



Decision _____

FILED
8-30-16
08:00 AM

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.	Rulemaking 11-09-011 (Filed Sept. 22, 2011)
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**INTERVENOR COMPENSATION CLAIM OF CLEAN COALITION
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF CLEAN
COALITION**

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 Icompcoordinator@cpuc.ca.gov.

Intervenor: Clean Coalition	For contribution to Decision (D.) 16-06-052	
Claimed: \$ 224,030	Awarded: \$	
Assigned Commissioner: Picker	Assigned ALJ: Maribeth 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).		
Signature:		/s/ Katherine Ramsey
Date: 8/29/16	Printed Name: Katherine Ramsey	

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

A. Brief description of Decision:	D.16-06-052 (Decision) approves two joint motions by the parties on behind-the-meter energy storage interconnection rule modifications, a new Unit Cost Guide, and new pre-application report request enhancements. It also approves a new cost envelope option for Rule 21 interconnection, which will further streamline the interconnection process for many projects and will provide additional cost certainty to developers. Additionally, the Decision also finds that the Smart Inverter Working Group (SIWG) has completed its technical recommendations for Phase 2 communication protocols and Phase 3 additional advanced inverter functions after three years of collaboration and consensus-
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	building. The Clean Coalition provided sustained and substantial input on all of these efforts over the last five years of this proceeding.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	2/16/2012	
2. Other specified date for NOI:	10/27/2011	
3. Date NOI filed:	12/8/2011	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
6. Date of ALJ ruling:	7/19/2011	
7. Based on another CPUC determination (specify):	See D.16-04-032	
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	
10. Date of ALJ ruling:	7/19/2011	
11. Based on another CPUC determination (specify):	See D.16-04-032	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-06-052	
14. Date of issuance of Final Order or Decision:	7/1/16	
15. File date of compensation request:	8/30/2016	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion
I.B.2.	Order Instituting Rulemaking (OIR) 11-09-011 (issued on Sept. 27, 2011) stated that as no PHC was currently set, the	

NOI should be filed within 30 days of the issuance of the OIR. See OIR, p. 14. However, the OIR also stated that if a PHC was held, the NOI could be filed within 30 days of the date of the PHC. See OIR, p. 14, n. 7, citing Rule 17.1(a)(1). Thus, the NOI was timely filed, which the Commission subsequently affirmed in D.16-04-032.	

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>This decision resolves a number of issues that have been part of this proceeding for up to five years, so the record and our involvement goes back to 2011. The Clean Coalition has been a lead participant in this proceeding since its start in 2011 and was active at the CPUC with the Rule 21 Working Group before it became this proceeding in 2011. We took part in every aspect of this decision, as described below. The Clean Coalition has previously received compensation for substantial contributions to the Settlement Agreement revising the Rule 21 Electric Tariff (D.12-09-018), and the Distribution Group Study Process and additional Tariff forms ((D. 14-04-003).</p> <p>This prior work is excluded from the current claim, which addresses the remaining Phase II issues resolved in the Final Decision closing this proceeding.</p> <p>1. Unit Cost Guide</p>	<ul style="list-style-type: none"> • D.16-06-052 at 19-20 approves the joint motion on the enhanced PAR and Unit Cost Guide. The Clean Coalition, as the record shows, was the party originating the Cost Guide idea and working with other parties to bring it into final form, which the Decision approved. • <i>Motion of Southern California Edison Company (U 338-E), San Diego Gas & Electric Company (U 902-E), Pacific Gas and Electric Company (U 39-E), California Solar Energy Industries Association, Clean Coalition, Coda Energy, and Interstate Renewable Energy Council, Inc., Proposing Preapplication Report Enhancements and Development of a Unit Cost Guide at 2-6 (Nov. 9, 2015).</i> • Clean Coalition Presentation at the Oct. 2, 2015 Status Conference proposing Pre-Application Report Enhancements and the Unit Cost Guide. • <i>Clean Coalition Cost Guide</i> 	

<p>The Clean Coalition first proposed the idea for a unit cost guide during Phase 1 in 2011. Between 2011 and the Commission’s decision, we refined the idea and gained full support from other parties in the joint motion approved by the Decision. We originated the idea for a Unit Cost Guide in 2011 through our <i>Comments on the Order Instituting Rulemaking</i> (Oct. 26, 2011) and advocated for its approval through the decision. This proposal was refined over the years and presented at workshops in the summer and fall of 2015 and in the <i>Clean Coalition Cost Guide Proposal</i> (Aug. 24, 2015), which was distributed to the proceeding’s service list. We proposed, drafted and lead the Phase II discussion about the new Unit Cost Guide, and drafted the related portions of joint motion that was approved by the Decision.</p>	<p><i>Proposal</i>, emailed to parties Aug. 24, 2015, per schedule adopted at the Status Conference.</p> <ul style="list-style-type: none"> • Clean Coalition Presentation at the Aug. 6, 2015 Status Conference on Party consensus proposals for scope and schedule of issues, including enhanced pre-application technical information and publicly available interconnection cost guidelines. • <i>Clean Coalition Reply Comments on the Staff Proposals for Cost Certainty & Response to Questions Regarding Issues, Priorities and Recommendations for Energy Storage Interconnection</i> at 8-9 (Sept. 26, 2014). • <i>Clean Coalition Opening Comments on the Staff Proposals for Cost Certainty & Response to Questions Regarding Issues, Priorities and Recommendations for Energy Storage Interconnection</i> at 12, 28 and Attachment 3 at 4 (Sept. 12, 2014). • <i>Clean Coalition Motion to Take Official Notice of Discovery Requests and Responses</i> (Apr. 25, 2013). • <i>Clean Coalition Standardized Pricing Proposal</i> Presentation at 4 (Mar. 5, 2013). • <i>Clean Coalition Revised Comments on Amended Scoping Memo</i> at 6-10 (Oct. 29, 2012). • <i>Clean Coalition Opening Comments on Amended Scoping Memo</i> at 14 (Oct. 25, 2012). • <i>Clean Coalition Comments on the Proposed Decision Adopting the Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 2-3 and Attachment B: Recommended Scope of Phase 2 Issues (Sept. 4, 2012). 	
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	<ul style="list-style-type: none"> • <i>Joint Reply Comments on the Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 3 (May 1, 2012) (noting agreement of parties to cover cost allocation and cost responsibility in Phase 2). • <i>Joint Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 5-8 (Mar. 16, 2012). • <i>Clean Coalition Amended Motion for Ruling on Confidentiality of Data Submitted by the Utilities</i> (Jan. 4, 2012). • <i>Clean Coalition Comments on Interconnection Cost Responsibility</i> at 2-5 (Oct. 28, 2011) [<i>Rule 21 Settlement Process</i>]. • <i>Clean Coalition Comments on Order Instituting Rulemaking</i> at 3-7 (Oct. 26, 2011). 	
<p>2. Behind the Meter Storage Interconnection</p> <p>The Clean Coalition advocated early on for additional refinements to the interconnection tariff in order to accommodate storage facilities. We also proposed use of the existing rules in the interim to treat storage facilities as generation until further refinements were enacted.</p> <p>The Clean Coalition further advocated for development of control standards to safely mitigate interconnection study parameters and impacts may be safely mitigated, and the separation of consideration of load and export factors.</p> <p>The Clean Coalition was an active participant in the subsequent</p>	<ul style="list-style-type: none"> • D.16-06-052 at 20-21, and Attachment C, approves the second joint motion, on behind the meter storage interconnection issues, which no party opposed. • <i>Joint Motion Supporting Revisions to Streamline Rule 21 for Behind-the-Meter, Non-Exporting Storage Devices</i> (Nov. 18, 2015). • Clean Coalition Presentation at the Aug. 6, 2015 Status Conference on behind-the-meter non-exporting storage and presenting a status report on behalf of active parties. • <i>Reply Comments to Joint IOU Motions on Language Implementing Joint Cost Certainty Proposal and Revisions to Streamline Rule 21 for Behind-the-Meter Non-Exporting Storage Devices</i> at 2-3, 12-13 (Jun. 	

<p>working group that produced the joint motion and helped to obtain consensus on the issues included.</p> <p>These recommendations were ultimately incorporated into the Nov. 18, 2015 Joint Motion Supporting Revisions to Streamline Rule 21 for Behind-the-Meter, Non-Exporting Storage Devices, which the Commission accepted in the Final Decision.</p>	<p>8, 2015).</p> <ul style="list-style-type: none"> • <i>Clean Coalition Comments on Joint IOU Motions on Language Implementing Joint Cost Certainty Proposal and Revisions to Streamline Rule 21 for Behind-The-Meter Non-Exporting Storage Devices</i> at 3, 21-25 (May 22, 2015). • <i>Clean Coalition Reply Comments on the Staff Proposals for Cost Certainty & Response to Questions Regarding Issues, Priorities and Recommendations for Energy Storage Interconnection</i> at 12-14 (Sept. 26, 2014). • <i>Clean Coalition Opening Comments on the Staff Proposals for Cost Certainty & Response to Questions Regarding Issues, Priorities and Recommendations for Energy Storage Interconnection</i> at 3, 19-30 (Sept. 12, 2014). 	
<p>3. Modifications to the Pre-Application Report (PAR) Request Process</p> <p>The Clean Coalition actively assisted in creating the new Enhanced Options to the PAR Request through the working group process, including coordination of information needs between utility staff and industry parties.</p> <p>The Clean Coalition was also the originating party for the PAR process in the Phase 1 Settlement that was previously adopted in this proceeding, and we drew upon that experience to identify additional information that could be made available to assist in evaluating potential siting opportunities and submitting project design applications that maximize use of existing hosting capacity and conform to system constraints. This will result in</p>	<ul style="list-style-type: none"> • D.16-06-052 at 9-11, 19-20, and Attachment B, approves the joint motion on the enhanced PAR and Unit Cost Guide. The Clean Coalition originated the PAR concept in Phase 1 of this proceeding and we worked diligently with parties in Phase 2 to craft a workable enhanced PAR option, which the Decision approved. • <i>Clean Coalition Opening Comments on Proposed Decision</i> at 5 (Mar. 7, 2016). • <i>Joint Motion Proposing Preapplication Report Enhancements and Development of a Unit Cost Guide</i> at 2-6 (Nov. 9, 2015). • Clean Coalition Presentation at the Oct. 2, 2015 Status Conference proposing Pre-Application Report Enhancements and the Unit Cost Guide. 	

<p>improved study outcomes and a higher percentage of applications proceeding to interconnection.</p> <p>Finally, the Clean Coalition developed and advanced the idea that the PAR option be modified to include an additional line item for cost certainty option eligibility and, if sufficient data is available early in the process, include a preliminary and non-binding determination of cost certainty eligibility for the project.</p>	<ul style="list-style-type: none"> • <i>Reply Comments to Joint IOU Motions on Language Implementing Joint Cost Certainty Proposal and Revisions to Streamline Rule 21 for Behind-the-Meter Non-Exporting Storage Devices</i> at 2, 5-7 (Jun. 8, 2015). • <i>Clean Coalition Reply Comments on the Staff Proposals for Cost Certainty & Response to Questions Regarding Issues, Priorities and Recommendations for Energy Storage Interconnection</i> at 4-5 (Sept. 26, 2014). • <i>Clean Coalition Opening Comments on Staff Priorities for Cost Certainty</i> at 27-28, 39 (Sept. 12, 2014). • <i>Clean Coalition Revised Comments on Amended Scoping Memo</i> at 11-13, 15 (Oct. 29, 2012). • <i>Clean Coalition Comments on the Proposed Decision Adopting the Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 2-3 and Attachment B: Recommended Scope of Phase 2 Issues (Sept. 4, 2012). • <i>Clean Coalition Comments on Utility Distribution Group Study Process Reports</i> at 4-6 (July 31, 2012). • <i>Joint Reply Comments on the Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 3 (May 1, 2012). • <i>Joint Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 5-8 (Mar. 16, 2012). • <i>Clean Coalition Comments on Interconnection Cost Responsibility</i> at 2-5 (Oct. 28, 2011) [Rule 21 	
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	<p><i>Settlement Process</i>].</p> <ul style="list-style-type: none"> • <i>Clean Coalition Comments on Order Instituting Rulemaking</i> at 6-9 (Oct. 26, 2011). 	
<p>4. Cost Envelope Option</p> <p>The Clean Coalition, with IREC, was one of two key parties who proposed and shaped the Cost Envelope Option (CEO) that the Energy Division staff report recommended in 2014 and that the Decision ultimately adopted. We submitted numerous filings on this issue, including redlined modifications to the Rule 21 tariff, and detailed descriptions of how the CEO should work. Most of our recommended structure for the CEO was adopted by the Decision, including the 25% margin.</p> <p>The Clean Coalition successfully recommended the topic of cost certainty in the original scoping of this proceeding in 2011, agreed in Settlement to subsequently address the topic in Phase II, and presented proposals in workshops and comments in 2012, 2013, and 2014 that ultimately informed and were referenced in the 2014 Staff Report recommendations.</p> <p>In revising the scoping of Phase II of this proceeding in 2014, the ALJ ruled that the record of Phase II would begin with the 2014 Staff Report.</p> <p>Coincident to these efforts, the Clean Coalition initiated a ‘meet and confer’ process and worked with Energy Division Staff and utility personnel to track, develop and report the interconnection cost information data that was critical for parties to develop—ultimately reaching a consensus that was reflected in the APD.</p>	<ul style="list-style-type: none"> • D.16-06-052 at 26 n. 13, 28, 29 (citing our recommendations on the cost envelope range), 33 n. 33 (citing our recommendations for creating a memorandum account to track cost certainty expenses). • <i>Notices of Ex Parte of the Clean Coalition</i> (June 22, 2016). • <i>Clean Coalition Reply Comments on Alternate Proposed Decision</i> at 1-4 (May 31, 2016). • <i>Clean Coalition Opening Comments on Alternate Proposed Decision</i> at 2-9 (May 26, 2016). • <i>Clean Coalition Reply Comments on Proposed Decision</i> at 1-2 (Mar. 14, 2016). • <i>Notice of Ex Parte of the Clean Coalition</i> (Mar. 11, 2016). • <i>Notice of Ex Parte of the Clean Coalition</i> (Mar. 10, 2016). • <i>Clean Coalition Opening Comments on Proposed Decision</i> at 2-3, 5-11 (Mar. 7, 2016). • <i>Status Conference Meet & Confer Report and Recommended Schedule to Administrative Law Judge</i> (Aug. 6, 2015) • <i>Reply Comments to Joint IOU Motions on Language Implementing Joint Cost Certainty Proposal and Revisions to Streamline Rule 21 for Behind-the-Meter Non-Exporting Storage Devices</i> at 2, 3-11 (Jun. 8, 2015). • <i>Clean Coalition Comments on Joint IOU Motions on Language Implementing Joint Cost Certainty Proposal and Revisions to</i> 	

<p>The Clean Coalition also provided the only analysis of the ratepayer impact and benefits, a central topic of the All Party Meeting and Final Decision adopting the CEO.</p> <p>The APD and final decision adopted the cost envelope in full, which had not been the case with the Proposed Decision. With the Clean Coalition’s leadership and extensive coordination with IREC, the utilities, staff and Commissioners through comments, ex parte communications, various phone calls and meetings, the Clean Coalition worked to revise the Proposed Decision in order to adopt the Cost Envelope Option as an alternative to the Fixed Price Option—obtaining consensus support from nearly all parties. Following these efforts, the Commission incorporated these recommendations and obtained a unanimous vote on the APD.</p> <p>Specific Clean Coalition recommendations that the Decision adopted include:</p> <ul style="list-style-type: none"> • The creation of a Cost Envelope limiting applicant liability for actual cost variation from utility estimated costs; • The use of 25% as the range of allowable variation from estimated costs; • The creation of a Memorandum Account for and excess or deficit in costs collected relative to actual costs; • Conditional ratepayer reimbursement to utilities of cost overages, if justified through Commission 	<p><i>Streamline Rule 21 for Behind-The-Meter Non-Exporting Storage Devices</i> at 2, 7-21 (May 22, 2015).</p> <ul style="list-style-type: none"> • <i>Notice of Ex Parte Communication of the Bioenergy Association of California, Clean Coalition, and Interstate Renewable Energy Council, Inc.</i> at 2 (Dec. 19, 2014). • <i>Clean Coalition Reply Comments on the Staff Proposals for Cost Certainty</i> at 5-8, 9-12 (Sept. 26, 2014). • <i>Clean Coalition Opening Comments on Staff Proposals for Cost Certainty</i> at 5-6, 10-11 (Sept. 12, 2014). • <i>Administrative Law Judge’s Ruling Setting Schedule for Comments on Staff Reports and Scheduling Prehearing Conference</i> at 1, Attachment A: Staff Report on Cost Certainty for the Interconnection Process at 11 (July 29, 2014). • <i>Notice of Ex Parte Communications of the Clean Coalition, Attachment: DER Interconnection Cost Certainty Proposal and Attachment: Reducing DER Interconnection Costs Proposal</i> (July 18, 2014). • <i>Clean Coalition Motion to Take Official Notice of Discovery Requests and Responses</i> (Apr. 25, 2013). • <i>Clean Coalition Standardized Pricing Proposal Workshop Presentation</i> (Mar. 5, 2013). • <i>Clean Coalition Rule 21 Cost Sharing Proposal Workshop Presentation</i> at 12 (Nov. 13, 2012). • <i>Clean Coalition Revised Comments on Amended Scoping Memo</i> at 6-11 (Oct. 29, 2012). • <i>Clean Coalition Comments on the Proposed Decision Adopting the Settlement Agreement Revising</i> 	
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<p>processes;</p> <ul style="list-style-type: none"> • Rejection of the ‘Fixed Cost’ proposal, including analysis of the limited applicability and market relevance; • Broad applicability of a cost certainty option, including the COE; • Avoiding excessive fees and schedule delays, and ensuring that all COE added study components are applicable to later study phases and fees; and • Itemization of costs used in developing the CEO, with reference to the Unit Cost Guide. 	<p><i>Distribution Level Interconnection Rules and Regulations</i> at 2-3 and Attachment B: Recommended Scope of Phase 2 Issues (Sept. 4, 2012).</p> <ul style="list-style-type: none"> • <i>Joint Reply Comments on the Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 3 (May 1, 2012). • <i>Joint Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations</i> at 5-8 (Mar. 16, 2012). • <i>Clean Coalition Comments on Interconnection Cost Responsibility at 2-5</i> (Oct. 28, 2011) [<i>Rule 21 Settlement Process</i>]. • <i>Clean Coalition Comments on Order Instituting Rulemaking</i> at 3-7, 10 (Oct. 26, 2011). • <i>Clean Coalition Comments on Various Distribution System Interconnection Settlement Issues</i> at 9-10 (Sept. 25, 2011) [<i>Rule 21 Settlement Process</i>]. 	
<p>5. PG&E’s Direct Transfer Trip (DTT) rules and the Synchronous Generator Working Group</p> <p>In work separate from but related to D.06-06-052, the Clean Coalition submitted comments on PG&E’s Technical Bulletin addressing the DTT costs and requirements (Sept. 29, 2013) after the Synchronous Generator working group raised this issue. We also took part more generally in this working group over a number of years, and this claim is the appropriate time to request compensation for this work because the decision closed R.11-09-011. The Clean Coalition</p>	<ul style="list-style-type: none"> • PG&E’s Technical Bulletins include guidance and cost information on the use of DTTs, which can be quite expensive when required for smaller DG projects. • PG&E’s revised Technical Bulletins and Rule 21 incorporated our comments on DTTs, as described in documents sent via email by Bryan Neff, coordinator of the working group (Feb. 14, 2014). 	

<p>previously included these hours in a compensation request for D.14-04-003, but the Commission deemed these hours not appropriate for compensation in connection with that decision.</p>		
<p>6. Smart Inverter Working Group</p> <p>The Clean Coalition actively promoted the inclusion of advanced inverter functionality in Rule 21 Tariff study process for the mitigation of generator impacts and accommodation of higher levels of distributed generation penetration starting in 2012, in advance of the Energy Division Staff Paper on this topic. We encouraged the creation of the Smart Inverter Working Group (SIWG) and were active participants early on in developing the rules for Smart Inverters.</p> <p>As the SIWG developed membership with high levels of technical expertise, we limited our participation to focus only on interconnection policy and tariff implications, reviewing and commenting on the draft and final recommendations submitted to the Commission.</p> <p>The Clean Coalition was involved with the SIWG during the course of this proceeding and now seeks compensation for involvement in the compliance filing.</p>	<ul style="list-style-type: none"> • The productive history, current work, and a compliance filing requirement for the Working Group is detailed in the Decision at 41 and in Attachment E. • <i>Clean Coalition Reply Comments on Smart Inverter Working Group Phase 2 Communications Protocols</i> at 2-3 (Nov. 20, 2014) (noting cost-effectiveness concerns on smart inverter communication standards). • <i>Clean Coalition Reply Comments on June 21, 2013 Workshop on Smart Inverter Functionalities and Recommendations for Updating Technical Requirements in Rule 21</i> at 2-3, (Aug. 30, 2013). • <i>Clean Coalition’s Opening Comments on June 21, 2013 Workshop on Smart Inverter Functionalities and Recommendations for Updating Technical Requirements in Rule 21</i> at 3-8 (July 31, 2013). 	

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

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: California Solar Energy Industries Association (“CalSEIA”), the Interstate Renewable Energy Counsel (“IREC”), SolarCity, and ORA.		
d. Intervenor’s claim of non-duplication: The Clean Coalition was a lead participant throughout each phase of this proceeding, including the original scoping of cost certainty issues in 2011. Our involvement in the proceeding was unique and focused on a specific set of issues designed to further improve interconnection procedures and thus save ratepayers money while improving the grid with increased distributed renewables. We successfully sought to bring parties together toward consensus. Our positions paralleled other parties on certain positions, including IREC in particular, but this did not duplicate efforts because of the reasoning behind our positions and the fact that IREC and the Clean Coalition only came to some similar position after a five-year process of discovery, discussion and deliberation—which ultimately led to the Commission adopting many of our key recommendations in the Decision. Moreover, the Clean Coalition’s and the Commission’s views on the most appropriate cost certainty improvements advanced over time, as this proceeding included three different iterations of efforts to address the cost certainty issue. The Clean Coalition initially proposed a standardized pricing approach to improved cost certainty for the most common scenarios, based on cost averaging, along with the Cost Guide, and the Cost Envelope approach for other types of projects. While IREC identified and originally proposed a variant of the Massachusetts Cost Envelope model, the Clean Coalition became the strongest and most active supporter of the Cost Envelope for the second half of the proceeding. Accordingly, even though the Clean Coalition and IREC’s positions overlapped at times, our roles were unique and highly important in leading to the eventual outcomes in the Decision. The Clean Coalition brought a unique perspective from our organization’s experience with distribution system planning and related benefit-cost analyses for various distributed energy resources and expertise in distribution interconnection among both public and investor owned utilities. The Clean Coalition developed the Cost Guide proposal and led data requests that were necessary to evaluate options in this proceeding, and initiated utility reporting of cost data to the Commission following the adoption of Phase 1 tariff amendments.		

¹ 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

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

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

a. Intervenor’s claim of cost reasonableness:	CPUC Discussion
<p>The Clean Coalition independently developed our unique policy positions based on our organization’s expertise in distribution system planning, valuing distributed energy resources, and streamlining interconnection practices, including the publication of DOE SunShot-funded Model Interconnection Standards. The cost certainty issue was originally raised by the Clean Coalition and scoped at our request based on unique outreach to effected parties to identify barriers to the development of renewable resources in California. The Clean Coalition has devoted extensive staff hours and resources to advance this work, including creating policy proposals that informed the efforts of the proceeding. While this related work informs our present contributions, only those hours directly associated with and unique to this proceeding are requested for compensation.</p> <p>The Clean Coalition worked consistently throughout this proceeding to engage disparate parties and Commission staff in reaching successful consensus and reducing the scope of alternatives and dispute, as evidenced through the Joint Motions and broadly supported Alternate Decision. As noted in the Decision (at p. 2, 20, and 47), collaboration was successfully developed over time, marking a distinct evolution from the initial Settlement process.</p> <p>The Clean Coalition’s involvement resulted in major improvements to the interconnection process under Rule 21, culminating a five-year process that began in 2011 with the opening of Phase 1 of this proceeding. These improvements support the interconnection process for solar, energy storage, EVs, and other DG and DER, ultimately benefiting ratepayers significantly through reduced uncertainty and reduced costs. Our efforts will also result in environmental benefits from decreasing California’s reliance on traditional energy resources, which emit greenhouse gases, ozone, particulate matter, and hazardous air pollutants.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Clean Coalition staff worked on four discreet sub-issues in this proceeding that we have developed significant expertise around: 1) Unit Cost Guide; 2) Behind the meter energy storage interconnection; 3) enhancements to the PAR process; 4) cost certainty. These four sub-issues all fall under the “implementation of cost responsibility” issued identified in the 2012 amended scoping memo (p. 4). We also included about 20 hours of time on the “technical operating standards” issue that were deemed inappropriate for inclusion in a previous comp claim in this</p>	

<p>proceeding and which are now ripe, arising from our work with the Synchronous Generator Working Group that was formed as part of this proceeding. Last, we also included some Smart Inverter Working Group (SIWG) hours that have not thus far been compensated. We limited our involvement in SIWG to less than 10% of the total review and discussion periods, only selectively engaging where we would not duplicate the contribution of others</p> <p>We ensured that only personnel essential to these matters worked on the issues. The claimed hours are reasonable in light of the significance of this proceeding and the ratepayer benefits described above. The hours devoted to this proceeding reflect work on written filings, research, and coordination time. Although we have spent a significant amount of time developing expertise in this policy area, only those staff hours spent specifically developing our policy position and commenting in this proceeding are part of this compensation request.</p> <p>Clean Coalition consulting attorney Tam Hunt and Clean Coalition Director of Economics and Policy Analysis Kenneth Sahn White jointly drafted and reviewed comments, developed policy positions, and participated in workshops. Mr. White’s established rate of \$300 reflects the significant level of expertise he has developed working on energy issues over more than 20 years, including 6 years practicing in front of the CPUC. Hunt’s 2011-2014 rates have been established in other decisions, and his 2015 and 2016 rates are being requested at this time (a recent decision—as discussed below—approved 2015 and 2016 rates, but that decision’s rate determination is being challenged by Hunt’s other client at the CPUC, the Green Power Institute).</p>	
<p>c. Allocation of hours by issue: The vast majority of hours in this claim (95%) go to Issue 4 in the scoping memo: improving cost responsibility, and the various sub-issues included. Some of the hours claimed belong to the technical operating standards issue and the Smart Inverter Working Group.</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Tam Hunt	2011	3	\$330	D.13-12-021	\$990			
Tam Hunt	2012	19.75	\$340	D.15-07-023	\$6,715			
Tam Hunt	2013	19.75	\$345	D.15-07-023	\$6,814			
Tam Hunt	2014	48	\$370	D.15-10-014	\$17,760			
Tam Hunt	2015	80.5	\$370	D.16-06-069	\$29,785			
Tam Hunt	2016	35.25	\$375	D.16-06-069	\$13,219			
K. Sahn White	2011	8	\$270	D.13-12-023	\$2,160			
K. Sahn	2012	22	\$280	D.13-12-023	\$6,160			

White								
K. Sahn White	2013	98.25	\$285	D.16-04-032	\$28,001			
K. Sahn White	2014	95.75	\$290	D.16-04-032	\$27,768			
K. Sahn White	2015	163	\$295	D.16-08-014	\$48,085			
K. Sahn White	2016	68.75	\$300	D.16-08-014	\$20,625			
Subtotal: \$215,240						Subtotal: \$		
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 \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Tam Hunt	2016	12	\$187.50	½ Full Rate	\$2,250			
K. Sahn White	2016	6	\$150	½ Full Rate	\$900			
Katie Ramsey	2016	26	\$117.50	½ Full Rate (ALJ-329)	\$5,640			
Subtotal: \$8,790						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
TOTAL REQUEST: \$224,030						TOTAL AWARD: \$		
<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 BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Katherine (Katie) Ramsey	Feb. 2015	302532	No
Tam Hunt	Nov. 2001	218673	No

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

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Clean Coalition Hours
3	Clean Coalition Staff Resumes
4	<p>Tam Hunt has represented various intervenors before the Commission since 2005, has practiced as an attorney since 2001, and has been in the renewable energy law field for over 12 years. Accordingly, the appropriate range for an attorney of his experience is \$320-570, based on Res. ALJ-308. His approved rate for 2014 and 2015 is \$370 and \$375 for 2016, approved in D.16-06-049.</p> <p>Mr. Hunt has since 2009 been the founder and president of Community Renewable Solutions LLC, a consulting and law firm focused on renewable energy and related fields. Among other clients, he represents the Clean Coalition, the Green Power Institute, and the Community Environmental Council, reflecting the fact that he has a broad background and deep expertise in many topics before the Commission, including renewable energy policy, energy storage policy, electric vehicle policy, greenhouse gas emission policy, and other areas. Hunt is a well-known member of the California policy-making community.</p> <p>Kenneth Sahn White is the Economics & Policy Analysis Director for the Clean Coalition and has over 20 years of experience in economic and environmental policy. Mr. White provided the bulk of the Clean Coalition’s contributions in this proceeding. He participated extensively in workshops, comments, and working groups, as noted in the attached hours. Prior to joining the Clean Coalition he held positions as a Senior Research Consultant to the Center for Ecoliteracy, Technical and Policy Analyst in the development of the Ecological Footprint, and Associate Director of Progressive Secretary, a leading web source of legislative constituent engagement. Subsequent to his graduate work in the Social Studies of Science and Technology at MIT, Mr. White has completed coursework for an MS Environmental Studies from San Jose State University with a planned thesis focus on economic optimization of local greenhouse gas reduction strategies.</p> <p>Katie Ramsey prepared this claim. Ms. Ramsey is submitting a first time rate request of \$235, which is in the middle of the range for an attorney with Ms. Ramsey’s four years of experience. Ms. Ramsey graduated from George Washington University Law School in 2011 and was admitted to the New York Bar in February 2012. Prior to working at the Clean Coalition, Ms.</p>

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

	Ramsey worked as an environmental law attorney in New York and on renewable energy policy at the Department of Energy and the Bureau of Ocean Energy Management. She was admitted to the California Bar in 2015. Ms. Ramsey’s resume is attached.
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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)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

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

Party	Comment	CPUC Discussion

FINDINGS OF FACT

- Intervenor [has/has not] made a substantial contribution to D._____.

Revised September 2014

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 75th 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.

**Attachment 1:
Certificate of Service by Customer**

I hereby certify that I have this day served a copy of the foregoing **INTERVENOR COMPENSATION CLAIM OF [Intervenor's Name] AND DECISION ON INTERVENOR COMPENSATION CLAIM** by (check as appropriate):

- hand delivery;
- first-class mail; and/or
- electronic mail

to the following persons appearing on the official Service List:

[Insert names and addresses from official Service List]

Executed this [day] day of [month], [year], at [city], California.

[Signature]

[Typed name and address]