



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**FILED**  
02-25-11  
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Application of Southern California Edison Company (U338E) for Authority to, Among Other Things, Increase Its Authorized Revenues for Electric Service In 2012, And to Reflect That Increase In Rates.

Application 10-11-015

**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION  
AND, IF REQUESTED (and  checked), ALJ RULING  
ON SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

Aglet Consumer Alliance (Aglet)			
Assigned Commissioner: Timothy Alan Simon		Assigned ALJ: Melanie Darling	
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:	25-Feb-11	Printed Name:	James Weil

**PART I: PROCEDURAL ISSUES**

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

<b>A. Status as “customer” (see Pub. Util. Code § 1802(b)): The party claims “customer” status because it (check one):</b>	<b>Applies (check)</b>
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. Aglet is an unincorporated nonprofit association registered with the State of California Secretary of State. (Reg. No. 6861.) Aglet is a group authorized pursuant to its articles of organization and bylaws to represent and advocate the interests of residential and small commercial customers of electrical, gas, water and telephone utilities in California. Copies of Aglet’s articles and bylaws were attached a Notice of Intent filed	

on June 11, 1999 in Application 99-03-014. There has been no change to Aglet's articles and bylaws since that filing. All of Aglet's present members are residential utility customers, including customers of applicant Southern California Edison Company (SCE). In this proceeding Aglet will address revenue requirement issues that affect all SCE customers.

<b>B. Timely Filing of NOI (§ 1804(a)(1)):</b>	<b>Check</b>
1. Is the party's NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: <u>31-Jan-11</u>	Yes ___ No ___
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 ___ No ___
2a. The party's description of the reasons for filing its NOI at this other time:	
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:	

**PART II: SCOPE OF ANTICIPATED PARTICIPATION**

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

<b>A. Planned Participation (§ 1804(a)(2)(A)(i)):</b>
<ul style="list-style-type: none"> <li>• Aglet intends to participate actively by conducting discovery, preparing testimony, defending its testimony in hearings, cross-examining other witnesses, and filing of briefs, comments and other necessary pleadings. Aglet will continue to coordinate its efforts with the Division of Ratepayer Advocates, The Utility Reform Network, Eastern Sierra Ratepayer Association, and other ratepayer interests.</li> <li>• Aglet expects to focus its work on a limited number of policy and revenue requirement issues: financial health; economic impact of utility capital spending; and post-test year ratemaking (attrition). (See prehearing conference transcript, RT PHC-2, 65:7-19.) Aglet may address other issues as the proceeding unfolds.</li> </ul>

<b>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)):</b>				
<b>Item</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Total \$</b>	<b>#</b>
<b>ATTORNEY FEES</b>				
	<b>Subtotal:</b>			
<b>EXPERT FEES</b>				
James Weil professional time	300	\$300	\$90,000	
James Weil compensation time	20	\$150	3,000	
James Weil travel time	50	\$150	7,500	
	<b>Subtotal:</b>		\$100,500	
<b>OTHER FEES</b>				
	<b>Subtotal:</b>			
<b>COSTS</b>				
Copies			\$100	
Postage, overnight delivery			80	
FAX charges			20	
Travel costs, including LA hearings			900	(a)
Lodging, LA hearings			300	(a)
	<b>Subtotal:</b>		\$1,400	
<b>TOTAL ESTIMATE \$:</b>			\$101,900	
Comments/Elaboration (use reference # from above): (a) Aglet prepared this NOI prior to issuance of the scoping ruling. Scheduling of LA hearings is uncertain.				
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)

<b>A. The party claims “significant financial hardship” for its claim for intervenor compensation in this proceeding on the following basis:</b>	<b>Applies (check)</b>
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	X
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)).	
<p>ALJ ruling (or CPUC decision) issued in proceeding number:                      The Commission has in many proceedings issued findings of significant financial hardship for Aglet. However, the Commission did not issue such a finding within one year before SCE filed the instant application.</p> <p>Date of ALJ ruling (or CPUC decision):</p>	

<b>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):</b>
<p>The economic interests of Aglet’s individual members are small compared to the costs of effective participation in this proceeding. Typical residential electric bills are in the order of \$1,200 annually, much less than Aglet’s estimated costs of participation. All of Aglet’s current members, including members that live in SCE’s service territory, are residential utility customers. None is a large commercial or industrial customer that might use great quantities of electricity.</p>

**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 RULING<sup>1</sup>**  
(ALJ completes)

	Check all that apply
<b>1. The Notice of Intent (NOI) is rejected for the following reasons:</b>	
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):	
<b>2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).</b>	
<b>3. The NOI has not demonstrated significant financial hardship for the following reason(s):</b>	
<b>4. The ALJ provides the following additional guidance (see § 1804(b)(2)):</b>	

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<sup>1</sup> 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.

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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:

<b>Parties:</b>		
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Executed this 25th day of February, 2011, at Sebastopol, California.

/s/

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