

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the Commission's Post-2008 Energy Efficiency Policies, Programs, Evaluation, Measurement, and Verification, and Related Issues.

Rulemaking 09-11-014
(Filed November 20, 2009)

**DECISION GRANTING COMPENSATION TO WOMEN'S ENERGY MATTERS
FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 10-10-033,
D.11-12-038 AND D.12-05-015**

Claimant: Women's Energy Matters (WEM)	For contribution to: Decisions (D.) 10-10-033, D.11-12-038 and D.12-05-015
Claimed (\$): \$70,477.50¹	Awarded: \$49,733.75 (reduced 29.4%)
Assigned Commissioner: Mark Ferron	Assigned Administrative Law Judge (ALJ): Darwin A. Farrar

¹ WEM's original Intervenor Compensation Claim lists the total amount claimed as \$99,180.00. When reviewing WEM's timesheets, mathematical errors were discovered, changing the total amount to \$99,396.25. After going through WEM's timesheets it was determined that \$28,918.75 of this total corresponds to Community Choice Aggregation (CCA) issues [165 hours in 2010 and 0.25 hours in 2011]. These costs are denied without prejudice, and WEM is encouraged to reapply for compensation once the Commission issues a final decision on CCA issues. Thus, the new amount claimed by WEM in this request (not including CCA issues) is \$70,477.50 (\$99,396.25 - \$28,918.75). The amount claimed is adjusted accordingly.

PART I: PROCEDURAL ISSUES**A. Brief Description of Decisions:**

D.10-10-033 provided updated guidance on evaluation, measurement and verification (EM&V).

D.11-12-038 approved methodology for continuation of funding, since the legislature declined to extend the Public Goods Charge (PGC).

D.12-05-015 approved new goals and avoided costs, approved financing initiatives, provided a pathway for local governments to provide independent administration of Energy Efficiency (EE) under Regional Energy Networks and Community Choice Aggregators (CCAs), extended residential programs with an emphasis on multifamily housing, established Energy Upgrade California (EUC) as the new statewide marketing, education and outreach (MEO) brand and broadened its scope, and provided other portfolio guidance for 2013-14 bridge programs.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	March 18, 2010	Correct
2. Other Specified Date for NOI:		
3. Date NOI Filed:	April 19, 2010	Correct
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D.12-02-034	Correct
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.12-02-034	Correct
12. Has the Claimant demonstrated significant financial hardship?		Yes

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.12-05-015	Yes
14. Date of Issuance of Final Order or Decision:	5-18-12	Yes
15. File date of compensation request:	7-17-12	Yes
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

Claimant	CPUC	Comment
X		The Commission has recommended that WEM file compensation requests as soon as possible in a proceeding, preferably one decision at a time. We regret that we were unable to file until now. WEM's advocate Barbara George had a very serious case of systemic poison oak lasting from Christmas 2010 through early February 2011; eyes swollen shut at first, head and neck burning even with strong medication. It was very difficult to work, especially to put in the extra time and concentration for a request on D.10-10-033. We didn't file on the gas funding decision D.11-10-014 because we were only peripherally involved in it. The Feb. deadline for the request for D.11-12-038 (cont. funding) was also inconvenient because of George's serious mid-Feb. flu (effects lingering six months later). We appreciate the opportunity to file this request on our contributions to each decision up to this point.
	X	We continue to urge WEM, in the future, to file compensation requests as soon as possible in a proceeding; preferably one decision at a time. We believe this method will add to the clarity and precision of the request.

PART II: SUBSTANTIAL CONTRIBUTION**A. Claimant's description of its contribution to the final decision.**

Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
2010 EM&V decision D.10-10-033		
	The Commission acknowledged contributions by WEM throughout its decisions in this case, although in some instances, WEM was not mentioned even though it had made a substantial contribution. Regarding such instances, the Commission	We do not respond to this general statement which does not make specific reference to WEM's claims of substantial contribution.

	<p>determined: “[T]he fact that WEM is not specifically credited with making a substantial contribution on a particular issue does not mean that a substantial contribution was not made. Where a decision states a position that is consistent with that asserted by a party we may infer that the party made a contribution on that issue.” (D.09-03-043 at 7.)</p>	
<p>EE AS A RESOURCE. WEM was the first party to report back to the EE proceedings about EE being rejected by procurement planners, in part because EM&V failed to account for important things they need to know. WEM began working to connect EE more fully with procurement in 2006 and continued since then.</p> <p>Throughout this proceeding WEM devoted considerable attention to this issue, explaining this problem and offering solutions. We recommended reporting of EE by geographical location and discussed how targeting EE to reduce peak in the Central Valley could lessen the need for power plants and lower customer costs. (3-15-10 WEM PHC proposal at 8-11; 7-16-10 WEM Comment on AC Ruling at 2-3, etc.)</p> <p>We recommended that EM&V’s role should be to ensure “expanded use of EE will maintain grid reliability.”</p>	<p>D.10-10-033 began to reflect some of WEM’s insights about the inability of procurement to use EE fully as a resource. It admitted the need for improvement: “FOF 7. EM&V activities that enable the Commission and the IOUs to improve their assessment of energy efficiency impacts for use in demand forecasting (and ultimately procurement) should be undertaken by the Commission.” FOF 8 tacitly acknowledged that improvements were needed to “ensure that efficiency will displace conventional generation and will be used as the first resource in California’s ‘loading order.’” OP6 ordered Policy & Planning to convene a series of workshops to address issues including “Expand EM&V Activities that Facilitate Load Forecasting” because “the mandate that EE goals be used in resource procurement and planning activities requires that EM&V activities expand...”</p>	<p>Yes</p>

<p>3-25-10 WEM Comments on PHC proposals at 2.</p> <p>We provided the <i>ISO-New England Manual for Measurement of Demand Side Resources</i>, which enables six states to utilize EE as grid capacity, which CA is not yet doing. (6-4-10 Comment on EM&V at 2 & Attachment.)</p>	<p>Ibid. at 38.</p> <p>(Note – The 6-26-12 workshop in this series finally explored the fact that procurement planners refuse to target EE to any particular need, as WEM had pointed out. This workshop however is not part of this request since it occurred after the May decision.)</p>	
<p>WEM explained that we found the EM&V objectives in D.09-09-047 lacking because of their lack of attention to grid impacts of EE. (10-18-10 Comment on PD at 3.)</p>	<p>The final decision added footnote 31 at 15, noting that (unlike other parties), WEM “[does] not believe the EM&V objectives are well suited to guide future EM&V efforts.”</p>	Yes
<p>ATTRIBUTION In our March 15, 2010 PHC proposal and March 25, 2010 comments on others’ proposals, WEM highlighted the problem of attribution for 2010-12 and beyond, given the multiple EE funding sources and administrators.</p> <p>WEM noted, “a major issue would be who would fund the work.” (7-16-10 WEM Comment AC Ruling at 7.)</p> <p>We pointed out that “it will be very expensive to sort out who funded what and who performed what tasks that led to savings.” (10-18-11 Comment on PD.)</p> <p>We offered solutions, for example, “WEM believes attribution becomes less complex where the purpose of EM&V is to measure the impact on the <i>grid</i> rather than</p>	<p>FOF 3 stated, “The current EM&V framework is not sufficient to effectively evaluate future energy efficiency programs in California’s dynamic and evolving [EE] market.” D.10-10-033 recognized that the future would bring “new challenges” because of the “multitude of [EE] programs, ...each ... provided by an independent administrator with its own funding mechanism, program structure, and performance metric....” It warned: “Disputes over who gets to claim [EE] savings (attribution) will inhibit success.” (D.10-10-033 at 7.) Later, the decision admitted that attribution has grown “increasingly difficult,” but that “Commission policies require that our EM&V program attribute savings as effectively as possible.” (Ibid.,</p>	Yes

determining the impact on shareholders’ pocketbooks.” (6-4-10 WEM Comments at 3.)	at 29 and COL 2.) FOF 5 stressed the need to “balance the benefits of and need for more accurate attribution with the need for timely and <u>cost-effective</u> EM&V results.”	
PROGRAM PLANNING: WEM provided an illustrated timeline showing that EM&V will always be out of phase with Program planning. (3-25-10 Comments on PHC proposals at 4.)	The decision stated: “In order to maximize return on ratepayer dollars, program evaluations must be completed on a timeline which informs mid-course corrections and/or program planning for the following cycle.” (Appendix A, “EM&V Core objectives,” item 2.)	Yes
WEM pointed out that investigating market transformation and other new metrics at a time of economic upheaval might yield little useful data. (7-16-10 WEM Comment on AC Ruling at 2.)	The decision stated that parties recommend the Commission “proceed cautiously” in applying new metrics. (D10-10-003 at 14.)	Yes
Given utilities’ failure to cooperate and objections to EM&V reports, WEM warned that some of the proposed metrics could give utilities more opportunities to challenge EM&V evaluations.” (7-16-10 Comment at 5.)	OP 4 ordered utilities to “cooperate fully” with ED’s efforts to expedite the Total Energy Consumption Pilot “and shall timely provide any energy usage data Energy Division deems necessary.”	Yes

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
D11-12-038 cont. funding 12-19-11		
WEM was sympathetic to the Legislature’s concerns that PGC-EE funds have been wasted by utility	The decision stated, “WEM supports CLECA’s request for additional analysis, and asserts that “[c]ontrary to NRDC’s claims, there’s no reason	Yes, as to showing. As to amount of

<p>administrators. We attended and provided comments to the Senate Energy Committee’s hearings on PGC funding in March and May, 2011, and reported in the settlement talks initiated by DRA and TURN that the legislature was unlikely to extend the PGC.</p> <p>We felt that the PGC funds would not be needed to meet goals if CA was not tied to utility administrators who have conflicts of interest. We cited the Texas EE programs, which are getting 4.5 times the savings per dollar as California. (6-20-11 Comments Bridge funding, Attachment C.)</p> <p>Early in the proceeding, we provided details and links to evaluations of 2004-05 programs which we consider “astounding failures,” for example multifamily programs at 31% electricity, 15% gas, single family at 48% elec, 37% gas... 3-25-10 WEM Comments on PHC proposals, at 5-6. The dispute over the 2006-08 evaluation report (showing utilities met only 62% of goals) was fresh in everyone’s minds, after the highly contested RRIM decision D1012049 to which the original Commissioner in this proceeding filed an eloquent dissent.</p> <p>We were unable to file opening comments on the AC Ruling because we were in the thick of the EE/CCA work (see below) but we filed a substantive reply. It included our proposals in the Long-Term Procurement Plans and the RRIM for alternative ways to fund EE without PGC funds. Our proposal in the LTPP was for the Commission to consider utilizing grid-reliable EE directly as a procurement resource, funded by procurement dollars. We noted that this is being done by ISO-New England, and we provided links to ISO-NE Manual for Measurement of Demand Resources). 10-19-11 WEM Reply</p>	<p>to believe that utilities will meet the [EE] goals even if they have full funding to complete the cycle.” (WEM October 19, 2011 Reply Comments at 1-2.)</p> <p>It went on: “... As an initial matter, whether continued funding will ensure that the IOUs meet their EE goals (which WEM claims they have never met) is not the issue before us today.” D1112038, at. -9.</p> <p>WEM’s unique and well-informed perspective enriched the record and increased the Commission’s understanding of the issues, even though our recommendations were not adopted. The Commission may fully compensate an intervenor in such instances, and should do so in this case.</p>	<p>compensation, see Section III.C below. We note that WEM appropriately did not seek compensation for attending the Legislative hearings it mentions in this section.</p>
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Continued Funding at 7-10.		
Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
D.12-05-015 portfolio guidance 5-18-12	This 450 page decision was more like 4 or 5 decisions rolled into one. WEM's contributions to the Commission's thinking on all these issues were wide-ranging; we only sketch some of the more obvious ones in this request, including where WEM's input was specifically mentioned.	We do not respond to this general statement which does not make specific reference to WEM's claims of substantial contribution.
<p>INDEPENDENT ADMINISTRATION</p> <p>WEM has supported independent administration of EE, especially for Local Govts, since we first became involved in CPUC's EE proceedings in 2001. WEM strongly supported development of Regional Energy Networks, e.g. 11-16-11 WEM Reply Comment Bridge Scoping Ruling at 3-5.</p> <p>WEM recommended supporting local govt EE infrastructure, noting "the Strategic Plan identifies LGs as the driver for clean energy, including EE and solar." (6-20-11 Comments on Bridge funding at 10 – 11.)</p> <p>Our comments on EE and Community Choice (see below) discussed the fact that there were no real legal barriers to independent administration. WEM contributed a great deal of the historical background for development of the Joint Workshop Report. (See 10-29-10 WEM Comment Workshop Report, Procedural History at 7-14.)</p> <p>Among other things we pointed out during the debate in the workshop and subsequent conference calls that in 2002 the Commission had simply ordered utilities to write contracts for independent administrators chosen by the Commission. The report stated: "For EE</p>	<p>The decision approved Regional Energy Network pilots, stating, "While we decided to forego local government program administration in 2005, we believe enough has changed over the last seven years to warrant revisiting this issue in light of the potential benefits and alternative administrative structures as described in recent party comments." D.12-05-015 at 147.</p> <p>Local governments were invited to submit plans for regional pilots in the Applications proceeding. Ibid at 149. OP 32 provided criteria that the pilots should meet, and OP 33 discussed their evaluation by the Commission. (Subsequently, the 6-20-12 Ruling clarified that regional pilots and CCAs should both apply on 7-16-12.)</p> <p>OP 34 ordered utilities to contract for the selected pilots, and named ED staff as joint contract managers for them.</p>	<p>Yes, subject to the discussion at Section II.C below.</p>

<p>program cycles 2002-03 and 2004-05, the CPUC was the overall administrator of EE programs. Third party program administrators applied to the CPUC through a competitive bid process; selection was made by Energy Division/CPUC. The third parties contracted with IOUs who provided limited administrative oversight and funding through collected EE funds.” (10-22-10 Joint Workshop Report at 3.)</p>		
<p>EE & CCAs. WEM initially discussed in detail the issue of Community Choice agencies administering EE in our 3-15-10 PHC proposal at 8-10. Subsequently, WEM was a very active participant in the Sept. workshop, two rounds of comments, and the negotiations around the wording of the Workshop Report. These activities went on through October. Among other things, WEM provided a detailed historical analysis of the Commission’s actions and decisions to date on the CCA/EE issues. 10-29-10 WEM Comment Workshop Report at 7-13. We also provided detailed information on the types of misuse of EE funds PG&E had employed in its anti-CCA efforts, and argued that the only real “safeguard” would be to remove PG&E as administrator of EE funds in CCA territory. We first discussed this in our 3-15-10 PHC proposal at 3. Our 10-8-10 Comments and 10-15-10 Replies on Safeguards went into detail on these issues. We filed further comments on PG&E’s misuse of EE funds to prevent Marin’s launch with our 6-20-11 Comments on Bridge Funding at 7-8, 16. This filing including two attachments – a digest of hearing testimony in PG&E’s 2011 General Rate Case regarding its misuse of</p>	<p>The OIR adopted WEM’s procedural recommendation (in the previous application and rulemaking proceedings) to address the issue of EE under CCAs. The Scoping Memo proposed to address CCA/EE issues, and in the fall of 2010 there was a workshop and several rounds of comments, culminating in a joint Workshop Report. No decision was forthcoming, perhaps in part because WEM urged parties to reject utilities’ insistence that CCAs apply to <i>them</i> for their funding, rather than to the CPUC. In 2011, CCAs succeeding in passing SB790, which provided a number of protections for CCAs, including requiring that anti-CCA marketing must be funded by shareholders and housed in different facilities. The new law provided CCAs the ability to “elect” to administer EE, and clarified that CPUC, not utilities, would rule on their applications. The decision on Portfolio Guidance offered an opportunity for CCAs to apply to CPUC for funds at the same time as utilities. (ALJ Fitch’s recent ruling extended that to 7-16.) As noted in the “independent administration” section above, the 6-20-12 Ruling clarified that regional</p>	<p>Yes, subject to the discussion in Section II.C below.</p>

<p>EE funds, and a partial transcript of PG&E’s EE offers to Novato to dissuade them from joining Marin Energy Authority. (Longer versions of these were initially filed during the EE/CCA phase; the ALJ asked us to provide a digest instead. We were unable to complete that in the fall but felt it was still relevant since no decision had yet been made on EE/CCA.)</p> <p>WEM continued throughout the proceeding to push for the Commission to provide fairly for EE under CCAs, e.g. 11-8-11 WEM Comment Bridge at 4-5.</p>	<p>pilots and CCAs should both apply for funds for 2013-14 in this proceeding on 7-16-12. Marin Energy Authority has already submitted its application for EE program funds for 2012; the Commission requested some revisions, which were made and resubmitted. The application is expected to be approved soon.</p> <p>Thus, WEM’s long struggle to obtain EE funds for CCAs to run independent programs appears to be finally approaching fulfillment. (We first filed comments on this issue in 2003, in R.01-08-028.)</p>	
<p>GOALS. WEM analyzed the Commission’s goal-setting process and potential studies in detail, providing historical perspective. 1-12-12 WEM Opening Comment Goals at 1-5, 16-17. We provided a long list (from parties’ filings at the time) of common measures that were excluded from the Xenergy study that formed the basis of 2004 goals. 1-19-12 WEM Reply re Goals at 8-14. We noted, “the 2004 goals were less than 0.3% per yr., per capita, and later decisions shrank that even more.” at 2-3. We pointed out that new Avoided Costs figures, alternate administrators and/or program models, which were called for in the Strategic Plan, could likely greatly increase savings but were rejected. (Ibid., at 3-4, 16-17.)</p> <p>We provided an example of Texas EE savings, which save 4.5 times more per dollar than CA, and suggested that a similar “standard offer” program was a way to reveal potential that the studies had missed. (Ibid at 6-7.)</p> <p>We discussed standard offer programs further in several filings, for example 11-8-11 WEM Comments Bridge at 3-6.</p>	<p>The decision mentioned, “WEM states that the goals are far too low, reflecting only 0.3% of total energy consumption, and that past goals were far too easy for IOUs to achieve.” It went on to acknowledge “parties’ concerns that the goals do not currently incorporate savings potential from strategic plan initiatives.” (D.12-05-015 at 78-79.)</p>	<p>Yes</p>

<p>CODES & STANDARDS WEM opposed the ED making Codes & Standards savings nearly half of the goals. We noted that utilities 2010-12 Applications lacked C&S savings estimates and the tracking reports lacked C&S impacts too. 1-12-12 WEM Opening Comment Goals at 8. We analyzed the C&S evaluations for 2006-08 and reported serious questions about the data. (Ibid at 8-9.)</p>	D.12-05-015	WEM's provides insufficient specific references to its presentation and to citations in D.12-05-015 for us to make the determination WEM requests on this item.
<p>PROCUREMENT & EE GOALS We provided an in-depth discussion of how procurement views EE goals in our 1-12-12 opening comments. We began by pointing out why C&S goals make problems for procurement planners, since the data overlaps with the CEC's other C&S work, and there was hardly any compliance data for C&S by either CEC or utilities. (Ibid. at 9-10.) We explained further that the Commission only credited 20% of EE goals as available for procurement in D.07-12-052, and the EE data in CEC's demand forecast was being reviewed ever since then but it was tricky because the amounts of EE "embedded" in the models keep changing, and there is a high potential for double-counting. Summarizing, we noted that C&S cannot be measured like other "resource" programs because it is unspecific as to place or time. Ibid. at 9-13; 1-19-12 WEM Reply Goals at 7.</p>	<p>The decision did not adopt the 50% C&S goal proposed in the 12-28-11 Ruling. As noted above, it opened a pathway to independent administration for local governments, thereby providing for alternate delivery models envisioned by the Strategic Plan.</p>	Yes
<p>GOALS – DECAY – WEM reported that the utilities had no intention of making up the decay from their short-lived CFLs unless they were paid for it. We recommended that the Commission make it clear if it really expected this to happen. (6-12-12 WEM Comment Goals at 15-16.)</p>	OP 18. Emphasized that utilities "shall be responsible for making one half of the decay" since 2006.	Yes, except the correct citation is to OP 20 (not OP 18). Also, the correct date to WEM's filing is 1/12/12.
C&S – GOVT PROGRAMS. We	The decision stated, "The	

<p>explored the inappropriateness of utilities being credited for advocacy for C&S while no credit is given to CEC and local govts, which are primarily responsible for them. (1-19-12 Reply at 2-7.) We objected to giving utilities money for EE lobbying efforts, which PG&E has misused to fight CCAs. (Ibid. at 4-5.)</p>	<p>development and implementation of codes and standards fall under the direct authority of local governments.” (Ibid. at 148.)</p>	<p>Yes</p>
<p>FINANCING. OBF. WEM has long supported OBF, and did so in this proceeding. (E.g. 6-20-11 at 14-15.) We noted that OBF (or OBR) is continually replenished, providing an “evergreen” fund for EE. 10-19-11 Reply Comment Continuation of Funding at 4. WEM mentioned that SDG&E is currently providing 90% of the OBF loans, SCE lagged far behind and PG&E resisted doing the program. 1-25-12 WEM Opening Comment on Financing, at 4-5.</p>	<p>The decision noted that WEM called for continuation of on-bill financing for non-residential customers. (D1205015, at 109.)</p> <p>OP 20(b) called for continuation of and improvement to OBF for non-residential customers. OP19 put SDG&E and SCG in charge of hiring an expert financing consultant on behalf of all the utilities.</p>	<p>Yes, except the correct citation is to OP 22(b) and OP 21, not OP 20(b) and OP 19.</p>
<p>FINANCING – MULTI-FAMILY. WEM commented several times on the need for financing for residential customers, particularly in multi-family housing. E.g. 6-20-11 WEM Opening Comments Bridge Funding at 13-15; 11-16-11 WEM Reply Comment Bridge Scoping Ruling at 3-5. We recommended devoting at least \$75m financing to this sector. 12-12-11 Reply Comment Continuation Of Funding at 3-4. We discussed how much this financing is needed in the current economic downturn. 1-25-12 WEM Opening Comment on Financing at 6.</p>	<p>OP 21 called for utilities to propose new financing program pilots in 2013-14 applications and full-scale offerings in 2014, including financing for single and multi-family customers and small businesses. The decision noted that the Strategic Plan called for near-term strategies for financing —giving “particular attention to issues of multifamily housing and ... longer-term paybacks.” D.12-05-015 at 98.</p>	<p>Yes, except we are unable to verify citation to the 12/12/11 reply. Also, the correct citation is to OP 22, not OP 21.</p>
<p>RESIDENTIAL EE. WEM strongly supported the new focus on residential programs, while we expressed concerns that they were delayed for over a year, and pointed out that they would need improvement, and should include multifamily programs, as well as new financing options. WEM followed the EUC and Whole House program closely since its inception (including filing a</p>	<p>The decision noted, “Greenlining Institute and WEM urge higher incentives for an Energy Upgrade California multifamily program element and increased attention to this market segment.” (Ibid. at 186.) OP 59 required utilities to “clearly define the ‘whole house’ program in their PIPs...[and include] estimates of the number of single-family</p>	<p>Yes, except the correct citation is to OP 60, not OP 59.</p> <p>Also, this compensation decision does not address in any way WEM’s</p>

<p>protest on the IOUs Whole House advice letter).</p> <p>In comments on the EUC program in various filings, we warned that utilities were resistant to this program and seemed to assume it would fail. We noted that this was the most full-featured residential program in many years, so the potential was largely untapped. 6-10-11 Comments at 13-14, 18; 11-8-11 WEM Comments Bridge Scoping at 2, 7; 12-23-11 Comments Program Guidance at 8-9. We frequently expressed concern that the ARRA stimulus funds were all being spent before a multi-family program was launched. 6-20-11 WEM Opening Comments Bridge Funding at 13-14. (Our AFR of D.09-09-047 also discussed this problem.)</p> <p>WEM provided background and analysis on the development and status of the EUC/ IOU Whole House program in multiple filings, recommending a variety of potential improvements, e.g. 6-20-11 Comments, fn. 12-23-11; 12-23-11 WEM Comment Program Guidance at 8-9.</p>	<p>homes they plan to participate in the program...”</p>	<p>application for rehearing of D.09-09-047 which it references but does not claim compensation for in this proceeding.</p>
<p>WEM drew on our long experience with the CFL issues in EE proceedings, noting for example that there’s a need for better Avoided Costs to reduce emphasis on short-lived, non-peak CFLs.)7-16-16 Comment at 3.)</p> <p>WEM consulted with lighting experts to provide up-to-date, in-depth comments. We discussed dimmable fluorescents and LEDs in 12-23-11 WEM Comment on Program Guidance at 9-12. We discussed the “power factor” of LEDs v. fluorescents in our 11-7-11 Comments on Avoided Costs at 8.</p>	<p>The decision noted that WEM believes dimmable CFLs can help achieve greater savings. (Ibid. at 240.) It improved Avoided Costs, to provide more valuation of peak reductions.</p> <p>It also took note of WEM’s comments on LED lighting: “WEM states that EnergyStar and Design Lights Consortium have provided adequate light emitting diode quality specifications for the Commission to establish as a baseline quality standard for rebates. (Ibid. at 240.)</p>	<p>Yes, except we are unable to verify WEM’s citation to the last pleading it lists as correct. Also, the correct citation to the first WEM filing is to the 7/16/10 (not 7/16/16) filing.</p>
<p>WEM participated in the 3-30-11 HVAC workshop, and commented in many filings on the need for more attention to reducing peak. We noted that we lagged behind the rest of the nation in this area.</p>	<p>FOF 48 noted the large contribution of space cooling to peak load, and the high potential for efficient HVAC replacement. FOF 49 recognized the value of streamlining</p>	<p>Yes, except the correct citations are to OP 47-53, not OP 45-50.</p>

<p>6-20-11 Comments at 5. We urged the Commission to do more work to reduce air conditioning load in the Central Valley and other hot inland areas, noting this potential had barely been touched. (<i>E.g.</i> 7-1-11 WEM Reply Bridge period at 10-11; 1-30-12 WEM Reply Financing at 6-7.)</p>	<p>approvals for HVAC in EUC programs. OP 45-50 ordered changes to provide more support for efficient HVAC.</p>	
<p>WEM continued to comment on EM&V issues beyond the 2010 EM&V decision. We pushed for more frequent EM&V in order to accommodate the needs of procurement, and also encouraged the Commission to consider that standard offer programs (which operate on rolling cycles) and require timely measurement in order to approve payments. (11-8-11 WEM Comments Bridge, at 1-3.)</p>	<p>The decision noted WEM’s comment that rolling cycles would necessitate rolling schedules for EM&V at 353.</p>	<p>Yes</p>
<p>STATEWIDE MEO. WEM supported the Commissioner’s decision to suspend Engage 360. 11-2-11 WEM Comment MEO. We stated that there was better brand recognition of EUC brand. 11-8-11 WEM Comments Bridge Scoping at 7-8.</p>	<p>Regarding what to do with the remaining budget for Engage 360, the decision noted, “WEM argues not to have a statewide marketing program, so it requests that that the funding be shifted to local governments and Community Choice Aggregators.” The decision noted that (if there is a statewide marketing program), “WEM, LGSEC, and CCSE advocate for the transfer of administration to non-profit organizations, following the model of Energy Upgrade California.” (Ibid., at 295.) The decision in fact decided to use the EUC brand, and expand it to encompass more EE programs for residential and small business customers, as well as a variety of other demand programs. The nonprofit CCSE will work on designing the marketing program. (OP 115-125.)</p>	<p>Yes</p>

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

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA)² a party to the proceeding?	Yes	Yes
b. Were there other parties to the proceeding with positions similar to claimants?	Yes	Yes
c. If so, provide name of other parties: ORA, The Utility Reform Network (TURN), City and County of San Francisco (CCSF), Local Government Sustainable Energy Coalition (LGSEC), and Marin Energy Authority (MEA)		Yes
<p>d. Claimant’s description of how it coordinated with ORA and other parties to avoid duplication or how its participation supplemented, complemented, or contributed to that of another party:</p> <p><i>Note: The Commission has ruled previously that some duplication is unavoidable in a proceeding such as this one where many stakeholder groups are encouraged to participate.³ Nevertheless, WEM took steps to avoid duplication, and in most cases our participation supplemented, complemented, or contributed to that of other parties, (or preceded their efforts).</i></p> <p>We discussed potential duplication with ORA and other parties from time to time. All felt that WEM’s positions were sufficiently distinct from theirs (and based on different types of research and experiences) so that there was no danger of duplication. In some instances, for example the use of EE in procurement, ORA expects WEM to take the lead, as we have established a particular approaches to this issue over time. Despite our similarities, WEM’s positions in this proceeding were mostly unique. For example, in the EM&V work, many of the other parties embraced the idea of new metrics, while WEM warned that these would cause additional distraction and delay in addressing the most important issue, which is the need for EM&V to more closely align EE with procurement. Thus, WEM’s positions were not duplicative, and wherever they were</p>		Verified; We make no reduction to this claim for duplication of effort.

² The Division of Ratepayer Advocates (DRA) was renamed the Office of Ratepayer Advocates (ORA) effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

³ See, i.e. D.96-08-040 (67 CPUC 2d 562, 575-576.X) (“[B]ecause of the extraordinary level of participation required of both parties and intervenors throughout these proceedings, we find that a reduction in the amount awarded to intervenors based on duplication of effort is unwarranted. Section 1803(b) requires that the awarding of fees to intervenors “be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” Each of the intervenor groups clearly has a stake in the process of restructuring California’s electrical services industry and we are grateful for their participation in these proceedings. Moreover, we rely on them to continue their effective and efficient participation in our proceedings as we move forward with the many implementation tasks ahead. [footnote omitted][¶] In a broad, multi-issue proceeding such as this, we expect to see some duplication of contribution. This duplication does not diminish the value of that contribution to the Commission. In our view, to deduct from an award of reasonable fees in this case would not encourage the effective and efficient participation of all stakeholders in the spirit of § 1801.3(b).”).

similar to other parties, WEM materially complemented or supplemented or contributed to the work of other parties, or vice versa.	
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C. Additional Comments on Part II:

Claimant	CPUC	Comment																																																
	X	<p>WEM's intervenor compensation request contains many hours attributable to CCA issues. WEM largely justifies these hours based on its claimed substantial contribution to D.12-05-015 regarding Regional Energy Network issues, to permitting CCAs to apply to the Commission at the same time as the utilities, and to the passage of Senate Bill 790. We do not compensate intervenors for their work in assisting the passage of legislation. To the extent that D.12-05-015 allowed Regional Energy Networks a chance to compete, this issue does not justify the expenditure of the large amount of hours WEM claims here. A similar analysis applies concerning the issue of permitting CCAs to apply to the Commission at the same time as utilities.</p> <p>The many CCA issues have yet to be decided by the Commission. (See <i>e.g.</i> March 25, 2013 Assigned Commissioner Ruling Amending Scoping Memo and June 20, 2012 Administrative Law Judge Ruling Regarding Procedures for Local Government Regional Energy Network Submissions for 2013-2014 and for Community Choice Aggregators to Administer Energy Efficiency Programs.) We therefore deny the following WEM hours without prejudice: for 2010, 165 hours; and for 2011, 0.25 hours. This total reduction equates to \$28,918.75. The Commission makes no judgment on the merits of these hours other than to deny them without prejudice.</p> <p><u>The following table reflects the hours denied without prejudice:</u></p> <table border="1"> <thead> <tr> <th>Date</th> <th>Activity</th> <th>Hours</th> </tr> </thead> <tbody> <tr><td>9/26/10</td><td>Misuse</td><td>2.0</td></tr> <tr><td>9/27/10</td><td>Workshop</td><td>6.5</td></tr> <tr><td>9/28/10</td><td>Workshop</td><td>0.5</td></tr> <tr><td>10/1/10</td><td>Workshop</td><td>0.5</td></tr> <tr><td>10/4/10</td><td>comment</td><td>3.0</td></tr> <tr><td>10/8/10</td><td>comment</td><td>4.5</td></tr> <tr><td>10/9/10</td><td>comment</td><td>1.25</td></tr> <tr><td>10/9/10</td><td>report</td><td>2.75</td></tr> <tr><td>10/10/10</td><td>report</td><td>2.0</td></tr> <tr><td>10/11/10</td><td>report</td><td>9.0</td></tr> <tr><td>10/12/10</td><td>report</td><td>10.0</td></tr> <tr><td>10/13/10</td><td>report</td><td>3.75</td></tr> <tr><td>10/14/10</td><td>comment</td><td>1.0</td></tr> <tr><td>10/15/10</td><td>report</td><td>2.0</td></tr> <tr><td>10/15/10</td><td>comment</td><td>3.25</td></tr> </tbody> </table>	Date	Activity	Hours	9/26/10	Misuse	2.0	9/27/10	Workshop	6.5	9/28/10	Workshop	0.5	10/1/10	Workshop	0.5	10/4/10	comment	3.0	10/8/10	comment	4.5	10/9/10	comment	1.25	10/9/10	report	2.75	10/10/10	report	2.0	10/11/10	report	9.0	10/12/10	report	10.0	10/13/10	report	3.75	10/14/10	comment	1.0	10/15/10	report	2.0	10/15/10	comment	3.25
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10/15/10	comment	3.25																																																

		10/16/10	report	1.75	
		10/19/10	report	6.50	
		10/19/10	conference	1.0	
		10/20/10	report	9.75	
		10/21/10	report	10.0	
		10/21/10	comments	5.0	
		10/22/10	report	8.25	
		10/24/10	revised report	3.75	
		10/25/10	comments	1.0	
		10/25/10	comments	3.5	
		10/26/10	comments	8.75	
		10/27/10	amended report	7.5	
		10/27/10	motion	0.75	
		10/28/10	Motion; amended report	1.75	
		10/28/10	comments	9.50	
		10/29/10	comments	6.50	
		11/4/10	reply	3.75	
		11/6/10	reply	7.0	
		11/20/10	reply	5.0	
		11/21/10	reply	12.0	
				Total for 2010: 165	
		2/1/11	Misuse of EE	0.25	
				Total for 2011: 0.25	
		<p>165 (hours) x \$175 (2010 hourly rate) = \$28,875.00</p> <p>0.25 (hours) x \$175 (2011 hourly rate) = \$43.75</p> <p>Subtotal for CCA Issues: \$28,918.75</p>			

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

c. Claimant’s explanation as to how the cost of Claimant’s participation bears a reasonable relationship with benefits realized through participation:	CPUC Verified
<p>In a complex rulemaking like this one, the Commission has recognized that it would not be possible for parties to calculate exactly the benefits of their participation. In this proceeding, we should note that WEM proposed a number of ways to reduce the cost of energy efficiency to ratepayers, including by providing “evergreen financing” (loans paid back through rates and reused over and over). Such financing was in fact adopted. WEM also advocated for better administration and delivery models that</p>	<p>After the reductions and disallowances we make to this claim, the remaining hours are reasonable and worthy of compensation.</p>

<p>would provide more “bang for the buck” including those outlined in the Strategic Plan, such as increased independent administration by local governments, more cooperation, and more attention on space cooling efficiencies, which reduce the cost of the entire energy system and should eventually translate into lower rates. These were also adopted.</p> <p>Thus, WEM had a hand in promoting improvements that will provide greater value from our annual EE expenditures of over a billion-dollars, and potentially shift more of the costs in the future into financing rather than ratepayer funding — and also provide enormous benefits to the environment through greenhouse gas reductions, cleaner air and water, and more livable homes, workplaces and communities. Thus it is clear that WEM’s participation was highly productive, and the relatively very small cost of our participation will be recovered many times over by ratepayers.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>WEM’s participation was very efficient and reasonable. The Commission has the advantage of a great deal of work conducted outside of this proceeding, and therefore not charged here. For example, WEM’s participation in all EE proceedings throughout the past decade, a time of massive changes in the EE landscape in California and the nation — as well as our participation in the Long-Term Procurement Proceeding, which provides us with unique insights about how EE is and is not used in our energy resource system — and how it is used more fully in other states. Likewise, our community work as an advocate for California’s first Community Choice program (for which advocate Barbara George won an award from the Marin Energy Authority) gave us a rare view of utility misuse of EE program funds, which we reported to the Commission. It also gave us a chance to participate in unified efforts by CCAs to gain access to EE funds in order to administer EE programs — something which WEM fought for in CPUC proceedings for most of the decade.</p> <p>Thus, our deep knowledge of many of the issues addressed here was acquired through all of these activities during this entire time, although we are only charging for the work in this particular proceeding during the current period.</p> <p>We efficiently studied the documents presented, participated in workshops, conducted further research and provided the comments called for in the proceeding, carefully recorded our time working on all these various activities.</p>	<p><i>See Parts III.B and III.C.</i></p>
<p>c. Allocation of Hours by Issue</p> <p>WEM provides information about our allocation of hours by issue, in our timesheets and the charts below. In some proceedings the issues are broader and more clear-cut, but in a complex rulemaking such as this one an experienced party like WEM addresses a multitude of varied and intertwined issues. Here is a list of issues WEM addressed, which were</p>	<p><i>See Parts III.B and III.C.</i></p>

identified in the OIR and the Scoping Memo:

LIST OF ISSUES

- A) Potential, goals
- B) EE as a resource, # 1 in loading order
- C) Strategic Plan
- D) EM&V protocols & processes including DEER, TRC & PAC tests
 - i) Attribution
 - ii) Metrics – Programs, MT (market transformation), Macro Consumption & Experimental design
 - iii) AMI (Advanced metering infrastructure)
 - iv) Non-energy benefits (GHG impact, economic impact, jobs)
- E) Rules & reporting
- F) Coordination with AB32 and ARRA (federal stimulus funds)
- G) EE Financing
- H) IOU administration, TPPs, Local Governments
- I) Community Choice & EE (CCA/EE)
- J) SW MEO (statewide marketing, education & outreach), web portal
- K) 2010-12 portfolio implementation
 - i) SW Residential
 - ii) Budget caps, targets
- L) 2013-15 cycle
 - i) Program plans, (e.g. HVAC, lighting, etc.)
 - ii) Funding levels
- M) Pre-2010 transition re outstanding issues
- N) Relate w/ other proceedings RRIM, LIEE, LTPP, Avoided Costs, DR
- O) General Participation

Note, it's difficult to say with certainty we spent 5 minutes only on this issue or set of issues and 2 minutes on that. A given paragraph in a filing may tie together 2 or more issues one way, and two pages later some of those issues may be recombined with others in different ways. We have done our best to estimate the amount of time spent on various issues during the proceeding to date.

(see next page)

Estimate issue allocation:

- 9 A
- 4 B
- 1 C
- 9 D
- 5 (i)
- 3 (ii)
- 1 (iii)
- 1 (iv)

4	F	
6	G	
4	H	
28	I	
5	J	
5	K(i)	
5	L(i)	
1	L9II)	
4	N	
5	O	

B. Specific Claim:*

Claimed						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours ⁴	Rate	Total \$
Barbara George	2009 ⁵	0.25	\$175.00	D1202034	43.75	0.25	\$175.00	43.75
Barbara George	2010	61.75 ⁶	\$175.00	D1202034	10,806.25	39.75	\$175.00	6,956.25
Barbara George	2011	170.50 ⁷	\$175.00	D1202034	29,837.50	120.25	\$175.00	21,043.75
Barbara George	2012	143 ⁸	\$180.00	Adopted here ⁹	25,740.00	115.5	\$180.00	20,790.00

⁴ For disallowances, please see subsection (c) below.

⁵ WEM failed to include 2009 hours in its Intervenor Compensation Request. The Commission has included this information after reviewing WEM's timesheets.

⁶ In WEM's original claim, the total hours spent working in 2010 was 224.75. WEM's timesheets however, reflect 226.75 hours. 165 of the 2010 hours concern CCA issues and are denied without prejudice. Therefore the compensable 2010 hourly total is 61.75 (226.75-165).

⁷ In WEM's original claim, the total hours spent working in 2011 was 170.25. WEM's timesheets however, reflect 170.75. Of the 2011 hours 0.25 concern CCA issues and are denied without prejudice. Therefore, the compensable 2011 hourly total is 170.50 (170.75-0.25).

⁸ WEM's Request lists the total hours for 2012 as 143.50. However, after reviewing WEM's timesheets the correct number of hours for work it completed in 2012 is 143.

⁹ Page 32 of the Commission's web-published Intervenor Compensation Guide specifies that if an intervenor is to request a new hourly rate, he or she must request it in accordance with PU Code Section 1806. The Commission does not accept WEM's language of "adopted here" to establish the 2012 hourly rate for Ms. George. The Commission urges WEM to follow the instructions in the Intervenor

Subtotal:					\$66,427.50	Subtotal:		\$48,833.75
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Barbara George	2012	45 ¹⁰	\$90	Adopted here	4,050.00	10	\$90.00	900
Subtotal:					\$4,050.00	Subtotal:		\$900.00
TOTAL REQUEST \$:					\$70,477.50	TOTAL AWARD \$:		\$49,733.75

* 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 requested 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.

** Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate (the same rate applies to travel time).

C. CPUC Disallowances & Adjustments:

#	Reason
1. Disallowance for Clerical and Administrative work.	The Commission disallows time for administrative overhead. ¹¹ In accordance with this practice, we disallow WEM’s clerical and administrative tasks (e.g., filing, formatting, serving, etc.). Thus we reduce WEM’s claim by the following: 5.5 hours for work completed in 2010; 9 hours for work completed in 2011; and 4 hours for work completed in 2012. A total of 17.5 hours are disallowed for clerical and administrative work.
2. Disallowance for Rule 17.4(b) violation.	Rule 17.4(b) in the Commission’s Rules of Practice and Procedure specifies that intervenors shall include time records of hours worked and identify each issue/task performed. Issues and/or tasks that are combined in one timesheet entry are a violation of Rule 17.4(b). Thus we reduce WEM’s entries that combine tasks by 1 hour each. We reduce WEM’s claim by the following: 5.5 hours for work completed in 2010; 8 hours for work completed in 2011; and 2 hours for work completed in 2012. A total of 15.5 hours are disallowed for Rule 17.4(b) violation.

Compensation Guide and PU Code Section 1806 in future proceedings when establishing new and/or existing hourly rates.

¹⁰ In WEM’s original filed claim, the total hours listed for claim preparation was 2 at the rate of \$87.50. However, after reviewing WEM’s timesheets, the correct total for claim preparation is 45. All of these hours took place in 2012, and therefore the correct hourly rate should be \$90 (1/2 time of \$180).

¹¹ See Decisions (D.) D. 12-02-034 at 13; D. 11-07-024.

3. Disallowance for unproductive efforts/excessive hours.	Many of the hours WEM claims in this proceeding involve the tasks of “drafting,” “reviewing,” “reading,” and “prepping.” Many of these hours also involve reviewing other parties’ work in this proceeding. Although the Commission appreciates WEM’s thoroughness to understand the different parties’ positions in this proceeding, much of this time billed is excessive/unproductive. Thus, we reduce WEM’s claim by the following: 11 hours for work completed in 2010; 10 hours for work completed in 2011; and 16.5 hours for work completed in 2012. A total of 37.5 hours are disallowed for unproductive efforts/excessive hours.
4. Disallowance for failure to allocate by issue.	We reduce WEM’s claim by 3.5 hours for 2011 for work done on March 2, 2011 for which the linkage to the issues in this proceeding is unclear and insufficiently justified.
5. Disallowance for undocumented costs.	WEM claims 3.5 hours for ex-parte meeting preparation and meeting time in May 2011. This cost is not associated with a formal issue of the proceeding and is therefore disallowed.
6. Disallowance for failure to make a substantial contribution.	The following time entries involve issues in the proceeding where WEM did not make a substantial contribution: (1) 6-15-11, review docs from 6/14/11 and missed meeting; (2) 6-16-11, draft introduction, parts of procedural history; (3) 10-26-11, avoided costs...search for Attachment B; and (4) 1-9-12, read 11/7/11 potential study...draft part of C&S history. As such, we reduced WEM’s claim by 7 hours for 2011, and by 4 hours for 2012. A total of 11 hours are disallowed for failure to make a substantial contribution.
7. Disallowance for unproductive effort/excessive hours.	WEM states it did not prevail on the issues it contributed to in D.11-12-038, but believes it should be compensated in full because WEM’s perspective enriched the record and increased the Commission’s understanding of the issues raised. WEM spent a total of 46.25 hours in 2011 on its June 20, 2011 comments and October 19, 2011 reply comments. We reduce WEM’s 2011 hours by 9.25 to reflect that these filings contributed to the issues decided, even though WEM did not prevail on these issues.
8. Disallowance for excessive hours.	WEM claims 1.5 hours of preparation for a 5-minute presentation in an All-Party meeting on April 15, 2012. 1.5 hours of prep time is excessive for a 5-minute presentation for a party that has claimed participation throughout this proceeding. Thus, the Commission disallows 1 hour for work completed in 2012.
9. Disallowance for unproductive effort/excessive hours.	WEM’s subtotal of hours for drafting its Intervenor Compensation Request is 45 hours. Although WEM appropriately bills this time at half the established hourly rate, this total does not reflect a polished work product. There are many errors throughout WEM’s timesheets and claim. Thus, 35 hours are disallowed from this compensation component.
10. Increase in 2012 hourly rates.	Abiding by Resolution ALJ-281, Ms. George’s 2012 hourly rate has been raised to reflect the 2.2% Cost-of-Living Adjustment adopted by the resolution.

PART IV: OPPOSITIONS AND COMMENTS

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

FINDINGS OF FACT

1. Women's Energy Matters has made a substantial contribution to Decisions (D.) 10-10-033, D.11-12-038 and D.12-05-015.
2. The requested hourly rates for Women's Energy Matters representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$49,733.75.

CONCLUSION OF LAW

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

ORDER

1. Women's Energy Matters is awarded \$49,733.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company shall each pay Women's Energy Matters their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2011 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 30, 2012, the 75th day after the filing of Women's Energy Matters' request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at San Francisco, California

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision? No
Contribution Decision(s):	D1010033; D1112038; D1205015	
Proceeding(s):	R0911014	
Author:	ALJ Darwin Farrar	
Payer(s):	Pacific Gas and Electric Company; San Diego Gas & Electric Company; Southern California Edison Company; Southern California Gas Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier	Reason Change/Disallowance
Women's Energy Matters	July 17, 2012	\$70,477.50 ¹	\$49,733.75	No	Disallowance for clerical and administrative work; reduction to reflect that WEM contributed to the record but did not prevail on certain issues; reduction for work with insufficient justification or link to proceeding; excessive hours claimed for some tasks.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Barbara	George	Expert	WEM	\$175	2009	\$175
Barbara	George	Expert	WEM	\$175	2010	\$175
Barbara	George	Expert	WEM	\$175	2011	\$175
Barbara	George	Expert	WEM	\$180	2012	\$180

(END OF APPENDIX)

¹ This total is without CCA issues; with CCA issues the total is \$99,396.25.