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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

**REQUEST FOR AN AWARD OF COMPENSATION TO
THE UNION OF CONCERNED SCIENTISTS
FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION (D.) 11-01-025**

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Dated: March 14, 2011

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I. INTRODUCTION

In accordance with §1804(c) of the Public Utilities Code, the Union of Concerned Scientists (“UCS”) submits this request for an award of intervenor compensation for its substantial contributions to Decision (“D.”) 11-01-025, *Decision Resolving Petitions for Modification of Decision 10-03-021 Authorizing Use of Renewable Energy Credits for Compliance With the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by Decision 10-05-018*. UCS requests \$12,210.75 for its contributions from 2010 to 2011 to the California Public Utilities Commission’s (“Commission”) deliberations regarding this decision.

UCS timely filed a Notice of Intent to Claim Intervenor Compensation (“NOI”) in this proceeding on May 8, 2006. On September 14, 2006, an Administrative Law Judge (“ALJ”) ruling was issued in this proceeding¹ that found UCS eligible to receive intervenor compensation, and also found UCS to be a “Category 3” customer meeting the standard of significant financial hardship within the meaning and definition of Public Utilities (“P.U.”) Code Sections 1802(b)(1)(C) and 1802(g). UCS’s circumstances with respect to eligibility have not changed.

In accordance with P.U. Code §1804(c), this request is being filed within 60 days of the mailing date of D.11-01-025, the most recent decision in R.06-02-012. This request includes a description of UCS’s substantial contributions to D.11-01-025, as well as a detailed description of services. UCS has previously been awarded intervenor compensation in D.96-08-040, D.98-01-007, D.03-10-085, D.04-03-033, D.05-06-025, D.06-04-022, D.07-06-032, D.07-05-028, D.08-12-017 and D.10-04-022. UCS

¹ *Administrative Law Judge’s Ruling Regarding Notices of Intent to Claim Intervenor Compensation*, September 14, 2006, in R.06-02-012.

submitted a request for an award of intervenor compensation for its substantial contributions to D.08-08-028, D.08-10-026, and D.10-03-021 on May 17, 2010. This request is still pending and relevant to this filing because D.11-01-025 addresses some of the same tradable renewable energy credit (“TREC”) issues addressed in D.10-03-021. On January 26, 2011, UCS received an email from a CPUC Intervenor Compensation Program Coordinator, which copied ALJ Anne Simon, Michelle Cooke, and Susan Rosenson.² This email confirmed that UCS’s May 17, 2010 request is still pending and that any work conducted after May 17, 2010 related to TRECs or the resolution of issues causing the stay of D.10-03-021 should not be combined with pending requests, but filed in a separate request. Finally, as requested by the Commission in D.04-03-033, UCS attests that no grant monies from any source were used to fund work for which UCS is requesting intervenor compensation.

II. UCS MADE SUBSTANTIAL CONTRIBUTIONS TO D.11-01-025 IN THIS PROCEEDING

A. Standards for Finding of Substantial Contribution

UCS’s participation in R.06-02-012 has clearly met the requirements for establishing a substantial contribution, as defined in Sections 1802(i) and 1803 of the Public Utilities Code. Section 1802(i) states:

‘Substantial contribution’ means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer's participation has resulted in a substantial contribution, even if the decision adopts

² This email is included in this filing as Appendix D.

that customer's contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate's fees, reasonable expert fees and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.

Section 1803 states in part:

The commission shall award reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs of preparation for and participation in a hearing or proceeding to any customer who...satisfies...the following requirements:

(a) The customer's presentation makes a substantial contribution to the adoption, in whole or in part, of the commission's order or decision.

The Commission has elaborated on this statutory standard as follows:

A party may make a substantial contribution to a decision in various ways. It may offer a factual or legal contention upon which the Commission relied in making a decision. Or it may advance a specific policy or procedural recommendation that the ALJ or Commission adopted. A substantial contribution includes evidence or argument that supports part of the decision, even if the Commission does not adopt a party's position in total. The Commission has provided compensation even when the position advanced by the intervenor is rejected. (D.99-08-006)

With respect to the last sentence in the quoted section immediately above, the Commission has made clear that a substantial contribution may consist of "...provid[ing] a unique perspective that enriched the Commission's deliberations and the record..."³ even if the position advanced is not adopted.

B. UCS's Substantial Contributions to D.11-01-025

This Decision resolved petitions to modify and lifted the stay of D.10-03-021, which adopted rules regarding TRECs for use in the Renewables Portfolio Standard ("RPS") program. Several events occurred following the Commission's adoption of D.10-03-021 in March 2010 that presented opportunities for UCS to provide guidance and build the record around the appropriate use of TRECs in the RPS program, for both

³ D. 07-06-032 at 4.

the investor-owned utilities (“IOUs”) and the energy service providers (“ESPs”), thereby making substantial contributions to D.11-01-025 in several areas. In contributing to this Decision, UCS filed opening and reply comments on the two petitions to modify D.10-03-021, filed on April 12th, 2010 by the three IOUs, and April 15th, 2010 by the Independent Energy Producer’s Association (“IEP”). UCS participated in the workshop to implement D.10-03-021 held April 23, 2010 and submitted comments on the issues raised at the workshop. On August 25, 2010, President Peevey issued a proposed *Decision Modifying D.10-03-021 Authorizing the Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by Decision 10-05-018* (“Peevey PD”), and a revised proposed decision on October 27, 2010, on which UCS filed opening, reply, and supplemental comments. On October 25, 2010, Commissioner Grueneich issued an alternative proposed decision on TRECs (“Alternate PD”) on which UCS filed reply comments. Appendix A to this request contains a list of filings that UCS made in this proceeding that are relevant to D.11-01-025 in this request. Appendix C contains a detailed timesheet of UCS staff hours in this proceeding.

The areas in which UCS made substantial contributions to the record for D.11-01-025 include justifying the TREC limits adopted in D.10-03-021, rejecting the IOU proposal to expand TREC earmarking, rejecting the IOU proposal to expand the definition of “bundled” contracts, submitting a detailed proposal for how the Commission might consider expanding the definition of “bundled” contracts based on the value they provide to California ratepayers, rejecting the IEP proposal to use the least-cost best-fit process to determine which contracts should be considered “bundled,” rejecting the

higher TREC limit proposed in the Peevey PD, extending the temporary TREC limit and price cap to December 31, 2013, and determining the appropriate TREC limit for the ESPs and how contracts that had been signed prior to the issuance of a final decision on TREC limits for ESPs should be handled.

Specifically, UCS assisted the Commission in developing a record and otherwise informing D.11-01-025 in the following ways:

- (1) The joint IOU petition to modify D.10-03-021 argued that the Commission should modify its short-term TREC limit for the IOUs because the limit was arbitrary and not supported by the record. UCS contributed to the Commission's decision in D.11-01-025 to not modify the short-term TREC limit for the IOUs by pointing out that the decision was not arbitrary but informed by whitepapers, public workshops, and several comment periods.⁴ In resolving the petitions to modify D.10-03-021, D.11-01-025 finds that "Many of the arguments in the utility petition have been made by parties over the two-and-one-half years of the Commission's consideration of the use of TRECs for RPS compliance, and have previously been rejected by the Commission."⁵
- (2) The joint IOU petition to modify D.10-03-021 also urged the Commission to expand its position on earmarking to allow any TREC earmarking between one buyer and one seller. PG&E also advocated this position in its response to the Peevey PD. UCS contributed to the Commission's ultimate decision in D.11-01-025 to maintain its position on TREC earmarking adopted in D.10-

⁴ UCS Response to the Petitions to Modify D.10-03-021, filed May 4, 2010, at 3-4.

⁵ D.11-01-025 at 34 (Finding of Fact 2).

03-021 as the only respondent on this issue, by submitting comments on the joint IOU petition to modify D.10-03-021 and opening and reply comments on the Peevey PD.⁶ The Peevey PD acknowledges UCS's opposition to modifying the earmarking policy and rejects the utilities' request.⁷ D.11-01-025 reflects no change to the Commission's earmarking policy adopted in D.10-03-021.

- (3) UCS provided information to the record on the perils of creating an overly broad definition of "bundled" energy transactions. The joint IOU petition to modify D.10-03-021 requested that the Commission simply classify "bundled" RPS transactions as any transaction "in which the LSE purchases both TRECs and energy."⁸ UCS warned the Commission that such a definition could result in gaming, and urged the Commission to reject the joint IOU proposal outright because it could result in energy imports that would be irrespective of the RPS program.⁹ D.11-01-025 rejected the joint IOU request by finding "The utility position does not persuade us that these positions would better advance the statutory goals of the RPS program, protect ratepayers, and further the sound administration of the RPS program than the policies and procedures adopted in D.10-03-021."¹⁰

⁶ UCS Response to the Petitions to Modify D.10-03-021, filed May 4, 2010, at 4-5; *See also* UCS Comments on the August 2010 Peevey Proposed Decision, filed September 7, 2010, at 5-6; *See also* UCS Reply Comments on the August 2010 Peevey Proposed Decision, filed October 4, 2010, at 3.

⁷ Proposed Decision of Commissioner Peevey Modifying D.10-03-021 Authorizing Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by D.10-05-018, mailed August 25, 2010, at 25.

⁸ Joint IOU Petition to Modify D.10-03-021, filed April 12, 2010, at 5.

⁹ UCS Response to the Petitions to Modify D.10-03-021, filed May 4, 2010, at 6. *See also* UCS Reply Comments on Petitions to Modify D.10-03-021, filed May 10, 2010 at 3.

¹⁰ D.11-01-025 at 10.

- (4) UCS contributed substantially to the discussion of what other types of contracts should be considered “bundled” beyond the contracts defined as such in D.10-03-021. UCS submitted technical comments on this issue following the April 23, 2010 workshop on firm transmission and related issues affecting TRECs, including a detailed proposal for how the Commission should expand its definition of bundled contracts.¹¹ UCS included a refined version of this proposal in its response to the IEP petition to modify D.10-03-021 and in its opening comments on the Peevey PD.¹² Although D.11-01-025 did not ultimately adopt an expanded definition of “bundled” contracts, it refers to a process in place to continue exploring additional ways to define “bundled” contracts.¹³
- (5) UCS provided comments to oppose IEP’s request that the least-cost best-fit evaluation process be used to determine whether an RPS contract should be classified as “bundled” or “REC-only.”¹⁴ D.11-01-025 rejects IEP’s proposal.¹⁵
- (6) UCS urged the Commission to reject the TREC limit proposed by the Peevey PD, which would have increased the temporary limit on TRECs to 40% of an IOU’s annual procurement target. UCS pointed out that combining the TREC grandfathering proposal in D.10-03-021 with an expanded TREC limit, as proposed in the Peevey PD, would cease to place any meaningful

¹¹ UCS post-workshop comments, filed April 30, 2010.

¹² UCS Response to the Petitions to Modify D.10-03-021, filed May 4, 2010, at 6-12; *See also* UCS Reply Comments on Petitions to Modify D.10-03-021, filed May 10, 2010 at 1-3; *See also* UCS Comments on the August 2010 Peevey Proposed Decision, filed September 27, 2010, at 6-8.

¹³ D.11-01-025 at 35 (Finding of Fact 4).

¹⁴ UCS Reply Comments on the Petitions to Modify D.10-03-021, filed May 10, 2010, at 5.

¹⁵ D.11-01-025 at 11.

limit on TREC's.¹⁶ D.11-01-025 did not change the temporary TREC limit adopted in D.10-03-021.

- (7) UCS provided comments on the need to extend the temporary limit on TREC's from December 31, 2011 to December 31, 2013 in order to give Energy Division staff sufficient time to evaluate the TREC market in California and the effect of price and usage limits.¹⁷ D.11-01-025 adopts this suggestion.¹⁸
- (8) UCS helped build the record on the need to place TREC limits on ESPs.¹⁹ UCS's reply comments on the Peevey PD suggested that the Commission consolidate all TREC usage restrictions into R.06-02-012 since there was already a robust record on the issue.²⁰ The subsequently revised Peevey PD incorporated TREC usage limits for the ESPs: "UCS suggests in its reply comments that it would be helpful to RPS-obligated retail sellers, other interested parties, and the public if the application of TREC's rules to all retail sellers were addressed in one place. We agree. We modify the TREC's usage limit to apply to ESPs, but otherwise leave the application on the usage limit and price cap unchanged."²¹ These changes prompted an opportunity for stakeholders to submit supplemental comments. In these supplemental comments, UCS suggested that "the Commission should only apply new

¹⁶ UCS Comments on the August 2010 Peevey Proposed Decision, filed September 27, 2010, at 3-4.

¹⁷ UCS Comments on the August 2010 Peevey Proposed Decision, filed September 27, 2010, at 4-5; *See also* UCS Reply Comments on August 2010 Peevey Proposed Decision, filed October 4, 2010, at 4.

¹⁸ D.11-01-025 at 44 (Ordering Paragraph 4-L).

¹⁹ UCS Reply Comments on the Alternative Proposed Decision of Commissioner Grueneich, filed November 22, 2010, at 4.

²⁰ UCS Reply Comments on August 2010 Peevey Proposed Decision, filed October 4, 2010, at 5.

²¹ Revised August 2010 Peevey Proposed Decision, filed October 27, 2010 (Revision 3), available at: http://162.15.7.24/word_pdf/AGENDA_DECISION/125381.pdf, p.28.

REC-only and bundled classifications to RPS contracts that were signed by the ESPs after a final decision from this RPD [Revised Proposed Decision] is issued. This would ensure the Commission provides consistent treatment for all ESP or IOU RPS contracts that were executed prior to a decision that would change their status.”²² These comments were filed in both R.06-02-012 and R.08-08-009. Although the Commission ultimately chose to address this issue in D.11-01-026 (R.08-08-009) instead of D.11-01-025, UCS’s proposal was adopted.²³ The Commission acknowledged that the supplemental comments made in R.06-02-012 relating to ESPs helped shape the TREC policies in D.11-01-026: “The Administrative Law Judge’s Ruling Granting Motion Requesting Comment Period for the Revised Proposed Decision of Commissioner Peevey (October 27, 2010), allowed supplemental comments on Section 3.9 and related ordering paragraphs of Revision 3 of the PD on petitions for modification of D.10-03-021 that was pending in R.06-02-012. These sections relate to the application to ESPs of the temporary limits on the use of TRECs for RPS compliance that D.10-03-021 imposes on the large utilities. The ALJ’s ruling required that any supplemental comments or supplemental reply comments were to be filed in both R.06-02-012 and R.08-08-009, and served on the service lists in both proceedings.”²⁴

²² UCS Supplemental Comments on the Revised Proposed Decision, filed November 4, 2010, at 2-4.

²³ D.11-01-026 at 28-29 (Ordering Paragraphs 3 & 4)

²⁴ D.11-01-026 at 26.

III. UCS'S PARTICIPATION HAS BEEN EFFICIENT AND PRODUCTIVE

In conducting its work, UCS consistently coordinated its efforts in this proceeding with other parties to avoid duplication of effort and to ensure efficiency. Any duplication that occurred in this proceeding was unavoidable due to parties' sometimes similar interests, and the overwhelming number and scope of issues addressed in the decision. However, UCS avoided duplication to the extent possible and tried to minimize it where it was unavoidable. In an effort to minimize duplication, UCS coordinated with several parties over the course of the proceeding. UCS addressed distinct issues and provided unique analysis and proposals as noted above in detail to demonstrate its contributions to record for D.11-01-025.

In D.98-04-059, the Commission adopted a requirement that a customer must demonstrate that its participation was "productive," as that term is used in §1801.3. The Commission directed customers to demonstrate productivity by attempting to assign a reasonable dollar value to the benefits of their participation to ratepayers. UCS requests that the Commission treat this compensation request as it has treated similar past requests with regard to the difficulty of establishing specific monetary benefits associated with the participation of consumer and environmental intervenors.

In a policy proceeding such as this one, particularly one concerned as much with environmental benefits as economic benefits, it is extremely difficult to estimate the monetary benefits of UCS's participation. However, UCS submits that its contributions to clear, reasonable, enforceable, and effective rules for TRECs will benefit ratepayers. The Legislature has found that increasing the amount of renewable energy resources "may promote stable electricity prices, protect public health, improve environmental

quality, stimulate sustainable economic development, create new employment opportunities, and reduce reliance on imported fuels,” among other benefits.²⁵ California’s extensive deployment of renewable energy resources will also provide protection from the risk of volatile market energy prices in the years and decades to come. The RPS Program will entail many billions of dollars of ratepayer expenditures in the pursuit of these vitally important environmental and energy policy goals. UCS’s work materially assisted the Commission in developing RPS program requirements that will result in the development of cost-effective renewable resources and as such has contributed to more productive and efficient expenditure of the billions of dollars of RPS-related expenditures. UCS submits that its work in this case therefore can be expected to save ratepayers many times the cost of our participation. As such, the Commission should find that the costs of UCS’s participation bear a reasonable relationship to the magnitude of UCS’s contributions, and that UCS’s overall participation was productive.

IV. UCS’S CLAIM IS REASONABLE

The hours and expenses claimed by UCS are reasonable and properly detailed, and the hourly rates requested are reasonable and consistent with rates requested by other intervenors for staff of similar experience and expertise, as well as with rates paid by IOUs to their staff and to outside consultants with similar experience and expertise.

A. The Hours Claimed Are Reasonable and Properly Detailed

UCS has maintained detailed records of time spent on this proceeding, which are provided in Appendix C. UCS is seeking compensation for time spent by staff to develop

²⁵ Calif. Pub. Util. Code §399.11(b); *see also* §399.11(c).

the record for D.11-01-025 and prepare this intervenor compensation request. The hours claimed are reasonable given the scope of this proceeding and the complexity of the issues presented. No compensation for administrative time or local travel time is requested, in accordance with Commission practice.

The individual who worked on this phase of the proceeding and for whom UCS is requesting compensation is Laura Wisland. A summary of the hours, requested rates, and amount of request is provided below:

Proceeding Participation and Preparation					
Name	Title	Organization	2010 Hours	2010 Hourly Rate	Total Request
Laura Wisland	Clean Energy Analyst	Union of Concerned Scientists	85.15	\$135	\$11,495.25

Intervenor Claim Preparation					
Name	Title	Organization	2011 Hours	2011 Hourly Rate	Total Request
Laura Wisland	Clean Energy Analyst	Union of Concerned Scientists	10.6	\$68	\$715.50

Grand Total: \$12,210.75

B. The Hourly Rates Claimed Are Reasonable

This section provides justification for the hourly rates requested for UCS staff member Laura Wisland. The rates requested are consistent with rates awarded to other intervenors with commensurate experience and expertise performing similar tasks, and

with D.08-04-010, which concerned the setting of 2006-2008 intervenor representatives' hourly rates.

Laura Wisland. UCS requests an hourly rate of \$135 for Ms. Wisland's work in 2010 and 2011, which is consistent with the rate requested for Ms. Wisland's work in the pending intervenor compensation claim submitted by UCS on May 17, 2010.

Ms. Wisland manages UCS's participation in Commission proceedings as an Energy Analyst in the Climate and Energy Program at UCS, a position she assumed in 2008. Ms. Wisland has an M.P.P from the Goldman School of Public Policy at the University of California at Berkeley, and a Bachelor's degree in Environmental Public Policy from the University of North Carolina at Chapel Hill. Prior to joining UCS, Ms. Wisland worked as a demand response analyst for Pacific Gas and Electric Company and served as an energy intern with the California Public Utilities Commission, where she worked on rules to develop a tradable renewable energy credit market for the California RPS. Ms. Wisland also served as the Director of the California Hydropower Reform Coalition from 2004-2006. Ms. Wisland's professional qualifications are provided in Appendix B. During the proceeding, Ms. Wisland was the sole person contributing to UCS's comments, participating in meetings with Commissioners and stakeholders, and preparing UCS's request for intervenor compensation.

V. CONCLUSION

UCS made a significant contribution to Decision 11-01-025 in the ways described above. The hourly rates and costs claimed are reasonable and consistent with awards to

other intervenors and utility experts and advocates with comparable experience and expertise, and consistent with the Commission's decisions regarding hourly rates. UCS has met the procedural requirements for intervenor compensation set forth in §1801 *et seq* of the Public Utilities Code. UCS respectfully requests that the Commission grant UCS's claim in its entirety.

Respectfully submitted,

By 

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Dated: March 14, 2011

APPENDIX A

LIST OF UCS FILINGS RELEVANT TO D.11-01-025

Decision 11-01-025

Date	Title
April 30, 2010	“Post-Workshop Comments of the Union of Concerned Scientists”
May 4, 2010	“Response of the Union of Concerned Scientists to the Petitions to Modify D.10-03-021”
May 10, 2010	“Reply Comments of the Union of Concerned Scientists Regarding Responses to the Petitions to Modify D.10-03-021”
September 27, 2010	“Comments of the Union of Concerned Scientists on Proposed Decision Modifying Decision 10-03-021 Authorizing Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by Decision 10-05-018”
October 4, 2010	“Reply Comments of the Union of Concerned Scientists on Proposed Decision Modifying Decision 10-03-021 Authorizing Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by Decision 10-05-018”
November 4, 2010	“Supplemental Comments of the Union of Concerned Scientists on the Revised Proposed Decision Modifying Decision 10-03-021 Authorizing Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard and Lifting Stay and Moratorium Imposed by Decision 10-05-018”
November 22, 2010	“Reply Comments of the Union of Concerned Scientists on the Alternative Proposed Decision of Commissioner Grueneich”

APPENDIX B

UCS STAFF QUALIFICATIONS

LAURA M. WISLAND

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EDUCATION

UNIVERSITY OF CALIFORNIA, Berkeley, CA, Goldman School of Public Policy (GSPP)

Master of Public Policy, May 2008

Honors: Robert and Patricia Switzer Fellow, 2007-2008

Graduate Student Researcher, GSPP Center for Environmental Public Policy, 2006-present

Courses: Energy Markets and Policy, Water Resources Law, Financial Management for Non-Profits, Microeconomics

UNIVERSITY OF NORTH CAROLINA, Chapel Hill, NC, 1996-2000

Bachelor of Arts, Public Policy Analysis-Environmental Protection, Highest Honors awarded May 2000

Honors: John Motley Morehead Scholar (full academic scholarship), Morris K. Udall Scholar, Phi Beta Kappa

EXPERIENCE

UNION OF CONCERNED SCIENTISTS, Berkeley, CA

California Clean Energy Analyst, June 2008 – Present

- Analyzing and advocating for clean and renewable energy policies pertaining to implementation of California's Renewables Portfolio Standard and AB 32 greenhouse gas reduction efforts.

PACIFIC GAS AND ELECTRIC COMPANY, INC., San Francisco, CA

Energy Policy Analyst, Demand Response Division, Spring 2008

- Developed recommendations to the CPUC on spinning reserve programs for the California ancillary services market.

CALIFORNIA PUBLIC UTILITIES COMMISSION, San Francisco, CA

Energy Policy Analyst, Renewable Portfolio Standard (RPS) Division, Summer 2007

- Analyzed the supply, demand, and price effects of a tradable renewable energy credit (REC) market in California, and worked with CPUC staff to develop draft compliance rules to shape a REC program as part of the state's RPS program.
- Delivered a presentation on price transparency and REC forward price curves at the CPUC's public workshop for the proposed REC ruling, R-06-02-012.

SONOMA COUNTY WATER AGENCY, Santa Rosa, CA

Policy Analyst, Spring 2007

- Valued the costs and benefits of building a landfill gas-to-energy project in Marin County.
- Presented findings to SCWA senior management and the Marin County Board of Supervisors.

CALIFORNIA HYDROPOWER REFORM COALITION, Berkeley, CA

Director, 2004-2006; Assistant Director, 2003-2004

- Directed a statewide coalition of organizations that pursue ecological enhancements and protections for California rivers by improving the operation of hydropower dams. Managed a \$600,000 budget and two staff.
- Successfully amended AB 2189, a state bill that redefined hydropower eligible for credits under California's RPS program.
- Analyzed and inserted hydropower reform concepts into the CA Energy Commission's 2005 Integrated Energy Policy Report.
- Conceived amendment language and successfully lobbied a U.S. Senator, which ultimately improved hydropower provisions in the Energy Policy Act of 2005.
- Designed a practitioner workshop to explore the impact of climate change on hydropower operations and aquatic communities.

APPENDIX C

UCS STAFF TIME RECORDS FOR D.11-01-025

Appendix C: UCS Time Records for Laura Wisland in R.06-02-012

	A	B	C	D	E	F	G	H	I
1	Name	Date	Hours	Rate	Amount	Proceeding	Issue	Decision	Task
2	L.Wisland	4/14/10	2.00	\$135	\$270	R.06-02-012	TREC rules	D.11-01-025	Read IOU Joint Petition and IEP petition to modify D.10-03-021
3	L.Wisland	4/23/10	5.00	\$135	\$675	R.06-02-012	RPS "bundled" contract requirements	D.11-01-025	Attended TRECs workshop following D.10-03-021
4	L.Wisland	4/29/10	2.00	\$135	\$270	R.06-02-012	RPS "bundled" contract requirements	D.11-01-025	Prepared UCS post-workshop comments
5	L.Wisland	4/30/10	7.00	\$135	\$945	R.06-02-012	RPS "bundled" contract requirements	D.11-01-025	Prepared UCS post-workshop comments
6	L.Wisland	5/3/10	6.00	\$135	\$810	R.06-02-012	TREC cap, TREC earmarking, "bundled" contract requirements	D.11-01-025	Prepared response to IOU and IEP petitions to modify D.10-03-021
7	L.Wisland	5/4/10	8.25	\$135	\$1,114	R.06-02-012	TREC cap, TREC earmarking, "bundled" contract requirements	D.11-01-025	Prepared response to IOU and IEP petitions to modify D.10-03-021
8	L.Wisland	5/5/10	3.00	\$135	\$405	R.06-02-012	TREC rules	D.11-01-025	Read party comments responding to IOU and IEP petitions to modify D.10-03-021
9	L.Wisland	5/6/10	3.40	\$135	\$459	R.06-02-012	TREC rules	D.11-01-025	Read party comments responding to IOU and IEP petitions to modify D.10-03-021
10	L.Wisland	5/9/10	2.75	\$135	\$371	R.06-02-012	RPS "bundled" contract requirements, least-cost best-fit	D.11-01-025	Prepared UCS reply comments responding to IOU and IEP petitions to modify D.10-03-021
11	L.Wisland	5/10/10	2.00	\$135	\$270	R.06-02-012	RPS "bundled" contract requirements, least-cost best-fit	D.11-01-025	Prepared UCS reply comments responding to IOU and IEP petitions to modify D.10-03-021
12	L.Wisland	8/26/10	2.00	\$135	\$270	R.06-02-012	TREC rules	D.11-01-025	Read Peevey Revised PD on TRECs

Appendix C: UCS Time Records for Laura Wisland in R.06-02-012

	A	B	C	D	E	F	G	H	I
13	Name	Date	Hours	Rate	Amount	Proceeding	Issue	Decision	Task
14	L.Wisland	9/20/10	1.00	\$135	\$135	R.06-02-012	TREC cap and review extension, TREC earmarking, RPS "bundled" contract requirements	D.11-01-025	Prepared UCS initial comments on Peevey Revised PD on TRECs
15	L.Wisland	9/24/10	4.00	\$135	\$540	R.06-02-012	TREC cap and review extension, TREC earmarking, RPS "bundled" contract requirements	D.11-01-025	Prepared UCS initial comments on Peevey Revised PD on TRECs
16	L.Wisland	9/27/10	5.00	\$135	\$675	R.06-02-012	TREC cap and review extension, TREC earmarking, RPS "bundled" contract requirements	D.11-01-025	Prepared UCS initial comments on Peevey Revised PD on TRECs
17	L.Wisland	9/28/20	4.00	\$135	\$540	R.06-02-012	TREC rules	D.11-01-025	Read party initial comments on Peevey Revised PD on TRECs
18	L.Wisland	9/30/10	3.00	\$135	\$405	R.06-02-012	TREC grandfathering & earmarking, TREC limits for ESPs	D.11-01-025	Read party initial comments and prepared UCS reply comments
19	L.Wisland	10/2/10	2.00	\$135	\$270	R.06-02-012	TREC grandfathering & earmarking, TREC limits for ESPs	D.11-01-025	Prepared UCS reply comments
20	L.Wisland	10/4/10	5.00	\$135	\$675	R.06-02-012	TREC grandfathering & earmarking, TREC limits for ESPs	D.11-01-025	Prepared UCS reply comments
21	L.Wisland	10/5/10	2.00	\$135	\$270	R.06-02-012	TREC rules	D.11-01-025	Read party reply comments
22	L.Wisland	11/2/10	0.25	\$135	\$34	R.06-02-012	TREC cap and review extension, TREC earmarking, RPS "bundled" contract requirements, TREC rules for ESPs	D.11-01-025	Met with A.Schwartz to discuss Revised Peevey PD on TRECs
23	L.Wisland	11/2/10	0.50	\$135	\$68	R.06-02-012	TREC cap and review extension, TREC earmarking, RPS "bundled" contract requirements, TREC rules for ESPs	D.11-01-025	Met with M.Wheeler to discuss Grueneich Alternate PD on TRECs

APPENDIX D

**EMAIL CORRESPONDENCE WITH CPUC INTERVENOR COMPENSATION
PROGRAM COORDINATOR**

Laura Wisland

From: Icompcoordinator <icompcoordinator@cpuc.ca.gov>
Sent: Wednesday, January 26, 2011 11:43 AM
To: Laura Wisland
Cc: Simon, Anne; Cooke, Michelle; Rosenson, Susan
Subject: FW: question about proposed decision to deny UCS and Aglet contributions to D.10-03-021

Dear Laura Wisland,

Administrative law judge Anne Simon forwarded your email to the intervenor compensation program coordinator, to respond.

Your request for intervenor compensation of May 17, 2010, related to D08-08-028 and D10-03-021, has been unresolved, mainly, due to the uncertainty with the status of that decision, since it was stayed pursuant to D10-05-018. A proposed decision you are referring to in your letter, denying, without prejudice, your May 17th request, was never voted upon and adopted. Now, with the D10-03-021 stay recently lifted (D11-01-025), we will consider that request. You do not need to re-file it or combine with a future request.

As far as your intervenor compensation claim related to D11-01-025 is concerned, you can file your intervenor compensation request related to that decision within 60 days from the date of its issuance or no later than March 15, 2011 (§1804(c)).

Please, do not hesitate to contact us on these matters.

Sincerely,

CPUC Intervenor Compensation Program Coordinator
Telephone: (415) 355-5574
Email: icompcoordinator@cpuc.ca.gov

VERIFICATION

I, Laura Wisland, am a representative of the Union of Concerned Scientists and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true to the best of my knowledge, except for those matters that are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 14, 2011, in Berkeley, California.



Laura Wisland
Union of Concerned Scientists
2397 Shattuck Ave. Suite 203
Berkeley, CA 94704
(510) 809-1567

CERTIFICATE OF SERVICE

I, Miriam Swaffer, certify that I have, on this date, caused the foregoing REQUEST FOR AN AWARD OF COMPENSATION TO THE UNION OF CONCERNED SCIENTISTS FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION (D.) 11-01-025 to be served by electronic mail, or for any party for which an electronic mail address has not been provided, by U.S. Mail on the parties listed on the Service List for the proceeding in California Public Utilities Commission Docket No. R.06-02-012.

I declare under penalty of perjury, pursuant to the laws of the State of California, that the foregoing is true and correct.

Executed on March 14, 2011 at Berkeley, California.



Miriam Swaffer