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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902E) for Approval of SB 350 Transportation Electrification Proposals.	Application 17-01-020 (Filed January 20, 2017)
Application of Southern California Edison Company (U 338-E) for Approval of its 2017 Transportation Electrification Proposals.	Application 17-01-021 (Filed January 20, 2017)
Application of Pacific Gas and Electric Company for Approval of its 2017 Transportation Electrification Proposals.	Application 17-01-022 (Filed January 20, 2017)

NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and ¹ checked), ADMINISTRATIVE LAW JUDGE'S RULING ON [COMMUNITY ENVIRONMENTAL COUNCIL]'S SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT icompcordinator@cpuc.ca.gov.

Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): Community Environmental Council	
Assigned Commissioner: Carla Peterman	Administrative Law Judge: John S. Wong, Michelle Cooke, Sasha Goldberg
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.	
	Signature: /s/ Michael Chiacos
Date: April 13, 2017	Printed Name: Michael Chiacos

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).

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

A. Status as “customer” (see Pub. Util. Code § 1802(b)) ² 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. See, for example, D.08-07-019 at 5-10).	<input type="checkbox"/>
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.	<input type="checkbox"/>
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 (§1802(b)(1)(C)). 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. See D.98-04-059, footnote at 30.	<input checked="" type="checkbox"/>
4. The party’s detailed explanation of the selected customer category. <u>The party’s explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding’s docket number and the date of filing) to such filings needs to be made. The Council has previously demonstrated its category 3 customer status and the Commission has ruled many times in favor of the Council as a category 3 customer in proceedings R.03-10-003 (community choice aggregation), R.04-04-026, R.06-02-010, R.08-08-009 (Renewable Portfolios Standard), I.05-09-005 (renewables transmission), R.06-04-010 (energy efficiency), R.08-12-009 (smart grid), R.12-03-	

² All statutory references are to California Public Utilities Code unless indicated otherwise.

014 (GHG compliance) and others. The Council has also been awarded intervenor compensation in a number of proceedings.

The Council has been developing creative solutions to environmental problems since 1970. It has served the people of Santa Barbara and the Central Coast for over 47 years, and is the leading non-profit environmental organization in the region. In 2004, the Council shifted its focus to energy and climate change issues and spearheaded a regional effort to wean local communities from fossil fuels entirely over the next generation.

The Council is participating in this proceeding because of its extensive on-the-ground and planning work with EV Readiness efforts. The Council's transportation program works to reduce vehicle miles traveled and encourage a switch to zero emission vehicles. The Council is on the steering committee for Plug-in Central Coast, the official EV Readiness group for the region. This group has developed a regional EV Readiness Plan, and works with local businesses and governments to develop EV friendly policies. The Council has worked with dozens of charging station companies, businesses, governments, and other site hosts to install hundreds of charging stations throughout Ventura, Santa Barbara, and San Luis Obispo Counties. The Council also hosts multiple consumer facing EV education events annually such as Drive Electric Week and the Santa Barbara Green Car Show, which attracts 35,000 people as part of Earth Day and features dozens of EVs and a Ride and Drive. Through our on-the-ground interactions with all actors of the EV ecosystem, the Council seeks to transform these lessons learned into effective policy. More information on the Council and its energy program may be found at www.CECSB.org

The Council has approximately 6,400 members, many of whom have specifically called for the creation of the Council's energy program and many of whom have become directly involved in some capacity in the energy program. The Council's members are generally Southern California Edison or PG&E customers who, by virtue of their electricity bills, have a direct interest in any energy related policy matter, such as this proceeding, that may affect the quality and type of their electric service, as well as utility EV Readiness activities planned for their service territory. The Council's members have an interest in achieving energy independence and mitigating climate change locally, regionally and globally by switching to electric vehicles while maximizing energy efficiency and utilizing local renewable energy resources.

Pursuant to D.98-04-059, Finding of Fact 13, an intervenor must show that it will represent customer interests that would otherwise be under-represented. The Council represents grassroots EV owners and is the only intervenor representing solely the interests of residential and small commercial electricity and natural gas customers in the Central Coast region of California.

Do you have any direct economic interest in outcomes of the proceeding? ³	
If “Yes”, explain:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 type="checkbox"/> No
C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)	
The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The party’s explanation of its status as an eligible local government entity must include a description of	
(1) The relevant triggering catastrophic event;	
(2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and	
(3) The entity’s reason(s) to participate in this proceeding.	
D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 3/16/2017	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2a. The party’s description of the reasons for filing its NOI at this other time:	
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:	

³ See Rule 17.1(e).

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

A. Planned Participation (§ 1804(a)(2)(A)):

The party’s statement of the issues on which it plans to participate:

The Council has been an active participant in proceedings regarding Community Choice, Renewables, Energy Efficiency, Smart Grid, GHG Compliance, and others. We expect to actively participate in the SB 350 transportation electrification applications by using our on the ground EV readiness experience, particularly in program design for deployment of EVSE, integration of renewable energy into transportation electrification, rate design and impacts to consumers, analysis of greenhouse-gas impacts, and consumer and fleet facing education and outreach programs.

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

As an environmental non-profit that leads EV Readiness efforts, the Council represents grassroots electric vehicle drivers, and has a unique consumer advocacy perspective from our work with governments and businesses. The Council has been working with the Green Power Institute to coordinate activities and comments in this proceeding (as we have in R.13-11-007 for a number of years), and will work with other parties who represent similar interests. The Council will also utilize the same attorney as Green Power Institute (Tam Hunt), which will reduce total hours needed.

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).

The Council expects to file briefs, prepare comments and testimony, will participate in hearings, workshops, and meetings as necessary.

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)):

Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Tam Hunt	150	375	\$56,250	
Michael Chiacos	150	230	\$34,500	
Subtotal: \$ 90,750				
OTHER FEES				
Subtotal: \$				
COSTS				

Office and Misc Expenses		\$150
Travel		\$1,200
Subtotal: \$1,350		
TOTAL ESTIMATE: \$92,100		
Estimated Budget by Issues:		
<p>The Council will focus on program design for deployment of EVSE, integration of renewable energy into transportation electrification, policy issues, rate design and impacts to consumers, and consumer and fleet facing education and outreach programs.</p> <p>Estimated Budget:</p> <p>EVSE Infrastructure Program Design: 30% Policy and Rate Issues: 30% EV adoption/Marketing and Outreach Issues: 30% General Preparation: 10%</p>		
<p><i>Attorney Tam Hunt has been the Council's attorney for 12 years (four years in-house and the last eight years as outside counsel) and was awarded a rate of \$375 in 2016.</i></p> <p><i>Expert Michael Chiacos has 10 years of clean energy and electric vehicle readiness experience</i></p>		

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

A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:	Applies (check)
1. The 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(h))	<input type="checkbox"/>
2. 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. (§ 1802(h))	<input checked="" type="checkbox"/>
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>
4. A § 1802(h) or § 1803.1(b) 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)).	<input type="checkbox"/>
The Commission has not made such a finding in the last year.	

<p>B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:</p>
<p>Section 1802’s rebuttable presumption does not apply to the Council’s showing of significant financial hardship because it has been more than a year since such a finding was made (it has been made previously many times). The Council is a 501(c)(3) non-profit with no specific funding for policy advocacy. As such, the Council’s continued participation in Commission proceedings requires intervenor compensation. Our participation over the last decade has been steady and prudent and we have repeatedly demonstrated that our contributions have been substantial and warrant the compensation we have received. We shall flesh out our showing of financial hardship in our claim for compensation.</p>

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC
ASSERTIONS MADE IN THIS NOTICE**

**(The party 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” or an “eligible local government entity” 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"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) 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 or eligible local government entity’s Intervenor Compensation Claim); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(h).

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 or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>
4. The customer or eligible local government entity 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 or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge