



**FILED**  
10/11/18  
11:22 AM

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

In the Matter of the Application of Pacific Gas and Electric Company for Approval of its 2018-2020 Electric Program Investment Charge Investment Plan. (U39E).

Application 17-04-028

And Related Matters.

Application 17-05-003

Application 17-05-005

Application 17-05-009

**ADMINISTRATIVE LAW JUDGE'S RULING ON CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE'S AMENDED NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION**

**Customer (party intending to claim intervenor compensation):** California Environmental Justice Alliance (CEJA)

**Assigned Commissioner:** Martha Guzman Aceves

**Administrative Law Judge:**  
Stephen C. Roscow

**PART I: PROCEDURAL ISSUES**  
**(Completed by the party intending to claim intervenor compensation)**

<b>A. Status as “customer” (see Pub. Util. Code § 1802(b))<sup>1</sup></b> The party claims “customer” status because the party is (check one):	<b>Applies (check)</b>
<b>1.</b> A <b>Category 1</b> 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"/>
<b>2.</b> A <b>Category 2</b> 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"/>
<b>3.</b> A <b>Category 3</b> 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"/>
<p><b>4. The party’s detailed explanation of the selected customer category.</b>            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.</p> <p>The California Environmental Justice Alliance (CEJA) is an alliance of grassroots environmental justice organizations situated throughout California. CEJA’s mission it to build the power of communities across California to create policies that will alleviate poverty and pollution through a statewide movement and advocacy for environmental health and social justice. Together, CEJA represents thousands of residents throughout California.</p> <p>CEJA operates as a project of the Environmental Health Coalition (EHC), which is also the fiscal sponsor of CEJA.<sup>2</sup> As described in CEJA’s agreement with EHC, EHC manages “cash and non-cash revenue items, accounts payable and receivable, negotiation of contracts, disbursement of [CEJA] funds (including grants).”<sup>3</sup> All of CEJA’s employees, unless otherwise agreed, are employees of EHC, and CEJA must</p>	

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

<sup>2</sup> See Agreement between EHC and CEJA (Attachment 3) (describing CEJA as a “project” of EHC and establishing the terms for the relationship between EHC and CEJA).

<sup>3</sup> See Agreement between EHC and CEJA (Attachment 3).

comply with “all EHC fiscal, grant management and personnel policies and procedures.”<sup>4</sup> Because CEJA is a project of EHC, and CEJA employees are employees of EHC, CEJA operates under EHC’s articles and bylaws. As described below, EHC qualifies as a Category 3 customer under Section 1802(b)(1)(C) of the Public Utilities Code pursuant to its bylaws.

In D.98-04-059 at 29, n. 14 (Intervenor Compensation Order), the Commission reaffirmed its “previously articulated interpretation that compensation be proffered only to customers whose participation arises directly from their interests as customers.” In that Order, the Commission further 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.<sup>5</sup>

EHC’s bylaws meet this requirement by providing that:

The purpose of this corporation is to achieve environmental and social justice by empowering impacted communities to make social change. EHC organizes, educates, develops leadership and participates in regulatory and public proceedings to protect public health and the environment threatened by toxic pollution. EHC supports broad efforts that create a just society and fosters a healthy and sustainable quality of life.<sup>6</sup>

As this language provides, EHC works to empower impacted communities through its participation in “regulatory and public proceedings” to protect both public health and the environment threatened by pollution. In other words, EHC represents impacted communities that share a concern for public health and the environment. CEJA, as a project of EHC, represents organizations whose members live in environmental justice communities and are customers that share a concern for public health and the environment. The concerns of these members distinguish their interests from Commission staff and other California ratepayers participating in this matter. This establishes that CEJA, through its fiscal sponsor EHC, qualifies as a Category 3 customer.

Notably, CEJA was previously found to be eligible for intervenor compensation in other CPUC proceedings including A.14-11-016. In the Administrative Law Judge’s

<sup>4</sup> See Agreement between EHC and CEJA (Attachment 3).

<sup>5</sup> See also D.09-09-045, p. 8.

<sup>6</sup> See June 25, 2018 EHC Bylaws (Attachment 2).

(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 also qualified as a Category 3 customer under Section 1802(b)(1)(C) of the Public Utilities Code.

Pursuant to Rule 17.1(d), a true and correct copy of EHC's articles of incorporation and bylaws are attached hereto along with the most recent fiscal sponsor agreement.

Additional Description of Environmental Health Coalition:

Consistent with its bylaws, EHC has long advocated on behalf of impacted communities to protect public health and the environment threatened by toxic pollution. As a prior ruling already acknowledged, EHC brings a "wealth of experience" to a Commission proceeding.<sup>7</sup>

EHC has worked 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.<sup>8</sup> 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.<sup>9</sup> EHC's work related to public health and the environment is furthered by its fiscal sponsorship of CEJA. EHC is a category 3 customer due to its representation of ratepayers with environmental concerns and groups with environmental concerns.

Overview of CEJA and Its Members:

CEJA, as a project of EHC and consistent with EHC's bylaws, has built an alliance of organizational members to organize and participate in regulatory and public proceedings on behalf of impacted communities and develop leadership to protect public health and the environment threatened by toxic pollution. CEJA has two types of organizational memberships – core and partner memberships – to represent and advocate for impacted communities throughout the state.<sup>10</sup> Core members are base-building environmental justice organizations who are deeply engaged in CEJA's work. Each core member has their Executive Director on CEJA's steering committee and staff members sitting on program committees.

The core members of CEJA are: Asian Pacific Environmental Network (APEN), the

<sup>7</sup> R.09-11-014, Dec. 22, 2011 ALJ Ruling Granting Party Status to EHC.

<sup>8</sup> EHC Green Energy/Green Jobs Campaign, <https://www.environmentalhealth.org/index.php/en/what-we-do/climate-justice/green-energy>.

<sup>9</sup> See EHC Green Energy/Green Jobs Campaign, <https://www.environmentalhealth.org/index.php/en/what-we-do/climate-justice/green-energy>.

<sup>10</sup> California Environmental Justice Alliance, Members and Partners, <https://caleja.org/about-us/members/>.

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).<sup>11</sup> The bylaws of each of the core members was filed in A.11-05-023.

CEJA also has partner members that are doing environmental justice work but are not limited to environmental justice identified organizations. Each partner organization sits on at least one of CEJA's program committees. CEJA's partner organizations are the Central Coast Alliance United for a Sustainable Economy (CAUSE), Leadership Counsel for Justice and Accountability, Physicians for Social Responsibility-Los Angeles, and Strategic Concepts in Organizing and Policy Education (SCOPE).<sup>12</sup>

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 to transform California's energy system into one that is just, democratic, equitable, and composed of genuinely clean energy.<sup>13</sup> To accomplish this transformation, CEJA 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. CEJA has been a party in several Commission proceedings including 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), and CEJA is currently active in the Integrated Resource Planning Proceeding (R.16-02-007). CEJA has also been 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.

Below are the descriptions of CEJA's members that it advocates on behalf of through its Steering Committee and program committees.

**CEJA CORE MEMBERS:**

In addition to the Environmental Health Coalition, which is described above, CEJA

<sup>11</sup> California Environmental Justice Alliance, Members and Partners, <https://caleja.org/about-us/members/>.

<sup>12</sup> California Environmental Justice Alliance, Members and Partners, <https://caleja.org/about-us/members/>.

<sup>13</sup> California Environmental Justice Alliance, Energy Equity, <https://caleja.org/what-we-do/energyequity/>.

has the following 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.<sup>14</sup> 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 represents 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<sup>15</sup>. 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.<sup>16</sup> 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.<sup>12</sup> 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 generatingresources that are expensive and environmentally damaging."<sup>17</sup>

CBE has thousands of members throughout the state of California. CBE's members live, work, or engage with environmental justice issues in urban communities in Northern and Southern California. CBE represents ratepayers with environmental concerns in low-income communities of color throughout 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.<sup>18</sup> 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

<sup>14</sup> See Asian Pacific Environmental Network, <https://apen4ej.org/>. APEN's bylaws were filed in A.11-05-023.

<sup>15</sup> Asian Pacific Environmental Network, What We Do, <https://apen4ej.org/what-we-do/>.

<sup>16</sup> Communities for a Better Environment, <http://www.cbecal.org/>.

<sup>17</sup> CBE's bylaws were filed in A.11-05-023.

<sup>18</sup> Center for Community Action and Environmental Justice, <http://ccej.org/>. CCA EJ's bylaws were filed in A.11-05-023.

levels and land use problems in Latino communities in California. CCAEJ'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." CCAEJ represents ratepayers with environmental concerns in communities in California. The majority of CCAEJ's thousands of members reside in California.

**Center on Race, Poverty & the Environment (CRPE)** – CRPE is a non-profit "public benefit" California corporation, authorized pursuant to its articles of incorporation to "perform advocacy on behalf of low-income communities and communities of color" and to assist those communities to build capacity to protect themselves from environmental hazards.<sup>19</sup> CRPE's mission is achieve environmental justice and healthy sustainable communities through collective action and the law.<sup>20</sup> CRPE aims to build the power of residents in California's San Joaquin Valley, improve community health, and address environmental hazards in low income and immigrant communities. CRPE is based in California and has approximately 500 members, the majority of whom reside in California. CRPE represents ratepayers with environmental concerns in low-income communities of color in California.

**PARTNER MEMBERS:** As described above, these members participate in at least one committee, but they do not sit on the steering committee.

**Central Coast Alliance United for a Sustainable Economy (CAUSE)** builds grassroots power to invoke social, economic, and environmental justice for the people of California's Central Coast region through policy research, leadership development, organizing, and advocacy.<sup>21</sup> CAUSE defines the Central Coast region as the counties of Ventura, Santa Barbara, San Luis Obispo, Santa Cruz, Monterey, and San Benito.

**Leadership Counsel for Justice and Accountability** is based in the San Joaquin and East Coachella Valley mobilizes community voices, advocates for sound policies, and eradicates injustice to promote equal access to opportunity regardless of race, income, and place.

**Physicians for Social Responsibility – Los Angeles (PSR-LA)** represents over 5,000 physician and health advocates in Southern California and works to protect public health from nuclear threats and environmental toxins by informing the medical community and policymakers about safer practices that strengthen engagement in meaningful public health and environmental advocacy.<sup>22</sup>

**Strategic Concepts in Organizing and Policy Education (SCOPE)** builds grassroots power to create social and economic justice for low-income, female, immigrant, black, and brown communities in Los Angeles.<sup>23</sup> To do this, SCOPE organizes communities, develops leaders, collaborates through strategic alliances, builds capacity through training programs, and educates South LA's residents to have an active role in shaping policies that affect the quality of life in our region.

<sup>19</sup> CRPE's bylaws were filed in A.11-05-023.

<sup>20</sup> Center for Race, Poverty and the Environment, <https://crpe-ej.org/en/>.

<sup>21</sup> CAUSE, <https://causenow.org/>.

<sup>22</sup> Physicians for Social Responsibility, Los Angeles, <https://www.psr-la.org/>.

<sup>23</sup> SCOPE-LA, <http://scopela.org/>.

<b>Do you have any direct economic interest in outcomes of the proceeding?</b> <sup>24</sup> If “Yes”, explain:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <sup>25</sup>
<b>B. Conflict of Interest (§ 1802.3)</b>	<b>Check</b>
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
<b>C. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</b>	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 7/12/2017 The original NOI was filed on 7/12/2017. This Amended NOI is being filed pursuant to instructions from the Intervenor Compensation section.	<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: This Amended NOI is being filed pursuant to instructions from the Intervenor Compensation section at the Commission. This Amended NOI includes the recent change in bylaws of the Environmental Health Coalition.	
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:	

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

<b>A. Planned Participation (§ 1804(a)(2)(A)):</b>
<u>The party’s statement of the issues on which it plans to participate:</u> CEJA’s primary areas of interest are listed below. It is possible that CEJA will identify other areas relevant to the interests of its constituencies as the proceeding unfolds. However, at this time CEJA’s participation is planned to focus on:  1) Ensuring an equitable portion of EPIC investments and programs are deployed in and benefit disadvantaged communities.  2) Promoting meaningful community engagement practices for low-income and disadvantaged communities in investment and program development. <u>The party’s explanation of how it plans to avoid duplication of effort with other parties:</u>

<sup>24</sup> See Rule 17.1(e).

<sup>25</sup> To support this, CEJA has filed a list of all of the contributors over \$2,000 from 2015-2018 under seal. See Attachment 4.

CEJA will work closely with Greenlining to discuss the issues that our organizations are planning to address, in order to avoid duplication. CEJA is also in communication with staff at the Office of Ratepayer Advocates, California Energy Commission staff, and representatives of low-income advocates, as well as with advocates for technology-driving firms that have in the past sought or secured EPIC funding for projects. CEJA intends to work to coordinate with the parties to ensure that issues regarding disadvantaged communities are thoroughly addressed and that no duplication occurs.

With its longstanding contributions to PUC proceedings regarding disadvantaged communities, CEJA is a critical party to this proceeding to ensure that the PUC actualizes benefits for disadvantaged communities from EPIC funding.

The party’s description of the nature and extent of the party’s planned participation in this proceeding.

CEJA plans to participate in the proceeding by with a particular focus on implementation in disadvantaged communities. Where this focus arises, CEJA will participate in workshops, submit comments and briefs, engaging with PUC staff and parties’ representatives to discuss and potentially collaborate on the issues and address any other matter that arises within the course of 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)):**

Item	Hours	Rate \$	Total \$	#
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>				
Attorney - Shana Lazerow	25	\$374	\$9,350	1
Attorney – Roger Lin	40	\$305	\$12,200	2
Attorney – Deborah Behles	50	\$386	\$ 19,300	3
Advocate – Strela Cervas	15	\$165	\$ 2,475	4
<b>Subtotal: \$ 43,325</b>				
<b>COSTS</b>				
Travel to PUC			\$500	
<b>Subtotal: \$ 500</b>				
<b>TOTAL ESTIMATE: \$ 43,825</b>				

**Estimated Budget by Issues:**

- CEJA estimates that its participation will be distributed approximately as follows.
- 45% Prioritizing investments located in and benefitting disadvantaged communities.
  - 40% Promoting meaningful community engagement strategies in low-income and disadvantaged communities for EPIC projects development, investments and program implementation.
  - 15% General Matters and Coordination with Other Parties.

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP  
(Completed by party intending to claim intervenor compensation)**

<b>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:</b>	<b>Applies (check)</b>
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)).  Commission’s finding of significant financial hardship made in proceeding number:  Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	<input type="checkbox"/>
<b>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:</b>	
<p>CEJA has no economic interest in this proceeding. CEJA is 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. CEJA is filing under seal a list of all of the grants and contributions made to it over \$2000 since 2015. This list demonstrates that CEJA has no economic interest in the proceeding.</p> <p>In addition, the average utility bill of the CEJA members are small compared to the costs of effective participation in this proceeding. If it recovers intervenor compensation, that compensation will be used to compensate the advocates and attorneys for the time and resources spent in this proceeding. Due to these factors, CEJA 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.”).</p>	

**ADMINISTRATIVE LAW JUDGE RULING**

<p><b>1. The Amended Notice of Intent to Claim Intervenor Compensation (NOI) filed by California Environmental Justice Alliance (CEJA) has demonstrated the party’s status as a “customer” for the following reason(s):</b></p> <p>CEJA’s original NOI was timely filed within 30 days after the prehearing conference. On July 3, 2018, CEJA filed an Amended NOI providing a copy of the revised bylaws of CEJA’s fiscal sponsor Environmental Health Coalition (EHC). CEJA operates under EHC’s bylaws. According to the bylaws, EHC, among other things, “participates in regulatory and public proceedings to protect public health and the environment threatened by toxic pollution.” (Article 2 Section 1 of the Bylaws of Environmental Health Coalition revised on June 25, 2018). These provisions contain a reasonably inferable authorization to represent environmental concerns before the Commission. Environmental groups representing “customers who have a concern for the environment” can be eligible under Section 1802(b)(1)(C).<sup>26</sup> In addition, CEJA’s activities, as described in the NOI, correspond to the purposes of CEJA’s fiscal sponsor. We find that CEJA has demonstrated its customer status under Section 1802(b)(1)(C).</p>	<input checked="" type="checkbox"/>
<p><b>2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).</b></p> <p>CEJA’s Amended NOI provides a copy of the Fiscal Sponsorship Agreement between EHC and CEJA, and information identifying CEJA’s financial supporters. The NOI also describes CEJA’s constituents (its core and partner members and the communities they serve) and activities. According to this information, CEJA’s constituents and financial supporters do not have an economic interest in the outcomes of this proceeding. This satisfies the significant financial hardship test of Section 1802(h) for groups and organizations.</p>	<input checked="" type="checkbox"/>
<p><b>3. CEJA’s Motion for Leave to File Attachment Disclosing Financial Information Under Seal (Motion) is granted.</b></p> <p>CEJA submitted under seal a list identifying grantors and grants exceeding \$2,000 received by CEJA between January 1, 2015 and June 15, 2018. The Motion describes this information as sensitive, and requests that this document be treated as confidential. The motion has not been opposed by parties to this proceeding.</p> <p>This Ruling finds that financial information filed by CEJA is of confidential nature and shall remain under seal. The information shall not be made accessible or disclosed to anyone other than Commission staff except upon the further order or ruling the Commission, the assigned Commissioner, the assigned Administrative Law Judge (ALJ), or the ALJ then designated as Law and Motion Judge.</p>	<input checked="" type="checkbox"/>

<sup>26</sup> D.98-04-059 at 30, fn. 14.

