



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning Framework
and to Coordinate and Refine Long-Term
Procurement Planning Requirements.

Rulemaking 16-02-007
(Filed February 11, 2016)

**MOTION OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE
FOR LEAVE TO FILE A NOTICE OF INTENT
TO CLAIM INTERVENOR COMPENSATION**

June 2, 2016

Shana Lazerow
Communities for a Better Environment
120 Broadway, Suite 2
Richmond, CA 94804
tel: 510-302-0430 fax: 510-302-0438
slazerow@cbeal.org

**MOTION OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE
FOR LEAVE TO FILE A NOTICE OF INTENT
TO CLAIM INTERVENOR COMPENSATION**

The California Environmental Justice Alliance (“CEJA”) hereby respectfully requests leave to file a Notice of Intent to Claim Intervenor Compensation for its participation in the above-captioned proceeding. The Order Instituting Rulemaking (“OIR”) for this proceeding provided that “Parties who were previously found eligible to request compensation in R.13-12-010 shall remain eligible in this proceeding and do not need to file an NOI within 30 days, provided there are no material changes in their by-laws or financial status.”¹ By ALJ order issued October 17, 2013, CEJA was found eligible in R.13-12-010. Since that time, CEJA has not seen any material changes to its by-laws or financial status. For these reasons, and in reliance on the OIR, CEJA did not file an NOI within 30 days of the April 26, 2016 prehearing conference.

On May 26, 2016, 30 days after the prehearing conference, the Scoping Ruling was issued.² The Scoping Ruling did not reiterate the OIR’s instructions related to NOI. Therefore, in an abundance of caution, CEJA is now requesting leave to file the attached NOI, based upon its previous reliance on the instructions in the OIR. Furthermore, to the extent that the May 26, 2016 Scoping Memo changed the instructions related to the NOI, CEJA timely files this NOI pursuant to CPUC Rules of Practice and Procedure, Rule 17.1(b), allowing parties to file an amended NOI within 15 days after the issuance of the scoping memo.

June 2, 2016

/s/

Shana Lazerow
Communities for a Better Environment
120 Broadway, Suite 2
Richmond, CA 94804
tel: 510-302-0430 fax: 510-302-0438
slazerow@cbeocal.org

¹ OIR, at pp. 34-35.

² See Joint Scoping Memo and Ruling.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements.	R.16-02-007 (Filed February 11, 2016)
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and []¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE'S
SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

NOTE: After electronically filing a PDF copy of this Notice of Intent (NOI), please email the document in an MS WORD format to the Intervenor Compensation Program Coordinator at lcompcoordinator@cpuc.ca.gov.

Customer CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE	
Assigned Commissioner: Liane Randolph	Administrative Law Judge: Julie A. Fitch
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent (NOI) is true to my best knowledge, information and belief.	
Signature:	/s/ Shana Lazerow
Date: June 2, 2016	Printed Name: Shana Lazerow

**PART I: PROCEDURAL ISSUES
(To be completed by the party (“customer”) intending to claim intervenor compensation)**

A. Status as “customer” (see Pub. Util. Code § 1802(b)): The party claims “customer” status because the party is (check one):	Applies (check)
1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. In addition to describing your own interest in the proceeding you must show how your participation goes beyond just your own self-interest and will benefit other customers.	<input type="checkbox"/>

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

<p>2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.</p> <p>A representative authorized by a customer must identify the residential customer(s) being represented and provide authorization from at least one customer. <i>See</i> D.98-04-059 at 30.</p>	<input type="checkbox"/>
<p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation.² Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. <i>See</i> D.98-04-059, footnote at 3.</p>	<input checked="" type="checkbox"/>
<p>The party’s explanation of its customer status must include the percentage of the intervenors members who are residential ratepayers or the percentage of the intervenors members who are customers receiving bundled electric service from an electrical corporation, and must include supporting documentation: (i.e., articles of incorporation or bylaws).</p> <p>The California Environmental Justice Alliance (CEJA) is an alliance of grassroots environmental justice organizations situated throughout California. The core members of CEJA are: Asian Pacific Environmental Network (APEN), the Center for Community Action and Environmental Justice (CCA EJ), Center on Race, Poverty & the Environment (CRPE), Communities for a Better Environment (CBE), Environmental Health Coalition (EHC), and People Organizing to Demand Environmental and Economic Justice (PODER). CEJA has brought together these organizations to impact and change policy decisions throughout the state. Together, the member organizations of CEJA work to achieve environmental justice for low-income communities and communities of color throughout California. In particular, CEJA is “pushing for policies at the federal, state, regional and local levels that protect public health and the environment.” CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color. One of CEJA’s primary initiatives is its Climate Justice and Local Renewable Energy initiative, which aims to transform California’s energy system into “one that is just, democratic, equitable, and composed of genuinely clean energy.” To accomplish this transformation, CEJA</p>	

² Intervenors representing either a group of residential customers or small commercial customers who receive bundled electric service from an electrical corporation, must indicate in Part I, Section A, Item #4 of this form, the percentage of their members who are residential customers or the percentage of their members who receive bundled electric service from an electrical corporation. The NOI may be rejected if this information is omitted.

works to bring locally produced clean energy to environmental justice communities, thereby putting energy production in their own hands, providing green jobs, and reducing local health and environmental impacts by displacing older and dirtier pollution sources. In 2012, CEJA ran a “Solar for All” campaign (AB 1990) that would have created small-scale clean energy projects in low-income communities and communities of color. Additionally, CEJA secured critical language in the Renewable Portfolio Standard of 2011 and at the California Energy Commission that ensures a focus on environmental justice communities. As part of its Climate Justice and Local Renewable Energy initiative, CEJA helped pass SB 43 in 2013, a bill to help build more renewable energy in environmental justice communities, and was a party to the Commission proceeding to implement SB 43 (consolidated applications A.12-01-008 and A.12-04-020). CEJA was an active participant in the Long Term Procurement Proceeding (R. 13-12-010). CEJA is participating in the Net Metering AB 327 (R.14-07-002) proceeding, to ensure that programs for disadvantaged communities are fully developed pursuant to AB 327 and to ensure that these environmental justice communities are thoughtfully considered in this proceeding. Most recently, CEJA was found to be eligible for intervenor compensation in proceeding A.14-11-016. In the Administrative Law Judge’s (ALJ’s) ruling dated March 24, 2015, ALJ DeAngelis found that CEJA met the eligibility requirements of Public Utilities Code Section 1804 based on CEJA’s status as a Category 3 customer. In A.14-11-016, CEJA qualified as a Category 3 customer under Section 1802(b)(1)(C) of the Public Utilities Code because each of its member organizations qualifies as a Category 3 customer. In D.98-04-059 (Intervenor Compensation Order), the Commission explained that:

[w]ith respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. (D.88-04-066, mimeo at 3.) They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example.

As described herein, CEJA represents organizations whose members live in environmental justice communities and are customers that share a concern for the environment. The concerns of these members distinguish their interests from Commission staff and other California ratepayers participating in this matter.

Together, the member organizations of CEJA are working to achieve environmental justice for low-income communities and communities of color throughout the state of California. In particular, CEJA is “pushing for policies at the federal, state, regional and local levels that protect public health and the environment.” CEJA’s organizations represent utility customers throughout California that are concerned about their health and the environment. The core member organizations of CEJA are: Asian Pacific Environmental Network, The

Center for Community Action and Environmental Justice, Center on Race, Poverty & the Environment, Communities for a Better Environment, Environmental Health Coalition, and People Organizing to Demand Environmental and Economic Justice. Each of these organizations qualifies as a Category 3 customer. Pursuant to Rule 17.1(d), a true and correct copy of each of these organizations' articles of incorporation and bylaws were attached to CEJA's Notice of Intent to Claim Intervenor Compensation in A.11-05-023 filed on February 29, 2012 and deemed eligible for intervenor compensation by the assigned ALJ on April 23, 2012. The bylaws and the financial status of each of the members have not changed.

CEJA CORE MEMBERS:

Asian Pacific Environmental Network (APEN) - APEN is a non-profit environmental justice organization that focuses on Asian and Pacific Islander environmental and social justice issues through community organizing, policy initiatives, and civic engagement. APEN is based in California and seeks environmental justice for all people but focuses its work with Asian and Pacific Islander communities that are also located in California. The majority of APEN's approximately 800 members live in California. APEN is a category 3 customer due to its representation of ratepayers with environmental concerns in Asian and Pacific Islander communities in California. APEN's policy planks include equitable implementation of AB32, geographic targeting of EJ priority areas, increased penetration of Distributed Generation in EJ communities, promotion of Climate / Green Jobs and economic development, community choice energy, renewable energy and energy efficiency financing, and limiting dirty crude oil imports. For example, during the past several years, APEN has worked on the Oakland Energy and Climate Action Plan and the Richmond General Plan.

Communities for a Better Environment (CBE) - CBE's mission is to achieve environmental health and justice by building grassroots power in and with communities of color and working-class communities. CBE has participated independently from CEJA in proceedings before the Commission on previous occasions; including: A.09-04-001, A.09-09-021, R.10-05-006 and A.13-11-006. CBE was determined eligible to receive, and did in fact receive, intervenor compensation in R.10-05-006.¹² CBE's bylaws provide that:

the mission of the organization is to conduct 'education, research, litigation, fundraising and advocacy . . . promoting the protection of the environment and public health . . . the organization and its members have engaged in research, advocacy and litigation specifically directed at securing "cost effective conservation measures and discourag[ing] unnecessary new generating resources that are expensive and environmentally damaging.

CBE has thousands of members throughout the state of California. More than 2,700 of CBE's members live, work, or engage with environmental justice issues in urban

communities in Northern and Southern California. Additionally, CBE and the California Environmental Justice Alliance were central to the creation of the Solar For All (AB1990) that would have created a pilot project to create 375 megawatts of local renewable energy—enough to power about 70,000 homes. The legislation would have also included local hiring programs in environmental justice communities, creating clean energy AND good jobs—a model of climate justice. CBE is a category 3 customer due to its representation of ratepayers with environmental concerns in low-income communities of color in California.

The Center for Community Action and Environmental Justice (CCA EJ) -

CCA EJ is a non-profit organization that provides leadership training and skills development programs to educate and empower the community. CCA EJ's mission is to organize local leadership and to build a base of community power to improve the social and natural environment. CCA EJ has worked on creating solutions for high pollution levels and land use problems in Latino communities in California. CCA EJ's bylaws provide that it will “work within communities to develop and sustain democratically based, participatory decision-making that promote involvement of a diverse segment of the community in ways that empower and create safe, healthy, toxic free places to live, work, learn and play.” CCA EJ is a category 3 customer due to its representation of ratepayers with environmental concerns in communities in California. The majority of CCA EJ's approximately 5,400 members reside in California.

Center on Race, Poverty & the Environment (CRPE) -

CRPE is an environmental justice organization that provides organizing, technical and legal assistance to communities. CRPE works with low-income communities and communities of color that are fighting environmental hazards. CRPE's Articles of Incorporation provide that the purpose of the organization is: “to perform advocacy on behalf of low-income communities and communities of color to address environmental hazards faced by those communities and to build the capacity of those communities to protect themselves from environmental hazards.” CRPE is focused on five main campaigns: Civil Rights, Clean Air, Climate Justice, Green and Just Economic Development, and Waste. CRPE is based in California and has approximately 500 members, the majority of whom reside in California. CRPE is a category 3 customer due to its representation of ratepayers with environmental concerns in low-income communities of color in California. CRPE is based in California and has approximately 500 members, the majority of whom reside in California. CRPE is a category 3 customer due to its representation of ratepayers with environmental concerns in low-income communities of color in California.

Environmental Health Coalition (EHC) -

EHC is a non-profit organization that is a member and the fiscal sponsor of CEJA. EHC operates in the San Diego area representing San Diego area ratepayers and environmental interests. EHC has approximately 3,950 members in its organization, most of whom reside in the San Diego area and are SDG&E customers. As a prior ruling already acknowledged,

<p>EHC brings a “wealth of experience” to a Commission proceeding. EHC’s bylaws provide that its purpose is:</p> <p>[t]o integrate the work of all groups that are concerned with environmental and occupational causes of disease in the health care system; [t]o generate public discussion on the environment and occupational causes of disease; [and] public discussion on the environment and occupational causes of disease.</p> <p>EHC’s Green Energy and Green Jobs Campaign aims to reduce energy use, maximize local, small scale clean energy generation and create high-quality, career-track jobs in the area’s disadvantaged and heavily impacted communities. EHC is also committed to creating a home retrofit industry to meet GHG reduction goals and create employment. EHC is committed to pursuing pilot programs that push the policy envelope and increase awareness of energy use in buildings. EHC has also done in home peer-to-peer education programs for HUD’s Healthy Homes Program, SDG&E’s Smart Meter Program, and the City of San Diego’s Home Energy Retrofit program. EHC’s work related to communities and reduction of toxics is furthered by its fiscal sponsorship of CEJA. EHC is a category 3 customer due to its representation of ratepayers with environmental concerns in San Diego.</p>	
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Identify all attached documents in Part IV.

Do you have any direct economic interest in outcomes of the proceeding?³

Yes: No:

If “Yes”, explain:

B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C. Timely Filing of Notice of Intent (NOI) (§ 1804(a)(1)):	Check
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: Click here to enter a date.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

³ See Rule 17.1(e).

<p>2. Is the party's NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>2a. The party's description of the reasons for filing its NOI at this other time:</p> <p>The Order Instituting Rulemaking in the proceeding provided that "Parties who were previously found eligible to request compensation in R.13-12-010 shall remain eligible in this proceeding and do not need to file an NOI within 30 days, provided there are no material changes in their by-laws or financial status. OIR, at pp. 34-35. Since CEJA was found eligible in R.13-12-010 and it has not seen any material changes to its by-laws or financial status, it did not file an NOI. The Scoping Ruling on May 26, 2016 did not set forth the same instruction related to NOI. Therefore, in an abundance of caution, CEJA is now filing this NOI with a request for leave based upon its previous reliance on the instructions in the OIR. Furthermore, to the extent that the May 26, 2016 Scoping Memo changed the instructions related to the NOI, CEJA timely files this NOI pursuant to CPUC Rules of Practice and Procedure, Rule 17.1(b), allowing parties to file an amended NOI within 15 days after the issuance of the scoping memo.</p>	
<p>2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:</p> <p>OIR, R.16-02-007; May 26, 2016 Scoping Ruling; and CPUC Rules of Practice and Procedure, Rule 17.1(b) (authorizing parties to file an amended NOI within 15 days after the issuance of the scoping memo).</p>	

PART II: SCOPE OF ANTICIPATED PARTICIPATION
(To be completed by the party ("customer") intending to claim intervenor compensation)

<p>A. Planned Participation (§ 1804(a)(2)(A)(i)):</p>
<p>The party's statement of the issues on which it plans to participate:</p> <p>CEJA will be a participant on behalf of its six member organizations, representing environmental and environmental justice concerns in the 2016 LTPP as it was in the 2012 and 2014 LTPPs. CEJA intends to fully participate in all aspects of the proceeding to advocate for all planning efforts to consider low income communities of color and disadvantaged communities that are already overburdened by air pollution. CEJA also intends to participate in the development of the Integrated Resource Plan requirements to advocate for California implementation of the requirements specified under SB 350 in ways that CEJA's communities envisioned during adoption of the law. CEJA will work to assure that decisions made in the proceeding benefit low income communities of color and disadvantaged communities that are disproportionately impacted by pollution. CEJA will also work to ensure that its member and the interests that its members represent have a voice in the decision-making process.</p>

The party's explanation of how it plans to avoid duplication of effort with other parties:

To the extent possible, CEJA will coordinate its responses and participation with other parties to avoid duplication. CEJA, through its legal representation, has worked with other parties including the Sierra Club and Office of Ratepayer Advocates in the 2012 and 2014 LTTPs. CEJA expects to be in regular contact with these and other parties that are covering similar issues and interests.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed).

CEJA will be an active participant in this proceeding by participating in workshops, conferences and hearings, submitting comments and briefs, working with an energy expert, preparing and filing testimony, cross-examining witnesses and propounding discovery. CEJA plans to be represented by an attorney from Communities for a Better Environment, and CEJA will likely obtain additional outside counsel to represent it in the proceeding.

B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Attorney	300	\$350.00	\$105,000	
Attorney - Shana Lazerow	100	\$355.00	\$35,500	
Advocate/Expert – Strela Cervas	25	\$170.00	\$4,250	
Expert – Julia May	100	\$230.00	\$23,000	
Subtotal: \$167,750				
OTHER FEES				
Subtotal:				
COSTS				
Copying / Mailing Expenses			\$50	
Travel			\$500	
Subtotal: \$550				
TOTAL ESTIMATE: \$168,300				

Estimated Budget by Issues:

CEJA expects to spend roughly 1/3 of its time on the analysis of the portfolio and 2/3 of its time on the Integrated Resource Planning Requirements. This breakdown is only an estimate as it depends on the issues raised by other parties.

When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP
(To be completed by party (“customer”) intending to claim intervenor
compensation; see Instructions for options for providing this
information)**

A. The party claims “significant financial hardship” for its Intervenor Compensation Claim in this proceeding on the following basis:	Applies (check)
1. “[T]he customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation” (§ 1802(g)); or	<input type="checkbox"/>
2. “[I]n the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding” (§ 1802(g)).	<input type="checkbox"/>
3. A § 1802(g) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)). Commission’s finding of significant financial hardship made in proceeding number: A.14-11-016 Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made: October 17, 2013 CEJA is making its showing of significant financial hardship at this time pursuant to Section 1804(b)(1). CEJA received a finding of significant financial hardship in an ALJ’s Ruling issued on March 24, 2015, in A.14-11-016. This proceeding commenced within one year of the date of the finding on March 24, 2015, so the rebuttable presumption applies in this case. If the rebuttable presumption is not applied, the argument below shows why the Commission should find that CEJA has made its showing of significant financial hardship. CEJA does not anticipate any challenge to its eligibility for compensation in this proceeding. If any party does attempt to rebut the presumption of eligibility, however, CEJA requests that it be granted the opportunity to reply to such party's allegations within 10 days after the service of such filing.	<input checked="" type="checkbox"/>

B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(g)) (necessary documentation, if warranted, is attached to the NOI:
The assigned ALJ in A.14-11-016 made a finding of CEJA’s significant financial hardship, and therefore, as discussed above, the rebuttable presumption should apply to this case. This

finding was based on CEJA meeting the standard listed in Public Utilities Code Section 1802(g): “in the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding.”

All of CEJA’s members are non-profit organizations and projects and as such have no economic interest in this proceeding. All the members of CEJA are focused on, and committed to, representing communities of color and low-income communities that are traditionally exposed to pollution and environmental contamination in much higher capacity than their higher income neighbors.

In addition, the average utility bill of the individual California members and supporters of the six organizations of CEJA are small compared to the costs of effective participation in this proceeding. Due to these factors, CEJA, representing each of the member organizations, is entitled to a finding of significant financial hardship pursuant to Public Utilities Code Section 1802(g) (“in the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding.”).

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**
**(The party (“customer”) intending to claim intervenor compensation
identifies and attaches documents; add rows as necessary)**

Attachment No.	Description
1	Certificate of Service

ADMINISTRATIVE LAW JUDGE RULING⁴
(Administrative Law Judge completes)

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>
a. The NOI has not demonstrated the party’s status as a “customer” for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>

⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer’s Intervenor Compensation Claim); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(g).

c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer has shown significant financial hardship.	<input type="checkbox"/>
4. The customer is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge