



FILED

08-20-10
Agenda ID # _____
04:59 PM

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

| | |
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| Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's Development of a Smart Grid System. | Rulemaking 08-12-009 (Filed December 18, 2008) |
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CLAIM AND DECISION ON REQUEST FOR INTERVENOR COMPENSATION

| | |
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| Claimant: Environmental Defense Fund | For contribution to D. 10-06-047 |
| Claimed (\$): 25,032 | Awarded (\$): |
| Assigned Commissioner: Nancy Ryan | Assigned ALJ: Timothy Sullivan |
| I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1). | |
| Signature: /s/ | |
| Date: 08/20/10 | Printed Name: Lauren Navarro |

PART I: PROCEDURAL ISSUES (to be completed by Claimant except where indicated)

A. Brief Description of Decision: Adopts rules for utility deployment of smart grids.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

| | Claimant | CPUC Verified |
|---|--|----------------------|
| Timely filing of notice of intent to claim compensation (§ 1804(a)): | | |
| 1. Date of Prehearing Conference: | N/A | |
| 2. Other Specified Date for NOI: | Spoke with ALJ Sullivan on 2/19/10. He stated that | |

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| | Intervenor Compensation was still available due to issuance of new Scoping Memo, and that the NOI was due by 3/23/2010. In his ruling on our NOI, he further extended the deadline to 04/26/10. | |
| 3. Date NOI Filed: | 03/08/2010 | |
| 4. Was the notice of intent timely filed? | | |
| Showing of customer or customer-related status (§ 1802(b)): | | |
| 5. Based on ALJ ruling issued in proceeding number: | R08-12-009 | |
| 6. Date of ALJ ruling: | 03/26/2010 | |
| 7. Based on another CPUC determination (specify): | | |
| 8. Has the claimant demonstrated customer or customer-related status? | | |
| Showing of “significant financial hardship” (§ 1802(g)): | | |
| 9. Based on ALJ ruling issued in proceeding number: | R08-12-009 | |
| 10. Date of ALJ ruling: | 03/26/2010 | |
| 11. Based on another CPUC determination (specify): | | |
| 12. Has the claimant demonstrated significant financial hardship? | | |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision | D10-06-047 | |
| 14. Date of Issuance of Final Decision: | 06/24/2010 | |
| 15. File date of compensation request: | 08/20/10 | |
| 16. Was the request for compensation timely? | | |

C. Additional Comments on Part I (use line reference # as appropriate):

| # | Claimant | CPUC | Comment |
|-----|----------|------|---|
| 5,6 | X | | Based on EDF’s NOI, the ALJ found EDF to be a customer as defined in Public Utilities Code Section 1802(b)(C). EDF is a non-profit organization with over 56,000 dues-paying members in California. EDF participates in this proceeding as a representative of these members and their interests in |

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| | | | maintaining affordable and reliable energy supply and infrastructure. The design and deployment of the smart grid should result in the best use of rate payer funds, including achieving desired environmental outcomes. |
| 9,10 | X | | Based on EDF’s NOI, the ALJ found EDF to qualify for significant financial hardship pursuant to §1804. EDF asserted that the economic benefit to an individual EDF electricity customer of participating in the proceeding is small when compared to the costs of effective participation by EDF. Similarly, the economic benefit to EDF as an organization that pays for electricity use in its offices in California is small when compared to the costs of effective participation as proposed. Therefore, neither EDF nor its members will be able to recoup the value of savings achieved by effective decision making in this proceeding. |

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Claimant except where indicated)

A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059) (For each contribution, support with specific reference to final or record.)

| Contribution | Citation to Decision or Record | Showing Accepted by CPUC |
|--|---|---------------------------------|
| <p>1. EDF offered recommendations in its opening comments of June 10, 2010; reply comments of April 07, 2010; and opening comments of March 09, 2010. In each of these comments EDF recommended that the PUC require utilities’ Smart Grid Deployment Plans to specifically address how deployment will impact compliance with existing legislative and policy initiatives, including AB 32 and SB 17. The Commission specifically adopted this policy recommendation.</p> <p>In more detail, as a part of analysis of legal requirements and environmental policy recommendations, in comments of June 10, 2010, EDF recommended that “To meet SB 17, the ‘Smart Utility’ section should discuss how the smart grid will help meet the state’s environmental laws and policies....”</p> | <p>D.10-06-047, p. 4</p> <p>“The decision requires that the Smart Grid Deployment Plans present a vision of the Smart Grid consistent with legislative initiatives.... The vision must also discuss how the Smart Grid will help the utility meet environmental policies already adopted by statute or Commission action....”</p> <p>D. 10-06-047, p. 37</p> <p>“The Smart Utility section should also discuss how the Smart Grid will help the utility meet environmental policies already adopted by statute or Commission action.”</p> | |

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| <p>2. EDF contended that analysis of the success of Deployment Plans should use metrics that quantify Smart Grid benefits, including environmental and health benefits, in monetary terms. In analysis, EDF highlighted the importance of recognizing and quantifying the benefits of achievement of environmental goals. EDF first introduced a discussion of the benefits of quantitative metrics as applied to meeting environmental goals in comments of March 09, 2010. EDF again emphasized this point in comments of April 07, 2010. Finally, in comments of June 10, 2010, EDF made a legal policy recommendation that “[T]he value of the environmental, health, and other benefits of meeting the state’s policies should also be quantified to fulfill §8367’s cost and benefit reporting requirement, and to better inform the PUC.” EDF also recommended in these comments that Deployment Plans should ensure that all of SB 17’s requirements are met, and that the Benefits Estimate section include benefits that can be difficult to quantify, including “benefits of compliance with legal and regulatory goals and requirements, qualitatively and translated into monetary terms.” EDF also recommended adding considerations of quantifiable environmental benefits to Conclusion of Law #29. The changes to that Conclusion of Law that reflect EDF’s analysis and policy recommendations are emphasized in the adjacent box in bold, as found in the final decision on p. 130.</p> | <p>D. 10-06-047, p. 5</p> <p>“The decision provides a discussion of the cost and benefit procedures that the Smart Grid Deployment Plans should use to enumerate, quantify, and—to the extent feasible—monetize the costs and benefits of Smart Grid investments.”</p> <p>D. 10-06-047, p. 75</p> <p>“In addition to facilitating the achievement of other policy goals, Smart Grid investments could produce other benefits that are difficult to quantify, but potentially significant, such as achievement of environmental goals.... The benefit section of the Smart Grid Deployment Plan should attempt to quantify these benefits. Furthermore, Smart Grid investment could also produce quantifiable environmental and economic benefits. The benefits estimates in the deployment plans should identify and estimate such benefits.”</p> <p>D. 10-06-047, p. 130</p> <p>Finding of Fact #58: “An estimation of the environmental benefits that may arise from Smart Grid will be useful in deployment plans.”</p> <p>D. 10-06-047, p. 137</p> <p>Conclusion of Law #29 explains that the Benefits Estimate section of the Smart Grid Deployment plan should include: “...(b) ...benefits that are difficult to quantify or price, such as safety and environmental benefits; and (c) benefits that are simple to quantify and are sometimes called “business-case” benefits and environmental benefits that can be quantified and monetized.”</p> | |
| <p>3. EDF’s comments of March 09, 2010 analyze the benefits and importance of</p> | <p>D. 10-06-047, p. 34</p> | |

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| <p>PUC encouragement of third party provision of behind-the-meter products and services. EDF expanded on those benefits in its comments of April 07, 2010, in which it recommended that the CPUC adopt the following policy requirements: “1. Enable maximum access by third parties to the grid, creating a platform for innovation in technology and services. 2. Have the infrastructure and policies necessary to enable and support the sale of demand response, energy efficiency, distributed generation, and storage into wholesale energy markets as a resource, on equal footing with traditional generation resources; and 3. Significantly reduce the total environmental footprint of the current electric generation and delivery system in California.” These considerations were re-iterated in EDF’s June comments. Part of this recommendation is adopted verbatim in several places in the final decision; on pps. 33, 133, and 140.</p> | <p>“[T]he vision should address the three areas identified by EDF, i.e.: ·Enable maximum access by third parties to the grid, creating a welcoming platform for deployment of a wide range of energy technologies and management services; ·Have the infrastructure and policies necessary to enable and support the sale of demand response, energy efficiency, distributed generation, and storage into energy markets as a resource among other things, on equal footing with traditional generation resources; and ·Significantly reduce the total environmental footprint of the current electric generation and delivery system in California.”</p> <p>D. 10-06-047, p. 133-134</p> <p>Conclusions of Law (#11): “Smart Grid Policy Goals consistent with the initiatives and policies of SB 17 include that the Smart Grid: [...]j. <i>Enable and support the sale of demand response, energy efficiency, distributed generation, and storage into wholesale energy markets as a resource, on equal footing with traditional generation resources; and, k. Significantly reduce the total environmental footprint of the current electric generation and delivery system in California.</i>” (emphasis added.)</p> <p>D. 10-06-047, p. 139</p> <p>Order (#3): Repeats the above language of Conclusion of Law i. – k.</p> | |
| <p>4. In comments of March 09, 2010, EDF introduces the importance of consideration of AB 32 goals and energy efficiency and demand response. Comments of April 07, 2010 build on these recommendations, citing the importance of compliance with SB</p> | <p>D. 10-06-047, p. 64</p> <p>“[T]he roadmap should explicitly address how the technology areas that the utility is considering in its deployment plan will facilitate achievement of each of the following</p> | |

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| <p>17. Finally, in comments of June 10, 2010, EDF recommends that, in order to incorporate the RPS, AB 32 goals, and goals of the California Solar Initiative in the roadmap, “at a minimum, the Commission should lay out the statutory objectives listed in SB 17, provide information about each of these objectives, and explain what will be considered ‘achieving’ these objectives with reference to the existing laws.” The final decision integrates EDF’s recommended criteria for evaluating “achievement,” and specifically references the importance to the roadmap of each of the policy areas on which EDF focused in its three comments.</p> | <p>policies: ·Global Warming Solutions Act of 2006 (AB 32), which requires California to reduce its greenhouse gas emissions to 1990 levels by 2020; ·The California Long Term Energy Efficiency Strategic Plan; Achievement of the energy efficiency and demand response goals as required by Section 454.5 and 454.55; ·Achievement of the renewable portfolio standard program; and, ·Full solar photovoltaic deployment under the California Solar Initiative.”</p> | |
| <p>5. EDF, along with other parties, recommended that the CPUC foster a competitive market for technology. In comments of March 09, 2010, for example, EDF recommended that “... Third parties bring competition and innovation to the market, and customers are able to choose among them for the products and services that they prefer...we support the CPUC continuing to work with stakeholders to address the best way to ensure that third parties are encouraged to provide behind the meter products and services.”</p> | <p>D. 10-06-047, p. 109 “...the Commission is fully supportive of a competitive and innovate market for customer-owned technology and devices. Should a utility request ratepayer funds for a device or technology that it anticipates owning and operating that is placed inside a customer’s home or establishment, we will expect the utility to fully explain and justify why such an investment is needed, and explain why such devices or technologies have failed to be adopted widely.”</p> | |
| <p>6. EDF first introduced the concept that Smart Grid development can reduce the need for other infrastructure in comments of March 09, 2010: “As stated in a US Department of Energy publication, the smart grid can obviate the need for many infrastructure investments - building less is more affordable than “building out.” More specifically, in comments of June 10, 2010, EDF proposed the following amendments to finding of facts. #6: “The smart grid can lower the need for other sorts of investments, and the effect of smart grid investments should</p> | <p>D. 10-06-047, p. 123 Finding of Fact #8: “The Smart Grid can decrease the need for other infrastructure investments and these benefits should be taken into account when planning infrastructure.” D. 10-06-047, p. 131 Finding of Fact #59: “An estimation of the benefit of infrastructure investments that the Smart Grid makes unnecessary will be useful in deployment plans.”</p> | |

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| <p>be taken into account when planning other infrastructure.” #45: “A section on Cost Estimates in Smart Grid deployment plans can include preliminary and conceptual costs. Because the smart grid can reduce the needs for other infrastructure investments, these costs should be compared to the costs of infrastructure needs without the smart grid.”</p> | | |
| <p>7. In comments of June 10, 2010, EDF stated that “As indicated in our earlier comments, we suggest that the decision clarify that evidence that an investment does not support the utility’s Smart Grid deployment plan or the goals of SB 17 should be considered as rationale for determining that the investment is unreasonable.”</p> | <p>D. 10-06-047, p. 123 Finding of Fact #10: “An approved Smart Grid Deployment Plan can provide a utility with guidance concerning Smart Grid investments and a rationale that can support a proposed investment during review of the project and help in the determination that the project is reasonable and consistent with the Commission’s overall Smart Grid vision. <i>Alternatively, evidence that an investment does not comport with a utility’s Smart Grid Deployment Plan or the goals of SB 17 should be considered a rationale supporting a determination that it is unreasonable.</i>” (Emphasis added.)</p> | |
| <p>8. In comments of June 10, 2010, Proposed Amendments to Finding of Fact (# 12), EDF wrote: “The smart grid can and should be built to maximize environmental benefits from renewables, efficiency, demand side management, demand response, and other innovative technologies envisioned in SB 17.”</p> | <p>D. 10-06-047, p. 124 Finding of Fact #14: “The Smart Grid can promote environmental benefits from renewables, energy efficiency programs, demand side management, demand response programs, and other innovative technologies and programs envisioned in SB 17.”</p> | |
| <p>9. EDF’s comments of June 10, 2010 recommended adding policy requirements in the finding of fact on the vision (Proposed Amendments to Findings of Fact, #17).</p> | <p>D. 10-06-047, p. 124 Finding of Fact #19: “A vision statement will help orient a utility’s effort to upgrade its electrical system to meet today’s electric system and <i>policy</i> requirements and tomorrow’s electric system and policy needs using the latest technologies.” (Emphasis</p> | |

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| | added.) | |
| <p>10. EDF proposed the following additions regarding “smart markets:” “The “Smart Electric Market” will be guided by the environmental vision of SB 17, as embodied in the “Smart Utility” and pertinent elements of the plan.” (From comments of June 10, 2010.)</p> <p>EDF proposed a similar emphasis in relation to “smart consumers:” “The ‘smart consumer’ will be guided by the environmental vision of SB 17, as embodied in the ‘Smart Utility’ and pertinent elements of the plan.”</p> <p>Finally, EDF proposed similar recommendations in relation to “smart utilities,” highlighting in the June comments a need for those utilities to comply with environmental laws and policies. (Comments June 10, 2010.)</p> <p>These specific recommendations in relation to the “smart market,” “smart consumer,” and “smart utility” are based on an overall emphasis on integration of the goals of SB 17 into any Smart Grid vision, especially as those concerns are detailed in comments of March 09, 2010.</p> | <p>D. 10-06-047, p. 36-37</p> <p>Sets the basis for findings of fact, below</p> <p>D. 10-06-047, p. 125</p> <p>Finding of Fact #20: “A presentation of a Smart Grid Vision Statement that shows that the proposed deployment plan advances a “Smart Market” that is transparent and demand responsive, provides pricing information, promotes distributed power, incorporates cost-effective energy storage, and <i>promotes the environmental goals of California would be consistent with SB 17 policies and initiatives.</i>” (Emphasis added.)</p> <p>D. 10-06-047, p. 125</p> <p>Finding of Fact #21: “A presentation of a Smart Grid Vision Statement that shows that the proposed deployment plan promotes a “Smart Customer” who is informed, empowered and able to use electricity efficiently and in ways [that] promote environmental goals would be consistent with SB 17 policies and initiatives.”</p> <p>D. 10-06-047, p. 125</p> <p>Finding of Fact #22: “A presentation of a Smart Grid Vision Statement that ... promotes compliance with California’s environmental laws and policies would be consistent with SB 17 policies and initiatives.”</p> <p>D. 10-06-047, p. 126</p> <p>Finding of Fact #28: “It is important that Smart Grid investments demonstrate how they meet the requirements of SB 17 and other applicable statutes and policies.”</p> | |
| 11. In its June comments, EDF | D. 10-06-047, p. 129 - 130 | |

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| <p>recommended the following change (in italics) to a Finding of Fact “A Smart Grid Roadmap can show how a proposed deployment of infrastructure can aid California in meeting the deadlines adopted in legislation for renewable energy projects, <i>the Global Warming Solutions Act of 2006 (AB 32), energy efficiency, demand-side management, demand response, and other energy-related environmental policies.</i>” (Emphasis added.)</p> | <p>Finding of Fact #48: A Smart Grid Roadmap can show how a proposed deployment of infrastructure can aid California in meeting the deadlines adopted in legislation for renewable energy projects <i>and other energy-related environmental policies, such as those pertaining to green house gases, energy efficiency, demand-side management, and demand response.</i>” (Emphasis added.)</p> | |
|---|--|--|

B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

| | Claimant | CPUC Verified |
|---|----------|---------------|
| a. Was DRA a party to the proceeding? (Y/N) | Y | |
| b. Were there other parties to the proceeding? (Y/N) | Y | |
| c. If so, provide name of other parties: A remarkably large and diverse set of stakeholders commented in this proceeding. | | |
| <p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>EDF was the only non-profit environmental group that was an active party to this proceeding. As such, the nature of the analysis, policy, and legal recommendations provided by EDF is unique.</p> <p>CEERT, the Center for Energy Efficiency and Renewable Technologies, also mentioned environmental benefits several times in their comments. EDF coordinated with CEERT to make sure efforts were not duplicative and were in fact were complimentary. EDF dealt with similar issues, but provided greater depth on environmental specifics, using our expertise on environmental law, benefits, and how SG can obtain those benefits.</p> | | |

C. Additional Comments on Part II (use line reference # or letter as appropriate):

| # | Claimant | CPUC | Comment |
|---|----------|------|---------|
| | | | |
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PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)

A. General Claim of Reasonableness (§§ 1801 & 1806):

| <p>Concise explanation as to how the cost of claimant’s participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</p> | <p>CPUC Verified</p> |
|--|-----------------------------|
| <p>EDF's participation in this case provided important factual bases for the Commission's final decision. As cited above, the Commission referenced EDF’s comments in its decision regarding compliance with existing legislation and policy; identifying benefits and metrics to consider in evaluating success of deployment; evaluating overall environmental performance; and the role of third parties, among other areas.</p> <p>Pursuant to Commission rules, EDF has provided a timesheet showing type of work done. The issues addressed by EDF that were integrated into the PUC’s final decision were 1) Compliance with existing legislation and policies, including SB 17, AB 32, the RPS, etc.; 2) Additional environmental issues; 3) Evaluating performance (benefits and metrics); 4) Ensuring compliance with the plans and reducing the need for other infrastructure; and 5) Role of third parties.</p> <p>Generally, we spent 25% of time preparing comments on compliance with existing legislation and policies; 10% of time on additional environmental issues; 15% of time on evaluating performance; 5% of time on ensuring compliance and reducing the need for other infrastructure; 10% of time on the role of third parties; 20% of time on general preparation. Additionally, about 15% of time was spent on issues where EDF was not a substantial contributor – we have deducted these hours from our request.</p> <p>In terms of the reasonableness of the specific amount requested, the hours claimed are an underestimation of the hours EDF has dedicated to these comments. The hours we have claimed are, for the sake of simplicity, only those of Lauren Navarro, Esq.; Lauren consulted with other individuals at EDF, and the time of those experts is not reflected in this request. Although we do not claim compensation for the time spent by scientific and other experts within EDF, Lauren’s contact with these individuals ensured an appropriate level of experience.</p> <p>Lauren’s hours were spent on three separate comments developed over a four-month period. The actual costs requested here are outweighed by the benefit of EDF’s participation. It is difficult to assign a dollar value on the benefits to ratepayers because EDF’s comments were directed toward policy matters, rather than the establishment of specific rates or disputes over particular dollar amounts. While the smart grid has quantifiable environmental benefits (e.g., positive environmental and health impacts, and monetary savings as a result of increased energy efficiency), it is</p> | |

difficult to tell to what extent benefits will be manifest as a result of the adoption of EDF's recommendations.

Further, the attorney rate that we are claiming is conservative. D.07-01-009 suggests a rate of at least \$195/hour for an attorney with 3 to 4 years of experience. Lauren has spent three years as an attorney and policy advocate, and is currently participating in other PUC decisions. However, we are only claiming a rate of \$155/hour based on our review of similar petitions.

B. Specific Claim:

| CLAIMED | | | | | | CPUC AWARD | | | |
|--|------|--------|----------|-----------------|----------|------------------|-------|---------|----------|
| ATTORNEY AND ADVOCATE FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| 1. Lauren Navarro | 2010 | 161.5 | \$155/hr | D. 07-10-014 | 25,032 | | | | |
| <i>Subtotal:</i> | | | | | | <i>Subtotal:</i> | | | |
| EXPERT FEES | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| | | | | | | | | | |
| <i>Subtotal:</i> | | | | | | <i>Subtotal:</i> | | | |
| OTHER FEES | | | | | | | | | |
| Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.): | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| | | | | | | | | | |
| <i>Subtotal:</i> | | | | | | <i>Subtotal:</i> | | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Year | Hours | Rate \$ | Total \$ |
| | | | | | | | | | |
| <i>Subtotal:</i> | | | | | | <i>Subtotal:</i> | | | |
| COSTS | | | | | | | | | |
| # | Item | Detail | | | Amount | Amount | | | |
| | | | | | | | | | |

| | | | |
|--------------------------|--------|------------------------|--|
| Subtotal: | | Subtotal: | |
| TOTAL REQUEST \$: | 25,032 | TOTAL AWARD \$: | |

When entering items, type over bracketed text; add additional rows as necessary.
 *If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.
 **Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.

C. Attachments or Comments Documenting Specific Claim (Claimant completes; attachments not attached to final Decision):

| Attachment or Comment # | Description/Comment |
|-------------------------|---------------------------------------|
| 1 | Certificate of Service |
| 2 | Lauren Navarro (Attorney) Time Record |
| | |

D. CPUC Disallowances & Adjustments (CPUC completes):

| # | Reason |
|---|--------|
| | |
| | |

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this claim, Commission Staff
or any other party may file a response to the claim (see § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the claim (Y/N)?

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If so:

| Party | Reason for Opposition | CPUC Disposition |
|-------|-----------------------|------------------|
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| | | |

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6)) (Y/N)?

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If not:

| Party | Comment | CPUC Disposition |
|-------|---------|------------------|
| | | |
| | | |

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.
2. The claimed fees and costs [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$_____.

CONCLUSION OF LAW

1. The claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Claimant is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime,

three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 75th day after the filing of claimant's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.
4. [This/these] proceeding[s] [is/are] closed.
5. This decision is effective today.

Dated _____, at San Francisco, California.

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

I hereby certify that I have this day served a copy of the foregoing **CLAIM AND ORDER ON REQUEST FOR INTERVENOR COMPENSATION** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail, with service by mail to parties without email addresses, and additional service by mail to assigned ALJ and Commissioner.

to the following persons appearing on the official Service List:

martinhomec@gmail.com;
carlgustin@groundedpower.com;
vladimir.oksman@lantiq.com;
jandersen@tiaonline.org;
jeffrcam@cisco.com;
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Executed this 20th day of August, 2010, at Sacramento,
California.

/s/

Lauren Navarro

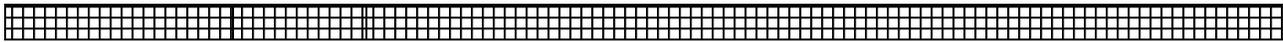
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**Attachment 2:
Lauren Navarro's Time Record**

Legend: "Leg" = Compliance with existing legislation and policies; "Env" = Other environmental Issues; "Eval" = Evaluating performance (benefits and metrics); "Comp" = Ensuring compliance with the plans and reducing the need for other infrastructure; "3P" = Role of third parties; "GP"= General Preparation

| Date | Hours | Task | Issue |
|---|--------------|---|------------------------------|
| 2/8/2010 | | | |
| Joint Ruling Amending Scoping Memo | | | |
| 2/9/2010 | 4 | Reading and Analyzing Memo | GP |
| 2/11/2010 | 4 | Reading and Analyzing Memo | GP |
| 2/12/2010 | 5 | Beginning Outline of Comments | Leg, Env, Eval, Comp, 3P |
| 2/17/2010 | 5 | Finishing Outline of Comments and sending to team | Leg, Env, Eval, Comp, 3P |
| 2/24/2010 | 10 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 2/25/2010 | 10 | Collaborating with team and colleagues, drafting comments | Leg, Env, Eval, Comp, 3P |
| 2/26/2010 | 7 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 3/1/2010 | 10 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 3/3/2010 | 5 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 3/4/2010 | 5 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 3/8/2010 | 10 | Collaborating with team, finalizing comments | Leg, Env, Eval, Comp, 3P |
| 3/9/2010 | 4 | Collaborating with team, finalizing and submitting comments, meeting with Commr | Leg, Env, Eval, Comp, 3P, GP |
| 3/9/2010 | | | |
| Opening Comments on Joint Ruling Due | | | |
| 3/10/2010 | 4 | Organizing and reviewing parties' comments | GP |
| 3/11/2010 | 4 | Organizing and reviewing parties' comments | GP |
| 3/17/2010 | 5 | Webcasting smart grids workshop | GP |
| 3/18/2010 | 5 | Webcasting smart grids workshop | GP |
| 3/19/2010 | 3 | Webcasting smart grids workshop | GP |
| 3/23/2010 | 4 | Attending meetings with PUC staff | Leg, Env, Eval, Comp, 3P |
| 3/24/2010 | 3 | Drafting reply comments | Leg, Env, Eval, Comp, 3P |
| 3/25/2010 | 3 | Drafting reply comments | Leg, Env, Eval, Comp, 3P |
| 3/26/2010 | 4 | Drafting reply comments | Leg, Env, Eval, Comp, 3P |
| 3/29/2010 | 5 | Collaborating with team, drafting comments, meeting with Commr | Leg, Env, Eval, Comp, 3P |
| 3/30/2010 | 8 | Drafting reply comments | Leg, Env, Eval, Comp, 3P |
| 3/31/2010 | 10 | Collaborating with team, drafting comments | Leg, Env, Eval, Comp, 3P |
| 4/2/2010 | 4 | Drafting comments | Leg, Env, Eval, Comp, 3P |
| 4/5/2010 | 6 | Collaborating with colleagues and team, drafting comments | Leg, Env, Eval, Comp, 3P |

| | | | |
|------------------|-----|--|------------------------------|
| 4/6/2010 | 4 | Collaborating with colleagues and team, finalizing comments | Leg, Env, Eval, Comp, 3P |
| 4/7/2010 | 5 | Finalizing and submitting comments | Leg, Env, Eval, Comp, 3P, GP |
| 4/7/2010 | | Reply Comments on Joint Ruling Due | |
| 5/25/2010 | 5 | Reading and analyzing Proposed Decision | GP |
| 5/27/2010 | 3 | Putting together summary of decision for colleagues | GP |
| 6/3/2010 | 9 | Drafting Comments | Leg, Env, Eval, Comp, 3P |
| 6/4/2010 | 2 | Drafting Comments | Leg, Env, Eval, Comp, 3P |
| 6/6/2010 | 3.5 | Drafting Comments | Leg, Env, Eval, Comp, 3P |
| 6/7/2010 | 1.5 | Formatting and making suggestions on Finding of Law and Fact | Leg, Env, Eval, Comp, 3P |
| 6/9/2020 | 4 | Incorporating colleague's amendments | Leg, Env, Eval, Comp, 3P |
| 6/10/2010 | 6 | Finalizing and Submitting Comments (and resubmitting comments) | Leg, Env, Eval, Comp, 3P, GP |
| 6/10/2010 | | Opening Comments On Proposed Decision Due | |



| | | |
|-----------------------|--------------|---|
| Total Hours | 190 | |
| 15 % Discount* | -28.5 | *Discount removes the hours spent on issues where EDF was not a substantial contributor |
| Hours Claimed | 161.5 | |