



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED
03-04-10
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Order Instituting Rulemaking on the Commission's Own Motion to address the issue of customers' electric and natural gas service disconnection.	R.10-02-005
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NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and checked), ALJ RULING ON SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

Customer (party intending to claim intervenor compensation): Disability Rights Advocates			
Assigned Commissioner: Dian Grueneich		Assigned ALJ: Bruce DeBerry	
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent (NOI) is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this NOI and has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).			
		Signature: /S/	
Date:	3/04/10	Printed Name:	Melissa W. Kasnitz

PART I: PROCEDURAL ISSUES

(To be completed by the party ("customer") intending to claim intervenor compensation)

A. Status as "customer" (see Pub. Util. Code § 1802(b)): The party claims "customer" status because it (check one):	Applies (check)
1. Category 1: Represents consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to the jurisdiction of the Commission (§ 1802(b)(1)(A))	
2. Category 2: Is a representative who has been authorized by a "customer" (§ 1802(b)(1)(B)).	
3. Category 3: Represents a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers, to represent "small commercial customers" (§ 1802(h)) who receive bundled electric service from an electrical corporation (§ 1802(b)(1)(C)), or to represent another eligible group.	X
4. The party's explanation of its customer status, economic interest (if any), with any documentation (such as articles of incorporation or bylaws) that supports the party's "customer" status. Any attached documents should be identified in Part IV.	
DisabRA's customer status has never been questioned. However, due to recent discussions of customer status in the context of other parties' compensation requests, DisabRA has recently amended its bylaws to explicitly conform to the statute that serves as the basis for customer	

eligibility. *See* Pub. Util. Code § 1802(b)(1)(C). Article I states, in part, that Disability Rights Advocates’ mission includes “representation of the interests of disabled residential customers, and small commercial customers who receive bundled electric service from an electrical corporation and other disabled customers of utilities.” Our revised bylaws have previously been submitted to the Commission, but additional copies can be provided if necessary.

B. Timely Filing of NOI (§ 1804(a)(1)):	Check
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: _____	Yes __ No <u>X</u>
2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	Yes <u>X</u> No __
2a. The party’s description of the reasons for filing its NOI at this other time: DisabRA is filing its NOI pursuant to the Commission’s Order Instituting Rulemaking (R. 10-02-005), which states that “Any party that expects to claim intervenor compensation for its participation in this rulemaking shall file its notice of intent to claim intervenor compensation no later than 30 days after the date of the issuance of this Rulemaking.”	
2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, or ALJ ruling, or other document authorizing the filing of its NOI at that other time: Order Instituting Rulemaking on the Commission’s Own Motion to address the issue of customers’ electric and natural gas service disconnection. R.10-02-005, Filed February 4, 2010 (Date of Issuance February 5, 2010).	

PART II: SCOPE OF ANTICIPATED PARTICIPATION

(To be completed by the party (“customer”) intending to claim intervenor compensation)

A. Planned Participation (§ 1804(a)(2)(A)(i)):
<ul style="list-style-type: none"> • The party’s description of the nature and extent of the party’s planned participation in this proceeding (as far as it is possible to describe on the date this NOI is filed). • The party’s statement of the issues on which it plans to participate.
<p><u>Nature and Extent of Planned Participation</u> Through this proceeding, the Commission has instituted a rulemaking to continue efforts</p>

already underway to reduce the number of residential gas and electric utility service disconnections due to nonpayment by improving customer notification and education. DisabRA has already advocated for the issue of customer arrearages to be addressed through the TURN petition that preceded this rulemaking, and anticipates active participation in all phases of this docket. DisabRA attended the initial workshop in January of 2010, and has been engaged since that time in separate discussions with each of the IOUs regarding improvements to the accessibility of existing communications regarding arrearages and disconnections for customers who cannot use standard print and/or voice communications. DisabRA is also working in conjunction with other consumer groups to respond to the initial request for comments; in our response, we anticipate requesting at least one additional workshop on accessible communications.

DisabRA will continue to work in conjunction with other consumer groups as appropriate to file comments and replies, to gather information as needed, and to participate in any workshops that may be scheduled. We anticipate that we will be addressing the appropriateness of the Commission's interim order, and addressing the issues presented in the Order Instituting Rulemaking, Section 4. (R.10-02-005). We also will be working with other consumer groups to raise additional issues that we believe are appropriate for consideration in evaluating customer arrearages and appropriate responses.

Economic Interest of Participation

In this proceeding DisabRA will represent the interests of residential consumers with disabilities who have a direct interest in efforts to address service disconnections. People with disabilities are disproportionately low-income, and often living on fixed incomes, putting them at risk of falling behind in utility payments during times of financial hardship. They also are disproportionately high energy consumers, often because they require energy for their adaptive technology or they have medical conditions that require stable temperature ranges. Finally, people with disabilities that affect their ability to use standard forms of communication are at risk of failing to receive or understand information sent by utilities to notify them of the risks and costs of service disconnections. This proceeding, with its focus on outreach and education, provides a forum to ensure that accessible communications are provided.

Issues Likely to Be Addressed

The Order Instituting Rulemaking raises issues regarding effective outreach and communication to customers with disabilities at risk of service disconnection. As we have in ongoing conversations with individual utilities, DisabRA will focus on the importance of accessible methods of outreach and communication, including suggestions for improving the accessibility of methods for contacting customers who are delinquent in their bill payments; for improving outreach and education to the disability community about customer assistance programs; and for improving the accessibility of calls and notices to customers with disabilities concerning disconnection. In addition to submitting comments, DisabRA will make a specific request for a workshop on best practices regarding accessible communication.

DisabRA will also coordinate with other consumer groups on issues that are applicable to all consumers, including all low income consumers, in an effort to reduce the number and

cost of service disconnections during this time of widespread financial hardship in California.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY FEES				
Melissa W. Kasnitz	80	\$420	\$ 33,600	1
Anna Levine	65	\$300	\$ 19,500	
		Subtotal:		
EXPERT FEES				
				3
		Subtotal:		
OTHER FEES				
Paralegal	25	\$120	\$ 3,000	2
		Subtotal:	\$ 56,100	
COSTS				
Internal costs			\$1,000	
		Subtotal:	\$1,000	
TOTAL ESTIMATE \$:			\$57,100	

Comments/Elaboration (use reference # from above):

No guidance has yet been provided regarding rate ranges for 2010, so we are making estimates using 2009 rates, and we will modify according to any subsequent guidance. The reasonableness of the hourly rates requested for DisabRA's representatives will be addressed in our Request for Compensation (#s 1 and 2). DisabRA has not included in this estimate claim preparation time (#1). The amount of any future request for compensation will depend upon the Commission's ultimate decision in this case, as well as the resources DisabRA has available to devote to the case going forward.

These hourly estimates presume ongoing separate efforts to address communications access with each IOU, participation in conjunction with other consumer groups for all comments and replies, and at least one additional workshop focused on best practices for

accessible communications. To the extent that there are substantial additional workshops, or that there are hearings and briefings, additional work may be required. If hearings are scheduled and factual disputes arise, it may be necessary for DisabRA to engage an expert to address issues concerning accessible communications (#3).

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated claim preparation time. Claim preparation is typically compensated at ½ of preparer’s normal hourly rate.

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

(To be completed by party (“customer”) intending to claim intervenor compensation; see Instructions for options for providing this information)

A. The party claims “significant financial hardship” for its claim for intervenor compensation in this proceeding on the following basis:	Applies (check)
1. “[T]he customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation” (§ 1802(g)); or	
2. “[I]n the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding” (§ 1802(g)).	X
3. A § 1802(g) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption of eligibility for compensation in this proceeding (§ 1804(b)(1)).	X
ALJ ruling (or CPUC decision) issued in proceeding number: R.10-02-005 (OIR on the Commission’s Own Motion to address the issue of customers’ electric and natural gas service disconnection.) Date of ALJ ruling (or CPUC decision): February 4, 2010	

B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(g)) (necessary documentation, if warranted, is attached to the NOI):

**PART IV: THE PARTY’S ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

(The party (“customer”) intending to claim intervenor compensation identifies and attaches documents (add rows as necessary.) Documents are not attached to final ALJ ruling.)

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING¹
(ALJ completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	
a. The NOI has not demonstrated status as a “customer” for the following reason(s):	
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	
4. The ALJ provides the following additional guidance (see § 1804(b)(2)):	

¹ An ALJ Ruling will not be issued unless: (a) the NOI is deficient; (b) the ALJ desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer’s claim for compensation); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(g).

IT IS RULED that:

	Check all that apply
1. The Notice of Intent is rejected.	
2. Additional guidance is provided to the customer as set forth above.	
3. The customer has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	
4. The customer has shown significant financial hardship.	
5. The customer is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	

Dated _____, at San Francisco, California.

ADMINISTRATIVE LAW JUDGE

**Attachment 1:
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail

to the following persons appearing on the official Service List:

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Executed this 4th day of March, 2010, at Berkeley, California.

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