

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**FILED**08-06-13
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August 6, 2013

Agenda ID #12313
Ratesetting**TO PARTIES OF RECORD IN RULEMAKING 11-10-003:**

This is the proposed decision of the Administrative Law Judge Division. This item is targeted to appear on Agenda No. 3321 for the Commission's September 5, 2013 Business Meeting, but may appear on a later agenda. Interested persons may monitor the Business Meeting agendas, which are posted on the Commission's website 10 days before each Business Meeting, for notice of when this item may be heard. The Commission may act on the item at that time, or it may hold an item to a later agenda.

When the Commission acts on the proposed decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at www.cpuc.ca.gov. Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

Comments must be filed pursuant to Rule 1.13 either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

/s/ KAREN V. CLOPTONKaren V. Clopton, Chief
Administrative Law Judge

KVC:cla

Attachment

Decision PROPOSED DECISION OF ALJ DIVISION (Mailed 8/6/2013)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's own motion to determine the impact on public benefits associated with the expiration of ratepayer charges pursuant to Public Utilities Code Section 399.8.

Rulemaking 11-10-003
(Filed October 6, 2011)

**DECISION AWARDING INTERVENOR COMPENSATION TO THE GREEN
POWER INSTITUTE FOR SUBSTANTIAL CONTRIBUTION TO
DECISIONS 11-12-035 AND 12-05-037**

| | |
|--------------------------------------------------|---------------------------------------------------------|
| Claimant: The Green Power Institute (GPI) | For contributions to D.11-12-035 and D.12-05-037 |
| Claimed: \$41,687 | Awarded: \$26,800 (reduced 36%) |
| Assigned Commissioner: Michael R. Peevey | Assigned ALJ: ALJ Division |

PART I: PROCEDURAL ISSUES

| | |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A. Brief Description of Decision: | Decisions D.11-12-035 and D.12-05-037 are the Phase 1 and 2 Decisions establishing the Electric Program Investment Charge (EPIC) program. The Phase 1 Decision authorizes the collection of special-purpose ratepayer funds during 2012, while the Phase 2 Decision establishes the parameters for the program, and extends its life-in-service out to 2020. |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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 (NOI) (§ 1804(a)): | | |
| 1. Date of Prehearing Conference: | GPI failed to provide this date | June 2, 2011 |
| 2. Date NOI Filed: | July 2, 2011 | Correct |
| 3. Was the NOI timely filed? | | Yes |

PROPOSED DECISION

| Showing of customer or customer-related status (§ 1802(b)): | | |
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| 4. Based on ALJ ruling issued in proceeding number: | R.11-03-012 | Correct |
| 5. Date of ALJ ruling: | Dec. 1, 2011 | Correct |
| 6. Based on another CPUC determination (specify): | | |
| 7. Has the Claimant demonstrated customer or customer-related status? | | Yes |
| Showing of “significant financial hardship” (§ 1802(g)): | | |
| 8. Based on ALJ ruling issued in proceeding number: | R.11-03-012 | On Dec. 1, 2011, in this proceeding, the ALJ ruled that GPI met the financial hardship condition pursuant to § 1802(g) through a rebuttable presumption of eligibility because the Commission found GPI had met this requirement in another proceeding within one year of the commencement of this proceeding (ALJ Ruling dated Mar. 6, 2011 in R.10-05-006. |
| 9. Date of ALJ ruling: | Dec. 1, 2011 | Correct |
| 10. Has the Claimant demonstrated significant financial hardship? | | Yes |
| Timely request for compensation (§ 1804(c)): | | |
| 11. Identify Final Decision: | D.12-05-037 | Correct |
| 12. Date of Issuance of Final Order or Decision: | May 31, 2012 | Correct |
| 13. File date of compensation request: | July 24, 2012 | Correct |
| 14. Was the request for compensation timely? | | Yes |

PART II: SUBSTANTIAL CONTRIBUTION**A. Claimant's description of its claimed contribution to the final decision:**

| Contribution | Specific References to Claimant's Presentations and to Decision | Showing Accepted by CPUC |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| <p>Continue Collecting Funds at Current Levels</p> <p>The initial threshold issue that had to be decided in this Proceeding was whether the Commission had the authority to create a benefits program in light of the failure of the legislature to reauthorize the PGC program during the 2011 Legislative session.</p> <p>The GPI was a strong advocate for continued funding of a benefits program for renewables and R&D at the same level of funding as was used for the PGC program the previous year, without allowing for a gap in collections. We favored a long-term commitment to a benefits program for renewables. The Phase 1 Decision continues funding for renewables and R&D without interruption.</p> | <p>GPI's <i>Comments on the OIR</i>, 10/20/11, pgs. 1 – 2.</p> <p>Joint Biomass Parties <i>Comments on the PD</i>, 12/5/11, pg. 2.</p> <p>The Phase 1 Decision establishes a renewables and R&D benefits program on an interim basis, at previous PGC funding levels. See D.11-12-035, pages 10 – 11, 24 – 27, Finding of Fact no. 7, Conclusion of Law no. 3, and Order no. 2.</p> | <p>Yes</p> |
| <p>Biomass Benefits at Risk</p> <p>One of the crucial questions that was being asked in regards to whether there was a policy imperative for establishing a benefits program under PUC auspices was whether failure to do so would put valuable benefits at risk. We warned that the market for biomass energy was not vibrant, that the recent contract amendments for biomass facilities did not completely solve their problems, and that the waste-disposal benefits of</p> | <p>GPI's <i>Comments on the OIR</i>, 10/20/11, pgs. 2 – 3.</p> <p>The Phase 1 Decision affirms that the PGC-funded ERF program provides valuable societal benefits. See D.11-12-035, pgs. 24 – 27, Finding of Fact no. 5.</p> | <p>Yes</p> |

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| <p>biomass energy production that the ERFPP had been securing were indeed at risk. The Phase 1 Decision affirms that biomass provides special benefits that are at risk.</p> | | |
| <p>Discontinue the ERFPP</p> <p>Although the ERFPP was enormously successful during the period that it was in effect, we believed that it had outlived its usefulness in its original form, and we recommended that it be discontinued. The Phase 2 Decision discontinues the ERFPP program.</p> | <p>Joint Biomass Parties <i>Comments on the OIR</i>, 10/20/11, pgs. 5 – 7.</p> <p>Joint Biomass Parties <i>Comments on the EPIC Staff Proposal</i>, 03/7/11, pg. 4.</p> <p>The Phase 2 Decision declines to fund any market support activities, including ERFPP. See D.12-05-037, pgs. 48 – 49, Finding of Fact no. 23.</p> | <p>Yes</p> |
| <p>Create Targeted Biomass-Fuels Program</p> <p>In view of the fact that EPIC was created in order to secure benefits that previously had been provided by the PGC program, including the benefits of full operations of the state’s fleet of biomass plants, we proposed a new targeted biomass-fuels program for inclusion in EPIC. Although our proposed program was ultimately not adopted in the Phase 2 Decision, we made a Substantial Contribution to the Decision by enriching the record upon which the Decision was made, ensuring</p> | <p>Joint Biomass Parties <i>Comments on the OIR</i>, 10/20/11, pgs. 2 – 5, 7 – 8, 9 – 11.</p> <p>Joint Biomass Parties <i>Reply on the OIR</i>, 10/26/11, pgs. 2 – 3.</p> <p>Joint Biomass Parties <i>Comments on the EPIC Staff Proposal</i>, 03/7/11, entire document.</p> <p>Joint Biomass Parties <i>Reply on</i></p> | <p>We disagree with GPI’s assessment of its claim of substantial contribution on this issue. Although GPI argued vociferously on this issue, the Commission rejected it.¹ According to GPI it estimates that 25% of its time was allocated to this issue.</p> |

¹ See D.12-05-037 @ 53-54.

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| <p>that the best possible case was made for our proposed program.</p> <p>In making the case for a targeted biomass-fuels program, we addressed the following major issues that were in dispute in the Proceeding:</p> <ul style="list-style-type: none"> • The marketplace for biomass power • The significance of the amended PPAs • New vs. existing facilities <p>We pointed out that the current marketplace for biomass power was very challenging. No greenfield plants were under active development in the state, and many existing generators are deciding to reduce or cease operations of their facilities. Even the PPA amendments may not be enough to keep facilities operating at full capacity. Finally, we pointed out that making a distinction between existing and new generators risks substituting the new, coal-to-biomass conversions that are under development for existing facilities, rather than seeing the overall market expand.</p> | <p><i>the EPIC Staff Proposal</i>, 03/16/11, entire document.</p> <p>Joint Biomass Parties <i>Comments on the Phase 2 PD</i>, 05/14/11, pgs. 7 – 10.</p> <p>The Phase 2 Decision extols the virtues of biomass, and the ancillary benefits it provides (D.12-05-037, pg. 53, Finding of Fact no. 24, Conclusion of Law no. 18). Unfortunately, it declines to include the targeted biomass-fuels program in the EPIC program.</p> | <p>We make reductions for lack of substantial contribution in Part III, Section D of this claim.</p> |
| <p>Beneficiaries and Alternate Funding Sources</p> <p>Some parties argued that there is a disconnect between the beneficiaries of the waste-disposal benefits of biomass, and ratepayers. We pointed out that while the connection might not be perfect, it was more than strong enough to eliminate this as a concern with respect to whether a targeted biomass-fuel program should be eligible for EPIC funds.</p> <p>One of the suggestions made in opposition to our proposal was that</p> | <p>GPI’s <i>Comments on the OIR</i>, 10/20/11, pg. 4.</p> <p>Joint Biomass Parties <i>Comments on the EPIC Staff Proposal</i>, 03/7/11, pg. 12.</p> <p>Joint Biomass Parties <i>Comments on the Phase 2 PD</i>, 05/14/11, pgs. 2 – 6.</p> <p>Joint Biomass Parties <i>Reply on the Phase 2 PD</i>, 05/21/11, pg.</p> | <p>Yes</p> |

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| <p>alternative funding sources might be tapped to provide compensation for the special benefits of biomass energy production. We pointed out that while that might sound attractive, more than a decade’s effort to do just that had yielded zero results. On the other hand, we pointed out that a parallel proceeding, R.11-03-012, was a potential source of the funds that would be needed for the proposed program, and the Phase 2 Decision affirms the desirability of this alternative.</p> | <p>3. The Phase 2 Decision states: “it might be wise for the state to consider a more diverse funding source beyond electricity ratepayers, such as the revenues anticipated from the cap and trade program of AB 32 ... (D.12-05-037, pg. 54).”</p> | |
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

| | Claimant | CPUC Verified |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <p>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</p> | Yes | Correct |
| <p>b. Were there other parties to the proceeding with positions similar to yours?</p> | Yes | Correct |
| <p>c. If so, provide name of other parties: SDG&E, PG&E, SCE, DRA, TURN, UCS, NRDC, Nature Conservancy, Sierra Club, Vote Solar Initiative, SEIA, California Farm Bureau, and Pacific Forest Trust.</p> | | Correct |
| <p>d. Claimant’s explanation as to how it coordinated with DRA and other parties to avoid duplication or how claimant’s participation supplemented, complemented, or contributed to that of another party:</p> <p>This proceeding covered a wide variety of topics related to the benefits of renewable energy, and how to secure them. The GPI focused its participation on its primary area of expertise, the benefits of biomass energy, and the biomass energy marketplace in California.</p> <p>The GPI coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission’s deliberations. In particular, we had discussions with UCS and other members of the joint environmental parties, and with other parties representing biomass-related interests, in developing our Comments on the EPIC staff proposal. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.</p> | | <p>GPI’s joint filings and timesheet entries support its claim of coordination with other parties to avoid duplication of effort.</p> |

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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

| a. Claimant’s explanation as to how the cost of Claimant’s participation bore a reasonable relationship with benefits realized through claimant’s participation | CPUC Verified |
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| <p>GPI made significant contributions to Decisions D.11-12-035 and D.12-05-037 by providing a series of Commission filings on the various topics under consideration in this proceeding and covered by this claim. GPI’s work was technical in nature, including documenting the history of the RPS program in California, and the performance of biomass within the program.</p> | <p>California has a long history of clean energy. Policy leadership and Research, Development and Deployment (RD&D) continues to be a core component of its success. While it is difficult to quantify the benefits of an improved RD&D Plan, there are important direct benefits that will accrue to Californians from improved technology that is expected to reduce the amount of energy Californians use. The benefits associated with bringing new technologies to market and integrating them into efficiency programs for customers will create jobs, save customers money on their energy bill, and help California achieve its aggressive</p> |
| <p>CPUC Comments:</p> <p>D.98-04-059 at 33-34 states that “participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation.” To demonstrate productivity, a customer must try to assign a reasonable dollar value to the benefits of its participation. Even benefits thought of as intangible may be so “monetized through appropriate proxies.” At 54, the decision states that “the customer should present its views and the Commission should evaluate them, and judge whether the participation is productive.” In cases where it is difficult to monetize intangible benefits, “just the same, an effort should be made. At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer’s participation will exceed a customer’s costs.”</p> <p>GPI failed to provide information sufficient enough to justify such a finding. Instead of reducing the claim, we elect instead to conduct our own independent review and conclude that, after reductions made to this claim, the remaining hours were productive. We caution GPI that future claims lacking a sufficient showing of productivity may be rejected or dramatically reduced.</p> | |

PROPOSED DECISION

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| | <p>environmental and energy policy mandates. Here, we find that GPI's compensated efforts were productive and will likely result in benefits to customers that will exceed GPI's award here..</p> |
| <p>b. Reasonableness of Hours Claimed.</p> | <p>CPUC Verified</p> |
| <p>The hours claimed herein in are reasonable given the scope of the proceeding, and according to GPI should be fully compensated.</p> | <p>After the reductions we make to this claim, the remaining hours and costs are reasonable and worthy of compensation.</p> |
| <p>c. Allocation of Hours by Issue</p> | <p>CPUC Verified</p> |
| <p>GPI allocates its time by major issue as follows:</p> <ul style="list-style-type: none"> 1. Continue collecting funds at current levels 20% 2. Biomass benefits at risk 7½% 3. Current state of the biomass market in California 30% 4. Discontinue the ERFPP 5% 5. Create a targeted biomass-fuels program 25% 6. Beneficiaries of biomass benefits, and alternative funding sources 12½% | <p>GPI has properly allocated its time by major issue as required by Rule 17.4.²</p> |

² See D.98-04-059 and D.85-08-012.

B. Specific Claim*:

| CLAIMED | | | | | | CPUC AWARD | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------|---------|--------------------|-----------|------------------------------------------|---------|----------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Rate Rationale | Total \$ | Hours | Rate \$ | Total \$ |
| G. Morris | 2011 | 77.0 | 240 | D.13-05-009 | 18,480 | 42.55 | 240 | 10,212 |
| G. Morris | 2012 | 79.5 | 240 | D.13-05-009 | 19,080 | 55.95 | 245 | 13,708 |
| V.Whiddon ³ | 2011 | 9.0 | 70 | D.13-05-009 | 630 | 9.0 | 70 | 630 |
| V.Whiddon | 2012 | 28.5 | 70 | D.13-05-009 | 1,995 | 17.25 | 70 | 1,208 |
| <i>Subtotal: \$40,185</i> | | | | | | <i>Subtotal: \$25,758</i> | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Rate Rationale | Total \$ | Hours | Rate | Total \$ |
| G. Morris | 2012 | 12.0 | 120 | ½ D.13-05-009 rate | 1,440 | 8.0 | 122.50 | 980 |
| <i>Subtotal: \$1,440</i> | | | | | | <i>Subtotal: \$980</i> | | |
| COSTS | | | | | | | | |
| Item | | | | | Amount \$ | Amount \$ | | |
| Postage | | | | | 62 | 62 | | |
| <i>Subtotal: \$62</i> | | | | | | <i>Subtotal: \$62</i> | | |
| TOTAL REQUEST: \$41,687 | | | | | | TOTAL AWARD: \$26,800⁴ | | |
| <p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are compensated at ½ of preparer's normal hourly rate.</p> | | | | | | | | |

³ Although Whiddon is listed as a consultant by GPI, her work here more closely resembles that of a paralegal. Whiddon's timesheets almost exclusively include work on "analyzing and summarizing the comments of other parties".

⁴ Rounded to nearest dollar increment.

C. CPUC Comments, Disallowances and Adjustments:

| Comments |
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| <p>At the onset of our review, we note that GPI's compensation request is the highest among 10 intervenors who participated in this proceeding and whom seek compensation. The average compensation request is \$12,905 (lowest \$6,320 and second highest is \$24,527.55). While we acknowledge that GPI filed joint comments with others where its interests were similar and we encourage this type of collaboration, our review of GPI's claim finds issues where: a substantial contribution was not made, where the requested hours to perform certain tasks are excessive and a minor area where internal duplication of effort occurred. We make reductions to GPI's claim to address these concerns.</p> |
| Lack of Substantial Contribution to Decision |
| <p>On page 4, we concluded that GPI did not make a substantial contribution on the issue of "Create Targeted Biomass-Fuels Program." The decision declined to include the targeted biomass-fuels program in the EPIC program. According to GPI, it spent 25% of its time on this issue. As such, we reduce GPI's request for compensation by 25%. To achieve this disallowance, we reduce Morris' 2011 hours by 21.7 hrs @ \$240/hr.= \$5,208 and reduce Morris' 2012 time by 21.3 hours @ \$245/hr.= \$5,219. We make no reductions to the hours of Whiddon since she was not involved in the substantive preparation of GPI's filings. The reductions equal \$10,427 or 25% of GPI's requested compensation.</p> |
| Internal Duplication of Effort |
| <p>GPI requests 5 hrs of Morris' 2011 hrs to "review other parties' comments on the PD and begin reply". This is duplicative of the compensated efforts of Whiddon.</p> |
| Excessive Hours |
| <p>GPI requests 4 hrs for Morris to "read and analyze the Order Instituting Rulemaking including questions for comment. Other intervenors log 1 hr. for this same task. We find that amount of time to be reasonable and reduce Morris' 2011 hrs by 3 hrs.</p> <p>GPI requests 3.5 hrs for Morris' attendance at the pre-hearing conference on 10/27/11. We reduce the 2011 hours of Morris by 2.25 hrs, equal to the same amount of time requested by other intervenors in attendance at the same event.</p> <p>GPI requests 5 hrs of Morris' 2011 hours to "read, review and analyze" the Proposed Decision on Phase I. We find 2.5 hrs sufficient to complete this task and equal to the time logged by other intervenors to complete this same work. To meet our expectations on the reasonableness of hours, we reduce Morris' 2011 hrs by 2.5 hrs.</p> <p>GPI requests 6.5 hrs of Morris' 2012 hours to "review ruling and staff proposal on Phase 2 and review and analyze EPIC staff proposal. We find this time to be excessive. Other intervenors performed this same task in 4.25 hrs. Under these circumstances, the disallowance of 2.25 hrs for this task is reasonable.</p> <p>GPI requests 13.5 hrs in 2012 for Whiddon to "analyze and summarize Comments on the Staff Proposal." And 9.0 hrs in 2012 for Whiddon to "analyze and summarize parties' comments and reply comments on the Proposed Decision." We reduce this time by 50%, reflecting a more reasonable</p> |

amount of time to receive compensations for these tasks.

Given the lack of complexity of GPI's request for compensation, 8 hrs of Morris' 2012 time should have been more than sufficient to have completed this task. We approve this allotment of time and disallow the remaining 4 hrs for excessiveness.

PART IV: OPPOSITIONS AND COMMENTS

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| A. Opposition: Did any party oppose the Claim? | No |
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| B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))? | No |
|----------------------------------------------------------------------------------------------|----|

FINDINGS OF FACT

1. Claimant has made a substantial contribution to Decisions (D.)11-12-035 and D.12-05-037.
2. The requested hourly rates for GPI's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed expenses are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$26,800.

CONCLUSION OF LAW

1. The Claim, with the adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. The Green Power Institute is awarded \$26,800.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall pay The Green Power Institute the total award. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall allocate payment responsibility among themselves based on their California-jurisdictional electric revenues for the 2011 calendar year, reflecting the year in which the proceeding was primarily litigated. 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 October 4, 2012, 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 not waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

| | | |
|---------------------------|------------------------------------------------------------------------------------------------------------|-----------------------|
| Compensation Decision: | | Modifies Decision? No |
| Contribution Decision(s): | D1112035 and D1205037 | |
| Proceeding: | R1110003 | |
| Author: | ALJ Division | |
| Payees: | Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company | |

Intervenor Information

| Intervenor | Claim Date | Amount Requested | Amount Awarded | Multiplier? | Reason Change/Disallowance |
|---------------------------|-------------------|-------------------------|-----------------------|--------------------|---------------------------------------------------------------------------------------|
| The Green Power Institute | 07-24-12 | \$41,687 | \$26,800 | No | lack of substantial contribution, excessive hours, and internal duplication of effort |

Advocate Information

| First Name | Last Name | Type | Intervenor | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|-------------------|------------------|-------------------------|---------------------------|-----------------------------|----------------------------------|---------------------------|
| Gregory | Morris | Expert | The Green Power Institute | \$240 | 2011 | \$240 |
| Gregory | Morris | Expert | The Green Power Institute | \$240 | 2012 | \$245 ⁵ |
| Venessia | Whiddon | Consultant ⁶ | The Green Power Institute | \$ 70 | 2011 | \$ 70 |
| Venessia | Whiddon | Consultant | The Green Power Institute | \$ 70 | 2012 | \$ 70 |

(END OF APPENDIX)

⁵ This rate includes the 2.2% cost-of-living increase authorized for 2012 intervenor work in Resolution ALJ-281.

⁶ Although Whiddon is listed as a consultant by GPI, her work here more closely resembles that of a paralegal. Whiddon's timesheets almost exclusively include work on "analyzing and summarizing the comments of other parties".