



**FILED**  
8-18-16  
04:59 PM

Decision \_\_\_\_\_

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

Order Instituting Rulemaking on the Commission's Own Motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources	R.11-09-011 (Filed September 22, 2011)
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**INTERVENOR COMPENSATION CLAIM OF  
INTERSTATE RENEWABLE ENERGY COUNCIL, INC.  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF  
INTERSTATE RENEWABLE ENERGY COUNCIL, INC.**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD, supporting EXCEL Timesheets, and any other supporting documents to the Intervenor Compensation Program Coordinator at [lcompcoordinator@cpuc.ca.gov](mailto:lcompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> Interstate Renewable Energy Council, Inc.	<b>For contribution to Decision (D.):</b> D16-06-052
<b>Claimed:</b> \$ 46,562.00	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> Michael Picker	<b>Assigned ALJ:</b> Maribeth A. Bushey
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/ Sky C. Stanfield
<b>Date:</b> 8/18/16	<b>Printed Name:</b> Sky C. Stanfield

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

<b>A. Brief description of Decision:</b>	Decision (D.) 16-06-052 grants joint motions improving Electric Tariff Rule 21 to (1) provide earlier and more reliable interconnection cost information to electric generation developers, (2) provide an enhanced pre-application report, and (3) set forth the process for analyzing requests for interconnection of non-exporting energy storage devices. The decision also (4) implements a cost envelop pilot policy to improve interconnection cost certainty and (5) requires the utilities to submit advice letters to implement any agreed-upon outcomes from Phase 2 and Phase 3 of the smart inverter working group.
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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):	October 2, 2014	
2. Other specified date for NOI:		
3. Date NOI filed:	October 31, 2014	
4. Was the NOI timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.11-09-011	
6. Date of ALJ ruling:	March 12, 2015	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	In R.11-09-011 on March 12, 2015, the ALJ requested more information (see Part C, below).	
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.16-06-052	
14. Date of issuance of Final Order or Decision:	June 23, 2016	
15. File date of compensation request:	August 18, 2016	
16. Was the request for compensation timely?		

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

#	Intervenor's Comment(s)	CPUC Discussion
1-8	<p>IREC has participated in R.11-09-011 from the very beginning of the proceeding, and already sought and received intervenor compensation for its substantial contributions to D.12-09-018, which adopted a settlement agreement that included revisions to Electric Tariff Rule 21 and related form and agreements (see D.13-10-017). IREC's current compensation claim before the Commission addresses IREC's substantial contributions to D.16-06-052, which focused on improving cost certainty and predictability and the process for reviewing non-exporting energy storage under Electric Tariff Rule 21. For this reason, IREC submitted a new NOI on October 31, 2014 (as well as a First Amended NOI on December 17, 2014 and a Second Amended NOI on April 1, 2015) to claim compensation for its participation in this second portion of the proceeding.</p> <p>Under Commission Rules of Practice and Procedure ("Rule") 17.3, a request for intervenor compensation may be filed at any point after a decision resolving issues to which an intervenor made a substantial contribution. Rule 17.3 provides that the ultimate deadline for filing a request for compensation for substantial contribution is within 60 days of the filing of a decision closing the proceedings. D.16-06-052 closed the proceeding on June 23, 2016.</p>	
9-12	<p>In ruling on IREC's October 2014 NOI, Administrative Law Judge (ALJ) Bushey requested that IREC provide additional information to allow her to evaluate IREC's claim of significant financial hardship (see ALJ Ruling, March 12, 2015, p. 10). IREC submitted this information in a second amended NOI on April 1, 2015. The ALJ never ruled on</p>	

<p>that second amended NOI. Accordingly, IREC has updated this information to include 2015 data and again submits descriptions of any partnerships or projects with a renewable energy company, producer, supplier, installer, equipment manufacturer, technology developer, renewable energy company-funded company, group or trade/professional organization or association in the renewable energy industry, any public utility or utility-funded group or organization (Attachment 2); IREC's most recent financial statements (Attachments 3 and 4); a list of credential recipients (Attachment 5); and the fee schedule for IREC credentialing program and procedures (Attachment 6).</p>	
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**PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b>INTRODUCTION</b></p> <p>IREC actively participated in and played a leading role in the development of nearly every aspect of the revised Rule 21 approved by D.16-06-052.</p> <p>IREC has participated in this proceeding since its origin in 2011 and has been involved in the development of 4 out of the 5 key aspects of the decision (as further explained below).</p> <p>IREC spent considerable time on this proceeding; however, IREC was able to offset some of the costs incurred with other available program funds. Thus, IREC only seeks recovery for a portion of</p>		

<p>IREC’s time leading up to D.16-06-052. IREC participated in, and helped reach a successful outcome on many of the issues in the decision, but will focus on the cost certainty and storage portions of the decision since those were the issues most active during the period of time from November 2014 to May of 2015 that IREC seeks cost recovery for.</p> <p>In order to demonstrate IREC’s impact, we will outline our contribution on these two items through the duration of the proceeding, though we only seek to recover for a portion of the overall time spent.</p>		
<p><b>COST CERTAINTY</b></p>		
<p><b>1.</b> IREC first introduced the idea of using a “cost envelope” modeled off of the approach used in Massachusetts. It further refined and built on that proposal throughout the proceeding, providing parties and the Commission with additional information on how the Massachusetts model worked in practice and how it could be applied to California. The Decision adopts a cost envelope that was modeled off of the Massachusetts approach and included numerous refinements that came out of the information IREC provided about how the Massachusetts process worked in practice and could be adapted to California’s unique needs.</p>	<p><b>Decision:</b></p> <p>D.16-06-052, p. 28-36</p> <p>Findings of Fact 10-19 p. 43-45</p> <p>Conclusions of Law 4-10 p. 46-47</p> <p><b>IREC’s Contributions:</b></p> <p>IREC Comments on Amended Scoping Memo, 10/25/12, p. 7-8</p> <p>IREC Comments on Staff Report, 9/12/14, p. 4, 8-10</p> <p>IREC Reply on Staff Report, 9/26/14, p. 9-13</p> <p>IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 1-3</p> <p>IREC Comments on Proposed Decision, 3/7/16, p. 2-9</p> <p>IREC Comments on Alternate Proposed Decision, 5/26/16, p. 2-8</p> <p>IREC Reply on Alternate Proposed Decision, 5/31/16, p. 1-5</p> <p>IREC also presented on the cost envelope at two workshops hosted by the Energy Division and provided information to Commissioners in noticed ex parte meetings.</p>	

<p>2. IREC proposed and supported through analysis the use of one comprehensive cost certainty mechanism rather than two separate mechanisms (i.e. the fixed cost proposal and a cost envelope). IREC also identified the problems with the utility's fixed cost proposal that was rejected by the Commission. The Decision adopts a single cost certainty framework based upon the cost envelope IREC proposed and advocated for.</p>	<p><b>Decision:</b> D.16-06-052, p. 21-35 Conclusions of Law 4 p. 46</p> <p><b>IREC's Contributions:</b> IREC Comments on Staff Report, 9/12/14, p. 4 IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 2-3</p>	
<p>3. IREC proposed allowing the cost envelope approach to apply to all Fast Track, Supplemental Review and Independent Study projects. The Commission decision cites IREC's recommendation on this point and includes the refinements to applicability recommended by IREC.</p>	<p><b>Decision:</b> D.16-06-052, p. 29</p> <p><b>IREC's Contributions:</b> IREC Comments on Staff Report, 9/12/14, p. 4 IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 1-2 IREC Comments on Alternate Proposed Decision, 5/26/16, p. 2-3</p>	
<p>4. IREC recommended not requiring Fast Track projects to go through Supplemental Review to obtain a cost estimate and instead proposed the Commission identify a specific timeline after the Fast Track or Supplemental Review results for preparation of the estimate.</p>	<p><b>Decision:</b> D.16-06-052, p. 29-30 (contrast with earlier APD) Conclusion of Law 5, p. 46.</p> <p><b>IREC's Contributions:</b> IREC Comments on Alternate Proposed Decision, 5/26/16, p. 3-4  IREC Reply on Alternate Proposed Decision, 5/31/16, p. 2-3</p>	
<p>5. IREC argued that adoption of a cost envelope would be the most effective and reasonable way to equitably balance the risk of inaccurate cost estimates. IREC argued some utility responsibility was necessary to encourage better performance by the entity responsible for developing the estimates.</p>	<p>D.16-06-052 p. 30-31, 34-35 Findings of Fact 10 &amp; 11, p. 43-44 Conclusions of Law 8 &amp; 10, p. 46-47</p> <p><b>IREC's Contributions:</b> IREC Comments on Proposed Decision, 3/7/16, p. 7-9  IREC Reply on Proposed Decision, 3/14/16, p. 1-5</p>	

<p>The Decision adopts the cost envelope and discusses the need to balance the risk and assign some responsibility to the utilities in accordance with IREC’s recommendations.</p>		
<p><b>6.</b> IREC recommended that the Commission require that the cost estimates provided be detailed. The Decision adopts IREC’s recommendation and requires “itemized” cost documentation (at 32).</p>	<p><b>Decision:</b> D.16-06-052, p. 32-33</p> <p><b>IREC’s Contributions:</b> IREC Comments on Staff Report, 9/12/14, p. 6-7 IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 8-9 IREC Comments on Proposed Decision, 3/7/16, p. 10-11 IREC Reply on Proposed Decision, 3/14/16, p. 4 IREC Comments on Alternate Proposed Decision, 5/26/16, p. 4-5</p>	
<p><b>7.</b> IREC recommended that the utilities evaluate changes to the project that could impact the cost estimate using the material modifications standard in the rule. The Decision requires use of the material modification standard in accordance with IREC’s suggestion.</p>	<p><b>Decision:</b> D.16-06-052, p. 32 fn. 8</p> <p><b>IREC’s Contributions:</b> IREC Comments on Alternate Proposed Decision, 5/26/16, p. 5-6</p>	
<p><b>8.</b> IREC supported allowing the utilities to charge a reasonable fee for the costs of preparing an estimate. The Decision adopts a \$2,500 fee (in contrast to the \$10,000 fee proposed for the fixed cost option).</p>	<p><b>Decision:</b> D. 16-06-052, p. 29 Conclusion of Law 5, p. 46</p> <p><b>IREC’s Contributions:</b> IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 5-8 IREC Comments on Proposed Decision, 3/7/16, p. 10</p>	
<p><b>9.</b> IREC sought data tracking cost estimates and requested a periodic review of that data to ensure estimates were not inflated. The Decision adopts multiple layers of</p>	<p><b>Decision:</b> D. 16-06-052, p. 38-40 Findings of Fact 15-16, p. 44 Conclusions of Law 6-10, p. 46-47</p>	

<p>data sharing and development in line with IREC's suggestions.</p>	<p><b>IREC's Contributions:</b></p> <p>IREC Reply on Staff Report, 9/26/14, p. 3-4, 7-8</p> <p>IREC Comments on Joint Cost Certainty Proposal, 5/22/15, p. 11-12</p> <p>IREC Comments on Proposed Decision, 3/7/16, p. 8, 11</p> <p>IREC Reply on Proposed Decision, 3/14/16, p. 3</p> <p>IREC Comments on Alternate Proposed Decision, 5/26/16, p. 7</p> <p>IREC also discussed the need for detailed cost estimates in workshops and noticed ex parte meetings with the Commissioner's Advisors.</p>	
<p><b>10.</b> IREC proposed the development of a mechanism that would hold shareholders liable for faulty cost estimates, but allow for recovery through rates if the estimates could be shown to be reasonable. The Decision adopts a framework like IREC recommended which holds shareholders responsible unless a showing of reasonableness can be made.</p>	<p><b>Decision:</b></p> <p>D. 16-06-052, p. 33-35</p> <p>Findings of Fact 10-11, 13, 18, p. 43-45</p> <p>Conclusions of Law 8, 10 p. 46-47</p> <p><b>IREC's Contributions:</b></p> <p>IREC Comments on Proposed Decision, 3/7/16, p. 8</p> <p>IREC Reply on Proposed Decision, 3/14/16, p. 1-4</p> <p>IREC Reply on Alternate Proposed Decision, 5/31/16, p. 3</p> <p>IREC also proposed using a hybrid approach of shareholder liability with recovery from the ratebase after a showing of reasonableness during the All Party Meeting.</p>	
<p><b>11.</b> IREC provided the legal analysis of PURPA necessary to show that the cost envelope would not violate PURPA, could be applied within the context of existing cost recovery principles, and would not illegally alter the cost-causer principle. The Decision adopts IREC's legal</p>	<p>D. 16-06-052, p. 35-36</p> <p>Findings of Fact 11, 18, p. 44</p> <p>Conclusions of Law 9-10, p. 47</p> <p><b>IREC's Contributions:</b></p> <p>IREC Reply on Staff Report, 9/26/14, p. 8-11</p> <p>IREC Comments on Proposed Decision,</p>	

analysis.	<p>3/7/16, p. 7-8</p> <p>IREC Reply on Proposed Decision, 3/14/16, p. 1-4</p> <p>IREC also discussed this legal framework with the Commissioner's at the All Party Meeting and answered questions from Commission legal staff in subsequent phone calls.</p>	
<p><b>12.</b> Throughout this proceeding IREC has supported the development of better data on the system and to track interconnection costs in order to inform better decision making by utilities, interconnection applicants and the Commission. The Decision adopts a framework to track actual interconnection costs and other data to ensure informed processes moving forward.</p>	<p><b>Decision:</b></p> <p>D. 16-06-052, p. 16, 19, 24-25, 27, 31-35, 37-41</p> <p>Findings of Fact 15-16, 19 p. 44-55</p> <p>Conclusions of Law 6-8, 10 p. 46-47</p> <p><b>IREC's Contributions:</b></p> <p>IREC Comments on Staff Report, 9/12/14, p. 6-7, 12-13</p> <p>IREC Comments on Proposed Decision, 3/7/16, p. 8</p> <p>IREC Comments on Alternate Proposed Decision, 5/26/16, p. 8</p>	
<p><b>ENERGY STORAGE</b></p>		
<p>For the following items much of the discussion and development of the joint motion on energy storage that was adopted by D. 16-06-052 occurred off the recording during working group phone calls during the spring of 2015 and during workshops in late 2015. IREC participated actively in all of those telephone calls and workshops and was a signatory to the joint motion.</p>		
<p><b>13.</b> IREC was one of the first parties to raise concerns about discriminatory treatment of the load (or charging) functions of energy storage systems in the interconnection review process. This issue was central to the discussions about streamlining and the ultimate joint motion. IREC contributed legal analysis</p>	<p><b>Decision:</b></p> <p>D. 16-06-052, p. 9-11, 20-21, Attachment C</p> <p>Findings of Fact 6-9, p. 43</p> <p>Conclusions of Law 1-2, p. 45</p> <p><b>IREC's Contributions:</b></p> <p>IREC Comments on Staff Report, 9/12/14, p. 13, 16-17</p>	

<p>and proposals for alternate resolution that were adopted in the joint motion. The Decision adopts the approach recommended by IREC to ensure load from energy storage is treated according to existing rules regarding upgrades associated with load while also allowing the utilities to combine their review of the charging and discharging functions of energy storage.</p>	<p>IREC Reply on Staff Report, 9/26/14, p. 2, 15-16</p> <p>IREC Comments on Joint Energy Storage Proposal, 5/22/15, p. 3-11</p> <p>Joint Motion re: Storage Devices, 11/18/15, p. 4-17</p>	
<p><b>14.</b> IREC advocated for clearly defining the review process for non-exporting storage systems such that it is clear what level of review would be required for different system types and designs. The Decision requires the utilities to develop a guidebook that will identify the review tracks for different systems in accordance with the proposal in the Joint Motion to which IREC was a party.</p>	<p><b>Decision:</b></p> <p>D. 16-06-052, p. 9-11, 20-21, Attachment C</p> <p>Findings of Fact 6-9, p. 43</p> <p>Conclusions of Law 1-2, p. 45</p> <p><b>IREC’s Contributions:</b></p> <p>IREC Comments on Staff Report, 9/12/14, p. 13, 16-19</p> <p>IREC Reply on Staff Report, 9/26/14, p. 2, 15-16</p> <p>IREC Comments on Joint Energy Storage Proposal, 5/22/15, p. 13-14</p> <p>Joint Motion re: Storage Devices, 11/18/15, p. 4-20</p>	
<p><b>15.</b> IREC facilitated discussion regarding the Inadvertent Export option for Rule 21 between solar developers and the utilities and supported development of a framework to reach consensus on possible rule changes, this was the path adopted by the Decision.</p>	<p><b>Decision:</b></p> <p>D. 16-06-052, p. 9-11, 20-21, Attachment C</p> <p>Findings of Fact 6-9, p. 43</p> <p>Conclusions of Law 1-2, p. 45</p> <p><b>IREC’s Contributions:</b></p> <p>IREC’s contributions to this topic occurred primarily in the working groups and workshops on energy storage and are reflected in the Joint Motion.</p> <p>Joint Motion re: Storage Devices, 11/18/15, p. 20-21</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?<sup>1</sup></b>	Yes.	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes.	
<p><b>c. If so, provide name of other parties:</b></p> <p>Most parties involved in the proceeding shared IREC's focus on improving the interconnection process for renewable generators, including the utilities. On the topic of cost certainty, the parties with positions most similar to IREC's included: the Clean Coalition, the Bioenergy Association of California, and ORA. Though each of these parties at one point supported the use of a cost envelope approach, each took different positions on how it should be implemented.</p> <p>On the topic of energy storage interconnection, parties with similar positions included SolarCity, California Energy Storage Alliance, Stem, and Bosch. IREC brought a different perspective than these industry parties and our positions were aligned with our mission as a public interest organization and with a consumer focus.</p>		
<p><b>d. Intervenor's claim of non-duplication:</b></p> <p>As the Commission has acknowledged (at p. 2, 20, and 47), this proceeding has been unusually collaborative and has benefitted from having the parties work together to develop common proposals. IREC's compensation in this proceeding should not be reduced for duplication as a result of having helped to bring parties together around strong proposals, many of which were originated by IREC. IREC brought to this proceeding a broad understanding of national best practices in the area of interconnecting distributed energy resources. While several parties shared IREC's interest in these issues, none brought the same knowledge and expertise that IREC provided, based on its longstanding work in this area nationwide. The cost envelope proposal came out of IREC's extensive understanding of other state and national practices in this area. IREC also contributed its thoughtful leadership on the development of the energy storage aspects of the decision, offering a unique viewpoint not tied to one business model and instead focused on expanding access to renewable energy for all consumers.</p> <p>IREC worked diligently with other aligned parties to reduce duplication, holding frequent calls with other parties to coordinate positions and ensure effective participation. IREC also facilitated a period of negotiations between the utilities, the Clean Coalition, the Bioenergy Association, and others that helped to bring about the ultimate consensus on the final Decision.</p>		

<sup>1</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.

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

#	Intervenor's Comment	CPUC Discussion
1.	As described above, IREC is only seeking intervenor compensation for a portion of the time it spent helping to get Decision 16-06-052 in this proceeding. In order to understand IREC's substantial role during that period, the time entries submitted should be viewed in the broader context of IREC's overall contributions to this docket as identified through the many comments cited above.	

**PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)**

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

<b>a. Intervenor's claim of cost reasonableness:</b>	<b>CPUC Discussion</b>
<p>IREC's level of participation in this proceeding reflects a reasonable balance of the need to engage outside expert consultants and attorneys to address policy, legal and technical matters and the ability to use internal policy oversight to advocate for IREC's positions. IREC's participation was targeted and IREC worked diligently to keep costs of participation as low as possible. IREC prepared thorough comments in the proceeding advancing original concepts that were then adopted by the Commission. IREC also worked diligently to build consensus with a range of parties to minimize the number of disputes that could drag out a proceeding. IREC also obtained outside support to fund the majority of the work in this proceeding so as to minimize the impacts on ratepayers. The policies adopted in this proceeding are likely to lower the costs of energy procurement for ratepayers across the state, as acknowledged by the Commission (see p. 22-23 of D.16-06-052). Thus, the work of IREC on this aspect of the case is reasonable relative to the significance of the policy impacts that flow from the Commission's orders in D.16-06-052.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>IREC's labor hours were carefully constrained to perform only the tasks necessary to meet IREC's primary objective. Because IREC identified its primary objective in this proceeding at the outset, IREC was able to limit the work of its consultants and attorneys to address those issues most relevant to adoption of a cost certainty framework and the streamlining of energy storage interconnection. IREC followed the directive of the ALJ at the beginning of this proceeding to proactively work to reduce duplication of efforts. These efforts resulted in a</p>	

modest number of hours spent on this proceeding compared to many other participants, which reflects IREC’s success in targeting its efforts and constraining the use of resources.	
<p><b>c. Allocation of hours by issue:</b></p> <p>Two primary issues account for the time of IREC’s consultants, advocates, and attorneys:</p> <p>(1) Cost certainty for the interconnection process (65%)</p> <p>(2) Issues, priorities, and recommendations for energy storage interconnection (35%)</p> <p>IREC chose not to participate in the smart inverter working group and related proceedings because it recognized that there were sufficient parties involved in that proceeding to ensure IREC’s interests were covered.</p>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Sky Stanfield	2014	24.1	\$320	ALJ-329	\$7,712.00			
Sky Stanfield	2015	54.3	\$330	ALJ-329	\$17,919.00			
Erica McConnell	2014	18	\$250	ALJ-329	\$4,500.00			
Erica McConnell	2015	35.2	\$300	ALJ-329	\$10,560.00			
Sara Baldwin	2016	11.5	\$225	ALJ-329	\$2,587.50			
[Advocate 2]								
<b>Subtotal: \$43,287.50</b>						<b>Subtotal: \$</b>		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
[Person 1]								
[Person 2]								
<b>Subtotal: \$</b>						<b>Subtotal: \$</b>		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Sky Stanfield	2016	19.9	165	ALJ-329	\$3,283.50			
[Preparer 2]								
<b>Subtotal: \$</b>					<b>Subtotal: \$</b>			
COSTS								
#	Item	Detail			Amount	Amount		
<b>TOTAL REQUEST: \$ 46,562.00</b>					<b>TOTAL AWARD: \$</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. Intervenors' 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>2</sup>		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Sky Stanfield		2006		244966		No		
Erica McConnell		2010		273560		No		

**C. Attachments Documenting Specific Claim and Comments on Part III  
(Intervenor completes; attachments not attached to final Decision):**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Updated Information for IC Claim from Second NOI
Attachment 3	2015 Income and Expense Statements

<sup>2</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

Attachment 4	2015 Balance Sheet
Attachment 5	Credential Recipients
Attachment 6	Credentialing Program Fee Schedule
Attachment 7	Hourly Rate Justification Statement
Attachment 8	Sky C. Stanfield Rule 21 Timesheet
Attachment 9	Erica S. McConnell Rule 21 Timesheet
Attachment 10	Sara Baldwin Auck Rule 21 Timesheet
Attachment 11	Sky C. Stanfield Resume
Attachment 12	Erica S. McConnell Resume
Attachment 13	Sara Baldwin Auck Resume

**D. CPUC Disallowances and Adjustments (CPUC completes):**

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	
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If not:

Party	Comment	CPUC Discussion

### **FINDINGS OF FACT**

1. Intervenor [has/has not] made a substantial contribution to D. \_\_\_\_\_.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ \_\_\_\_\_.

### **CONCLUSION OF LAW**

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

### **ORDER**

1. Intervenor is awarded \$ \_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay Intervenor the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of Intervenor's request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

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