell (Pacific) to begin long distance service in California. Pacific is now SBC California (U 1001 C).

1. Background

In D.02-09-050, the Commission concluded that Pacific satisfied most of the so-called "checklist" items set forth in Section 271 of the Telecommunications Act of 1996 necessary to win permission to enter the long distance telephone market in California. However, the Commission also found merit in TURN's positions that local exchange competition was weak and that SBC's long distance entry raised the possibility of harm to the competitive intrastate interexchange telecommunications market. (*See* D.02-09-050, at 4; Finding of Fact 329, at 303.) Accordingly, the Commission instituted further proceedings to address the remaining issues, resulting in D.02-12-081 on December 30, 2002.

Consistent with the requirement of Pub. Util. Code § 1804(c), TURN filed this request for compensation within 60 days of the date of issuance of D.02-12-081. The request also addresses TURN's participation in an earlier decision, D.98-04-059, compensation for which had been deferred.

2. Requirements for Awards of Compensation

Intervenors who seek compensation for their contributions in Commission proceedings must file requests for compensation pursuant to Pub. Util. Code §§ 1801-1812. Pub. Util. Code § 1804(a) requires an intervenor to file a notice of intent (NOI) to claim compensation within 30 days of the prehearing conference or by a date established by the Commission. TURN filed a timely NOI in this proceeding.

Section 1804(c) requires an intervenor requesting compensation to provide "a detailed description of services and expenditures and a description of the customer's substantial contribution to the hearing or proceeding." Section 1802(h) states that "substantial contribution" means that,

> in the judgment of the commission, the customer's presentation has substantially assisted the Commission in the

> making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer's participation has resulted in a substantial contribution, even if the decision adopts that customer's contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate's fees, reasonable expert fees, and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.

Section 1804(e) requires the Commission to issue a decision that determines whether or not the customer has made a substantial contribution and the amount of compensation to be paid. The level of compensation must take into account the market rate paid to individuals with comparable training and experience who offer similar services, consistent with § 1806.

3. Contributions to Resolution of Issues

This compensation request is somewhat unusual. TURN is seeking compensation not only for work done in D.02-09-050 and D.02-12-081, but also for work performed in an earlier phase of the Section 271 proceeding that culminated in D.98-12-069. The latter work on the status of local competition was requested by the presiding Managing Commissioner, but resolution of the underlying issues was deferred to a subsequent phase of this proceeding. TURN sought an award of compensation for its work on D.98-12-069, but the request was denied in D.99-12-004 on the basis that issues raised by TURN had been deferred. Therefore, to adequately assess TURN's contribution in the Section 271 proceeding, TURN suggests that "we must go back several years and walk a somewhat long and winding road." (Request, at 4.)

3.1 Activities Leading Up to D.98-12-069

The review of Pacific's 271 application began in August 1996 with the issuance of the Managing Commissioner's Ruling. The ruling asked Pacific and interested parties to supply information on: (1) market and technical conditions related to local exchange competition in California; (2) the relationship between the Section 271 requirements and the rules and policies being developed in competition-related dockets; and (3) the extent to which interconnection agreements entered into by Pacific and competitive local exchange carriers (CLECs) satisfied Telecommunications Act requirements.

On February 20, 1998, the Assigned Commissioner issued a ruling finding that the underlying record was stale, lacked quantitative information, and failed to address a number of issues of interest to the Federal Communications Commission (FCC). The ruling ordered Pacific to file a draft 271 application with the Commission at least 90 days before filing with the FCC so that the Commission and interested parties could develop an up-to-date factual record. In addition, the ruling directed Pacific and CLECs to respond to a long list of questions seeking detailed, quantitative information.

On March 31, 1998, the draft 271 application and responses to the Commission's questions were filed. TURN filed a brief and two affidavits on April 30, 1998. One affidavit, by telecommunications specialist Charlotte TerKeurst, compiled and analyzed proprietary information from the parties to assert that competitive local carriers had gained only about 1% of access lines in Pacific's territory. TURN contended that this "insignificant" level of competition showed that the local market was not open to competition and, accordingly, long distance authorization would not be in the public interest.

TURN presented a second affidavit by Thomas J. Long, then the agency's senior telecommunications attorney, contending that Pacific had presented inaccurate and misleading monitoring data to the Commission.

TURN subsequently made detailed ex parte presentations to each of the Commissioners and their telecommunications advisors on the market study of local competition. TURN stressed the importance of its findings to the advisory ruling that the Commission intended to make to the FCC when the federal agency considered Pacific's request for long distance authority.

On May 20, 1998, the Commission's Telecommunications Division was directed to issue a detailed report based on the 16,500 pages of documents that had been submitted by the parties. Staff's initial report was issued on July 10, 1998 and was discussed in a series of industry workshops. Staff concluded that Pacific was out of compliance with 11 of the 14 checklist items, but it also recommended deferral of the issue of local competition. On October 5, 1998, staff issued its final report, concluding that Pacific was out of compliance with 10 of the 14 checklist requirements and set forth a list of corrective actions to aid Pacific in complying with Section 271 requirements. On December 17, 1998, the Commission in D.98-12-069 adopted the final report with modifications.

3.2 TURN's Request for Compensation for D.98-12-069

On February 22, 1999, TURN filed a request for compensation relating to D.98-12-069. That request was denied in D.99-10-004 on the basis that TURN did not make a substantial contribution to the issues addressed in D.98-12-069. However, the Commission added:

> TURN may renew its current request for compensation at the conclusion of [the further phase of the proceeding]. In that request, TURN should restate its contention that it

> should be compensated for its participation in 1998 and its efforts in preparing its intervenor compensation request in 1999, because it participated on issues identified by the Commission in the Joint Managing Commissioners' and Administrative Law Judge's Ruling dated February 20, 1998. TURN is correct that the Ruling identified the state of local competition and whether granting Pacific's 271 application would be in the "public interest" as both being issues relevant to the Commission's inquiry. Our denial of TURN's request for compensation at the current time is based upon the fact that the issues on which it participated were deferred to a later date. We reach no conclusion at this time regarding the ultimate merits or ultimate value to the Commission of TURN's participation. (D.98-12-069, at 3-4.)

3.3 Activities Leading Up to D.02-09-050 and D.02-12-081

TURN continued to be an active participant in the proceedings leading to D.02-09-050 and D.02-12-081. TURN reviewed each of the voluminous compliance filings made by Pacific between 1999 and 2001, submitting responses on several. TURN participated in three days of all-party meetings in April 2001, an August 2001 workshop on pricing issues, ongoing discovery hearings and other meetings.

TURN in its briefs argued that CLECs attempting to enter California markets are significantly hampered by business practices (particularly service orders) of Pacific and by high prices for Pacific's unbundled network elements (UNE). TURN presented data intended to show that UNE prices were not cost based, that a line-splitting order process harmed both CLECs and customers, that UNE problems impeded access to 911/E911 services, and that local competition in California continued to lag.

In proceedings leading to D.02-12-081, TURN joined with the Office of Ratepayer Advocates (ORA) in arguing that further hearings were required.

TURN identified several examples of what it termed "anticompetitive behavior" by Pacific. TURN joined with ORA and WorldCom in developing an expedited dispute resolution process for complaints about Pacific's service and outlined steps to implement such a process.

4. Did TURN Make a Substantial Contribution?

In assessing TURN's contribution here, we note that the 271 proceeding was not a typical one. Rather than deciding whether Pacific had met the requirements of Section 271(c), the Commission's job was consultative in nature. Its task was to develop as detailed and credible a record as possible, make recommendations, and then forward the facts and analysis to the FCC, which would make the final decision.

The Commission did not rule on the local competition issue in D.98-12-069. However, the Commission determined that local competition was highly relevant. In D.02-09-050, the Commission concluded:

> While Pacific largely satisfies the technical requirements of Section 271, in accordance with Section 709.2, we cannot state unequivocally that we find Pacific's imminent entry into the long distance market in California will primarily enhance the public interest. (D.02-09-050, at 4.)
>
> Local telephone competition in California exists in the technical and quantitative data; but it has yet to find its way into the residences of the majority of California's ratepayers. (D.02-090-050, Finding of Fact 336.)

It is clear that TURN's arguments and data substantially contributed to these conclusions. The decisions also agreed with TURN that Pacific's UNE prices were not cost based (*see* D.02-09-050, Finding of Fact 176). TURN also presented arguments that the Commission acknowledged regarding Pacific's line-splitting order processing and the limited competition in the DSL market (*see* D.02-09-050 at 154-55). TURN also contributed to the development of an

expedited dispute resolution process that was praised by the Commission (*see* D.02-12-081, Finding of Fact 28).

Given the purpose and scope of the 271 proceeding, the merits of TURN's compensation request should be judged in substantial part on whether its participation helped the Commission carry out its duty as an advisor and fact finder on issues relevant to long distance entry by Pacific. We conclude that TURN contributed to the Commission's decision-making process by ensuring a full discussion of different substantive positions. The record demonstrates that TURN contributed substantially to the development of a quality record, particularly on the issues of pricing and local competition.

There can be little question that the consolidated proceedings on Pacific's quest for long distance authority in California were extraordinarily complex. The proceedings took six years to complete, involved numerous parties, and created a record of more than 16,500 pages. Most parties were carriers of one sort or another and represented their own business interests. TURN focused on issues of significant concern to residential ratepayers and small businesses. TURN has demonstrated that it made a substantial contribution as defined in Pub. Util. Code § 1802(h).

We find further that no reduction of compensation for duplication is warranted on this record. Alone among the parties, TURN and ORA represented primarily the interests of consumers. While some overlap was unavoidable, TURN and ORA took steps to keep duplication to a minimum and to ensure that when it did happen, the work served to complement and assist the showings of the other party.

TURN acknowledges that it is difficult to assign a dollar value to the benefits achieved through its contribution to these decisions. However, TURN

urges, and we agree, that the costs claimed here are far outweighed by the value of TURN's contribution to the development of a quality record in this important proceeding.

We find that TURN has demonstrated that it made a substantial contribution to D.02-09-050 and D.02-12-081, and that it also should be reimbursed for its work performed leading up to D.98-12-069.

5. Reasonableness of Requested Compensation

TURN requests compensation for all of the time and expenses reasonably devoted to its participation in this proceeding, a total of $34,556.81 for work leading up to D.98-12-069 and a total of $49,728.03 for costs recorded since the issuance of D.98-12-069. In the first category, TURN has voluntarily reduced its request by 33%. In the second category, TURN has voluntarily reduced its request by 20%. The reductions reflect TURN's assessment of work on recommendations that the Commission did not adopt and on issues that the Commission did not address.

EXPENSES AND COSTS ASSOCIATED WITH D.98-12-069

Advocate's Fees

T. Long	91 Hours	X	$260 (1998)	=	$23,660.00

Consultant's Fees

C. TerKeurst	76.7 Hours	X	$200 (1998)	=	$15,340.00
C. Marsh	75.5 Hours	X	$125 (1998)	=	$ 9,437.50
Adm. Support	4.5 Hours	X	$ 40 (1998)	=	$ 180.00
Expenses				=	$ 1,048.48

Other Costs

Telephone	=	$ 43.65
Copies	=	$1,607.81
FedEx	=	$ 407.25
Lexis	=	$ 8.30
Postage	=	$ 102.22

TOTAL=	$51,835.21
TURN's 33% Reduction	<$17,278.40>
TOTAL REQUESTED=	**$34,556.81**

EXPENSES AND COSTS RECORDED SINCE D.98-12-069

Advocate's Fees

R. Costa	12.50	Hours X	$160 (2000)	=$ 2,000.00
	149.50	Hours X	$180 (2001)	=$26,910.00
	90.25	Hours X	$200 (2002)	=$18,050.00
C. Mailloux	35	Hours X	$250	=$ 8,750.00
W. Nusbaum	17.50	Hours X	$125	=$ 2,187.50
R. Finkelstein	5	Hours X	$170	=$ 850.00
S. Bowen	4	Hours X	$350	=$ 1,400.00

Other Costs

Telephone		=$5.87
Copies		=$1,750.58
Facsimile		=$21.80
Postage		=$234.28
	TOTAL	**=$62,160.03**
	TURN's 20% Reduction	<$12,432.00>
	Total Requested	**=$49,728.03**
	Grand Total Requested	**=$84,284.84**

5.1 Hours Claimed

TURN has presented its attorney, consultant and staff hourly records in an appendix to the request for compensation. The information reflects the hours devoted to reviewing the records, drafting briefs and responses, and participating in workshops and other proceedings. Consistent with Commission policy, TURN billed half of its attorney rate for time related to preparation of this compensation request. The hours TURN claims are reasonable.

5.2 Hourly Rates

Section 1806 requires the Commission to compensate eligible parties at a rate that reflects the "market rate paid to persons of comparable training and experience who offer similar services."

TURN seeks compensation for Thomas J. Long, then senior telecommunications attorney, at the rate of $260 per hour, his 1998 rate. The Commission in D.99-07-045 has previously awarded compensation for his work using that hourly rate.

TURN seeks compensation for Charlotte F. TerKeurst, who at the time was vice president of Chicago-based Competitive Strategies Group, Ltd., at the hourly rate of $200. The Commission has previously awarded compensation using that hourly rate for her work on behalf of TURN in 1998. (D.99-07-045.) TURN also requests compensation for 4.5 hours of administrative work performed by staff at TerKeurst's firm. Professional rates are assumed to include administrative overheads and therefore administrative support is not separately compensated. Therefore, we do not allow compensation for administrative support hours, totaling $180.00.

Christopher Marsh is a consultant also employed by Competitive Strategies Group. He assisted in preparing the quantitative analysis of the state of local competition. Marsh has a 1995 master's degree in communications studies from the University of Nebraska, and he completed two years of doctoral course work on telecommunications regulation at Northwestern University. He joined the Competitive Strategies Group in May 1997. The requested rate of $125 for his work in 1998 was the same rate charged at that time to private clients and thus is market-based. The requested rate is reasonable.

TURN requests an hourly rate for Regina Costa of $160 for her work in 2000, $180 for work in 2001, and an increase to $200 for work performed in 2002. The rates for 2000 and 2001 have been approved by the Commission in earlier cases. (D.01-08-011 and D.02-04-013.) TURN states that there had been no increase in the hourly rates sought for Costa's work from 1996 to 2000, and it

asserts that the combination of inflation and Costa's increasing skills and responsibilities provide support for the reasonableness of the $200 rate sought for 2002. Costa has an advanced degree in telecommunications and nearly 20 years of experience in research, analysis, advocacy and expert testimony in the field of telecommunications. With the departure of TURN's senior telecommunications attorney at the end of 2000, she assumed responsibility for formation and presentation of TURN's positions on telecommunications matters. TURN contends that the $200 rate for work performed in 2002 is consistent with the market rate for consultants and experts with similar experience and qualifications. It notes that the Commission in D.01-07-020 approved as reasonable the then-current (2000) market rate of $180 per hour for Beth Kientzle, who has performed services for AT&T California, Inc., and other telecommunications companies. While a highly qualified consultant, Kientzle has less experience than Costa and lacks the specialized academic degree in telecommunications held by Costa. As another example, TURN cites D.01-09-045, in which the Commission adopted a 1999 market rate of $175 per hour for consultant Scott Cratty. Cratty has experience comparable to Costa but does not have the advanced degree in telecommunications. In sum, TURN asserts, Costa has an advanced degree in telecommunications and nearly 20 years of experience in research, analysis, advocacy and expert testimony in the field of telecommunications. We will approve a rate of $200 per hour for Costa for work performed in the year 2002.

Christine Mailloux is a relatively new addition to TURN's staff. This is the first request for compensation in which TURN seeks approval of an hourly rate for Mailloux's substantive work, although the Commission earlier approved a $190 rate for her for preparation of a compensation request. TURN now seeks a

$250 hourly rate for Mailloux for her substantive work in 2001. Mailloux earned her law degree in 1993 and worked with the Privacy Rights Clearinghouse. She joined Blumenfeld & Cohen in 1996, representing CLECs in state commission proceedings. In 1999, she became assistant general counsel of regulatory affairs at NorthPoint Communications. Immediately before coming to TURN, she consulted with a telecommunications equipment manufacturer on state and federal regulatory issues, intervening on its behalf in several FCC proceedings. At TURN, she has taken a lead role in the Commission's review of a Telecommunications Bill of Rights and Consumer Protection Rules. In view of her experience, TURN asserts that her hourly rate should be commensurate with that of a senior associate or junior partner at a firm. TURN submits an *Of Counsel* survey of attorney fees to show that a $250 rate is substantially below the low-end rates for partners reported in the 2000/2001 period. In D.02-05-005 we adopted a rate of $220 for Osa Armi, a 1997 law school graduate. Given her four years of additional practice, the rate requested for Mailloux is reasonable and is approved.

TURN also requests an hourly rate of $250 for William Nusbaum, who joined the consumer agency this year as senior telecommunications attorney. Nusbaum has over 25 years of telecommunications experience. He is a former assistant general counsel for the National Association of Regulatory Utility Commissioners, was a communications policy specialist at the National Telecommunications and Information Administration, and he held several senior level positions at Pacific Telesis for 13 years. Given Nusbaum's experience, TURN expects to seek a higher rate for substantive work he performs, but it limits its request to $250 in this proceeding because Nusbaum's work has been limited to preparation of this compensation request. Since such work is billed at

50% of the normal rate, the effective rate for Nusbaum in this proceeding is $125. We approve the requested $250 rate with respect to this proceeding.

TURN requests an hourly rate of $350 for four hours of work Stephen Bowen performed on TURN's behalf in this proceeding. Bowen is head of Bowen Law Group in San Francisco and has appeared before the Commission in numerous telecommunications matters for nearly 20 years. He appeared for TURN at a workshop on pricing issues in August 2001. Although his billing rate to TURN was higher than the $350 rate TURN seeks to recover, TURN states that it voluntarily limited its request due to the limited nature of the work and the Commission's past reluctance to allow a rate for outside counsel higher than the top rate paid to TURN's senior attorney. Michel Florio of TURN received $350/hour in 2001. Given Bowen's comparability to Florio, we award $350/hour for his limited work in this proceeding.

Robert Finkelstein is an experienced supervising attorney, and the $340 rate requested has previously been approved by this Commission for work in the year 2002. (D.03-01-074.) Because of the small number of hours devoted to supervising this compensation request, TURN asserts that it is appropriate to apply the 2002 rate to 2003 work, since the 50% cap for work on compensation requests will effectively reduce the rate to $170. We agree.

We find that the rates requested by TURN for its attorneys, consultants and staff in this proceeding are reasonable and reflect market rates for individuals of similar experience and qualifications.

5.3 Other Costs

TURN claims $2,169.23 in administrative and other miscellaneous expenses associated with its work performed prior to the issuance of D.98-12-069. It also seeks compensation for $1,048.48 of expenses associated with its expert

witness, including travel and meal expenses and the cost of preparing overhead slides for presentations at the Commission. TURN also asks compensation for $2012.53 in expenses since D.98-12-069. We have examined the documentation supporting these requests. We find them reasonable.

6. Responses to TURN's Request

In a letter dated March 26, 2003, AT&T Communications of California, Inc., supports TURN's request for compensation, stating, "TURN was a consistent, active, productive participant in the above-captioned proceeding." Similarly, SBC California in comments filed April 1, 2003, supports TURN's request, citing that agency's "submission of detailed testimony, its presentation of oral argument, and its participation in all-party-meetings." However, SBC California opposes inclusion of legal fees for outside counsel Bowen, stating that TURN has not shown that Bowen's participation in a pricing workshop made any substantial contribution to the Commission's decision.

In its reply to comments, TURN states that the pricing workshop that Bowen handled on its behalf was scheduled at a time when TURN's attorneys were not available, putting TURN in the position of obtaining outside counsel for this task or having no attorney participate on TURN's behalf. TURN states:

> SBC California's approach is inconsistent with the intervenor compensation statutes, which do not require the Commission to assess whether each and every TURN activity represents a substantial contribution warranting compensation. Instead, the Commission has long recognized that once it has determined that an intervenor has made a substantial contribution as defined by Section 1802(h), the agency must determine the reasonable costs and expenses of the intervenor's participation. Where, as here, a workshop was convened on relatively short notice to address issues as critical as the pricing issues covered in the August 2001 workshop, the Commission should have no trouble in concluding that an

> intervenor's participation in that workshop was part of the work necessary to make its substantial contribution. (TURN Reply, at 2.)

We agree that TURN's participation in the pricing workshop was appropriate, and that the $1,400 in fees incurred for that representation is not unreasonable given the experience and knowledge that outside counsel brought to the task. We deny the objection of SBC California with respect to this matter.

7. Award

We award TURN $84,104.84 for its substantial contributions to D.02-09-050, D.02-12-081, and for its earlier work in D.98-12-069. Consistent with previous Commission decisions, we will order that interest be paid on the award amount (calculated at the three-month commercial paper rate), commencing the 75th day after TURN filed this compensation request (the 75th day will be May 14, 2003) and continuing until the utility makes full payment of the award.

The award granted today should be paid by SBC California pursuant to Pub. Util. Code § 1807.

8. Waiver of Comment Period

This is a compensation matter in which the decision grants the relief requested. Accordingly, pursuant to Pub. Util. Code § 311(g)(3), the otherwise applicable 30-day review and comment period is being waived.

9. Assignment of Proceeding

Jessie Knight was the Assigned Commissioner when D.98-12-069 was issued. Geoffrey F. Brown was the Assigned Commissioner when D.02-09-050 and D.02-12-081 issued. Jacqueline A. Reed was the assigned Administrative Law Judge in all of these proceedings.

Findings of Fact

1. TURN timely requests compensation for contributions to D.02-09-050 and D.02-12-081, and for earlier work in D.98-04-059, as set forth herein.

2. TURN requests hourly rates for its attorneys, consultants and staff that have either been approved earlier by the Commission or that now are found to be reasonable based on a comparison to market rates for individuals of similar experience and qualifications.

3. Compensation for administrative support is already reflected in professional rates and therefore is not separately compensated.

4. The miscellaneous costs incurred by TURN in this proceeding are reasonable.

Conclusions of Law

1. TURN has fulfilled the requirements of Pub. Util. Code §§ 1801-1812, which govern awards of intervenor compensation.

2. TURN should be awarded $84,104.84 in compensation for substantial contributions to D.02-09-050 and D.02-12-081, and for earlier work in D.98-12-069.

3. This order should be effective today so that TURN may be compensated without unnecessary delay.

O R D E R

IT IS ORDERED that:

1. The Utility Reform Network (TURN) is awarded $84,104.84 as set forth herein for substantial contributions to Decision (D.) 02-09-050 and D.02-12-081, and for earlier work in D.98-12-069.

2. The award should be paid pursuant to Pub. Util. Code § 1807 by SBC California (U 1001 C). Interest shall be paid at the rate earned on prime, three-month commercial paper as reported in the Federal Reserve Statistical Release, H.15, with interest beginning on May 14, 2003, and continuing until the full payment has been made.

This order is effective today.

Dated _____, at San Francisco, California.

Compensation Decision Summary Information

Compensation Decision(s):	
Contribution Decision(s):	D0209050;D0212081;D9812069
Proceeding(s):	R9304003;I9304002;R9504043;I9504044
Author:	ALJ Reed
Payer(s):	SBC California

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Reason Change/Disallowance
The Utility Reform Network	2/28/03	$84,284.84	$84,104.84	Administrative time not compensable

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Thomas	Long	Attorney	The Utility Reform Network	$260	1998	$260
Christine	Mailloux	Attorney	The Utility Reform Network	$250	2001	$250
Charlotte	TerKeurst	Policy Expert	The Utility Reform Network	$200	1998	$200
Christopher	Marsh	Policy Expert	The Utility Reform Network	$125	1998	$125
Regina	Costa	Policy Expert	The Utility Reform Network	$160	2000	$160
Regina	Costa	Policy Expert	The Utility Reform Network	$180	2001	$180
Regina	Costa	Policy Expert	The Utility Reform Network	$200	2002	$200
William	Nusbaum	Attorney	The Utility Reform Network	$250	2003	$250
Robert	Finkelstein	Attorney	The Utility Reform Network	$340	2003	$340
Stephen	Bowen	Attorney	The Utility Reform Network	$350	2001	$350