

Decision \_\_\_\_\_

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

Order Instituting Rulemaking on the Commission's own motion to determine the impact on public benefits associated with the expiration of ratepayer charges pursuant to Public Utilities Code Section 399.8.

Rulemaking 11-10-003  
(Filed October 6, 2011)

**DECISION GRANTING INTERVENOR COMPENSATION TO THE CONSUMER FEDERATION OF CALIFORNIA**

<b>Claimant: Consumer Federation of California</b>	<b>For contribution to D.12-05-037</b>
<b>Claimed (\$): \$22,225</b>	<b>Awarded (\$): \$19,560 (reduced 12%)</b>
<b>Assigned Commissioner: Commissioner Michael R. Peevey</b>	<b>Assigned ALJ: David M. Gamson, October 13, 2011 Assigned ALJ: Julie A. Fitch, December 08, 2011</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief Description of Decision:</b>	Decision (D.) 12-05-037 establishes a policy framework concerning oversight over the new Electric Program Investment Charge (EPIC). Included in the EPIC policy framework are: 1) several guiding principles, of which direct ratepayer benefits to electricity ratepayers is considered a mandatory principle; 2) funding levels for 2013-2020 at \$162 million per year; 3) specific areas of investment 3) EPIC program governance 4) funding and budget issues, including setting fund shifting limits.
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**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

	Claimant	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	October 27, 2011	Correct
2. Other Specified Date for Notice of Intent (NOI):	N/A	
3. Date NOI Filed:	November 04, 2011	Correct
4. Was the NOI timely filed?		Yes
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on Administrative Law Judge (ALJ) ruling issued in proceeding number:	Rulemaking (R.) 09-08-009	Correct
6. Date of ALJ ruling:	November 02, 2010	Correct
7. Based on another CPUC determination (specify):	N/A	
8. Has the Claimant demonstrated customer or customer-related status?		Yes
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		Correct, as set forth in Section I(c) below. In the future, the information set out in Section I(c) should be here, in Section I(b)
10. Date of ALJ ruling:		Correct (see comment above)
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.12-05-037	Correct
14. Date of Issuance of Final Order or Decision:	May 31, 2012	Correct
15. File date of compensation request:	July 29, 2012	Incorrect; filing date was July 30, 2012
16. Was the request for compensation timely?		Yes

**C. Additional Comments on Part I :**

#	Claimant	CPUC	Comment
1	Consumer Federation of California	Yes	CFC established a showing of significant hardship in R.09-08-009 in an ALJ ruling dated November 2, 2010.

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).**

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<p>1. <u>Guiding Principles: Prioritizing Ratepayer Benefits</u></p> <p>From the beginning of this proceeding, CFC advocated for the new EPIC surcharge to prioritize ratepayer benefits. CFC supported the staff proposal’s definition of ratepayer benefits and the staff proposal’s emphasis on EPIC funded activities having a clear nexus in the electricity industry. In comments to the proposed decision, CFC argued that the CPUC should officially adopt a direct ratepayer definition and suggested a definition, which the Commission did adopt in its final decision. CFC also argued that certain guiding principles that were listed as subordinate to direct ratepayer benefits were actually components of ratepayer benefits.</p>	<p>1. <b>CFC Opening Comments on the Phase 2 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge</b>, at 4-7.</p> <p>2. <b>CFC Opening Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020</b>, at 4-7, 12 (Appendix).</p> <p>3. “In summary, we will operate the EPIC program under the mandatory principle of providing electricity ratepayer benefits. In comments on the proposed decision, CFC points out that it could be useful for the Commission to define what we mean by electricity ratepayer benefits, and suggests the following: “Promote greater reliability, lower costs, [and] increased safety.”<sup>10</sup> This is a useful clarification and we will adopt it. In addition, CFC and the Joint Environmental Groups, in</p>	<p>Yes</p>

	<p>comments on the proposed decision, point out that the additional principles articulated below, rather than being subordinate to electricity ratepayer benefits, are actually components of those benefits. We agree with this clarification as well. The following guiding principles are adopted as complements to the key principle of electricity ratepayer benefits:</p> <ul style="list-style-type: none"> <li>• Societal benefits;</li> <li>• GHG emissions mitigation and adaptation in the electricity sector at the lowest possible cost;</li> <li>• The loading order;</li> <li>• Low-emission vehicles/transportation;</li> <li>• <input type="checkbox"/> Economic development; and</li> <li>• <input type="checkbox"/> Efficient use of ratepayer monies.</li> </ul> <p>The mandatory guiding principle of ratepayer benefits and the complementary principles will guide the EPIC program to ensure that it is just and reasonable to ratepayers.” <b>D.12-05-037 at 19, 20, 89, 90.</b></p>	
<p>2. <u>Funding and Budget Issues: Just and Reasonable Analysis</u></p> <p>CFC advocated throughout the proceeding that the Commission should do a more just and reasonable analysis before approving funding levels. CFC differentiated between the just and reasonableness of certain programs and the just and reasonableness of funding amounts. CFC recommended that a financial audit take place in order to see whether the amount of overall funding for EPIC programs is just and reasonable.</p>	<ol style="list-style-type: none"> <li>1. <b>CFC Opening Comments on the Phase 2 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, at 8 &amp; 9.</b></li> <li>2. <b>CFC Reply Comments on Phase 2 Scoping Memo And Ruling of Assigned Commissioner and Administrative Law Judge, at 1-4.</b></li> <li>3. <b>CFC Opening Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020, at 9</b></li> </ol>	<p>Yes</p>

	<p>4. “CFC, in its comments on the proposed decision and previously, has requested that the Commission conduct a financial audit “to determine not only if certain programs should continue to be funded but also whether the <i>amount</i> of funding is just and reasonable.”<sup>45</sup> We understand this suggestion conceptually; however, it is unclear how it could be implemented. The previous PGC-funded programs were legislatively mandated (in statute) and not under the control of this Commission. New EPIC funds are being collected, but have yet to be allocated to particular purposes (until this decision). However, the spirit of CFC’s suggestion could be met by the CEC sharing publicly an accounting of the costs and estimated benefits of the previous PGC-funded programs. Such reports of various programs should already exist and could be consolidated and shared with parties to this proceeding.” <b>D.12-05-037 at 83.</b></p>	
<p>3. <u>Funding and Budget Issues: Formal review process before shifting funds.</u></p> <p>CFC recommended that before the administrator proposes any funding allocation changes there should be a formal review process. CFC suggested that the formal review process should include a showing that the money spent on these program areas were spent appropriately and that additional funding is absolutely necessary.</p>	<p>1. <b>CFC Opening Comments on the Phase 2 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge,</b> at 15.</p> <p>2. <b>CFC Opening Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020,</b> at 9.</p>	<p>Yes</p>

	<p>“The Efficiency Council supports the basic notion of flexibility and giving the administrator some discretion in case unexpected opportunities arise. SDG&amp;E also supports some flexibility, but suggests that a 10% limit is too high. PG&amp;E likewise believes some flexibility is warranted, but suggests that the fund shifting flexibility be reviewed as part of each investment plan approval process and determined at that time. CFC believes similarly, that there should be a formal review process of the program areas to be funded. SCE’s view is the most restrictive, arguing that any flexibility for the CEC to shift funds constitutes unlawful delegation of judgment, discretion, and decision-making from the Commission to another governmental entity.... With the potential size of each three-year investment plan portfolio budget under the EPIC program, we believe it is necessary to allow the administrators some flexibility in the event that events during the three-year period do not exactly match the plans adopted in the investment plans. This is not a delegation of the Commission’s discretionary authority; it is purely for administrative practicality. This type of fund-shifting flexibility is given to utilities routinely within their energy efficiency portfolios, for example. The consequence of not allowing any flexibility in fund shifting will be either unspent/idle funding or regulatory delay while a Commission proceeding is completed, even for relatively small changes. SDG&amp;E’s suggested limit of 5% strikes a reasonable balance and we will adopt it. For the sake of clarity, this limit is for 5% of the adopted budget for each category of expenditures approved in each investment plan. If the administrator wishes to propose an entirely new category of expenditures between adopted investment plans, that would constitute a material change to the plan and would require further</p>	
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	Commission review and consideration.” <b>D.12-05-037 at 66 &amp; 67.</b>	
<p>4. <u>Program Governance and Consolidated Review Process</u></p> <p>In Phase 1 of this proceeding, CFC commented on the various mechanisms by which utilities can receive funding for RD&amp;D and that some type of reform should take place in order to maximize transparency and minimize the potential for excessive spending.</p> <p>CFC was pleased that the Commission acknowledged CFC’s and other consumer advocates concerns over the difficulty to track the amount of money IOUs receive for projects and came up with a solution to increase transparency by creating a consolidated review process for all utility RD&amp;D activities.</p> <p>CFC supported the staff proposal to create a consolidated review process but was concerned that existing law (§ 740) would make it difficult to implement since IOUs still had authority to ask for funds through GRCs and applications.</p>	<ol style="list-style-type: none"> <li>1. <b>CFC Opening Comments on the Phase 2 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge,</b> at 14.</li> <li>2. <b>CFC Opening Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020,</b> at 10 &amp; 11.</li> <li>3. <b>CFC Reply Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020,</b> at 2 &amp; 3.</li> <li>4. “In terms of the staff proposal elements devoted to coordination of utility RD&amp;D with EPIC and suggesting a similar triennial application process by utilities for RD&amp;D expenditures, several parties support these ideas. The Efficiency Council and CFBF generally support the notion of greater coordination of IOU RD&amp;D activities with those of the CEC. CFBF also objects to the staff report’s segregation of utility RD&amp;D efforts from the rest of the EPIC program, and suggests that there may be no need for utility RD&amp;D outside of EPIC. CFBF argues that only in considering both CEC and utility efforts “jointly in some manner will ratepayer interests be protected and programs delivered most effectively.”<sup>1</sup> The Joint</li> </ol>	<p>Yes</p>

<sup>1</sup> CFBF comments, March 7, 2012, at 4.

	<p>Environmental Groups suggest that the CEC EPIC program should not supplant all utility RD&amp;D, but support staff’s proposals to consider the review and approval of all utility RD&amp;D activities into one proceeding. CFC also supports having one procedural vehicle to evaluate all utility RD&amp;D.  <b>D.12-05-037 at 25 &amp; 26.</b></p> <p>5. “CFC also identifies what it characterizes as a conflict between § 740 and the language of the proposed decision stating that EPIC should be the “primary vehicle” for utility RD&amp;D proposals.<sup>2</sup> However, we see no conflict. Section 740 does not specify the procedural vehicle by which the Commission may “allow the inclusion of expenses for research and development” in rates. The EPIC proceedings are just as valid a venue for consideration of these expenses as GRCs or any other type of proceeding.” <b>D.12-05-037 at 83.</b></p>	
<p>5. <u>Program Governance and Process</u> : Project metrics for evaluating EPIC program activities.</p> <p>CFC argued that project metrics used in evaluating EPIC programs should be reorganized to reflect the prioritization of ratepayer benefits. In addition, CFC suggested that direct ratepayer benefit metrics should be quantified separately from state benefits and that metrics should clarify that an approval of an EPIC project is contingent on whether</p>	<p>1. <b>CFC Opening Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020</b>, at 8.</p> <p>2. <b>CFC Reply Comments on the Phase 2 Proposed Decision Establishing Purposes and Governance for Electric Program Investment Charge and</b></p>	<p>Yes</p>

<sup>2</sup> *Ibid.* at 10.

the project provides ratepayer benefits.	<b>Establishing Funding Collections for 2013-2020</b> , at 4.	
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?</b>	Yes	Correct
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Correct
<p><b>c. If so, provide name of other parties:</b> SDG&amp;E.</p>		<p>This list is incomplete. CFC positions on various issues were similar to positions of parties other than or in addition to SDG&amp;E. See, e.g., D.12-05-037’s discussion of “Guiding Principles,” on which the CFC position was “similar” to that of the “Joint Environmental Groups.”</p>
<p><b>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</b></p> <p>CFC shared similar positions with SDG&amp;E in the areas of fund shifting and investment plan project metrics, although CFC and SDG&amp;E each had a particular take on the argument making it an original contribution. For example, both CFC and SDG&amp;E agreed that the administrator’s ability to shift 10% of funds to another area was too high of a percentage; however, CFC argued for a formal review process before any funds are shifted, whereas SDG&amp;E argued for the ability to shift 5% of funds automatically.<sup>3</sup> In addition, CFC and SDG&amp;E both agreed that the project metrics should clearly prioritize ratepayer benefits however CFC specifically argued that ratepayer benefits and state</p>		<p>This discussion is incomplete, and fails to reflect the overlap between CFC positions and positions advocated by other parties on issues beyond those CFC identifies here.</p>

<sup>3</sup> CFC Opening Comments on the Phase 2 Scoping Memo and Ruling at 15; SDG&E Opening Comments on the Phase 2 Scoping Memo and Ruling at 29.

benefits such as “job creation” and “economic benefits” should be evaluated separately whereas SDG&E felt that that these metrics should be stricken completely. <sup>4</sup>	
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**C. Additional Comments on Part II:**

#	Claimant	CPUC	Comment
General	Nicole A. Blake	Correct; however note overlap with other parties’ positions discussed above.	CFC supported many of the recommendations stated in the staff proposal and adopted in the final decision. For example, CFC supported the staff proposal’s definition of applied research as well as the staff proposal’s recommendation to eliminate funding for generic education and outreach activities. CFC also supported the hiring of an independent evaluator to assess program success and identify areas of improvement using predetermined metrics developed by CPUC staff with input from stakeholders.
1	Nicole A. Blake	This argument reflected a fundamental misunderstanding of § 740.	CFC did not prevail on the issue of conflict between § 740 and language proposed a consolidated review process eventually supplanting GRCs as a means of receiving RD&D funds. However, CFC felt that it was useful to mention this argument to highlight the various mechanisms by which to receive RD&D funding will continue to be in place making it potentially difficult to track RD&D spending.
2	Nicole A. Blake	No disallowance for raising this argument.	D.12-05-037 (Decision) addressed project metrics but stated that “Parties did not comment specifically on the program metrics suggested by staff or on what elements should be included in each investment plan.” <sup>5</sup> CFC did comment on project metrics as referenced above. SDG&E also commented on the project metrics. <sup>6</sup> The Decision did not reject CFC’s or other parties, such as SDG&E’s, recommendations but overlooked whether <i>any</i> party commented on project metrics. CFC should not be penalized for the Commission’s omission of parties’ comments on this particular issue.

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<b>a. Concise explanation as to how the cost of Claimant’s participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</b>	<b>CPUC Verified</b>
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<sup>4</sup> CFC Opening Comments to Proposed Decision at 8; SDG&E Opening Comments to Proposed Decision at 15.

<sup>5</sup> D.12-05-037 at 27.

<sup>6</sup> SDG&E Opening Comments to Proposed Decision at 15.

<p>There will be monetary benefits for ratepayers based on CFC’s participation, although it is difficult to estimate a specific amount of monetary benefits. Some of the CFC’s contributions adopted by the final decision will result in a clearer prioritization of ratepayer benefits, efficient use of ratepayer money, as well as greater transparency in the EPIC program evaluation process.</p> <p>Because of CFC’s contribution, the Commission adopted an official definition of ratepayer benefits for purposes of EPIC program as well as making sure that certain guiding principles originally listed as subordinate to ratepayer benefits were considered essential to ratepayer benefits<sup>7</sup>. These clearer definition will minimize confusion during the triennial investment plan process, making it easier to choose and evaluate EPIC programs based on their ability to promote greater reliability, lower cost, and increased safety to ratepayers.</p>	<p>The Commission discussed and analyzed the arguments and recommendations made by CFC. The Commission adopted many of CFC’s recommendations. Where the Commission did not accept all of CFC’s recommendations, CFC still made significant contributions to the proceeding and the subject decision by raising important issues for the Commission’s consideration, as reflected in the decision.</p>
<p><b>b. Reasonableness of Hours Claimed.</b></p> <p>CFC worked efficiently and recorded hours rounding down to the nearest decimal.</p>	<p>Subject to the adjustments we make below, CFC’s hours were reasonable.</p>
<p><b>c. Allocation of Hours by Issue</b> See Attachment 3</p>	<p>Correct</p>

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Nicole A. Blake	2011	103.75	\$200	See Attachment 2	\$20,750	90.6	\$200	\$18,120
<b>Subtotal:</b>					\$20,750	<b>Subtotal:</b>		\$18,120
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$

<sup>7</sup> D.12-05-037 at 19.

Nicole A. Blake	2011	14.75	\$ 100	See Attachment 2	\$1475.00	14.4	\$100	\$1,440
<b>Subtotal:</b>					\$1,475.00	<b>Subtotal:</b>		<b>\$1,440</b>
<b>COSTS</b>								
<b>TOTAL REQUEST \$:</b>					<b>\$22,225</b>	<b>TOTAL AWARD \$:</b>		<b>\$19,560</b>
<p>* We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant's 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>								
<b>Attorney</b>				<b>Date Admitted to CA BAR</b>			<b>Member Number</b>	
Nicole Blake				January 4, 2010			268541	

### C. CPUC Disallowances, Adjustments, and Comments :

#	Reason
1	CFC's billing records vary between billing in .1 hour increments, and billing in .25 hour increments. CFC should bill in .1 hour increments. Where CFC has billed in .25 hour increments, we have rounded down to the nearest .1 hour.
2	<p>In several instances, CFC has charged time to "prepare for filing" of, or to file, documents. <i>See</i> entries for 3/6/12, 3/7/12, 3/16/12, 5/14/12, 5/21/12, and 7/29/12. We do not reimburse for clerical tasks such as making filings.</p> <p>CFC's time entries are generally "block billed" and include multiple tasks. Therefore we cannot determine what amount of the total entry is attributable to the non-reimbursable work for 3/6/12, 3/16/12, 5/14/12, 5/21/12, and 7/29/12.<sup>8</sup> Absent a breakdown allowing us to determine exactly how much of an entry was spent on clerical versus reimbursable tasks, we attribute .5 hours to clerical work, and reduce the entries for 3/6/12, 3/16/12, 5/14/12, and 5/21/12, and 7/29/12 by .5 hours each. We disallow in its entirety the .2 billed on 3/7/12 for filing of comments.</p>
3	<p>CFC requests a rate of \$200/hour for Ms. Blake. CFC's "Basis for Rate" contends that this is appropriate for an attorney of Ms. Blake's background and experience level.</p> <p>The last rate the Commission approved for Ms. Blake was \$175 for work performed in 2010. <i>See</i> D.12-07-020. Applying the step increases authorized by Resolutions ALJ-237 and ALJ-281, and the cost-of-living adjustment authorized in Resolution ALJ-281, we calculate a rate for Ms. Blake of \$197.18 per hour, which we round to \$200.</p>

<sup>8</sup> The entry for 3/7/12, unlike the other listed entries, is *just* for filing of comments.

4	CFC’s claim understates the extent to which CFC’s positions duplicated those of other parties. In addition, CFC’s claim fails to reflect the extent to which CFC’s positions simply endorsed the positions of Commission staff or the positions taken in the Proposed Decision. We reduce CFC’s claim by 10% to account both for duplication of the positions of other parties, and for the portions of CFC’s comments that did not substantially contribute to the proceeding.
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**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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
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<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?</b>	Yes
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**FINDINGS OF FACT**

1. Consumer Federation of California made a substantial contribution to Decision 12-05-037.
2. The requested hourly rate for Consumer Federation of California’s representative is comparable to a market rate 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 contribution is \$19,560.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

**ORDER**

1. Consumer Federation of California is awarded \$19,560.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay Consumer Federation of California their respective shares of the award, based on their California-jurisdictional electric revenues for the 2012 calendar year, reflecting 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 September 25, 2012, the 75th day after the filing of Consumer Federation of California's request for intervenor compensation, and continuing until full payment is made. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_, at Redding, California.

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b> No
<b>Contribution Decision(s):</b>	D1205037	
<b>Proceeding(s):</b>	R1110003	
<b>Author:</b>	ALJ David Gamson	
<b>Payer(s):</b>	Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company	

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Consumer Federation of California	7/30/2012	\$22,225	\$19,560	No	(1) Billing in .25 hour increments instead of .1 hour increments (2) Billing for clerical tasks (3) Work duplicative of that of other parties

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year for which rate requested</b>	<b>Hourly Fee Adopted</b>
Nicole	Blake	Attorney	Consumer Federation of California	\$200	2012	\$200

**(END OF APPENDIX)**