

**DOCKETED**

<b>Docket Number:</b>	23-OPT-01
<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	262646
<b>Document Title:</b>	County of Shasta's Reimbursement Request #3
<b>Description:</b>	County of Shasta's Reimbursement Request #3 - replaces TN262604 in its entirety
<b>Filer:</b>	Kari Cameron
<b>Organization:</b>	County of Shasta
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/10/2025 10:29:04 AM
<b>Docketed Date:</b>	4/10/2025

# Office of the County Counsel

## County of Shasta

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April 7, 2025

**VIA E-FILING DOCKET 23-OPT-01**

**VIA E-MAIL**

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[STEPsiting@energy.ca.gov](mailto:STEPsiting@energy.ca.gov)

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Repsol  
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Woodlands, TX 77381  
[hwoltag@connectgenllc.com](mailto:hwoltag@connectgenllc.com)

**Re: Fountain Wind Project, Docket 23-OPT-01  
County of Shasta Invoice Reimbursement #3**

Dear Supervisor Chang and Mr. Woltag:

The County of Shasta (County) is hereby submitting the attached invoices totaling \$35,973.13 for expenses it actually incurred related to its review and comment on the Fountain Wind Project application. The County submits for reimbursement in accordance with Assembly Bill (AB) 205 establishing the California Energy Commission's (Commission) opt-in certification process, Public Resources Code §§ 25519(f) and 25538, 20 CCR § 1878.1, Commission reimbursement precedent, Commission staff and counsel direction, and applicable state law mandates. Invoices are being filed in the docket per CEC Staff Counsel direction and submitted concurrently to Commission staff and the applicant, Fountain Wind LLC.<sup>1</sup>

Note that the County has retained outside counsel and consultants with expertise in the Eligible Activity items above to assist the County with its review and comments. All invoices are subject to applicable attorney-client privilege and have been redacted accordingly. The

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<sup>1</sup> The County incorporates its prior comments from its first and second reimbursement requests. See TN 260946 and TN 261499.

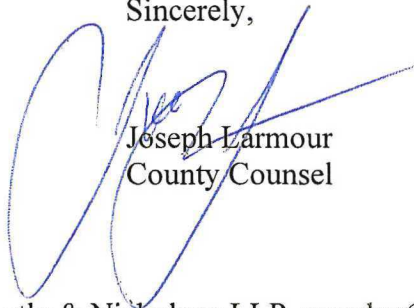
County has, however, segregated non-reimbursable activities, such as litigation advice or general meetings from the invoices and has not claimed reimbursement for these items. In an effort to ease Commission and applicant review, the County has marked reimbursable activity billing descriptions and line item entries with a stamp categorizing the Eligible Activity based on the coding system, without otherwise waiving privilege for the work product therein. The County has previously sought Commission direction on the process for filing reimbursement requests, as there is no written rules or process regarding reimbursement submittals, and has not received such direction to date.

To the extent that there is a dispute over a reimbursement invoice, the County anticipates and reserves the right to request Commission dispute resolution.

We are willing to meet with Commission staff and the applicant to further discuss and refine the reimbursement process.

Thank you for your review and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Joe Larmour', is written over the typed name and title.

Joseph Larmour  
County Counsel

cc Anne E. Mudge, Cox, Castle & Nicholson LLP, [amudge@coxcastle.com](mailto:amudge@coxcastle.com)

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COUNTY OF SHASTA  
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January 14, 2025  
1017707  
CHRISTOPHER M. PISANO  
Page 1

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## INVOICE SUMMARY

*For Professional Services Rendered Through December 31, 2024:*

Matter # 55398.00043

FOUNTAIN WIND PROJECT

Current Fees:	\$	
Current Reimbursable Costs:	\$	
Total Current Billings For This Matter:	\$	

**Invoice Due and Payable Upon Receipt**

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/05/24		0.30	52.50
Eligible Activity 6	Paralegal: KARI CAMERON		
12/11/24		2.50	875.00
Eligible Activity 6	Partner: RYAN BARON		

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/11/24		0.50	137.50
Eligible Activity 6	Associate: CHAD COLTON		
12/12/24		4.60	1,610.00
Eligible Activity 6	Partner: RYAN BARON		

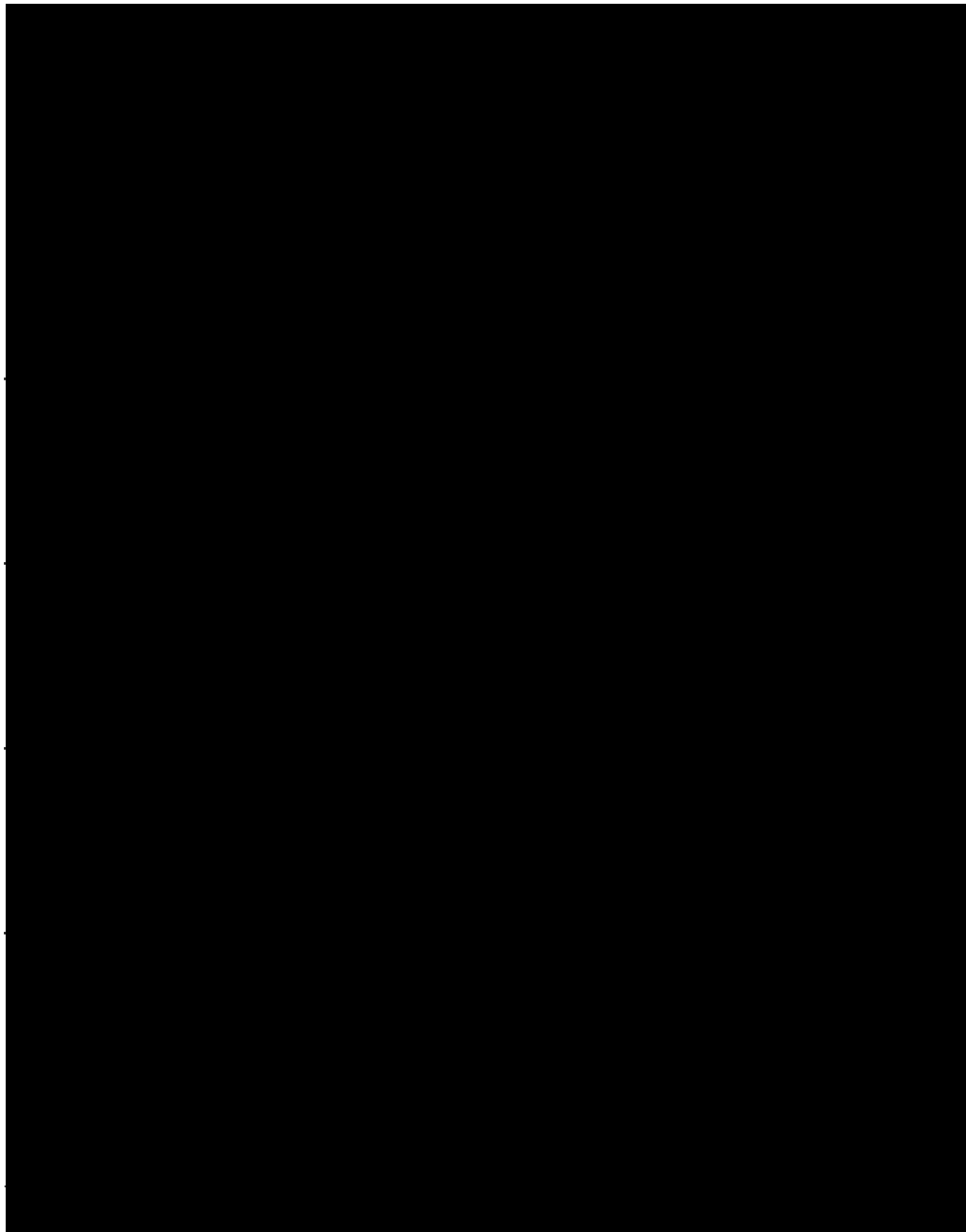
<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/13/24		3.70	647.50
Eligible Activity 6			
	Paralegal: KARI CAMERON		
12/20/24		0.40	70.00
Eligible Activity 6			
	Paralegal: KARI CAMERON		

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

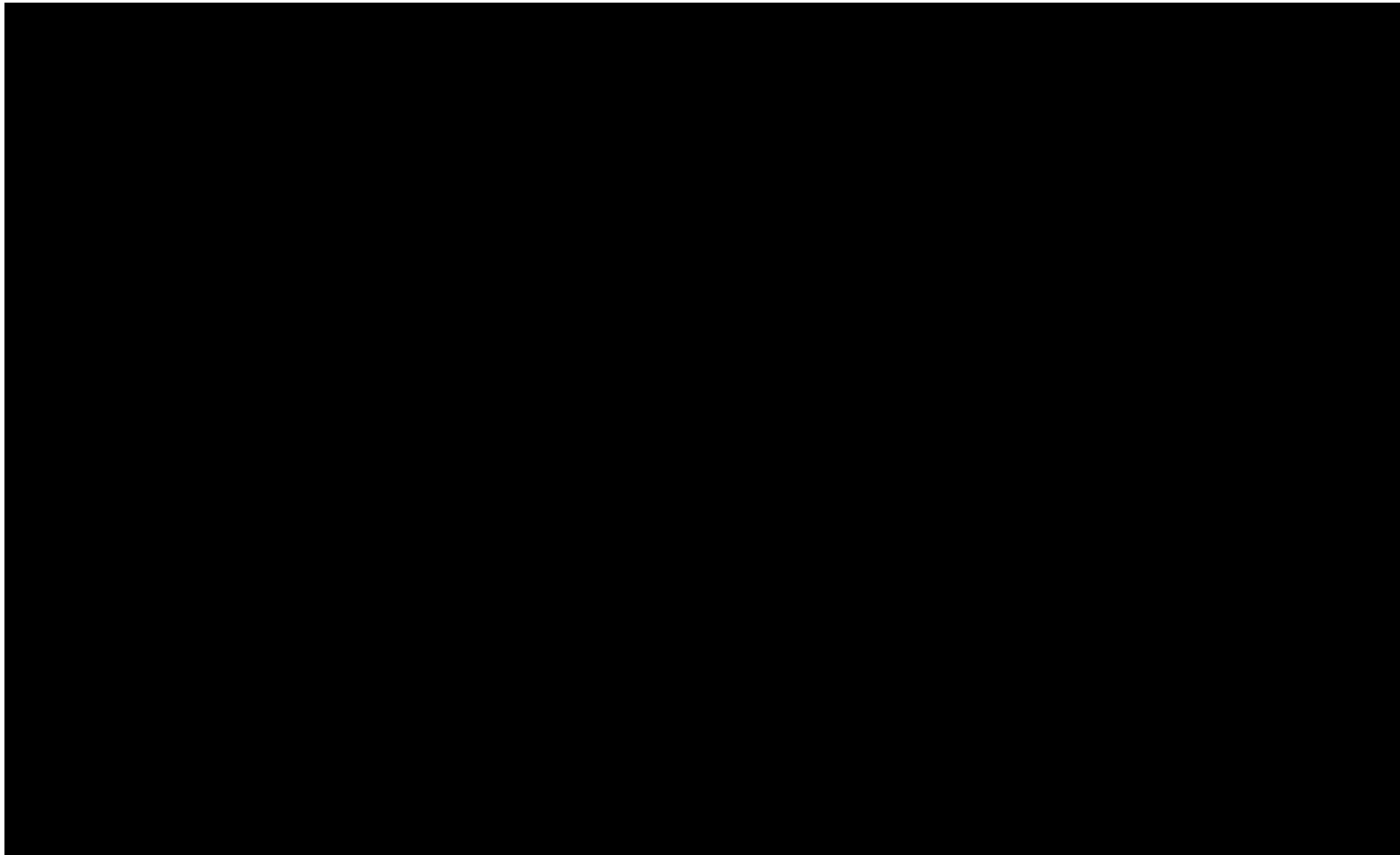
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]		
	[REDACTED]			

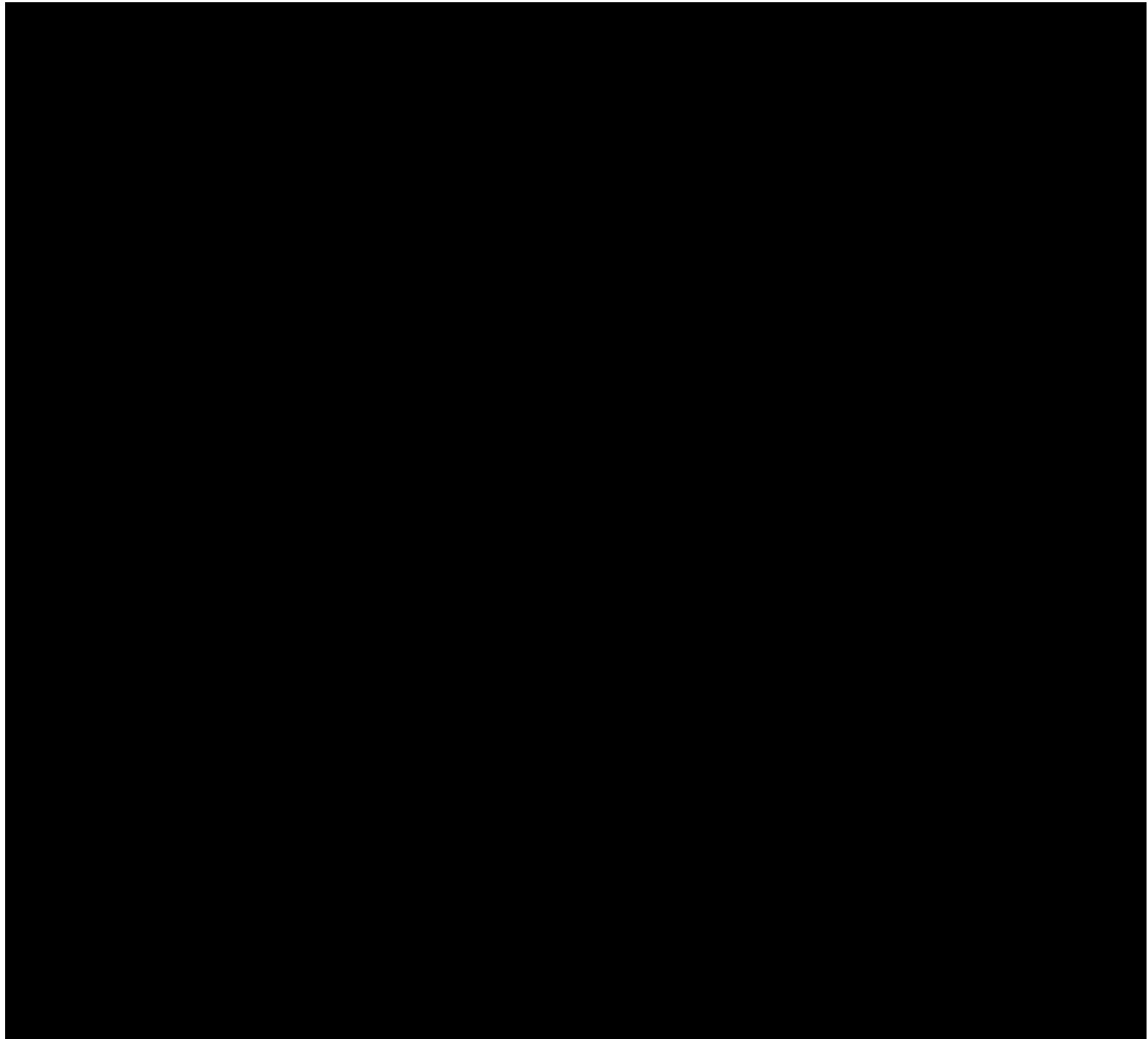
Activity	Period	Amount
Eligible Activity 6	09/30/24	688.75
Eligible Activity 8	10/31/24	(2,187.50)
Eligible Activity 8	11/15/24	4,900.00
Eligible Activity 4	11/30/24	5,650.00
Eligible Activity 6	11/30/24	21,425.63
Subtotal:		

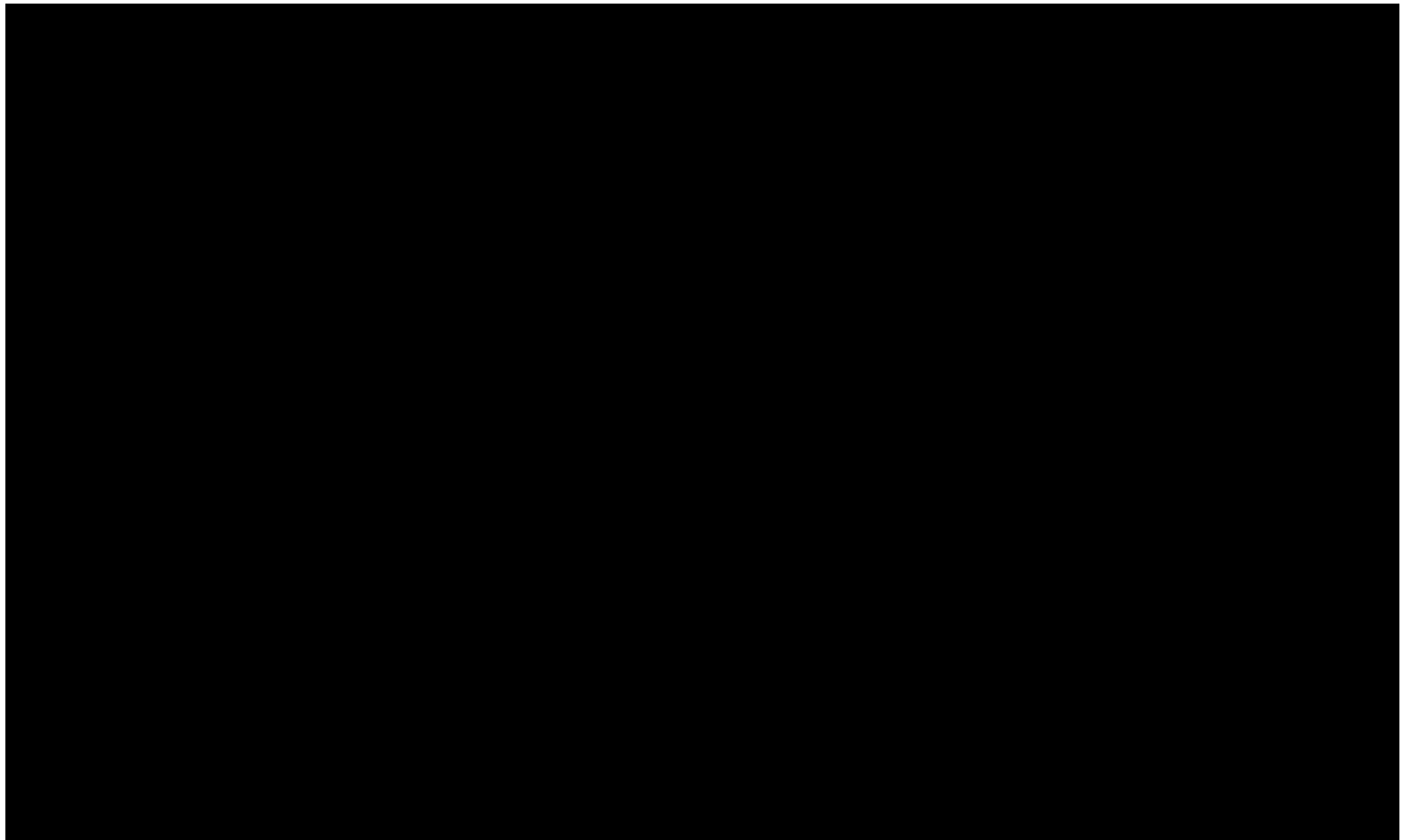
<b>Total Reimbursable Costs:</b>	\$	
<b>Total Current Billings For This Matter:</b>	\$	

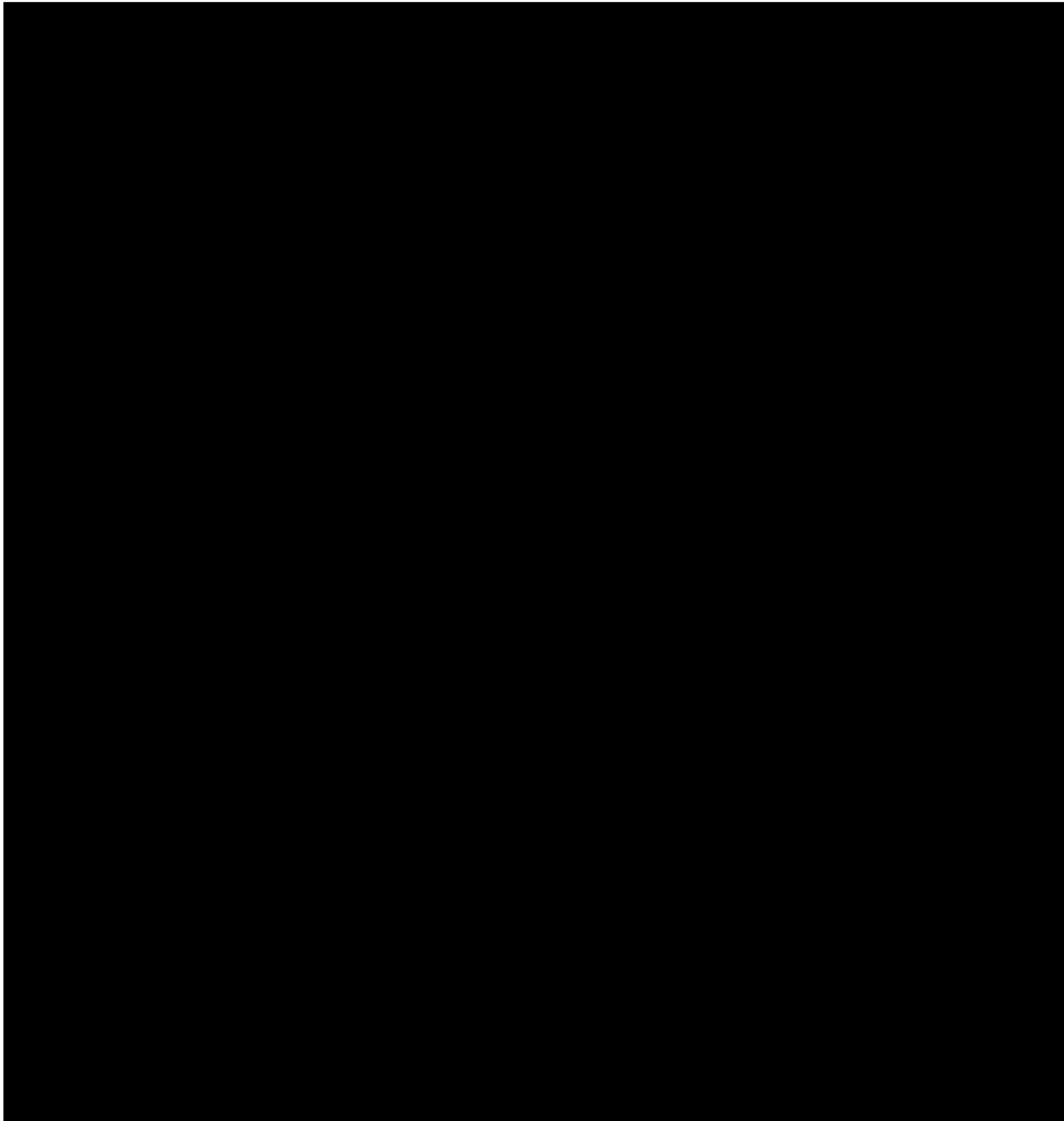


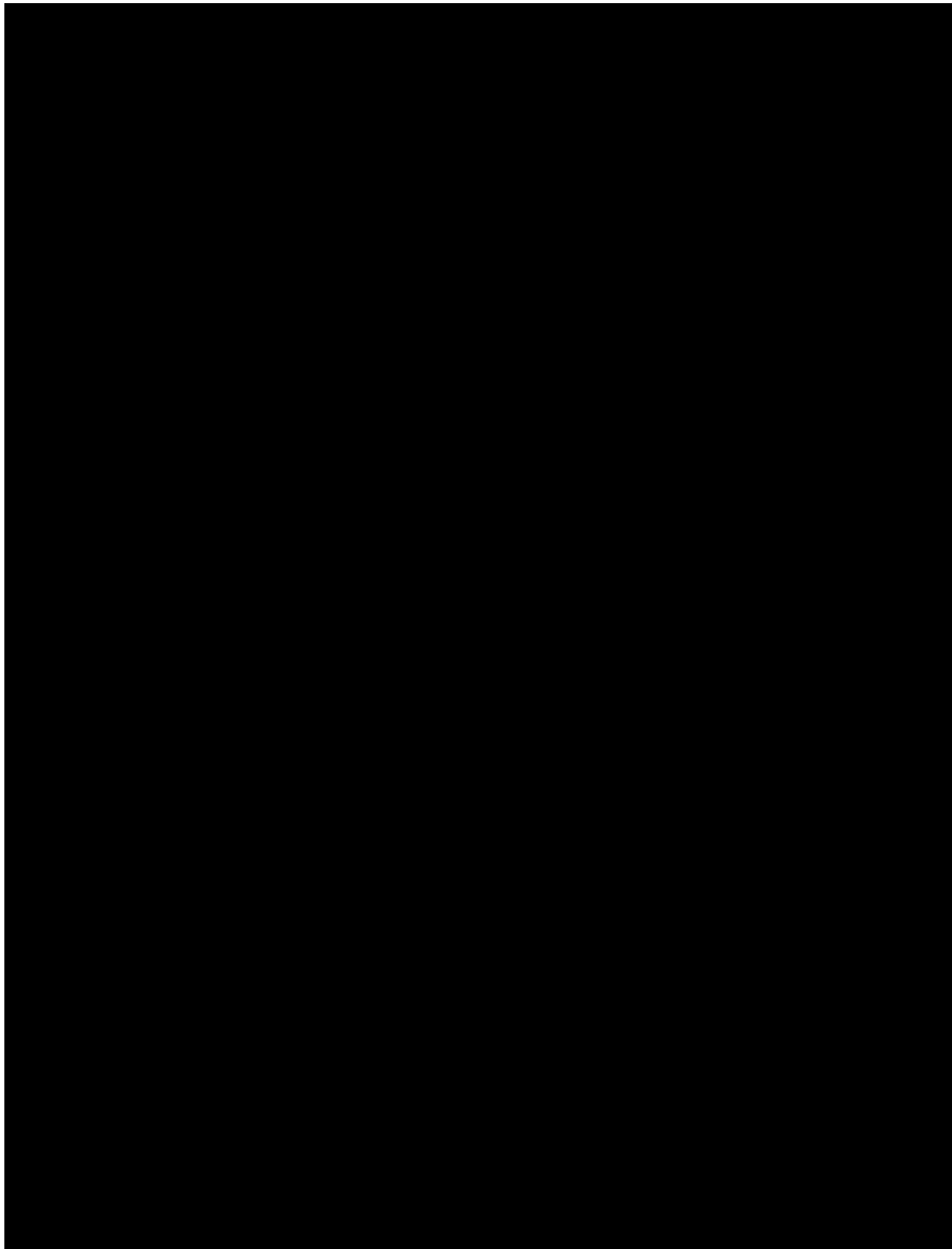




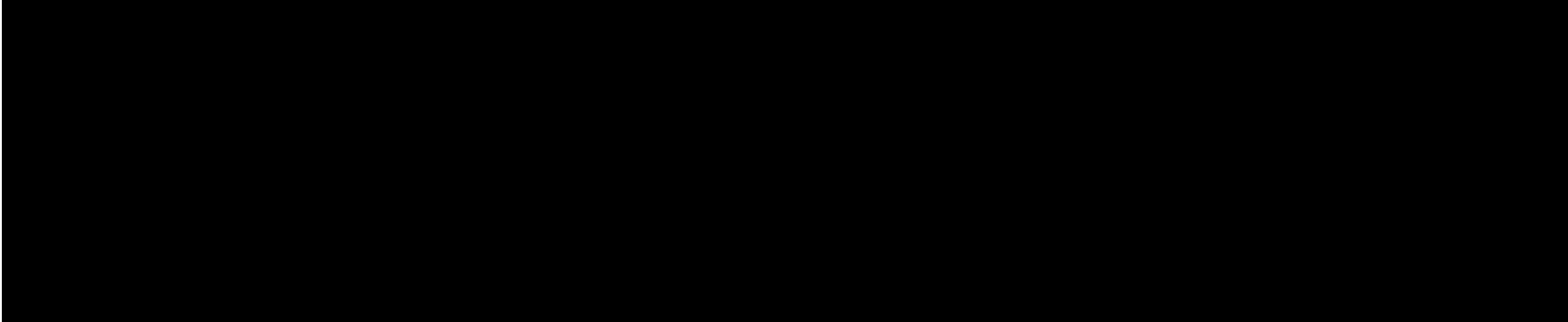












[REDACTED]

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COUNTY OF SHASTA  
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1450 COURT STREET, ROOM 332  
REDDING, CA 96001

February 10, 2025  
1019524  
CHRISTOPHER M. PISANO  
Page 1

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## INVOICE SUMMARY

*For Professional Services Rendered Through January 31, 2025:*

Matter # 55398.00043

FOUNTAIN WIND PROJECT

Current Fees:

\$



Current Reimbursable Costs:

\$



Total Current Billings For This Matter:

\$



**Invoice Due and Payable Upon Receipt**

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/04/24	[REDACTED]	0.20	70.00
Eligible Activity 6	Partner: RYAN BARON		
12/05/24	[REDACTED]	0.40	140.00
Eligible Activity 6	Partner: RYAN BARON		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
12/19/24	[REDACTED]	0.10	35.00
Eligible Activity 6	Partner: RYAN BARON		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
01/10/25	[REDACTED]	0.60	223.80
Eligible Activity 6	Partner: RYAN BARON		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
01/22/25	[REDACTED] [REDACTED]	0.10	37.30
Eligible Activity 6	Partner: RYAN BARON		
01/23/25	[REDACTED] [REDACTED] [REDACTED]	0.30	111.90
Eligible Activity 4	Partner: RYAN BARON		
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

*Privileged and Confidential*

*Privileged and Confidential*

Date	Description	Hours	Amount
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		

### Summary of Fees:

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Total Fees for Professional Services:** \$

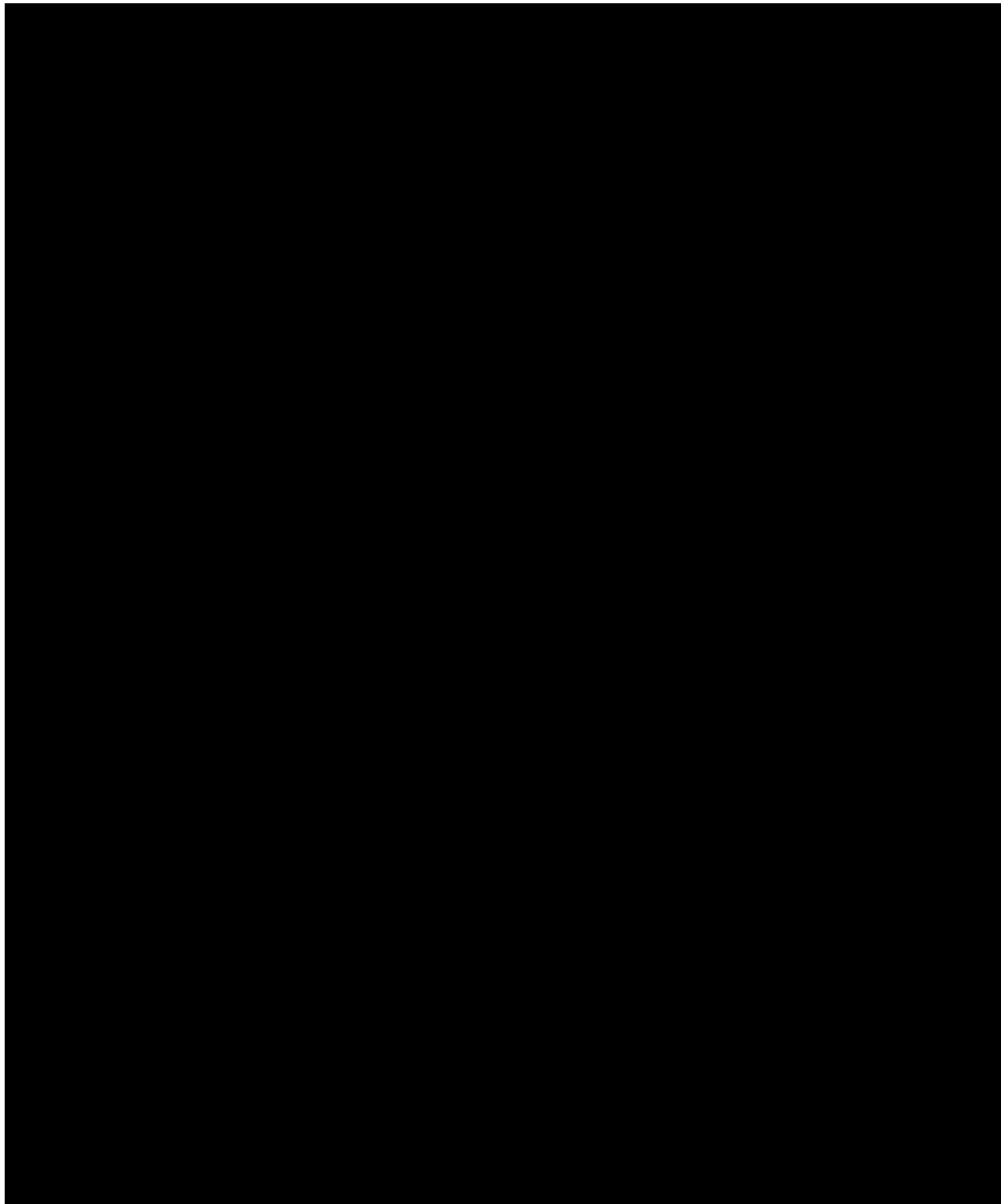
### Reimbursable Costs:

## PROFESSIONAL SERVICES

[illegible]

<b>Total Reimbursable Costs:</b>	<b>\$</b>	<b>[REDACTED]</b>
<b>Total Current Billings For This Matter:</b>	<b>\$</b>	<b>[REDACTED]</b>





The first part of the paper discusses the importance of the research and the objectives of the study. It then presents a literature review of the existing research on the topic. The next section describes the methodology used in the study, including the data sources and the statistical techniques employed. The results of the study are then presented, followed by a discussion of the findings and their implications. Finally, the paper concludes with a summary of the main points and suggestions for future research.

The research was conducted using a quantitative approach, with data collected from a large sample of participants. The results show a significant positive correlation between the variables studied, indicating that the hypothesis was supported. The findings have important implications for the field, suggesting that the proposed model is valid and can be used to predict outcomes.

In conclusion, the study has provided valuable insights into the relationship between the variables and has contributed to the understanding of the phenomenon. Further research is needed to explore the underlying mechanisms and to test the model in different contexts.

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March 11, 2025  
1022104  
CHRISTOPHER M. PISANO  
Page 1

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## INVOICE SUMMARY

*For Professional Services Rendered Through February 28, 2025:*

Matter # 55398.00043

FOUNTAIN WIND PROJECT

Current Fees:

\$



Total Current Billings For This Matter:

\$



**Invoice Due and Payable Upon Receipt**

*Privileged and Confidential*

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]		

Summary of Fees:

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate/Hr</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]		
	[REDACTED]			
	[REDACTED]			