

Control Number: 26195



Item Number: 493

Addendum StartPage: 0

SOAH DOCKET NO. 473-02-3473 PUC DOCKET NO. 26195

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PUBLIC UTILITY COMMISSION FILING CLERK

JOINT APPLICATION OF TEXAS § GENCO, LP AND CENTERPOINT §	,
ENERGY HOUSTON ELECTRIC, LLC § TO RECONCILE ELIGIBLE FUEL §	' I VL'
REVENUES AND EXPENSES SPURSUANT TO SUBST. R. 25.236	ADMINISTRATIVE HEARINGS

SUPPLEMENTAL

DIRECT TESTIMONY AND EXHIBITS

OF

JAMES W. DANIEL

ON BEHALF OF THE CITY OF HOUSTON

November 5, 2003

SOAH DOCKET NO. 473-02-3473

PUC DOCKET NO. 26195

JOINT APPLICATION OF TEXAS GENCO, LP AND CENTERPOINT	-	BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC TO RECONCILE ELIGIBLE FUEL	§	OF
REVENUES AND EXPENSES PURSUANT TO SUBST. R. 25.236		ADMINISTRATIVE HEARINGS

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SOAH DOCKET NO. 473-02-3473 PUC DOCKET NO. 26195

JOINT APPLICATION OF TEXAS	§	BEFORE THE STATE OFFICE
GENCO, LP AND CENTERPOINT	§	DEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC	§	OF
TO RECONCILE ELIGIBLE FUEL	§	Or
REVENUES AND EXPENSES	§	ADMINISTRATIVE HEARINGS
PURSHANT TO SURST R 25 236	8	ADMINISTRATIVE HEARINGS

SUPPLEMENTAL

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November 5, 2003

SUPPLEMENTAL DIRECT TESTIMONY AND EXHIBITS OF JAMES W. DANIEL

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1 2		SUPPLEMENTAL DIRECT TESTIMONY OF JAMES W. DANIEL
3		
4		I. PROFESSIONAL TRAINING AND EXPERIENCE
5		
6	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
7	A.	My name is James W. Daniel. My business address is 919 Congress Avenue, Suite
8		800, Austin, Texas 78701.
9		
10	Q.	ARE YOU THE SAME JAMES W. DANIEL THAT PREVIOUSLY FILED
11		TESTIMONY IN THIS PROCEEDING?
12	A.	Yes. Information regarding my professional training and experience was provided in
13		my testimony previously filed in this proceeding.
14		
15		
16		II. INTRODUCTION
17		
18	Q.	BY WHOM ARE YOU RETAINED IN THIS PROCEEDING?
19	A.	I have been retained by the City of Houston, Texas ("COH").
20		
21	Q.	WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT
22		TESTIMONY?
23	A.	The purpose of my supplemental direct testimony is to review and support the
24		reasonableness of the COH's request for additional rate case expenses over the
25		amounts already approved in the Interim Order in this proceeding.
26		
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3	Q.	HAVE	YOU	PREVIOUSLY	TESTIFIED	REGARDING	THE
4		REASON	NABLENI	ESS OF CITY RAT	E CASE EXPEN	SES?	

5 A. Yes. I have testified on the reasonableness of rate case expenses on several occasions.

A.

7 Q. WOULD YOU BRIEFLY DESCRIBE THE COH'S REQUEST FOR REIMBURSEMENT OF THEIR RATE CASE EXPENSES?

Yes. Under PURA, cities maintain original jurisdiction over the electric rates for service within their respective city limits. In performing their regulatory responsibilities, cities retain attorneys and experts to provide advice and support. Section 33.023 of PURA allows cities to be reimbursed for such reasonable expenses incurred in processing rate cases.

The majority of the COH's rate case expenses in this proceeding were already approved in the Administrative Law Judge's ("ALJ") Interim Order. The current request for reimbursement of rate case expenses is to recover the amounts that have been incurred since the Interim Order plus estimated expenses for the remainder of this proceeding, including appeals. These expenses are primarily related to the remaining issues that have not been settled.

SOAH Docket No. 473-02-3473 PUC Docket No. 26195

1	Q.	WOULD YOU PLEASE SUMMARIZE THE RESULTS OF YOUR REVIEW
2		AND ANALYSIS OF THE RATE CASE EXPENSES INCURRED BY THE
3		сон?
4	A.	Yes. Since the Interim Order, the COH has incurred additional rate case expenses of
5		\$21,470 in Docket No. 26195. I have also determined that the COH can expect to
6		incur approximately an additional \$70,000 in rate case expenses in order to see this
7		case to completion, including participation in any court appeals. Based upon my
8		review, I have determined that these expenses are reasonable and should be
9		reimbursed to the cities.
10		
11	Q.	WOULD YOU PLEASE IDENTIFY THE FIRMS RETAINED BY THE COH
12		FOR PROVIDING ASSISTANCE IN CARRYING OUT THEIR
13		REGULATORY RESPONSIBILITIES?
14	A.	Yes. The COH retained the firm of Epstein, Becker, Green, Wickliff, and Hall
15		("EBGW&H"). EBGW&H, a law firm that has experienced attorneys in utility
16		regulation and administrative law, was retained for legal representation. GDS
17		Associates, which I previously described in my direct testimony, was retained to
18		provide technical assistance and expert testimony.
19		
20	Q.	HAS THE COH PREVIOUSLY USED THESE FIRMS FOR RATE CASES
21		INVOLVING RELIANT?

1	A.	Yes. Both EBGW&H and GDS have represented the COH, and in some instances
2		other cities, in all Reliant, and HL&P rate cases and fuel cases since 1990. In
3		addition, these two firms represented the COH in Reliant's transition case, Docket
4		No. 18465; presented testimony in Reliant's Business Separation Plan ("BSP") case,
5		Docket No. 21956; intervened and presented testimony in Reliant's Unbundled Cost
6		of Service ("UCOS") case, Docket No. 22355; and filed comments and presented
7		testimony in the Commission's generic rate issue proceeding, Docket No. 22344.
8		
9	Q.	PLEASE EXPLAIN THE BASIS FOR THE CITY'S SELECTION OF FIRMS
10		TO PROVIDE LEGAL AND CONSULTING SERVICES.
11	A.	The City's selection of firms was based on prior experience with those firms and on
12		those firms knowledge of CenterPoint and Texas Genco. Maintaining continuity and
13		leveraging prior knowledge also helps to contain costs. Further, both GDS and
14		EBGW&H have extensive experience in representing other municipalities in a variety
15		of matters.
16		
17	Q.	PLEASE SUMMARIZE THE SERVICES PROVIDED BY THE FIRMS
18		RETAINED BY COH DOCKET 26195?
19	A.	EBGW&H and GDS assisted the COH in their evaluation of all issues in Docket No.
20	٠	26195.

EBGW&H has advised the City on legal issues and services necessary to
represent the City's' interests in the this docket. These services include the review of
CenterPoint's filings, preparation of various pleadings and motions, preparation of
discovery requests and responses, assistance with discovery disputes, preparation of
comments and briefs, attendance at pre-hearing conferences and technical
conferences, participation at hearings and the cross-examination of adverse witnesses
and assistance with settlement negotiations and case strategy.

GDS has provided technical assistance to the City and provided overall guidance on identifying, analyzing and presenting non-legal issues and adjustments in this docket. Services included the review and analysis of CenterPoint's application, preparation of requests for information ("RFIs"), attendance at technical conferences, assistance with settlement negotiations, preparation of direct testimony, providing expert testimony at hearings and assistance with drafting comments and other filings on behalf of the COH.

- Q. PLEASE IDENTIFY THE ADDITIONAL AMOUNT OF RATE CASE EXPENSES INCURRED BY THE COH SINCE THE INTERIM ORDER AND THROUGH SEPTEMBER 2003 FOR DOCKET NO. 26195.
- 19 A. The additional rate case expenses incurred by the COH through September 2003 on the issues not subject to the Stipulation and Settlement Agreement (the "Reserved Issues") are summarized in the following table:

FIRM	FEES	EXPENSES	TOTAL	
GDS	\$8,562	\$211	\$8,773	
EBGW&H	\$12,024	\$674	\$12,697 \$21,470	
TOTAL	\$20,586	\$884		

2

3

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16

4 Q. HAVE YOU ESTIMATED THE ADDITIONAL RATE CASE EXPENSES THE

5 COH WILL INCUR BEYOND SEPTEMBER 2003?

- A. Yes. Additional services expected to be provided in this case include, but are not
 limited to, the following:
- Preparation for hearing, including preparation for cross examination,
 compilation of hearing exhibits, review of rebuttal testimony, and
 preparation of prehearing motions and responses,
 - Presentation of witnesses at Docket No. 26195 hearing,
 - Preparation of Initial and Reply Briefs,
 - Preparation of Exceptions and Replies to Exceptions,
- Attendance at Open Meetings and Prehearing Conferences,
- Settlement negotiations,
 - Analysis of compliance filings, and
- Assistance with any appeals.

While it is difficult to anticipate all services that may be needed to see this case to completion, my current estimated additional rate case expenses are presented in the following table:

4

DIDA	ESTIMATED ADDITIONAL			
FIRM	RATE CASE EXPENSES			
GDS	\$20,000			
EBGW&H	\$50,000			
TOTAL	\$70,000			
	1			

6

5

7 Q. BASED ON THESE ESTIMATES, WHAT IS THE COH'S ADDITIONAL 8 REQUEST FOR REIMBURSEMENT OF RATE CASE EXPENSES?

A. The additional amount requested for the Reserved Issues portion of this proceeding including actual expenses incurred through September 2003 plus estimated additional rate case expenses is approximately \$91,470.

12

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10

11

Q. IF THE COH DOES NOT INCUR THE ADDITIONAL ESTIMATED RATE CASE EXPENSES OR INCUR MORE THAN THE ESTIMATED EXPENSE AMOUNT, HOW SHOULD THAT DIFFERENCE BE TREATED?

16 A. The COH is only requesting to be reimbursed for expenses actually incurred. If the additional estimated expense amount is not incurred, then the COH will only be

1		reimbursed for the lower amount actually incurred. Similarly, if the estimated
2		expense amount is too low, the COH should be reimbursed for the higher amount.
3		
4	Q.	ARE THE HOURLY RATES CHARGED BY THE FIRMS RETAINED BY
5		THE COH REASONABLE AND COMPARABLE TO THE FEES CHARGED
6		BY OTHER LAW AND CONSULTING FIRMS?
7	A.	Yes. The hourly rates charged were the normal billing rates charged by GDS. As
8		reflected in the affidavit of Alton J. Hall, Jr., attached as Supplemental Exhibit JWD-
9		1, EBGW&H's rates were in some instances discounted from normal billing rates.
10		These rates are comparable and in many cases lower than the hourly rates charged by
11		other regulatory lawyers and consultants with similar experience. This opinion is
12		based on experience in numerous rate cases, a review of legal and consulting fees
13		charged in other Texas PUC proceedings, and the affidavit of Alton J. Hall, Jr.
14		attached as Supplemental Exhibit JWD-1. A schedule summarizing the hourly rates
15		charged by other firms is provided as Exhibit JWD-2.
16		
17	Q.	DID ANY MEMBER OF THE FIRMS USED BY THE COH BILL IN EXCESS
18		OF 12 OR MORE HOURS IN ONE DAY?
19	Ä.	No.
20		

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1	Q.	HAS THE COH BEEN CHARGED FOR MEAL EXPENSES IN EXCESS OF
2		\$25 PER PERSON?
3	A.	No.
4		
5	Q.	DID ANY MEMBER OF THE FIRMS USE NON-COMMERCIAL AIRCRAFT
6		OR FIRST CLASS AIR TRAVEL?
7	A.	No.
8		
9	Q.	DO THE FIRMS' RATE CASE EXPENSES INCLUDE ANY LUXURY ITEMS
10		SUCH AS LIMOUSINE SERVICE, SPORTING EVENTS, ALCOHOLIC
11		DRINKS, HOTEL MOVIES OR OTHER ENTERTAINMENT?
12	A.	No.
13		
14	Q.	HAVE THE FIRMS' FEES AND EXPENSES CHARGED TO THE COH
15		BEEN PROPERLY SUPPORTED?
16	A.	Yes. The monthly invoices to the COH are accompanied by a description of the
17		services provided, the number of hours by individual, the hourly rate, and an
18		itemization of expenses. Copies of all invoices to the COH are voluminous and will
19		be made available for review.
20		
	SOAF	I Docket No. 473-02-3473 9 Supplemental Direct Testimony

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1		VII. SUMMARY AND CONCLUSIONS
2		
3	Q.	WOULD YOU PLEASE SUMMARIZE YOUR FINDINGS AND
4		CONCLUSIONS REGARDING THE COH'S ADDITIONAL RATE CASE
5		EXPENSES?
6	A.	Yes. Based upon my review and analysis, I have concluded that the COH's requested
7		reimbursement of additional rate case expenses of \$91,470 in Docket No. 26195 is
8		reasonable and necessary and should be approved.
9		
10		
11		
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AFFIDAVIT

THE STATE OF TEXAS §

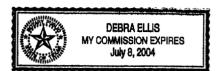
COUNTY OF TRAVIS §

BEFORE ME, the undersigned notary public, this day personally appeared JAMES W. DANIEL, to me known, who being duly sworn according to law, deposes and says:

"My name is JAMES W. DANIEL. I am of legal age and a resident of the State of Texas and am competent to make this affidavit. I certify that the foregoing testimony and exhibits, offered by me on behalf of the City of Houston, are true and correct based upon my personal knowledge and professional experience."

JAMES W. DANIEL

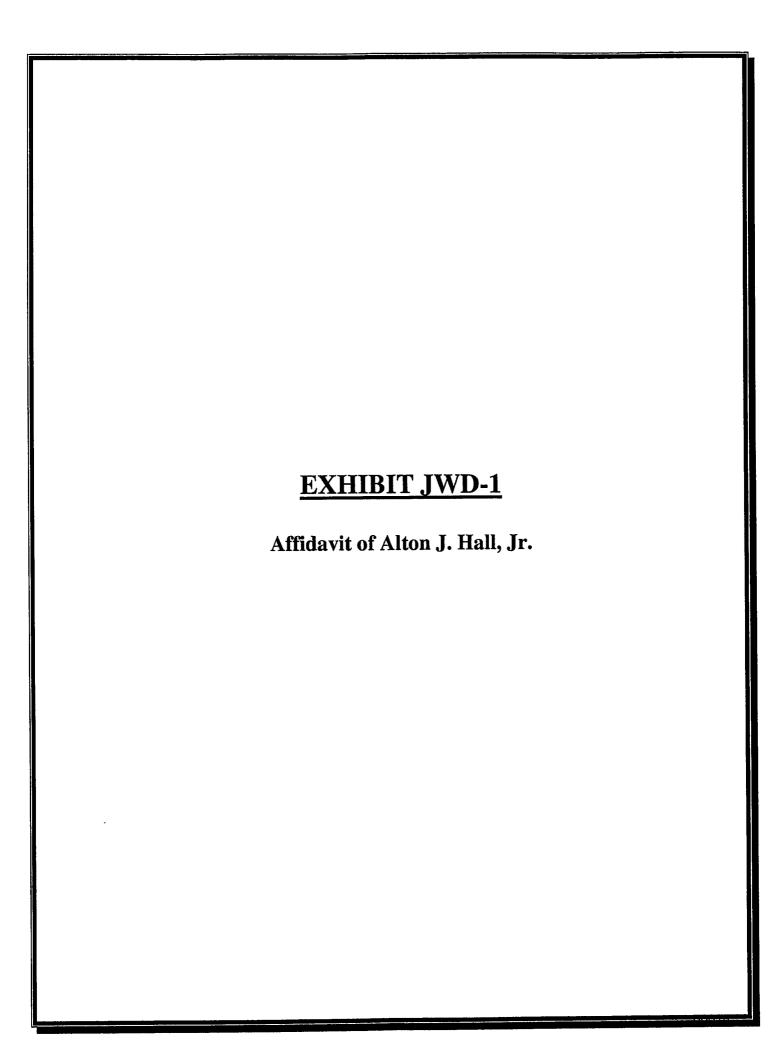
SUBSCRIBED AND SWORN TO BEFORE ME, notary public, on this the 5^{th} day of November, 2003.



Debra Ellis

Notary Public in and for the State of Texas

My Commission expires: July 8, 2004



SOAH NO. 473-02-3473 P.U.C. DOCKET NO. 26195

JOINT APPLICATION OF TEXAS	§	BEFORE THE STATE OFFICE
GENCO, LP AND CENTERPOINT	§	OF
ENERGY HOUSTON ELECTRIC, LLC	§	ADMINISTRATIVE HEARINGS
TO RECONCILE FUEL REVENUES	8	
AND EXPENSES PURSUANT TO	S S	
SUBST, R. 25,236	3	

AFFIDAVIT OF ALTON J. HALL, JR.

STATE OF TEXAS §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, personally appeared Alton J. Hall, Jr., known to me to be a credible person who on his oath deposed and stated the following on his personal knowledge:

- 1. "My name is Alton J. Hall, Jr. and I am a shareholder with Epstein Becker Green Wickliff & Hall, P.C. (formerly Wickliff & Hall, P.C.) ("EBGW&H") and one of the attorneys for the City of Houston in Docket 26195 currently pending before the Public Utility Commission of Texas ("PUC"). My business address is 1000 Louisiana, Suite 5400, Houston, Texas 77002. I am over the age of eighteen (18) years, and there is no legal impediment to my giving this affidavit. I make this affidavit on my personal knowledge and the statements contained herein are true and correct.
- 2. "I have been practicing law before the Public Utility Commission of Texas since 1986. I supervise and manage the legal services performed by EBGW&H on behalf of the City of Houston ("COH") in connection with Docket 26195. This includes the issues reserved from the Stipulation and Settlement Agreement reached in this Docket ("the Reserved Issues.") Therefore, I am familiar with the work performed on behalf of COH

in this docket. I have reviewed the time and expenses billed thus far by EBGW&H relating to the Reserved Issues in the aforementioned docket. These billings have been accurately calculated and there is no double billing. None of the charges to the COH have been recovered through reimbursement of other expenses. The expenses are associated with the Reserved Issues in Docket 26195, and are reasonable and necessary to accomplish the tasks performed or to be performed in this docket.

- 3. Through September 30, 2003, COH has incurred \$12,023.50 in fees and \$673.73 in expenses in the above referenced Docket. This amount includes legal services associated with review of the filing package and testimony, review of legal and regulatory authorities, preparation for cross-examination and preparation of testimony.
- 4. The hourly rates for attorneys of \$185 to \$290, upon which the above billings are based, are reasonable fees for lawyers of similar experience in Houston, Harris County, Texas. I am the only attorney charging in excess of \$200/hour. I am a shareholder with EBGW&H and have extensive (18 years) experience in handling complex regulatory and litigation matters. Moreover, my standard rate for this type of complex matter is greater than the rate charged to COH in the above referenced Docket. In fact, the \$290 rate charged for my services represents a significant discount from the normal rate charged to clients for shareholder services. This discounted rate is also substantially below the prevailing market rate in Houston, Harris County, Texas.
- 5. The attorneys working on this matter were not able to perform other legal services during the time necessary to perform these services. The hours spent to perform the tasks

assigned to EBGW&H were reasonable and necessary to complete those tasks in a professional manner on a timely basis.

- 6. The expenses charged are particularly reasonable considering the complexity of the issues in this case and the time and resources required to analyze these issues. This case involves important issues affecting electric utility rates in Texas. Moreover, when compared to the amount requested by CenterPoint as reconcilable fuel in this case, the amount expended by the Cities in reviewing and filing testimony in this case is minimal.
- 7. The invoices prepared by EBGW&H include a description of services performed and time expended on each activity. The invoices through September 30, 2003, are available for review. Invoices for legal fees and expenses for all subsequent months will be available after the 15th day of the succeeding month. The firm documents its charges with time sheets, invoices, and records. The documentation in this case is similar to that provided in previous rate cases before the PUC.
- 8. EBGW&H has not charged for luxury items, including first class airfare, limousine service, entertainment, alcoholic beverages or sporting events. No meal charges were submitted in excess of \$25.00/person. To date, no member of this firm has billed in excess of 12 hours in one day.
- 9. It is estimated that EBGW&H will incur fees of \$22,000 and expenses of \$3,000 subsequent to September 30, 2003. This amount is based on my actual experience in previous rate cases at the PUC. The estimate accounts for preparation for hearing and participation in the hearing on the merits, participation in settlement discussions, preparation of briefs and reply briefs pertaining to this case, review of the proposal for

decision, preparation of exceptions and replies to exceptions, preparation for and attendance at PUC final order meetings, and preparation of motion for rehearing and reply to motions for rehearing. In addition, it is estimated that the COH would incur \$25,000 in fees and expenses associated with any appeal of the above referenced dockets through the Texas Supreme Court. The total amount of incurred and estimated legal fees

includes \$59,023.50 in fees and \$3,673.73 in expenses.

10. In addition to the legal expenses incurred by EBGW&H in this case, testifying

and expenses requested for the Reserved Issues in this Docket is \$62,697.23, which

experts were retained to aid in review and evaluation of this case. The scope and

amounts of such expenses are set forth in the testimony of James Daniel, dated November

5, 2003. These expenditures were necessary to retain consultants with special expertise

in important fuel reconciliation issues and were necessary to properly represent the City

of Houston in this proceeding.

"Further affiant sayeth not."

Alton J. Hall, Jr.

THE STATE OF TEXAS §
COUNTY OF HARRIS §

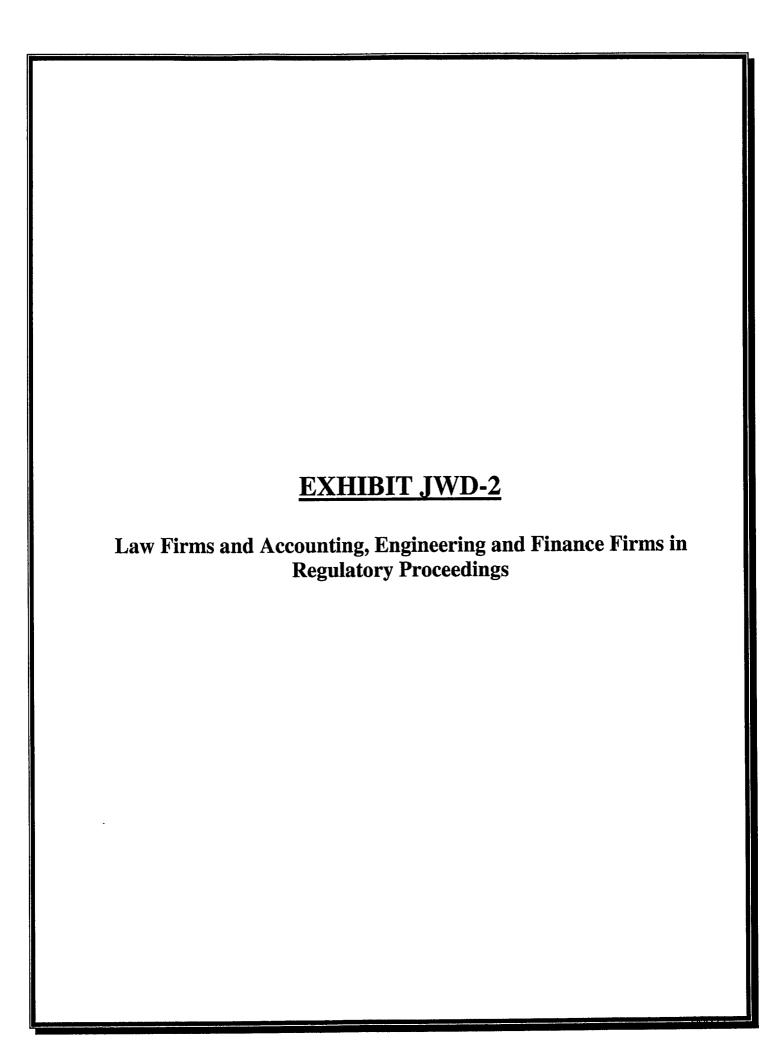
BEFORE ME, the undersigned authority, personally appeared Alton J. Hall, Jr., known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he has read the foregoing affidavit and that the statements therein are true and correct.



The State of Texas

Notary Public in and for

HODMA/PCDOCS/HOLIE1/28676/1



Survey of Hourly Rates Charged By

Law Firms and Accounting, Engineering and Finance Firms in Regulatory Proceedings

Line No.	Firm Name / Employee Name		ployee ification		Rate per Hour	File Date	Source
(a)	(b)		(c)		(d)	(e)	(f)
	Law Firms						
1 2 3 4	Robert A. Rima Robert A. Rima Linda Nickell Mary Carolyn Carmichael	Attorney			\$185 \$50 \$125	August 97 - December 98	PUCT Docket 17751
5	Law Firm of Jim Boyle	•	, ,			August 97 - December 98	PUCT Docket 17751
6	Jim Boyle	Attorney			\$170		
7	Jim Haley TSM::: 17 FT Martina Martinaeth	Attorney	1 44. 114		\$120		PLANT TARREST WERE SELECT
8	Shaw, Pittman, Potts & Trowbridge	Attorney			\$220	February 98 (2)	PUCT Docket 10200
9	Bob Web	Attorney	Zilish kup da N	કારો કાનેલ આવે ⁴	\$250	February 98 (2)	PUCT Docket 11735
10 10	Bob Web Burford & Ryburn Sutin, Thayer & Brown	Attorney		alatik kilike	100 \$150	February 98 (2)	PUCT Docket 11735
11	Sutin Theyer & Brown	#9.803.8" (5. > asp.") Attorney	CALLESTER (ME)		\$100	February 08 (2)	PUCT Docket 12000
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12 13	Kemp, Smith & Duncan		Fee Range	Low	\$150	• • •	
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17	Baker & Botts		ree Range	Low	\$203 \$23	reductly 96 (2)	FUCT DUCKET 8423
18	Commission of the Commission o	Personal Residence	Fee Range		\$400	March 00 (5)	PLICT Docket 22355
19				Low	\$50		
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21	Worsham, Forsythe, Samples & Woolridge				\$59	-	
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26				Low	\$300		
27		Partners			\$225		
28 29		Associates	Fee Range	High	\$190		
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31		Paralegals			***		
32 33			Fee Range	High Low	\$90 \$40		
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34 35	Bracewell & Patterson, LLP		Fee Range	High Low	\$280 \$215	March 00 (4)	PUCT Docket 22354
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36 37	Carroll & Gross	Partners Associates			\$225 \$150	November 98 (1)	PUCT Docket 20150
11 To Strates	CHARLES OF THE SECTION OF THE SECTION OF THE	######################################	Id o'r 100 thial allo	MEDINAL STATE	Legitani Ho	Laws Use Andrews Company Of December Of	DUCT Docket 17751
38 39	Brown McCarrol & Oaks Hartline Mark W. Smith	Attorney			\$185	January 98 - December 98	PUCT Docket 17751
40	Kay Trostle	Attorney			\$170		·
41	Liz Drews	Attorney			\$170		
42	Mike Wilkins	Attorney			\$70		
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44	Brown McCarrol & Oaks Hartline	Senior Partners			\$300	November 98 (1)	PUCT Docket 20150
45 46		Partners	Fee Range	High	\$225		
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Survey of Hourly Rates Charged By <u>Law Firms and Accounting, Engineering and Finance Firms in Regulatory Proceedings</u>

Line No.	Firm Name / Employee Name	Employee Classification		Rate per Hour	File Date	Source	
(a)	(b)	(c)		(d)	(e)	(f)	
, ,	Law Firms		.,				
49	Akin, Gump, Strauss, Hauer	Senior Partners				November 98 (1)	PUCT Docket 20150
50	& Field		Fee Range	High	\$325		
51				Low	\$300		
52		Partners			****		
53			Fee Range	_	\$250		
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58	Graves, Dougherty, Hearon		Fee Range		\$250	February 98 (2)	PUCT Docket 8425
59	& Moody Laren Podratellario della adella di la Larona di la	r toras and the	male to the second	Low	\$40 - 1452-477	A V 1859 POLICE DE VILLAGE ET MASSE AL TORS	·····································
60	Graves, Dougherty, Hearon	Senior Partners	9.4 * 1 50 *	, ,, ,,	A	November 98 (1)	PUCT Docket 20150
61	& Moody		Fee Range	High	\$350		
62				Low	\$300		
63		Partners					
64			Fee Range	_	\$230		
65		A!		Low	\$175		
66		Associates	Fee Range	Lligh	\$175		
67 68			ree Range	Low	\$95		
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·特殊的於	CLIMA DOSCHINARAMANAMANINE DE CALLES	ATT 小把機線35-166	irantianal i	adrini	Mildell Tilde	STATES OF STATES AND A CONTRACT OF A CONTRAC	PUCT Docket 22355
72	Graves, Dougherty, Hearon		Fee Range	Low	\$400 \$50	March 00 (5)	FUCT DOCKET 22333
73 ইয়ার হ্রার্টার	& Moody	le al tals Aleks III Mile	M aka yan gelit lah Il	STABLE D			
74	Broyles & Pratt		Fee Range		\$195	February 98 (2)	PUCT Docket 12700
75	。 1、1995年 - 1725年 - 1	EDEG ALTABE, KI D	iget ar diament ingener	Low	\$45	· · · · · · · · · · · · · · · · · · ·	CONTRACTOR OF THE PROPERTY OF
76	Broyles & Pratt	Partners				November 98 (1)	PUCT Docket 20150
77			Fee Range	_	\$200		
78				Low	\$180		
79		Associates	B B .	T T ! 1.	6105		
80			Fee Range	-	\$125 \$90		
81		Davalacala		Low	\$40		
82	网络松果果 表示方式 医黑神经神经病毒病 医中性中枢 计图像中枢	Paralegals	induced Walth	Smith Pacific	all little little i to de la	ministration and the control of the state of	MAN TO THE RESIDENCE OF THE PARTY OF THE PAR
83	Naman, Howell, Smith and Lee	Senior Partners			\$250	November 98 (1)	PUCT Docket 20150
84		Partners					
85			Fee Range	-	\$225		
86				Low	\$140		
87		Associates	Fee Range	High	\$150		
88 89			ree Range	Low	\$90		
90	•	Paralegals			4,0		
91			Fee Range	High	\$65		
92				Low	\$40		and the second s
.* 2 11	MINERAL DARKER THEREOF THE TARTER	್ಷಭಿಷ್ಠವಾಣಕ ೪	Fee Dange		\$160	February 98 (2)	PUCT Docket 8702
93	Clark, Thomas & Winters		Fee Range	Low	\$65	•	
94 5 49 1.85	e de marçale en l'action de l'Albanda de l'A	- 10 Sand 100 - 100	Lygna - Film	100 M	. , a 2 KW2 a	the enterest of a contact enterest of	在2015年1月1日

Survey of Hourly Rates Charged By <u>Law Firms and Accounting</u>, <u>Engineering and Finance Firms in Regulatory Proceedings</u>

Line		Employee		Rate			
No.	Firm Name / Employee Name	Classification			per Hour	File Date	Source
(a)	(b)	((c)		(d)	(e)	(f)
	Law Firms						
95	Clark, Thomas & Winters	Senior Partners				November 98 (1)	PUCT Docket 20150
96			Fee Range	High	\$250		
97				Low	\$200		
98		Partners					
99			Fee Range	High	\$230		
100				Low	\$150		
101		Associates					
102			Fee Range	_	\$160		
103				Low	\$100		
104		Paralegals			***		
105			Fee Range	-	\$90		
106	The Contract of the Contract o			Low	\$55	STORES OF THE SECOND PROBLEMS OF THE SECOND P	Torgetha gelitic, values el l' è abable
107	Buford & Ryburn	Attorney	,		\$165	March 00 (3)	PUCT Docket 22350
. N. 16	Works - Possith	m n e Eze engel	Fee Dance	Uigh	6338	্রতি, পিট্রার্ডির ক্রিক্রিকর জালিকর বিশ্বর	PUCT Docket 22350
100	& Wooldridge I I D		ree Kange	Low	\$336 \$72	Materioo (5)	1 GC1 DOCKEL 22550
109	Worsham, Forsythe & Wooldridge, L.L.P.	San Cara July	Same and	in to the	ψ/ 2	CONTRACTO DISCOUNTED AND AND AND AND AND AND AND AND AND AN	1.00.00.00.000.000.000.000000000000000
110	Pratt and Grant		Fee Range	uign	\$203	March 00 (4)	PUCT Docket 22354
111	STEEL BOOKERS CONTRACTOR STEELS OF STEELS ASSESSED TO	national and a North of St.		Low	\$130	a semble produce a top of the second contract	Security of Terretal Security in the continue of the continue
112	Vinson & Elkins	THE CASE COMMENTS	Fee Range	High	\$375	March 00 (4)	PUCT Docket 22354
113				Low	\$165		
	the collection of the state of	the state of the state of the state of	Jan Dones	V. T.\	# 14 4 # 15 16 16 16 16 16 16 16 16 16 16 16 16 16	March 00 (4)	PLICT Docket 22354
114 115	Jones, Day, Reavis & Pogue		ree Kange	Low	\$330 \$115	Water 60 (4)	1 OCT DOCKET 22334
4 75 7	rengeria de la composiçõe de Principa de P	Elen Color State of Land	Ner buracia	+ 1+38 " 1 +13"	- 48-2-7703 F W	题(代码)。 5/200号 [198] 在 中型 [2] 明	"(1.1.4) Lagrage the Catalog Little (1.1.1)
116	Barbara Day	Attorney		685. 4	\$175	September 01 (6)	PUCT Docket 24336
21.152	·公司在2004年12月1日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日日	प्रात्त के बार्ड के किया के किया है। किया के क	State Section	daw!	" name to the same	radion for the property of the second and the secon	EERC Dookst TV06 2 000
118	Bruder, Gentile & Marcoux, L.L.P.				#20F	April 02	FERC Docket TX96-2-000
119	Carmen L. Gentile	Attorney			\$395		
120	J. Michel Marcoux	Attorney			\$275 \$105		
121	Robert T. Stroh	Law Clerk	nav, o a kladeni		OUG And Hilled	englit general and "Principality in the Clerk	MENINESS SERVICE CONTRACTOR OF THE SERVICE C
122	McGinnis, Lochridge & Kilgore, L.L.P.	The same of the sa				March 02	FERC Docket TX96-2-000
123	Brook Brown	Attorney			\$275		
124	Campbell McGinnis	Attorney			\$300		

Survey of Hourly Rates Charged By

Law Firms and Accounting, Engineering and Finance Firms in Regulatory Proceedings

Line		Employee	Rate		
No.	Firm Name / Employee Name	Classification	per Hour	File Date	Source
(a)	(b)	(c)	(d)	(e)	(f)
	Accounting, Engineering and Finance	<u>Firms</u>			
118	Reed-Stowe & Co.			February 97 - December 98	PUCT Docket 17751
119	Jack E. Stowe, Jr.	Consultant	\$195		
120	Mark D. Israelson	Consultant	\$50		
121	Yvette Thompson	Consultant	\$125		
122	Daniel Bedell	Consultant	\$50		
123	Dave Yanke	Consultant	\$150		
124	Ellen Swan	Consultant	\$100	LI CALL FULTS, LOUDE MONSHINGS CONTES	Colonia (Carlos Carlos Car
125	Diversified Utility Consultants, Inc.			October 97 - December 98	PUCT Docket 17751
126	Daniel J. Lawton	Consultant	\$125		
127	Jack Pous	Consultant	\$125		
128	Sara Coleman	Consultant	\$100	an an the second of the second	COLUMN TO SERVICE OF THE SERVICE SERVICES
129	Diversified Utility Consultants, Inc.	MANAGEMENT AND	ne 15 17 2 20 20 4 4 5 1 1	September 01 (6)	PUCT Docket 24336
130	Daniel J. Lawton	Consultant	\$150		
131	Jack Pous	Consultant	\$150	2 . CAS ABBREVERS down 2 75° pt . a.m. No	a 1975. The large for the parameter appears and the colors of the
132	ではないできない。このでもない。 we will blad できっちゃ add bu そんご Professor Jim Dryer	Consultant	ಪಟಟಟಿಕ್ ಎಂಡಿ 170°, ಪರ \$250	November 98 (1)	PUCT Docket 20150
\$11.796	Proposition and the second and the second of the second	This fight I was classed the Field	Land Land College - 1 4 mil	e alter de reger de la companyation	BANKA KULONA YANDAN MERENYE NA ZINGUPEN
133 Pakay Na	Professor Michael Alles	Consultant	\$225 ∴ ಪಾರ್ಚಿಕ ಕನ್ನಡಿಸುವ ಪ್ರ	November 98 (1)	PUCT Docket 20150
134	Dennis Thomas & Assoc.			November 98 (1)	PUCT Docket 20150
135	Dennis Thomas	Consultant	\$250		
136	Hackett Group	on the Control State and Control to Control to the Anti-Anti-Anti-Anti-Anti-Anti-Anti-Anti-	STOP BOTT IN SHIP BOOKEN TO STORY	November 98 (1)	PUCT Docket 20150
137	Gregg Hackett	Consultant	\$750	* *	
138	Christine Gattenio	Consultant	\$750		
139	Dwayne Punnaewart	Consultant	\$300	and the state of t	Annual Committee of the
140	Price Waterhouse		Nati Thai Cori Visadraa Maasi Moddie	November 98 (1)	PUCT Docket 20150
141	Jim Warren	Consultant	\$400	, ,	
142	Price Waterhouse Coopers	k er iki (1914-li), senileku 1, ° et Pedu	工程程序的研究等。中国社会的	November 98 (1)	PUCT Docket 20150
143	Greg Wilson	Consultant	\$420	November 30 (1)	1 CC1 BOURGE 20130
WALL FLANK	nerical de la fille de la fill				
144	KFG Group	a	6175	November 98 (1)	PUCT Docket 20150
145	Ken Gallager	Consultant	\$175	useratzoa es cara en esta en e	
146	Actuarial Science Assoc.			November 98 (1)	PUCT Docket 20150
147	Frank Becker	Consultant	\$400		
148	J. Nemeth	Consultant	\$375		
149	R. Quesada	Consultant	\$325	e - Alberta a St. Kerata a P elak a a Sta lita ka	
150	TLG Service, Inc.	en i en al destro erren elektri symmettini. Ettishvetteleri tildiselektet tild	a man of the state of the state of	November 98 (1)	PUCT Docket 20150
151	Thomas LaGuardia	Consultant	\$250	g janga jan ang ang pangang pangangan dipangan na madalah	n, dolekti siinka ja maan ja tuut saataan kalentaan kalentaan ka
152	TLG Service, Inc.	Fee Range	High \$250	March 00 (3)	PUCT Docket 22350
153	•	•	Low \$42		
154	ECONAT Inc	[4] 27 (A.C. A.	A STANDARD OF THE STANDARD ST	November 98 (1)	PUCT Docket 20150
155	ECONAT, Inc. Bruice Louiselle	Consultant	\$250	November 38 (1)	1 OCT DOCKET 20130
133 13850	Drugge Douisene Infinantial Charles (Aller)	Separation of the sections of	φ 250 A. Similahisili Jaimbah	three states and the same and the second	THE PERSON OF TH
156	The Northbridge Group			November 98 (1)	PUCT Docket 20150
157	Mike Schnitzer **Life	Consultant	\$375 Walio wa waka wa 1	e and september of the second	PINES OF LARREST PARTIES
158	RINANCO	Concultant	\$165	February 98 (2)	PUCT Docket 9945
150	TINANCO FINANCO	Concultant	\$165	February 08 (2)	PUCT Docket 9850
2 3 6 6 6 6 6 6	FIRE A TO DO CONTROL OF A VICE A STATE OF THE PARTY OF THE ANALYSIS AND A STATE OF THE	and the first transfer of the advantage of the con-	No. of the second second	一大 "大大学",小龙山林花 600 年 111 年 12 14	 This interpretation that the abstract of the production of the producti
160	FINANCO COMPANYON	Consultant	\$105	Teuruary 98 (2)	CIGHT DOCKEL 9943
161	FINANCO	Consultant	\$175	February 98 (2)	PUCT Docket 12700
162	rtikki i sa manaka kalandari sa	Consultant	\$175	February 98 (2)	PUCT Docket 12900
25. A.	OSÉGNA NOO	Consultant	. 142. 144. 144. 14. 14. 14. 14. 14. 14. 14.	. 1, . 355 fr & faith, seidhst - February 08 (2)	PHCT Docket 12820
103	FINANCO	Companies and the first	1 12 (0.35) Victory (0.35)	and the same of th	195,000, Police College And College Million Server

Survey of Hourly Rates Charged By <u>Law Firms and Accounting, Engineering and Finance Firms in Regulatory Proceedings</u>

Line No.	Firm Name / Employee Name	Employee Classification	Rate per Hour	File Date	Source
(a)	(b)	(c)	(d)	(e)	(f)
	Accounting, Engineering and Finance	Firms			
164	FINANCO			November 98 (1)	PUCT Docket 20150
165	Sam Hadaway	Consultant	\$210	• •	
166	FINANCO	Fee Range Hig	gh \$250	March 00 (3)	PUCT Docker 22350
167		Ī	w \$165		
168	Allen H. King Salah Salah Sala	Consultant	\$175	November 98 (1)	PUCT Docket 20150
169	residentia in	Tonsultant	دیکانی اداماند. 175	November 98 (1)	PUCT Docket 20150
<i>⊘</i> 555. 170	്യ് ആര്ട്ട് ക്രിസ്ക്കാം അപ്രീട്ടെ സി. മ Mal McI etchie	ALLEANISC COLLECTION COLLECTION	₩₩₩.∆3 %2 **. \$25 0	Angember 08 (1)	PLICT Docket 20150
.15,964	Mal McLetchie	Constitution of the Constitution and	asis i midde kis ekis.	- Butter field of the car test.	THE REAL PROPERTY OF THE PROPE
TANKSIKSI	Olson & Co.	Consultant	\$210	February 98 (2)	PUCT Docket 8702
172	Olson & Co. McGregor Luftig	Consultant	\$235	February 98 (2)	PUCT Docket 11735
173	McGregor	Consultant	\$290	February 98 (2)	PUCT Docket 12900
174	Luftig	Consultant	\$300	February 98 (2)	PUCT Docket 12900
√	Maria Company and a second of the company of the co	that the thing is a second to be a second	en ir kaltbalka bost (*	February 98 (2)	PLICT Docket 0045
176	Peat Marwick	Consultant	\$250	reordary 50 (2)	1 GC1 Docket 9943
177	analogia (Carlanda) (C	in Land Fred Parks . Alson Flore	1775 M. 12 1 125 12	LANGESTAGE ON 192000	PLICT Dooket 12700
		Consultant	\$285	February 98 (2)	FOCT DOCKET 12700
170	Peat Marwick Thank herman sag in all the spreaker te haupt a KPMG	是"大學",就是實際不行。,然為你是是一行了心臟的	er andre 57 Tild	Echmon, 09 (2)	PLICE Dealest 12000
179 180	Peat Marwick	Consultant	\$275	February 98 (2)	FOCT DOCKET 12900
ANDIANA 101	Stone & Wolston			Folomory 09 (2)	PLICT Doolest 0045
(4) (4) (4) (4) (4) (4) (4) (4) (4) (4)	Stone & Webster	Consulant Habot Casalital, 1861, ilin 1811, 1822 (1811)	دلار فرد المنطقة المنط المنطقة المنطقة	redruary 96 (2)	PUCT DOCKET 9943
182	Stone & Webster	Consultant	\$210	February 98 (2)	PUCT Docket 12900
183	Coopers & LyBrand	Consultant	\$230	February 98 (2)	PUCT Docket 8702
184	Arthur Anderson			February 98 (2)	PUCT Docket 12820
185	Mike O'Donnell	Consultant	\$295	ran - Art. 1 - 1957年 To. 11. 1284章 abrik af ギノ (佐藤守藤)開発で建	Sees of the control o
186	UMS Group	one of the District of the state of the stat	algunalistiksi ente hatelisi	November 98 (1)	PUCT Docket 20150
187	Jack Shearman	Consultant	\$438		
188	Don Miller	Consultant	\$288		
189 190	Mark Forsyth Paul Kolter	Consultant Consultant	\$265 \$105		
191	Dave Army	Consultant	\$250		
192	Jack Parkes	Consultant	\$250		
193	Iris Rosenberg	Consultant	\$108		
194	Alex Park	Consultant	\$152		
195	Suzanne Elizer	Consultant	\$156 \$250		
196 197	Debra Smiliski Julie Kim	Consultant Consultant	\$250 \$113		
198	Mario Bauer	Consultant	\$156		
199	Art Sederstrom	Consultant	\$250		
200	Bob Champagne	Consultant	\$375		
201	Stephen Spencer	Consultant	\$375		
202 203	Floyd Yeager Steve Hall	Consultant Consultant	\$313 \$313		
204	Kelsey Lewis	Consultant	\$125		
205	Andrew Bryne	Consultant	\$350		
206	Tom Inglesby	Consultant	\$90		
207	Shiraz Kaderali	Consultant	\$325		
208	Dion Alley	Consultant	\$265 \$91		
209 210	Sharon Hefetz Bruce Lang	Consultant Consultant	\$91 \$281		
211	Greg Lormand	Consultant	\$250		
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Survey of Hourly Rates Charged By Law Firms and Accounting, Engineering and Finance Firms in Regulatory Proceedings

Line		Emp	loyee	Rate		
No.	Firm Name / Employee Name	Classi	fication	per Hour	File Date	Source
(a)	(b)	(c)	(d)	(e)	(f)
	Accounting, Engineering and Finance	<u>Firms</u>				
212	Brian Swain	Consultant		\$300		
213	John Thomas	Consultant		\$250	,	
214	John Thomas John Jeter Tenera Bechtel	Consultant		\$295	February 98 (2)	PUCT Docket 12820
215	Tenera	Consultant	s 40 %	\$228	February 98 (2)	PUCT Docket 9300
216	Bechtel	Consultant	o Maritina kon e tomo	\$50	February 98 (2)	PUCT Docket 11735
217	Energy Planning, Inc.	Consultant	i radi je ras i stavatan	\$200	February 98 (2)	PUCT Docket 11735
218	John T. Boyd	Consultant	in Private and	\$175	ก็เมื่อใช้นาก ที่นโปกรายสมบังษ์ February 98 (2)	PUCT Docket 12900
219	John Ferguson	Managara (n.). Consultant	Constitution of the second	\$300	February 98 (2)	PUCT Docket 12820
220	William M. Mercer, Inc.	Consultant		### ₹ 7 0 % % % \$ 525	March 00 (3)	PUCT Docket 22350
221	William M. Mercer, Inc.	Mari Willer of her	Fee Range High	15-18-4 - 100 1 \$100	March 00 (3)	PUCT Docket 22350
222			LOW	/ 5/0		
223	National Economic Research				March 00 (3)	
224	Associates				e Salina Salina a reservidadade. Se il Salina	1 2 or hall thrond September 1987 to the sample to be set of the sample
225	Henwood Energy Services, Inc.	Consultant	a No transcomment at the	\$225	March 00 (3)	PUCT Docket 22350
226	Communic & Dollar, Analysis Inc.				Index 0.1	DITOT Dealest 22050
220	Steven Andersen	Principal		\$145	July 01	1 0C1 DOCKE 23930
228	Economic & Policy Analysis, Inc.	M. K. B. L. E. S. C.	T. What it has the i	. in this still ?	ts Belling America (1986). 1991 (1986) July 01	PUCT Docket 24195
	Steven Andersen	Principal		\$145	July Of	1 0C1 DOCAC 24193
4.5256	Steven Andersen	i imoipai Saikkiki Kii Kiimo.	and Pality College of the c	many a many my many and many many	of the first the second section of the second	Allian Constitution of the

Notes: (1) From the Direct Testimony of Allen H. King in PUCT Docket 20150.

- (2) From the Direct Testimony of Jacob Pous in PUCT Docket 17751 which was based on a TNMP survey conducted for PUCT Docket 12900.
- (3) From the Direct Testimony of R. Keith Pruit in PUCT Docket 22350.
- (4) From the Request For Information based on the Direct Testimony of David G. Carpenter in PUCT Docket 22354.
- (5) From the Request For Information based on the Direct Testimony of George H. Roper in PUCT Docket 22355.
- (6) From the Direct Testimony of Jacob Pous in PUCT Docket 24336.