



**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

**FILED**  
12-11-15  
03:07 PM

December 11, 2015

**Agenda ID #14544**  
**Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 11-05-017 ET AL.:

This is the proposed decision of Administrative Law Judge Kim. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's January 14, 2016 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

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. Electronic and hard copies of comments should be sent to ALJ Kim at [kk2@cpuc.ca.gov](mailto:kk2@cpuc.ca.gov) and to the Intervenor Compensation Program at [[Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov)]. The current service list for this proceeding is available on the Commission's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov).

/s/ KAREN V. CLOPTON  
Karen V. Clopton, Chief  
Administrative Law Judge

KVC: avs  
Attachment

Decision **PROPOSED DECISION OF ALJ KIM** (Mailed 12/11/2015)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U338E) for Approval of its 2012-2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets.

Application 11-05-017  
(Filed May 16, 2011)

Application of Southern California Gas Company (U904G) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012-2014.

Application 11-05-018  
(Filed May 16, 2011)

Application of Pacific Gas and Electric Company for Approval of the 2012-2014 Energy Savings Assistance and California Alternate Rates for Energy Programs and Budget (U39M).

Application 11-05-019  
(Filed May 16, 2011)

Application of San Diego Gas & Electric Company (U902M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012-2014.

Application 11-05-020  
(Filed May 16, 2011)

**DECISION DENYING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR FAILURE TO MAKE A SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 14-08-030 AND D.12-12-011**

<b>Intervenor: Center for Accessible Technology (CforAT)</b>	<b>For contribution to Decision (D.) 14-08-030 and D.12-12-011</b>
<b>Claimed: \$73,122.92</b>	<b>Awarded: \$0.00</b>
<b>Assigned Commissioner: Catherine J.K. Sandoval</b>	<b>Assigned ALJ: Kimberly Kim</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	<p>D.14-08-030 (the Phase 2 Decision) resolves and/or continues the review of several pending Phase II issues, resolves several pending petitions for modification of D.12-08-044, authorizes bridge funding for the IOUs<sup>1</sup>, ESA<sup>2</sup> and CARE<sup>3</sup> Programs, authorizes continued funding for the CHANGES<sup>4</sup> pilot program, provides guidance to the IOUs in preparation of their 2015-2017 CARE and ESA Programs and Budget Applications, directs the IOUs to file their 2015-2017 applications within 90 days of issuance of this decision, and makes minor corrections and clarifications to D.12-08-044.</p> <p>D.12-12-011 (the CHANGES decision) continued funding for the CHANGES program.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	August 8, 2011	Verified.
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	September 7, 2011	Verified.
4. Was the NOI timely filed?		Yes, CforAT timely filed the notice of intent to claim intervenor compensation.
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.11-05-017 et al.	Verified.
6. Date of ALJ ruling:	October 20, 2011	Verified.
7. Based on another CPUC determination	N/A	

<sup>1</sup> Investor Owned Utilities’.

<sup>2</sup> Energy Savings Assistance.

<sup>3</sup> California Alternate Rates for Energy.

<sup>4</sup> Community Help and Awareness with Natural Gas and Electricity Services.

(specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, CforAT demonstrated status as a Category 3 customer.
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.11-05-017	Verified.
10. Date of ALJ ruling:	October 20, 2011	Verified.
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes, CforAT demonstrated significant financial hardship.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.14-08-030	Verified.
14. Date of issuance of Final Order or Decision:	August 20, 2014	Verified.
15. File date of compensation request:	10/20/14	10/21/2014
16. Was the request for compensation timely?		No. CforAT did not timely file the request for compensation and no compensation will be awarded for this claim.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
1. <b>Eligibility Issues:</b> Subsequent to the Phase 1 Decision in this proceeding, two key issues regarding consumer eligibility for CARE emerged, requiring substantial		Because CforAT did not timely file the request for compensation, the Commission did not assess the alleged

<p>attention from CforAT and other consumer groups to preserve enrollment opportunities and program retention for low-income consumers. These two key issues were categorical eligibility for CARE (CE), and questions regarding post-enrollment verification (PEV).</p>		<p>substantial contributions of the Intervenor.</p>
<p><b>Eligibility: CE</b></p> <p>The Phase 1 Decision in this proceeding required the IOUs to file an advice letter addressing benefit programs whose eligibility requirements align sufficiently with CARE to use as an alternative to income-based enrollment. The IOUs filed a join advice letter proposing to significantly reduce the number qualifying programs.</p> <p>Many people with disabilities participate in a variety of public benefit programs, making categorical eligibility a simple and effective means for such customers to demonstrate eligibility for CARE. Because of the importance of CE for our constituency, CforAT was deeply concerned about efforts to limit its utility. In response to the IOU's proposal to substantially reduce the number of qualifying programs, CforAT worked with other consumer groups to protest the advice letter and pursue a Commission resolution to the policy questions raised by IOU's</p>	<p>CforAT's written submissions regarding CE include participation in a joint protest of PG&amp;E Advice Letter 3340-G/4136-E (Revised CARE Program Re-Certification Application for Residential Single-Family Customers), submitted on November 29, 2012 and a further protest of a joint letter from the IOUs issued on January 31, 2013 identifying a dramatically reduced list of programs for categorical eligibility. The consumer protest of the joint advice letter was submitted on February 20, 2013.</p> <p>The consumer protests resulted in a suspension of the joint advice letter on February 28, 2013, and further proceedings by the Commission, including a discussion at the Low Income Oversight Board Meeting on February 27, 2013, a further joint letter from the consumer groups addressing key policy issues raised by the IOUs' efforts to restrict CE, and arguing for a resolution of issues at the Commission level rather than the staff level due to the non-ministerial nature of the proposed changes to the program.</p> <p>While this issue was pending, the Commission declined to change any CE requirements for 2013-2014 in its annual income guideline letter, issued on March 29, 2013 and then</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not assess the alleged substantial contributions of the Intervenor.</p>

<p>proposal. This included multiple sets of written comments, participation in an all-party meeting and additional ex parte meetings, and other activity conducted in a coordinated manner with ORA, TURN and Greenlining. CforAT was active with other consumers in developing all aspects of the strategy and in producing materials in opposition to efforts to limit CE, as detailed in our time records.</p> <p>As this issue was developed, CforAT worked closely in coordination with other consumer groups to address the IOUs' proposals comprehensively, but efficiently.</p>	<p>subsequently rejected the joint IOU letter on May 1, 2013. An All-Party meeting was then held on May 16, 2013, with questions provided to the parties in advance. CforAT coordinated with the other consumer groups to address the issues presented for the all-party meeting.</p> <p>On February 25, 2014, an Assigned Commissioner's Ruling requesting further input from parties on CE was issued (no changes were made to the existing list of CE programs during the delay). CforAT worked closely with the other consumer groups to provide a detailed response.</p> <p>The Phase 2 Decision briefly recounts this history, notes that the issues as developed by the parties are complex, and refers questions regarding categorical eligibility to the upcoming 2015-2017 program cycle proceeding. Phase 2 Decision at pp. 69-71. At the same time, the Phase 2 Decision clearly directs the IOUs to make no changes to the existing list of qualifying programs until the Commission takes further action, and notes (consistent with consumer requests) that housing subsidies should not be counted as income. <i>Id.</i> at p. 71. While these actions are do not bring the issues surrounding categorical eligibility to a conclusion, they mark a substantial contribution by consumers, including CforAT, because the consumer groups prevented the attempt by the IOUs to use the ministerial proceedings authorized by the Phase 1 Decision to make substantial changes to the program, preserved the status quo, and developed a record to ensure that the Commission is aware of the complexities surrounding the issue.</p> <p>The fact that this work, and these</p>	
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	<p>results, were achieved in direct response to issues raised by the IOUs (in advice letters required by the Phase 1 Decision) and the Commission (via the ACR requesting party input) means that the work was appropriately conducted within the scope of this proceeding, making compensation appropriate at this time.</p>	
<p><b>Eligibility: PEV &amp; Other Eligibility Issues</b></p> <p>In September of 2013, as required by the Phase 1 Decision, the IOUs set forth proposals for use of post-enrollment verification models (PEV) to validate customer eligibility for CARE by targeting those customers who were determined by use of various algorithms to be less likely to be appropriately enrolled. CforAT worked with other consumer groups to evaluate the proposed models and ensure that they did not overburden customers who were appropriately enrolled in CARE.</p> <p>Additionally, throughout Phase 2 of this proceeding and as reflected in CforAT’s time records, CforAT closely monitored activity that would potentially impact CARE eligibility due to the importance of the CARE program for our constituency. Examples of other items reflected in CforAT’s time records regarding eligibility matters include close review of the IOUs’ income-limit adjustments (see e.g. time entries on 12/4/13, 12/5/13,</p>	<p>While CforAT’s oversight of eligibility issues other than CE is not directly reflected in the Phase 2 Decision, our work in conjunction with the work of other parties to effectively implement the policy decisions on eligibility adopted in Phase 1 are well documented in the time records submitted and are appropriate for compensation.</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not assess the alleged substantial contributions of the Intervenor.</p> <p>Additionally, simply conducting research on issues, and documenting the action in time records, does <u>not</u> offer support for substantial contribution.</p>

<p>and 4/1/14), concerns about revisions to application forms and availability of forms in local offices (see e.g. time entries on 11/22/13, 11/27/13, 12/2/13, 4/8/14, 4/30/14), and other similar matters throughout this phase of the proceeding.</p>		
<p><b>2. LINA:</b> CforAT, in conjunction with the Greenlining Institute, took the lead in efforts to ensure that the new Low-Income Needs Assessment ordered in Phase 1 of this proceeding was properly and timely conducted and issued. CforAT opposed delay in issuing the LINA, worked to ensure that the record was clear on how the delay that was permitted came to pass, and worked to ensure that the results of the LINA were understandable and useful. CforAT also took the lead in ensuring that the Commission formally adopted the LINA to avoid any disputes about its authority as evidence in other Commission proceedings.</p>	<p>See Center for Accessible Technology’s Motion to Correct the Record, filed on October 9, 2013 for a summary of CforAT’s concerns about the timely release of the LINA and our efforts to oppose delay and ensure that the record was clear.</p> <p>See matrix of changes provided with the final LINA showing responses to substantive input from CforAT after release of the initial study draft.</p> <p>In addition to our earlier work on the LINA, CforAT was the primary consumer organization to address the LINA in both opening and reply comments on both the PD and the AD, primarily to urge that the study be formally adopted by the Commission. CforAT Comments on PD at pp. 2-5, CforAT Reply Comments on PD at p. 4; CforAT Comments on AD at pp. 3-5; CforAT Reply Comments on AD at pp. 2-3.</p> <p>While not citing the input of CforAT, the Phase 2 Final Decision expressly adopts the 2013 LINA, consistent with CforAT’s recommendations. Phase 2 Final Decision at p. 57; see also Phase 2 Final Decision at p. 102 (COL 41) and p. 118 (Ordering Paragraph 34).</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not assess the alleged substantial contributions of the Intervenor.</p>
<p><b>3. CHANGES:</b> CforAT closely followed activity around the CHANGES program to ensure that it</p>	<p>CforAT supported continued funding for the CHANGES program through the 2012-2014 low-income program cycle, and opposed efforts by the IOUs to take direct responsibility to administer the</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not</p>

<p>allows inclusion of disability-related CBOs and to support its ongoing viability.</p>	<p>program directly. <i>See</i> Reply Comments on the CHANGES PD filed jointly by TURN, CforAT, DRA, and the Greenlining Institute on December 17, 2012 at pp. 1-2 and CHANGES Decision at pp.36-42. <i>See</i> also Phase 2 Decision at pp. 81 (further extending the program into the 2015-2017 program cycle) and CforAT’s Reply Comments on AD at p. 3 (in support of the extension of CHANGES).</p>	<p>assess the alleged substantial contributions of the Intervenor.</p>
<p><b>4. Other Implementation Issues:</b> CforAT monitored work in Phase 2 to implement various orders from Phase 1, including various reports, workshops, and other activity. Where appropriate, CforAT participated in these efforts to support effective program implementation for our constituency. For example, while CforAT was not as active as other parties in efforts such as review of ESAP measures (including cost-effectiveness), energy education, multi-family issues, or the mid-cycle working group, we reviewed activity in each of these program areas and made contributions to maximize effectiveness for people with disabilities.</p>	<p>CforAT’s contributions to the various implementation issues are noted in our time records (including participation in scheduled workshops and input on draft reports); <i>see also</i> CforAT’s Opening Comments on PD at p. 5; CforAT’s Reply Comments on PD at pp. 2-3; and CforAT’s Opening Comments on AD at pp. 5-6 reflecting CforAT’s coordination with other parties and support for effective resolution of concerns regarding various implementation issues. .</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not assess the alleged substantial contributions of the Intervenor.</p>

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

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b> <sup>5</sup>	<b>Yes</b>	<b>Yes.</b>
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	<b>Yes</b>	<b>Yes.</b>
<p><b>c. If so, provide name of other parties:</b></p> <p>On virtually all issues where CforAT actively participated, we had similar positions to ORA, TURN, Greenlining Institute. While CforAT was less active on other issues, including most Phase 2 issues regarding ESAP, we frequently supported the position of other groups on matters such as multi-family issues, energy education, and other items that would impact our constituency. In addition to the groups identified above, CforAT also took similar positions to the National Consumer Law Center (NCLC) and the other housing groups focused on multi-family issues.</p>		<b>Verified.</b>
<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>CforAT closely coordinated with other intervenors on Phase 2 issues.</p> <p>On the various eligibility issues, including categorical eligibility and post-enrollment verification, the consumer groups all worked together to develop and implement a strategy to address the IOU efforts to substantially reduce the reach of program-based enrollment opportunities. CforAT was involved in all aspects of the work on CE in response to the IOUs’ Advice Letter submissions and the ACR on this issue; however, in order to avoid duplication, CforAT coordinated with other consumer groups in comments on the PD and AD regarding this issue, and supported the work by those parties rather than writing separately.</p> <p>On the issue of the importance of the LINA, CforAT worked most closely with the Greenlining Institute, which is the other intervenor organization most directly focused on vulnerable consumers, but also sought to coordinate with all consumer groups to the extent appropriate. Again, as an example, this is an issue where CforAT took the lead in comments on the PD and AD, while coordinating with other consumer groups that supported the same outcome.</p> <p>These issues, plus oversight of the CHANGES program, were of most direct concern to CforAT, and were the issues where CforAT took a very active role. Other implementation issues, including energy education, multi-family</p>		Because CforAT did not timely file the request for compensation, the Commission did not assess Intervenor’s claim of non-duplication.

<sup>5</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>eligibility/participation in ESAP, the mid-cycle working group process, and others, were also significant for CforAT’s constituency, and we appropriately monitored and participated in efforts concerning this issues through Phase 2. At the same time, other consumer groups were more focused on these issues than CforAT. Because of this, we were able to limit our efforts to coordinating with the most active parties, providing input as appropriate, and avoiding duplication of effort. For example, CforAT deferred to the active multi-family groups on most issues concerning that aspect of implementation, but provided input on the multi-family study to the extent that it impacts people with disabilities. Similarly, CforAT did not take the lead on energy education issues, but participated to ensure that any energy education efforts implemented would be conducted in a manner that is accessible to people with disabilities who cannot use standard forms of communication.</p>	
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**C. Additional Comments on Part II:**

#	Intervenor’s Comment	CPUC Discussion
	<p>To the extent that the Commission declines to award compensation for work done by consumer groups including CforAT on the issue of categorical eligibility because questions raised in this proceeding have been referred to the next application cycle, CforAT requests that the Commission state clearly that parties are authorized to resubmit time spent in this proceeding with further efforts that we anticipate will be conducted in the next-cycle application process.</p> <p>Commission precedent allows compensation to be awarded when there is no final decision on the merits if work was within the scope of a matter when it was conducted and the party performing the work did not cause (and could not have</p>	<p>As evaluated in the forthcoming decision awarding intervenor compensation to TURN in the present proceeding, compensation requests concerning categorical eligibility are appropriate in A.11-05-017. The Commission will not compensate CforAT if the intervenor requests compensation on this issue in a future proceeding.</p>

<p>predicted) the conclusion of the proceeding without a substantive result. <i>See e.g.</i> D.12-08-025 (specifically authorizing consumer groups to request compensation for work in a merger proceeding after the proceeding was rendered moot upon a request by the applicants to withdraw the Application). Thus, CforAT reiterates our request for compensation to be awarded now for work on categorical eligibility. However, to the extent that the Commission defers any award of compensation, it should ensure that time already appropriately spent on this issue remains eligible for eventual compensation.</p>	
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**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>While it is difficult to assign a dollar value to the benefit provided to CforAT’s constituency from this decision, there is no dispute that the CARE and ESAP programs are extremely significant for IOU customers with disabilities. In working to ensure that the Commission’s policy decisions regarding these programs are implemented effectively, that eligibility options remain open, and that appropriate data on low-income households is collected and used for future policy-making decisions reflecting the needs of our constituency, CforAT obtains benefits for all low-income customers with disabilities that none could obtain acting individually. In particular, preserving categorical eligibility for low-income households, including eligibility based on programs that serve many low income people with disabilities, ensures their ability to obtain or retain CARE discounts with a value far beyond CforAT’s costs of participation. Other benefits that are harder to quantify also preserve the low-income programs’ accessibility and usefulness for people with disabilities.</p>	<p><b><u>CPUC Discussion</u></b></p> <p>Because CforAT did not timely file the request for compensation, the Commission did not assess the claims of cost reasonableness.</p>
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<p><b>b. Reasonableness of hours claimed:</b></p> <p>As noted above, CforAT worked closely with other consumers on issues where our interests aligned, allowing us to allocate tasks and produce input for the record jointly in order to maintain efficiencies. CforAT also selectively focused on issues of importance to our constituency, with focused attention on key issues such as categorical eligibility and the LINA, and input at optimized times on other implementation issues.</p> <p>In order to coordinate effectively with other parties, CforAT necessarily and reasonably spent time on coordination efforts, as well as time reviewing and editing draft documents prepared by other parties. In some circumstances, CforAT was the lead in drafting, while in others our role was primarily to develop and enhance the coordinated output. These efforts are necessary to allow for effective coordination and cooperation, and promote overall efficiencies for parties, the Commission, and for ratepayers. Thus the Commission should not penalize cooperating parties by denying compensation for time reasonably spent to ensure effective coordination on positions, strategies and documents.</p>	<p>Because CforAT did not timely file the request for compensation, the Commission did not assess the reasonableness of the hours claimed.</p>
<p><b>c. Allocation of hours by issue:</b></p> <p>CforAT’s time records are allocated into the following issues:</p> <p>Eligibility: This issue category includes time spent on the issue of Categorical Eligibility, Post-Enrollment Verification, and other matters that came up during Phase 2 of this proceeding impacting consumer eligibility for CARE.</p> <p>Low Income Needs Assessment (LINA): This issue category includes time spent addressing the Low-Income Needs Assessment.</p> <p>CHANGES: This issue category includes time spent addressing the CHANGES program.</p> <p>Implementation: This issue includes time spent addressing other substantive Phase 2 issues in which CforAT did not take a lead role, but rather monitored and offered input as appropriate to protect the interests of our constituency. This issue category includes review and input on energy education, multi-family work, the mid-cycle working group’s efforts, ESAP measures (including cost-effectiveness), and other mandated activity from Phase 1. In addition, all time addressing the Phase 2 PD is included as “Implementation,” though CforAT’s comments and active participation reflected substantially the other separately identified issues on which we were active such as eligibility and the LINA. These entries are all categorized as “implementation” because it is not possible to subdivide</p>	<p>Verified.</p>

them into the separate issues.

General Participation (GP): This issue includes time spent on general activity in the proceeding not directly related to implementation of Phase 1 obligations, such as reviewing filings and participating in activities related to the upcoming next-cycle application process.

The annual breakdown of CforAT's time by issue is as follows:

**2012 Time (9.8 hours total):**

CHANGES:	4.3 hours (44%)
Eligibility:	3.6 hours (37%)
GP:	1.1 hours (11%)
Implementation:	0.1 hours (8%)

**2013 Time (88.9 hours total):**

CHANGES:	0.1 hours (<1%)
Eligibility:	28.3 hours (32%)
GP:	1.0 hours (1%)
Implementation:	25.8 hours (29%)
LINA:	33.7 hours (38%)

**2014 Time (60.8 hours total):**

CHANGES:	0.1 hours (<1%)
Eligibility:	20.0 hours (33%)
GP:	6.8 hours (11%)
Implementation:	32.8 hours (54%)
LINA:	1.1 hours (2%)

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours [1]	Rate \$	Total \$
Melissa W. Kasnitz	2012	9.8	\$430	D.13-04-008	\$4,214	00.00	\$00.00	\$00.00
Melissa W. Kasnitz	2013	88.9	\$440	D.13-11-007	\$39,116	00.00	\$00.00	\$00.00
Melissa W. Kasnitz	2014	60.8	\$450	See below	\$27,360	00.00	\$00.00	\$00.00
<b>Subtotal: \$ 70,690.00</b>						<b>Subtotal: \$59,803.00</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2014	10.5	\$225	½ standard rates	\$2,362.50	00.00	\$00.00	\$00.00
<b>Subtotal: \$2,362.50</b>						<b>Subtotal: \$00.00</b>		
COSTS								
#	Item	Detail			Amount	Amount \$		
	Postage	See attached expense report			\$32.52	\$00.00		
	Printing/copying	See attached expense report and comment below			\$109.50	\$00.00		
	Transportation	See attached expense report			\$28.40	\$00.00		
		<b>Subtotal:</b>			<b>\$170.42</b>	<b>Subtotal: \$00.00</b>		
<b>TOTAL REQUEST: \$73,122.92</b>						<b>TOTAL AWARD: \$00.00</b>		
<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. Intervenor’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 typically compensated at ½ of preparer’s normal hourly rate</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR <sup>6</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	December 1992	162679	No, but Kasnitz was inactive from 1/1/1993 until 1/25/1995 and from 1/1/1996 until 2/19/1997.

### C. Intervenor's Comments on Part III

Comment #	Intervenor's Comment(s)
1	<b>Justification for 2014 Rate – Melissa W. Kasnitz:</b> As noted above, Ms Kasnitz's approved rate for 2013 is \$440 per hour. No COLA or other rate adjustment has yet been authorized for 2014. However, if a 2% COLA, consistent with what was authorized for 2013, is eventually approved, the appropriate adjustment would result in a rate of \$450 for 2014. To the extent that a different rate adjustment is eventually authorized, CforAT requests that the adopted adjustment be applied in place of this estimate. CforAT has requested a 2014 rate of \$450 for Ms. Kasnitz in multiple other pending compensation requests in other proceedings, but no decision has yet issued authorizing such rate.
2	<b>Printing/Copying Expenses:</b> CforAT absorbs most printing/copying costs as overhead expenses. However, as a small nonprofit, we do not have printers/copiers capable of easily producing large documents. In order to obtain necessary large documents effectively, CforAT has arranged with another nonprofit, Disability Rights Education and Defense Fund (DREDF) to use their high-capacity printer/copier for production of selected large documents, for which DREDF charges CforAT at its regular rate (approved by various courts) of \$0.25 per page. In this case, CforAT printed the draft LINA, the PD and the AD for close review.

<sup>6</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

**D. CPUC Disallowances and Adjustments:**

Item	Reason
[1]	Because CforAT did not file the request for compensation within 60 days, as required by Pub. Util. Code § 1804(c) of the Public Utilities Commission, the Commission cannot compensate the Intervenor.

**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))**

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

If not:

Party	Comment	CPUC Discussion

**FINDINGS OF FACT**

1. Pub. Util. Code § 1804(c) requires intervenors to file requests for awards within 60 days following issuance of a fund decision.
2. CforAT filed its request for compensation to 62 days after the issuance of D.14-08-030.
3. No hourly rates are set in today’s decision.

**CONCLUSION OF LAW**

1. The Claim fails to satisfy all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. Center for Accessible Technology's claim for compensation for its participation in this proceeding is denied.
2. Center for Accessible Technology shall not request compensation for any work performed in this proceeding as part of a future compensation request in a different proceeding.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1212011, D1408030		
<b>Proceeding(s):</b>	A1105017 et al.		
<b>Author:</b>	ALJ Kim		
<b>Payer(s):</b>	Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric, and Southern California Gas Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Center for Accessible Technology	10/20/2014	\$73,122.92	\$00.00	N/A	<i>Did not timely file request for compensation</i>

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Melissa	Kasnitz	Attorney	CforAT	\$430.00	2012	N/A
Melissa	Kasnitz	Attorney	CforAT	\$440.00	2013	N/A
Melissa	Kasnitz	Attorney	CforAT	\$450.00	2014	N/A

**(END OF APPENDIX)**