

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of 2013-2014 Energy Efficiency Programs and Budget (U39M).	Application 12-07-001 (Filed July 2, 2012)
And Related Matters.	Application 12-07-002 Application 12-07-003 Application 12-07-004

DECISION GRANTING COMPENSATION TO THE CALIFORNIA HOUSING PARTNERSHIP CORPORATION FOR SUBSTANTIAL CONTRIBUTION TO DECISION 13-09-044

Intervenor: California Housing Partnership Corporation (CHPC)	For contribution to Decision (D.) 13-09-044
Claimed (\$): \$27,070.00	Awarded (\$): \$25,837.50 (reduced 4.5%)
Assigned Commissioner: Michael R. Peevey	Assigned ALJ: Todd O. Edmister

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	<p>This decision follows up on the approval of the 2013-2014 energy efficiency programs and budgets for new financing pilots (Decision (D.) 12-11-015). This decision authorizes new financing pilots, as well a coordinating entity, the California Hub for Energy Efficiency Financing.</p> <p>The decision authorizes three residential EE financing pilot programs: Single Family Loan Program, Energy Financing Line-Item Charge, and the Master-Metered Multifamily pilot with On-Bill Repayment (OBR).</p> <p>The decision also authorizes three non-residential EE financing pilot programs: OBR for Small Business Sector with CE, Small Business Sector OBR with Credit Enhancement, and OBR for non-residential customers without CE.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	August 16, 2012	Verified
2. Other Specified Date for Notice of Intent (NOI):	n/a	
3. Date NOI Filed:	September 12, 2012	Verified
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:	A. 12-07-001 et al	Verified
6. Date of ALJ ruling:	January 4, 2013	Verified
7. Based on another CPUC determination (specify):	n/a	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A. 12-07-001 et al	Verified
10. Date of ALJ ruling:	January 4, 2013	Verified
11. Based on another CPUC determination (specify):	n/a	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.13-09-044	Verified
14. Date of Issuance of Final Order or Decision:	September 19, 2013	Verified
15. File date of compensation request:	November 18, 2013	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor’s Claimed Contributions	Specific References to Intervenor’s Claimed Contributions	CPUC Discussion

	<p>as possible, assuming proper development and ratepayer protections.”</p> <p>D.13-09-044 at 43, “The Implementation Plan anticipates that SoCalGas will be able to launch an early release of a limited, manual version of the MMMF pilot, without using these CE funds, by working with CHPC...Based on SoCalGas’s proposal to take advantage of on-going developments in this sector, the Commission finds it reasonable to authorize the early release of a limited version of the MMMF program.</p> <p>“Comments from CHPC regarding October 19, 2012 Consultant Report on Energy Efficiency Finance Pilot Programs and November 30, 2012 Supplemental Information”, Filed December 14, 2012 (Dec. 14th Comments) at 11, “Flexibility for mid-course revisions...designing a strong program will involve program improvements that are not apparent until we begin to implement the pilots.”</p> <p>Dec. 14th Comments at 15-16, “If the program experiences high initial interest, but few participants decide to move forward with the program, it will be critical to identify which parts of the process served as barriers.”</p> <p>D.13-09-044 at 91, “Lastly, the Commission finds its important to conduct a mid-point review of the implementation of all the EE Financing programs, as suggested by some parties. There are many moving parts, expectations, and variables which could impact the roll out and uptake of these pilot programs. It may be necessary to</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
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	<p>make program or budgetary changes to achieve our goals.”</p> <p>Aug. 22nd Comments at 4, “CHPC believes the pilot period should be extended to provide more time to implement the pilots fully.”</p> <p>D.13-09-044 at 20, “Now that many of the key hurdles have been overcome, the Commission finds it reasonable to authorize the pilot programs to operate from the date of the decision until the end of 2015.”</p>	<p>Yes</p> <p>Yes</p>
<p>2. Support a Whole Building, Performance Based approach through multifamily energy audits</p> <p>CHPC argued for the use of a whole building performance based approach wherever possible, in order to better serve the diverse nature of multifamily properties and to achieve the deepest and most cost-effective retrofit CHPC recommended the use of ratepayer dollars to fund whole building, performance based audits that work for multifamily properties and limit upgrades to measures supported by the audits.</p>	<p>Dec. 14th Comments at 9, “We support the Consultant Report’s recommendation to fund energy audits...Performance based, whole building audits which are properly scoped to meet the properties’ needs serve the critical function of providing savings estimates necessary to calculate the amount to be financed using OBR...and will aid in using scarce ratepayer funds effectively by targeting the energy savings measures best matched to the unique utility delivery systems of each multifamily low income property.”</p> <p>Aug. 5th Comments at 12, “Given that the IOUs have been working on audit guidelines for multifamily properties for several years, that numerous standards already exist, and that energy audits will be one of the earliest steps in the process for a property executing a retrofit through the MMMFP, the Commission should require that any Energy Audit guidelines for the MMMFP be</p>	<p>Yes</p> <p>Yes</p>

	<p>announced expeditiously...Energy audit guidelines should also be standardized across all IOU territories to avoid confusion among lenders, owners, and contractors.”</p> <p>D.13-09-044 at 44, “During the post-transfer period, the IOUs shall incorporate the Energy Upgrade California audit protocols for multifamily properties to avoid duplicate effort. Authorized EE finance program funds shall be used for building audits to improve understanding of building science and review contractor performance.”</p>	<p>Yes</p>
<p>3. Support integration and coordination of energy efficiency incentive programs, and other support, with the MMMFP.</p> <p>CHPC argued that the best approach to reach the multifamily sector was to coordinate the various offerings, including 1) leveraging the existing incentive programs, with the new financing pilots and 2) allowing ratepayer credit enhancement to be leverage with additional outside credit enhancement.</p>	<p>Dec. 14th Comments at 9-10, “ The multifamily energy efficiency pilot should be allowed to be used in complement with existing incentives, such as [ESAP] and [MFEER]...The pilot should strive to integrate the OBR-financed retrofit measures seamlessly with other retrofit work related to existing incentive programs.”</p> <p>D13-09-044 at 42, “To the extent the customer is eligible for other rebates and incentives, the Utility shall apply them, but CEs will apply only to the financing net of such rebates and incentives.”</p> <p>Aug. 5th Comments at 7, “CHPC strongly suggests that the Commission expressly allow the DSRF to be combined with credit enhancement from other sources, such as letters of credit supplied by foundations.”</p> <p>D.13-09-044 at 25, “Nothing in this decision limits the use of other available CEs, if CAEATFA’s</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

	<p>program rules allow it and necessary data collection is not impaired.”</p>	
<p>4. Promote flexibility during the pilot phase of the MMMFP.</p> <p>CHPC argued that flexibility would be important to promote deal flow during the pilot phase since this program is innovative and we need to understand more about this sector’s needs. CHPC promoted this concept by proposing: 1) flexibility around measures that could be financed through this pilot, 2) lenders have sufficient discretion around loan terms, and 3) an adapted MMMFP unit rather than property goal to give participants flexibility to enroll with small, medium and large multifamily properties.</p>	<p>Aug. 5th Comments at 5, “The definition of EEEMs should be changed to include any efficiency measures that are recommended by the property’s energy audit and reduce the consumption of gas, electricity, or water.”</p> <p>Aug. 22nd Comments at 6, “...as long as no ratepayer credit enhancement is used, the measures not listed as EEMs should be financeable through the MMMF pilot and not count towards the 30% [non energy measures limit]. While CHPC would prefer a broad definition of EEMs for program simplicity, this clarification is essential if a broad definition cannot be achieved.”</p> <p>D.13-09-044 at 31, “Several parties (e.g., CHPC, PG&E, Global Green, LGSEC, and EHC) agreed to a defined level of inclusion of non-EE measures in the total loan... We find that customers may be more likely to add EE projects while undertaking improvement activities... Therefore, financing eligible for CEs may include funds for non-EEEMs totaling up to 30% of the loan total. The 70%/30% ratio of EE measures and non-EE measures also applies to financing which does not rely on ratepayer-funded CEs. However, as set forth in Section 5.5, a wider range of eligible projects (e.g., demand response, distributed generation) may be included in the 70% eligible EE measures for those pilots.”</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>

	<p>Dec. 14th Comments at 12, re: How specific should Commission guidance and oversight be on specifying exact credit enhancement terms with financial institutions: “We would support guidance that incentivizes lenders to request a lower level of credit enhancement as long as it does not specify the exact terms.”</p> <p>Aug. 5th Comments at 3, a goal of the program should be “...to provide flexible pilot guidelines that enable a high probability of success and opportunity to learn what aspects of the program are most critical to multifamily owners and lenders/Financial Institutions.”</p> <p>Aug. 5th Comments at 9, “Lenders should have full discretion to negotiate the terms of the loan with the borrower, with the EEFE role limited to certifying that minimum standards have been met.”</p> <p>D.13-09-044 at 13, “The LSAs will be a mechanism to establish minimum qualifications, set standards for financial products, ensure FIs conform with the terms of the pilot program in which they are participating (including data collection and privacy requirements), and for any additional requirements related to the use of CEs.”</p> <p>D.13-09-044 at 23, “Therefore, the Commission finds its input and review of the PIPs, followed by tracking CAEATFA’s public rulemaking process for approval of program rules, results in reasonable and appropriate Commission oversight of the CE design for each pilot program. However we do not</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
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	<p>find that Commission approval of specific loan terms is practical.</p> <p>Aug. 22nd Comments at 4, Because the 25 projects that have an average of 200 individual units in each project goal would be difficult to meet and would lead to low participation, “CHPC agrees with Global Green USA’s recommendation that the ‘MMMFP should reach 5,000 total units...all to be located in 20+ unit buildings.’</p> <p>D.13-09-044 at 40, “Nonetheless, CHPC, who will be implementing this pilot as “pre-development,” supports Global Green’s recommendation to reframe the target to ‘reaching 5000 units through properties with building of 20 or more units.’ This is a reasonable modification and we adopt it.”</p>	<p>Yes</p> <p>Yes</p>
<p>5. Limit costs to participants, both lenders and multifamily owners</p> <p>CHPC argued that these deals are extremely sensitive to fees and at least during the emerging stages of this pilot, it would be detrimental to program goals to charge fees to multifamily owners or lenders for either the use of OBR or to cover other pilot expenses.</p>	<p>Dec. 14th Comments at 8, “CHPC recommends that the program guidelines specifically state that the amount of these charges passed on to OBR users during the pilot must be nominal to avoid their becoming a barrier to fulfilling the CPUC’s goal of test OBR for low income multifamily properties.”</p> <p>Dec. 14th Comments at 11 re: Whether fees from lenders or other parties should be collected to cover the cost of the hub: “The relatively small financing size of these projects will make them extremely sensitive to payment of fees for initial systems work and especially to on-going fees that reduce the savings available for OBR.”</p> <p>Aug. 5th Comments at 14, “The absolute minimum CHPC needs to begin assisting properties in</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>

	<p>accessing financing to complete whole building retrofits paid for in part by private capital, is no cost access to the line item billing repayment mechanism.”</p> <p>Aug. 22nd Comments at 3, “Based on our prior experience exploring the use of line item billing (LIB) with SoCalGas, we believe it is essential to offer manual bill entry to MMMF pre-development pilot participants at no cost.”</p>	<p>Yes</p>
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Intervenor	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
<p>c. If so, provide name of other parties:</p> <p>Our position was most closely aligned with Global Green and they were our main contact throughout the proceeding, but we also worked with and found common goals with:</p> <p>Greenlining Institute, ORA, NRDC, Build It Green, SolarCity, and the Marin Energy Authority (MEA).</p>		Verified
<p>d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>CHPC worked most closely with Global Green in this proceeding. With these parties, we explicitly share goals for improved energy efficiency in multifamily</p>		Verified. We agree that CHPC coordinated with ORA and other parties to

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates 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.

<p>housing serving low income residents. However, CHPC has direct access to multifamily property owners and managers who have detailed their experience of barriers accessing existing programs, which informs CHPC’s recommendations. Therefore CHPC provided extensive briefings and coordinated policy recommendations from owners and lenders; building consensus for program improvements including: funding for whole building audits, flexibility around eligible measures, program coordination, a phased in approach to launch the pilot, flexibility for lenders around terms, etc.</p> <p>In coordination with Global Green we recommended a refinement to the Master-Metered Multifamily finance pilot goals; suggesting a unit goal, rather than property goal with an overly high per property unit target. We also coordinated with Global Green around recommendations regarding the eligible energy efficiency measures. They brought knowledge around the environmental value of counting water measures and we were able to show that owners highly valued the ability to finance solar domestic hot water systems and water systems for cost saving reasons. Finally, Global Green and CHPC agreed that in an underserved market such as the multifamily sector there would be a need to analyze performance, but rather than cancel the program based on slow up take, to make mid course corrections. We coordinated on comments about what performance metrics should be tracked and agreed that evaluating the program along the way would be important.</p> <p>We spoke with Build It Green while developing our comments on Whole building audits. We were able to speak to lender and owner concerns that audits be detailed enough to trust savings projections and Build It Green added details about which current audit protocols being used in utility programs were most helpful.</p> <p>We spoke with SoCalGas to better understand the IOUs position on eligible energy efficiency measures and shared owner experiences, particularly around solar domestic hot water measures with SoCalGas staff.</p> <p>We have had several discussions with ORA related to financing, particularly On-Bill Repayment, credit enhancement and CHPC’s energy efficiency experience in low income multi-family housing. We worked with them to develop a recommendation on how to balance the goals of guidelines for lenders that would not be overly prescriptive, yet provide sufficient oversight. We were able to share our conversations with lenders and our 25 years of affordable housing finance expertise, as well as the work we had done on behalf of owners to seek favorable terms from lenders for this product. We also explored the importance for the multifamily sector to move towards a coordinated, whole-building, performance based approach in order to achieve the deepest savings with the most cost-effective ratepayer investment.</p>	<p>avoid unnecessary duplication.</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

<p>a. Concise explanation as to how the cost of Intervenor’s participation bears a reasonable relationship with benefits realized through participation:</p>	<p>CPUC Verified</p>
<p>Generally, CHPC will advocate for the interests of low-income multifamily tenants and affordable housing building owners/managers. CHPC has significant experience in affordable housing finance and frequently communicates with lenders about their interest in this sector. CHPC’s objective in this proceeding is to ensure the Master-Metered Multifamily financing pilot is attractive and workable for affordable multifamily owners. CHPC worked to assure the program, meets owners needs under feasible requirements. In addition, using our expertise in financing major projects through a variety of lenders, we worked to make sure the program’s framework would be usable by lenders.</p>	<p>CHPC contributed to the development of a more complete record and ultimately a more informed decision regarding a financing pilot for the multifamily sector. The costs of CHPC’s participation were reasonable in relation to the benefits to be realized.</p>
<p>b. Reasonableness of Hours Claimed.</p> <p>CHPC coordinated with other parties to avoid duplication of efforts (Part II(B)(d) above).</p> <p>CHPC’s total hours claim is conservative for the following reasons:</p> <ol style="list-style-type: none"> 1. CHPC worked diligently to divide labor internally to those best suited for the particular tasks. Megan Kirkeby, CHPC’s Sustainable Housing Policy Manager, had primary responsibility for performing substantive research, and for the drafting and review of filings and other proceeding-related documents. Matt Schwartz, CHPC’s President & CEO, provided strategic direction, informing the discussion with his high-level expertise on low-income multifamily issues, particularly regarding finance. Tara Siegel, CHPC’s Sustainable Housing Program Manager, provided input on the needs of owners and lenders, with whom she speaks frequently to help build a pipeline for participation in the Master-Metered Multifamily financing pilot. Ann Gressani, consultant to CHPC, was the primary assistant to Megan Kirkeby in all proceeding-related activities including drafting and review of filings and coordinating with other parties. 2. As noted above, section II.B, regarding duplication of efforts, CHPC also made sure that other parties with similar interests were aware of 	<p>Yes, with the following exceptions, which are more fully discussed below:</p> <ol style="list-style-type: none"> 1. Reduction of Kirkeby’s hours for preparation of intervenor compensation claim 2. Reduction of hours for Schwartz’s attendance at 8/16/13 workshop 3. Reduction of hours for Gressani’s billing for assessment of 9/19/13 Commission meeting discussion

<p>our planned efforts.</p> <p>3. All of CHPC’s comments were informed by many hours of consultation with Community Development Financial Institutions (lenders), foundations, and multifamily property owners to deepen the value of comments regarding program improvements, but CHPC does not claim any of this research time toward the proceeding in the interest of keeping this claim reasonable and conservative.</p>	<p>of decision</p>																																
<p>c. Allocation of Hours by Issue</p> <p>Allocation of Hours by Issue in 2012</p> <table border="1" data-bbox="188 646 1063 968"> <tr> <td colspan="2">CHPC’s time is allocated by issue category as follows:</td> </tr> <tr> <td>A Phased deployment of Multifamily pilot</td> <td>22%</td> </tr> <tr> <td>B Support a whole building performance based approach</td> <td>10%</td> </tr> <tr> <td>C Support integration and coordination of incentive programs and other support with the MMMFP</td> <td>10%</td> </tr> <tr> <td>D Promote flexibility during the pilot phase of the MMMFP (and misc.)</td> <td>50%</td> </tr> <tr> <td>E Limit costs to participants of the MMMFP</td> <td>8%</td> </tr> <tr> <td>F Preparation of Intervenor Compensation Claim forms</td> <td>0%</td> </tr> <tr> <td style="text-align: right;">TOTAL</td> <td>100%</td> </tr> </table> <p>Allocation of Hours by Issue in 2013</p> <table border="1" data-bbox="188 1102 1063 1465"> <tr> <td colspan="2">CHPC’s time is allocated by issue category as follows:</td> </tr> <tr> <td>A Phased deployment of Multifamily pilot</td> <td>25%</td> </tr> <tr> <td>B Support a whole building performance based approach</td> <td>5%</td> </tr> <tr> <td>C Support integration and coordination of incentive programs and other support with the MMMFP</td> <td>6%</td> </tr> <tr> <td>D Promote flexibility during the pilot phase of the MMMFP (and misc.)</td> <td>38%</td> </tr> <tr> <td>E Limit costs to participants of the MMMFP</td> <td>7%</td> </tr> <tr> <td>F Preparation of Intervenor Compensation Claim forms</td> <td>18%</td> </tr> <tr> <td style="text-align: right;">TOTAL</td> <td>100%</td> </tr> </table>	CHPC’s time is allocated by issue category as follows:		A Phased deployment of Multifamily pilot	22%	B Support a whole building performance based approach	10%	C Support integration and coordination of incentive programs and other support with the MMMFP	10%	D Promote flexibility during the pilot phase of the MMMFP (and misc.)	50%	E Limit costs to participants of the MMMFP	8%	F Preparation of Intervenor Compensation Claim forms	0%	TOTAL	100%	CHPC’s time is allocated by issue category as follows:		A Phased deployment of Multifamily pilot	25%	B Support a whole building performance based approach	5%	C Support integration and coordination of incentive programs and other support with the MMMFP	6%	D Promote flexibility during the pilot phase of the MMMFP (and misc.)	38%	E Limit costs to participants of the MMMFP	7%	F Preparation of Intervenor Compensation Claim forms	18%	TOTAL	100%	<p>Yes</p>
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$

Matt Schwartz (Expert and Advocate)	2012	3.5	\$225	See Comment 1	\$787.50	3.5	\$225	\$ 787.50
Megan Kirkeby (Expert and Advocate)	2012	22.5	\$125	See Comment 2	\$2812.50	22.5	\$130	\$2,925.00
Ann Gressani (Expert and Advocate)	2012	10	\$160	See Comment 4	\$1600	10	\$160	\$1,600.00
Matt Schwartz (Expert and Advocate)	2013	15.5	\$225	See Comment 1	\$3487.50	11.5	\$230	\$2,645.00
Megan Kirkeby (Expert and Advocate)	2013	52.5	\$125	See Comment 2	\$6562.50	52.5	\$135	\$7,087.50
Tara Siegel (Expert and Advocate)	2013	19.5	\$160	See Comment 3	\$3120	19.5	\$165	\$3,217.50
Ann Gressani (Expert and Advocate)	2013	43	\$160	See Comment 4	\$6880	39	\$165	\$6,435.00
	Subtotal:				\$25,250.00	Subtotal:		\$24,697.50
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Megan Kirkeby	2013	24	\$62.50	See Comment 2	\$1500	12	\$67.50	\$810
Ann Gressani	2013	4	\$80	See Comment 4	\$320	4	\$82.50	\$330
	Subtotal:				\$1,820.00	Subtotal:		\$1,140.00
COSTS								
#	Item	Detail			Amount	Amount		
		N/A				N/A		
	Subtotal:					Subtotal:		
TOTAL REQUEST \$:					\$27,070.00	TOTAL AWARD \$:		\$25,837.50

**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. Intervenors' 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.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

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

Attachment or Comment #	Description/Comment
Attachment #1	Certificate of Service
Attachment #2	Time records for CHPC staff
Comment #1	<p>Matt Schwartz, President & CEO: As President & CEO of the California Housing Partnership Corporation, Matt plays a leadership role in California in expanding the resources available to preserve and create affordable housing with a focus on sustainability. Matt has worked in the development, planning and financing of affordable housing for more than twenty years in both the private and public sectors and has extensive experience with most government funding programs.</p> <p>In 2010, under Mr. Schwartz's leadership, CHPC created a coalition of local organizations to help owners and residents of low income rental housing better access federal and state energy efficiency retrofit resources and to achieve deeper energy savings.</p> <p>Matt is a past President of the Board of Housing California and is recognized as an expert on sustainable affordable rental housing policy in California and nationally. Matt was appointed to the San Francisco Housing Authority Commission by Mayor Gavin Newsom in 2008 and reappointed by Mayor Ed Lee in 2011.</p> <p>Resolution ALJ-281 adopted Intevenor rates for 2012. The range for experts with 13+ years of experience is \$160-\$400. CHPC requests that Mr. Schwartz's hours be billed at \$225 which is his standard rate of billing for public contracts, and is well within the range for his experience level. We believe given his 23 years of experience in affordable housing development and finance, this rate is appropriate.</p>
Comment #2	<p>Megan Kirkeby, Sustainable Housing Policy Manager: Megan Kirkeby provides program level support for the Green Rental home Energy Efficiency Network (GREEN), as well as supporting CHPC's research, communications, and policy initiatives. Megan received a Bachelor of Arts in Global Economics from the University of California, Santa Cruz and received a Master of Public Policy with a concentration in Urban Planning and Regional Development from the UCLA Luskin School of Public Affairs in June of 2012. Megan has over 6 years experience in affordable housing policy. Prior to joining CHPC, Megan was the Policy Associate for the Non-Profit Housing Association of Northern California where she led numerous issue-focused working groups, and provided in depth research on a wide variety of relevant topics. She also participated in the Housing CA Land Use and Finance Committee, as well as the National Low Income Housing Coalition's State Partner Working Group.</p> <p>Resolution ALJ-281 adopted Intevenor rates for 2012. The range for all experts is \$125-\$390. CHPC requests that Ms. Kirkeby's hours be billed at \$125 which is her standard rate of billing for public contracts, and is at the low end of the range for her experience level. Ms. Kirkeby is new to representing affordable housing issues at the CPUC, but considering Ms. Kirkeby's more than 6 years experience in affordable housing policy and research, we believe this rate is appropriate. Her claim preparation time will be requested at ½ of \$125, or \$62.50 per hour.</p>

<p>Comment #3</p>	<p>Tara Siegel, Sustainable Housing Program Manager: Tara manages the Green Rental home Energy Efficiency Network’s (GREEN) efforts to expand access to government and ratepayer funded energy retrofit programs. In addition, Tara works with CHPC’s Sustainable Housing Policy Manager to support CHPC’s Federal and State advocacy efforts in the area of sustainable housing.</p> <p>Prior to joining CHPC, Tara worked at the Low Income Investment Fund (LIIF) for four years where she helped develop and manage LIIF's green initiatives, including the Green Opportunity Fund (GO Fund) in Los Angeles and the Bay Area Multifamily Fund (BAM Fund) in San Francisco. Prior to joining LIIF, Ms. Siegel was a Rose Architectural Fellow at the Pratt Center for Community Development in Brooklyn, New York, where she worked on housing and child care initiatives with a focus on energy efficiency. In all, Tara has 15 years in the field of sustainable architecture and affordable housing.</p> <p>Tara has a B.A. in Architectural Studies from the University of Washington, and a Master of Architecture degree from New Jersey Institute of Technology.</p> <p>Resolution ALJ-281 adopted Intevenor rates for 2012. The range for all experts is \$125-\$390. CHPC requests that Ms. Siegel’s hours be billed at \$160 which is her standard rate of billing for public contracts, and is at the low end of the range for her experience level. Ms. Siegel is new to representing affordable housing issues at the CPUC, but considering Ms. Siegel’s more than 12 years experience in affordable housing policy and research, we believe this rate is appropriate.</p>
<p>Comment #4</p>	<p>Ann Gressani, Consultant to CHPC</p> <p>Ann is an independent consultant specializing in California public utilities policy. She has over twenty-five years experience working with the California Legislature and Public Utilities Commission. She served the California State Senate as Principal Consultant to the Energy and Public Utilities Committee in the 1980's, managed State Government and Regulatory Affairs in California and other western states for MCI Telecommunications in the 1990's and most recently has assisted several affordable housing non-profit organizations with state and federal policy issues.</p> <p>Resolution ALJ-281 adopted Intevenor rates for 2012. The range for all experts is \$125-\$390. CHPC requests that Ms. Gressani’s hours be billed at \$160 which is at the low end of the range for her experience level. Considering Ms. Gressani’s more than 25 years of utility issues policy experience and affordable housing experience, we believe this rate is appropriate. Her claim preparation time will be requested at ½ of \$160, or \$80.00 per hour.</p>

D. CPUC Disallowances and Adjustments:

#	Reason
<p>1. Adoption of Matt Schwartz’ 2012 hourly rate.</p>	<p>Resolution ALJ-281 sets rates for experts with 13-plus years of experience at \$160-\$400. Schwartz is the President and CEO of the CHPC. His long-time career in public housing is reflective of the range for experts with 13-plus years of experience. As such, the Commission adopts the rate of \$225 for Schwartz</p>

	for work he completed in this proceeding in 2012. This hourly rate is reflective of both Schwartz's experience as well as the guidelines set in Resolution ALJ-281.
2. Adoption of Matt Schwartz's 2013 hourly rate.	Per Resolution ALJ-287, the 2.0% Cost-of-Living Adjustment is applied to Schwartz's 2012 hourly rate to establish his 2013 hourly rate. As such, the commission adopts Schwartz the rate of \$230 per hour for 2013.
3. Adoption of Megan Kirkeby's 2012/2013 hourly rates.	CHPC proposes a 2012 and 2013 hourly rate of \$125 for Megan Kirkeby. We agree with the assessment of her education and years of experience, but increase the rates to \$130 for 2012 and \$135 for 2013, consistent with Resolution ALJ-281 for 2012 and Resolution ALJ-287, respectively.
4. Adoption of Tara Sigel's 2012/2013 hourly rates.	CHPC proposes a 2012 and 2013 hourly rate of \$160 for Tara Sigel. We agree that the rates are reasonable based on her education and years of experience. The 2012 rate is within the accepted ranges for experts with comparable experience, consistent with Resolution ALJ-281. We update the rate for 2013 to \$165, consistent with Resolution ALJ-287.
5. Adoption of Ann Gressani's 2012/2013 hourly rates.	CHPC proposes a 2012 and 2013 hourly rates of \$160 for Ann Gressani. We agree that the rates are reasonable based on her education and years of experience. The 2012 rate is within the accepted ranges for experts with comparable experience, and is consistent with Resolution ALJ-281. We update the rate for 2013 to \$165, consistent with Resolution ALJ-287.
6. Disallowance for excessive hours.	We note that Kirkeby claimed 24 hours to prepare the intervenor compensation claim for CPHC's contribution to D.13-09-044. This is excessive, particularly considering the CHPC claimed 9 hours to prepare the intervenor compensation claim for its substantial contribution to D.12-11-015. We reduce Kirkeby's hours by 50%. It is reasonable to compensate CHPC a total of 16 hours (by Kirkeby and Gressani) to prepare the intervenor compensation claim for D.13-09-044.
7. Disallowance for duplication of efforts.	Kirkeby, Gressani, and Schwartz all claimed hours for attending the 8/16/13 workshop. While we appreciate that more than one representative may need to attend and participate in such a workshop, it is not clear that three representatives are required. We disallow 4 hours for Schwartz's participation.
8. Disallowance for Gressani's listening to and summary of discussion at 9/19/13 Commission business meeting	Gressani charged 2 hours for listening in to the 9/19/13 business meeting at which D.13-09-044 was discussed and voted out, and also charged 2 hours for summarizing this discussion for her client. These activities are not required and should not be compensated.

PART IV: OPPOSITIONS AND COMMENTS

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

1. California Housing Partnership Corporation (CHPC) has made a substantial contribution to Decision 13-09-044.
2. The requested hourly rates for California Housing Partnership Corporation's 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 claimed costs and expenses, as adjusted herein are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$25,837.50.

CONCLUSION OF LAW

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

ORDER

1. California Housing Partnership Corporation is awarded \$25,837.50.
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 pay California Housing Partnership Corporation their respective shares of the award, based on their California-jurisdictional energy revenues for the 2012 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include interest at the rate earned on prime, three-month on non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 1, 2014, the 75th day after the filing of California Housing Partnership Corporation's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1309044		
Proceeding(s):	A1207001, A1207002, A1207003, A1207004		
Author:	ALJ Edmister		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Housing Partnership Corporation	11/18/13	\$27,070.00	\$25,837.50	N/A	See Part III. D, above

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Ann	Gressani	Advocate	California Housing Partnership Corporation	\$160	2012	\$160
Ann	Gressani	Advocate	California Housing Partnership Corporation	\$160	2013	\$165

Matt	Schwartz	Expert	California Housing Partnership Corporation	\$225	2012	\$225
Matt	Schwartz	Expert	California Housing Partnership Corporation	\$225	2013	\$230
Mega n	Kirkeby	Advocate	California Housing Partnership Corporation	\$125	2012	\$130
Mega n	Kirkeby	Advocate	California Housing Partnership Corporation	\$125	2013	\$135
Tara	Siegel	Advocate	California Housing Partnership Corporation	\$160	2013	\$165

(END OF APPENDIX)