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PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

February 1, 2019

Agenda ID #17193 Alternate to Agenda D#16574 Ratesetting

TO PARTIES OF RECORD IN RULEMAKING 14-10-003:

Enclosed is the Alternate Proposed Decision of Commissioner Liane M. Randolph to the Proposed Decision (PD) of Administrative Law Judge (ALJ) Kelly Hymes that appeared on the Agenda for the Commission meeting of June 21, 2018 as Item 42; the PD will now be on the March 14, 2019 Commission meeting. This cover letter explains the comment and review period and provides a digest of the alternate decision.

When the Commission acts on this agenda item, it may adopt all or part of it as written, amend or modify it, or set aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Public Utilities Code Section 311(e) requires that an alternate to a proposed decision or to a decision subject to subdivision (g) be served on all parties, and be subject to public review and comment prior to a vote of the Commission.

Parties to the proceeding may file comments on the alternate proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at <u>www.cpuc.ca.gov</u>. Pursuant to Rule 14.3 opening comments shall not exceed 15 pages.

Comments must be filed pursuant to Rule 1.13 either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Hymes at khy@cpuc.ca.gov and Commissioner Randolph's' advisor, Rachel Peterson, at rachel.peterson@cpuc.ca.gov. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

<u>/s/ ANNE E. SIMON</u> Anne E. Simon Chief Administrative Law Judge

AES:avs

Attachment

Agenda ID #17193 Alternate to Agenda ID #16574 Ratesetting 3/14/2019 CPUC01 # 263187808

DIGEST OF DIFFERENCES BETWEEN ADMINISTRATIVE LAW JUDGE KELLY HYMES'S PROPOSED DECISION AND THE ALTERNATE PROPOSED DECISION OF COMMISSIONER RANDOLPH

Pursuant to Public Utilities Code Section 311(e), this is the digest of the substantive differences between the proposed decision of Administrative Law Judge Kelly Hymes and the proposed alternate decision of Commissioner Randolph (mailed on February 1, 2019).

The ALJ's Proposed Decision finds that Clean Coalition is ineligible to claim intervenor compensation but grants the intervenor compensation claim filed by Clean Coalition, based on an equity approach.

The Alternate Proposed Decision finds that Clean Coalition is ineligible to claim intervenor compensation because earlier findings of eligibility have expired, and Clean Coalition's submitted facts do not support a present finding of customer status pursuant to the Public Utilities Code. The Alternate Proposed Decision thus denies the Clean Coalition's intervenor compensation claim.

ALTERNATE PROPOSED DECISION Agenda ID #17193 Alternate to Agenda ID# 16574 Ratesetting

Decision <u>ALTERNATE PROPOSED DECISION OF COMMISSIONER</u> <u>RANDOLPH</u> (Mailed 2/1/2019)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Create a Consistent Regulatory Framework for the Guidance, Planning and Evaluation of Integrated Distributed Energy Resources.

Rulemaking 14-10-003

DECISION DENYING INTERVENOR COMPENSATION CLAIM OF CLEAN COALITION

Intervenor: Clean Coalition	For contribution to Decision (D.) 16-12-036 and D.15-09-022
Claimed: \$ 69,902.50	Awarded: \$ 0
Assigned Commissioner: Michael Picker	Assigned ALJ: Kelly Hymes

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.16-12-036 adopted the consensus recommendations	
-	from the Competitive Solicitation Framework Working	
	Group August 1, 2016 Report. The Commission also	
	approved a regulatory incentive mechanism pilot,	
	based upon a proposed pilot, the outcomes of the	
	Working Group and party comments. To implement	
	the Incentive Pilot, the Commission directed Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company to identify one to four projects where the deployment of	
	distributed energy resources on the system would	
	displace or defer the need for capital expenditures on	
	traditional distribution infrastructure. Lastly, the	
	Commission re-established the Working Group to	
	develop a technology-neutral pro forma contract for	
	future use, based upon the Incentive Pilot experience.	

D.15-09-022 adopted an expanded scope, a definition, and a goal for the integration of distributed energy
resources.

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 clai	m compensation (NOI) (§ 1804(a)):
1. Date of Prehearing Conference	12/5/2014	Verified
2. Other specified date for NOI:	N/A	N/A
3. Date NOI filed:	12/26/2014	Verified
4. Was the NOI timely filed?		Yes
Showing of cus	tomer or custom	er-related status (§ 1802(b)):
5. Based on ALJ ruling issued in proceeding number:	R.10-05-006	A rebuttable presumption of eligibility established in R.10-05-006 has expired (§1804(b)). See CPUC's comment in Item 10, below.
6. Date of ALJ ruling:	7/19/2011	A rebuttable presumption of eligibility only applies to the proceedings initiated within a year of the date of finding of eligibility (Section 1804(b)). Accordingly, a finding of eligibility made in the July 19, 2011 ruling (R.10-05-006) does not apply to this proceeding, which started more than 3 years after that ruling.
7. Based on another CPUC determination (specify):		No
8. Has the Intervenor demonstrated customer or customer-related status?		No, see CPUC's comments in Part I(C).
Showing of "	significant finan	cial hardship" (§ 1802(g)):
9. Based on ALJ ruling issued in proceeding number:	R.10-05-006	A rebuttable presumption of eligibility stemming from the July 19, 2011 ruling (R.10-05-006) has expired (§1804(b)) (see CPUC's discussion in item 10, below).
10. Date of ALJ ruling:	7/19/2011	Under Section 1804(b), a rebuttable presumption of eligibility is only valid

		within a year after a finding of eligibility in another proceeding. This proceeding started more than 3 years after the ruling of July 19, 2011 issued. Therefore, the reference to the ruling here is invalid.
11. Based on another CPUC determination (specify):	<i>See also</i> D.16- 11-017	D.16-11-017 issued in R.11-09-011. It did not make a finding of significant financial hardship pursuant to Section 1802(h) but relied on the July 19, 2011 ruling, via rebuttable presumption, pursuant to Section 1804(b). That presumption has expired and is no longer valid.
. 12. Has the Intervenor demonstrated significant financial hardship?		No, see CPUC's comments in Part I(C).
Timely r	request for comp	ensation (§ 1804(c)):
13. Identify Final Decision: D.16-12-036, D.15-09-022		Verified
14. Date of issuance of Final Order or Decision:	12/22/2016, 9/22/2015	09/22/2015, 12/22/2016
15. File date of compensation request:	2/16/2017	2/16/2017
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

	Intervenor's Comment			
I.B.11	The Clean Coalition sought a new finding of significant financial hardship in this proceeding through our NOI filed on December 26, 2014, and our Amended NOI filed on April 2, 2015. However, the Commission did not issue a ruling on our Amended NOI. We therefore include this citation to a recent intervenor compensation reward that affirmed Clean Coalition's showing of significant financial hardship.			
	CPUC's Comments			
Part I(B) (5-8)	Clean Coalition filed two NOIs in this proceeding – on December 26, 2014 and January 2, 2015. A ruling of March 3, 2015 requested additional information concerning customer status and significant financial hardship. Clean Coalition's Amended NOI of April 2, 2015 responded to the Ruling. Similar information was included in Clean Coalition's Amended NOI filed on March 9, 2015 in a separate proceeding, R.14-07-002 (rulemaking to develop a successor to existing Net Energy Metering Tariffs). In that proceeding, the Commission states without			

	further discussion in the final decision (D.16-05-049) that the amended NOI of March 9, 2015 demonstrated significant financial hardship. Clean Coalition does not rely on a presumptive effect of that statement on Clean Coalition's eligibility in this proceeding. However, even if Clean Coalition referred to D.16-05-049 here, new materials filed after March 9, 2015, have effectively rebutted a presumption of Clean Coalition's qualification to claim compensation.
	Since March 2015, Clean Coalition filed factual information that prompted the Commission to reassess this intervenor's standing as a customer pursuant to Section 1802(b)(1)(C). This reassessment was first performed in the Ruling issued on June 30, 2016 in A.15-02-009 (Pacific Gas and Electric Company's application for electric vehicle infrastructure program). ¹ The Ruling found that new facts indicated that Clean Coalition primarily serves the needs of entities in the renewable energy industries and markets. Therefore, the Ruling concluded, Clean Coalition is no longer an organization representing the interests of residential customers as required in Section 1802(b)(1)(C) and has not demonstrated significant financial hardship. The Commission later denied Clean Coalition's Motion to Reconsider the Ruling. ²
	Recently, in D.18-11-010 (issued within R.15-02-020, the rulemaking to continue implementation and administration, and consider further development, of California Renewables Portfolio Standard Program), the Commission examined a compendium of the facts referenced in Clean Coalition's filings, pertaining to its purposes, activities and participation in our proceedings. In that decision, the Commission determined that Clean Coalition has not demonstrated a status as a "customer" representing the interests of residential ratepayers, pursuant to Section 1802(b)(1)(C), as Clean Coalition claimed.
	Since the issuance of the Ruling of June 30, 2016 denying the NOI, Clean Coalition has not provided new factual information about its standing that would challenge or change our findings. Therefore, we adopt, without repeating, the pertinent analysis performed in D.18-11-010 (issued in R.15-02-020) and the June 30, 2018 ruling (issued in A.15-02-009).
Part I(B) (9-12)	A finding of "customer" status is a pre-requisite to a finding of significant financial hardship. ³ A denial of "customer" status renders the issue of financial hardship moot. Our Ruling of June 30, 2016, and D.18-11-010 both found that Clean Coalition has not demonstrated customer status, and the June 30, 2016 ruling also found that Clean Coalition has not demonstrated significant financial hardship. We will briefly discuss this issue again.

¹ See, Administrative Law Judge's Ruling Rejecting Clean Coalition's Amended Notice of Intent to Claim Intervenor Compensation, issued on June 30, 2016, in A.15-02-009, at 6-10.

² D.16-12-065, directing Pacific Gas and Electric Company to establish electric vehicle infrastructure and education program, Ordering Paragraph 23 at 88.

³ See D.98-04-059 at 21.

For groups and organizations, "significant financial hardship" means that "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" (Section 1802(h)). Section 1804(b) affords a party that has received a finding of financial hardship, a presumption of such hardship in other proceedings, within certain time limits. This presumption is not absolute, and can be rebutted (Section 1804(b).) Facts analyzed in D.18-11-010 and the June 30, 2016 Ruling show that Clean Coalition cannot demonstrate significant financial hardship. Clean Coalition's claim that subscribers to its free newsletter are Clean Coalition's "members" has been found unsuccessful. We have determined that Clean Coalition's activities and advocacy target primarily the interests of the entities participating in or entering, renewable energy industry and markets, that Clean Coalition provides services to these entities, and that these services bring economic benefits to these entities and to Clean Coalition. We have further determined that these entities have significant economic interests at stake in our proceedings, and do not have cost barriers to their participation.⁴ The economic interests of the entities Clean Coalition actually represents is not small in comparison to the costs of effective participation. Therefore, Clean Coalition is unable to pass the significant financial hardship test of Section 1802(h). Since the issuance of the Ruling of June 30, 2016, Clean Coalition has not provided factual information that would change our finding that Clean Coalition has not demonstrated significant financial hardship.⁵ This does not preclude Clean Coalition from submitting new factual information in a future proceeding for consideration of eligibility. Because we find Clean Coalition ineligible to claim intervenor compensation, the issues of substantial contribution to Decisions 16-12-036 and 15-09-022 and the reasonableness of this claim are moot.

⁴ See D.18-11-010 (R.15-02-020) and Ruling of June 30, 2016 (A.15-02-009).

⁵ Since the June 30, 2016 ruling, Clean Coalition submitted several intervenor compensation-related documents, for example, Motion to Reconsider the June 30, 2016 Ruling, filed on August 1, 2016 (A.15-02-009); notices of ex parte communication of August 9 and 12, 2016 (A.15-02-009); Intervenor Compensation claim filed on April 17, 2017 (R.14-08-013, et al.); Intervenor Compensation Claim filed on December 22, 2016 (R.15-02-020), etc.

PART II: SUBSTANTIAL CONTRIBUTION

In	tervenor's Claimed Contribution(s)	Specific References to Intervenor's	CPUC
		Claimed Contribution(s)	Discussion
The Wo gro Sol Fin and repo and Pos	Participation in the Competitive Solicitation Framework Working Group ("Working Group") e Clean Coalition participated in the rking Group, including several sub- ups, and contributed to the Competitive icitation Framework Working Group al Report. The Clean Coalition's oral written contributions shaped the final ort, which the Commission referenced adopted parts of in the final decision. itions the Clean Coalition took in the rking Group include:	 See D.16-12-036 at 6. See Competitive Solicitation Framework Working Group Final Report Filed by Southern California Edison Company (U 338-E), Pacific Gas and Electric Company (U 39-M), San Diego Gas & Electric Company (U 902-E), and Southern California Gas Company (U 904-G) at 7 (Aug. 1, 2016). 	n/a
-	Ensuring that the pilot and the Working Group's efforts work towards developing technology-neutral solicitations and pro forma contracts;		
-	Establishing the services to be procured using the Framework;		
-	Coordination with the locational valuation occurring within R.14-08-013;		
-	Establishing potential valuation components and principles for valuation;		
-	Ensuring proper Commission oversight of the competitive solicitation through Advice Letters and advisory group participation;		
-	Allowing market participants to participate in parts of the Distribution Planning Advisory Group; and		
-	Maintaining as much transparency as allowed by prior Commission decisions in the bid evaluation process.		
2.	Pilot design	• D.16-12-036 at 24, 34, 42–44, 50, 53.	n/a

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

The Clean Coalition advocated for several positions that were not directly adopted in the final decision but did contribute to the Commission's reasoning. For example, the Clean Coalition urged to Commission to:

- Issue a roadmap describing the Commission's planned process for comprehensive business model reform;
- Ensure that either a new Distribution Planning Advisory Group or the Procurement Review Group oversees the bid evaluation process;
- Require a high degree definition and transparency regarding the products sought in the solicitation documents;

- Create a working group to focus on the initial identification of target areas for distribution planning activities, which will now be scoped into the Distribution Resources Plans ("DRP") proceeding; and

- Consider the use of a Tier One Advice Letter for distributed energy resources ("DER") contract approval in order to streamline the approval process.

3. Refining the scope of the proceeding

The Clean Coalition was active in the initial stages of what is now known as the Integrated Distributed Energy Resources ("IDER") proceeding. We submitted comments and participated in a workshop to present recommendations that the Commission expand the scope of the proceeding. Specifically, the Clean Coalition urged the Commission to:

 Ensure that the IDER proceeding builds upon but does not duplicate efforts in the DRP proceeding to maximize the locational benefits

- Comments of Clean Coalition on Assigned Commissioner's Ruling Introducing a Draft Regulatory Incentives Proposal at 2–12 (May 9, 2016).
- Reply Comments of Clean Coalition on Assigned Commissioner's Ruling Introducing a Draft Regulatory Incentives Proposal at 2–6 (May 23, 2015).
- Clean Coalition Comments on Revised Regulatory Incentive Mechanism Pilot Proposal at 2–8 (Sept. 15, 2016).
- Clean Coalition Opening Comments on Proposed Decision Addressing Competitive Solicitation Framework and Utility Regulatory Incentive Pilot at 2– 4 (Nov. 30, 2016).
 Clean Coalition Reply Comments on Proposed Decision Addressing Competitive Solicitation Framework and Utility Regulatory Incentive Pilot at 2– 5 (Dec. 5, 2016).
- D.15-09-022 at 5, 7–11, 13–14, n/a 20–23.
 Clean Coalition Comments on Order Instituting Rulemaking to Create a Consistent Regulatory
 - Create a Consistent Regulatory Framework for the Guidance, Planning, and Evaluation of Integrated Demand-Side Resource Programs at 1–4 (Nov. 7, 2014).
 - Clean Coalition Response to
 Joint Assigned Commissioner
 and Administrative Law
 Judge's Ruling Requesting

and minimize the incremental costs of DER;	Responses to Questions at 2–12 (May 15, 2015).
 Develop market-based and other	 Clean Coalition Reply to
compensation mechanisms to	Responses to Joint Assigned
reflect the value of all grid services	Commissioner and
provided by individual and	Administrative Law Judge's
portfolios of DER; and Develop a complete cost-	Ruling Requesting Responses to
effectiveness evaluation to value	Questions at 3–4 (May 29,
and monetize the benefits of DER.	2015).

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? ⁶	Yes	n/a
b.	Were there other parties to the proceeding with positions similar to yours?	Yes	n/a
c. If so, provide name of other parties: Sierra Club, Natural Resources Defense Council, Environmental Defense Fund, Vote Solar, SolarCity		n/a	
 d. Intervenor's claim of non-duplication: The Clean Coalition's positions sometimes overlapped with those of other parties, but our proposals and the justification for our positions were not identical. The Clean Coalition actively coordinated with other parties in the Working Group to develop consensus recommendations that were reflected in our comments and joint proposals, dividing and limiting participation in sub-groups that were most relevant to our expertise. Further, the Clean Coalition's contributions brought a unique perspective from our organization's experience with DER valuation, procurement, and policy. 		n/a	

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor's claim of cost reasonableness: The Clean Coalition independently developed its policy positions based on the organization's expertise with DER valuation, procurement, and policy.	CPUC Discussion
The Clean Coalition has developed policy proposals aimed at valuing the	n/a
benefits of DER—focusing on the locational benefits resulting from	
producing energy near load. Our input also directly benefited from our prior	
work in drafting the Load Modifying Resource Valuation Working Group	

⁶ The Office of Ratepayer Advocates was renamed the Public Advocates Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which was signed by the Governor on June 27, 2018 (Chapter 51, Statutes of 2018).

Report in the Demand Response proceeding, as well as active concurrent participation in the closely related Locational Net Benefits Analysis Working Group in the DRP proceeding. The Clean Coalition has devoted extensive staff hours and resources to advance this work and develop the expertise relied upon in comments, but we seek compensation only for the hours directly associated with our advocacy in this proceeding.	
The Clean Coalition's involvement will result in increasingly cost-effective renewable energy for all ratepayers in California. 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.	
b. Reasonableness of hours claimed: The Clean Coalition allocated staff hours based on previously developed expertise to ensure efficient participation. Although we have spent a significant amount of time developing expertise related to DER valuation, procurement, and policy, only those staff hours spent specifically developing our policy positions an participating in this proceeding are part of this compensation request.	n/a
The hours devoted to this proceeding reflect work on written filings, workshop and Working Group participation, and related research. Policy Director Brian Korpics and Director of Economics and Policy Analysis Kenneth Sahm White drafted and reviewed comments, developed policy positions, and participated in the workshop and Working Group. Staff Attorney Katie Ramsey drafted and reviewed comments.	
c. Allocation of hours by issue:Hours are allocated in the attached timesheets for this request for compensation, which covers three issues: (1) participation in the Working Group, (2) pilot design, and (3) refining the scope of the proceeding.	n/a

B. Specific Claim:*

CLAIMED							CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES									
Item	Item Year Hours Rate Basis for Rate* Total \$					Hours	Rate	Total	
Brian Korpics	2016	103.25	\$205	D.16-08-014	\$21,166.25			\$0.00	
Brian Korpics	2015	37.75	\$200	D.16-08-014	\$7,550.00			\$0.00	
Brian Korpics	2014	13.50	\$100	D.15-10-014	\$1,350.00			\$0.00	
K. Sahm White	2016	82.75	\$300	D.16-08-014	\$24,825.00			\$0.00	
K. Sahm White	2015	41.25	\$295	D.16-08-014	\$12,168.75			\$0.00	
K. Sahm White	2014	4.25	\$295	D.15-10-044	\$1,253.75			\$0.00	

Katie Ramsey	2016	5.00	\$205	D.16-11-017	\$1,025.00	\$0.0			
Subtotal: \$ 69,338.75									
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours Rate Total			
Brian Korpics	2017	5.5	\$102.5	D.16-08-014	\$563.75	\$0.0		\$0.00	
Subtotal: \$563.75									
	TOTAL REQUEST: \$ 69,902.50 TOTAL AWARD: \$ 0.00								
**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. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the employee hear the sector of 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.

**Travel and Reasonable Claim preparation time typically compensated at $\frac{1}{2}$ of preparer's normal hourly rate.

ALTERNATE PROPOSED DECISION

ATTORNEY INFORMATION							
Attorney	Date Admitted to CA BAR ⁷	Member Number	Actions Affecting Eligibility (Yes/No?)				
Brian Korpics	June 2, 2015	303480	No				
Katherine Ramsey	February 11, 2015	302532	No				

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Clean Coalition Time Records

D. CPUC Disallowances and Adjustments:

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))

A. Opposition: Did any party oppose the Claim?	No	
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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))? No

If not:

Party	Comment	CPUC Discussion

⁷ This information may be obtained through the State Bar of California's website at http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch.

FINDINGS OF FACT

1. Clean Coalition has not provided facts that would change the Commission's prior determination of Clean Coalition's ineligibility to claim intervenor compensation.

CONCLUSION OF LAW

1. Clean Coalition is not eligible to claim intervenor compensation.

ORDER

1. The intervenor compensation claim filed by Clean Coalition is denied.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	Modifies Decision?				
Contribution Decision(s):	D1509022, D1612036				
Proceeding(s):	R1410003				
Author:	ALJ Hymes				
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric				
	Company, and Southern California Edison Company				

Intervenor Information

Intervenor	Claim	Amount	Amount	Multiplier?	Reason
	Date	Requested	Awarded		Change/Disallowance
Clean Coalition	2/16/2017	\$69,902.50	\$0.00	N/A	Clean Coalition is not eligible to claim
					intervenor compensation

Advocate Information

First	Last	Туре	Intervenor	Hourly Fee	Year Hourly	Hourly Fee
Name	Name			Requested	Fee Requested	Adopted
Brian	Korpics	Attorney	Clean Coalition	\$100.00	2014	n/a
Brian	Korpics	Attorney	Clean Coalition	\$200.00	2015	n/a
Brian	Korpics	Attorney	Clean Coalition	\$205.00	2016	n/a
K. Sahm	White	Expert	Clean Coalition	\$295.00	2014	n/a
K. Sahm	White	Expert	Clean Coalition	\$295.00	2015	n/a
K. Sahm	White	Expert	Clean Coalition	\$300.00	2016	n/a
Katie	Ramsey	Attorney	Clean Coalition	\$205.00	2016	n/a

(END OF APPENDIX)