

COM/MP1/avs **ALTERNATE PROPOSED DECISION** Agenda ID #13276 (Rev. 1)
Alternate to Agenda ID#13274
Ratesetting
10/2/14 Item 34a

Decision **ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY**
(Mailed 8/29/2014)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric
 Company (U902E) to Fill Local Capacity
 Requirement Need Identified in D.13-03-029.

Application 13-06-015
 (Filed June 21, 2013)

**ALTERNATE DECISION GRANTING INTERVENOR
 COMPENSATION TO CALIFORNIA ENVIRONMENTAL JUSTICE
 ALLIANCE FOR SUBSTANTIAL CONTRIBUTION TO
 DECISION 14-02-016**

Claimant: California Environmental Justice Alliance	For contribution to Decision (D.) 14-02-016
Claimed: \$34,639.40	Awarded: \$ 26,940.74 (-22.225% reduction)

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	D.14-02-06 grants San Diego Gas & Electric Company authority to enter into a purchase power tolling agreement with Pio Pico Energy Center, LLC and to recover the costs of the agreement, subject to a cost cap, through its local generation charge on an equal per kilowatt-hour basis by customer class.
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B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	August 21, 2013	Verified
2. Other Specified Date for NOI:	N/A	
3. Date NOI Filed:	September 17, 2013	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.13-06-015	Verified
6. Date of ALJ ruling:	October 17, 2013	Verified
7. Based on another CPUC determination (specify):	N/A	
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:	A.13-06-015	Verified
10. Date of ALJ ruling:	October 17, 2013	Verified
11. Based on another CPUC determination (specify):	N/A	
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-02-016	Verified
14. Date of Issuance of Final Order or Decision:	February 12, 2014	Verified
15. File date of compensation request:	April 11, 2014	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

Intervenor	Comment
Description of California Environmental Justice Alliance	<p>The California Environmental Justice Alliance (CEJA) is an alliance of six grassroots environmental justice organizations that are situated throughout the state of California. CEJA’s six organizations represent utility customers throughout California that are concerned about their health and the environment. The organizational members of CEJA are: Asian Pacific Environmental Network, The Center for Community Action and Environmental Justice, Center on Race, Poverty & the Environment, Communities for a Better Environment, Environmental Health Coalition, and People Organizing to Demand Environmental and Economic Justice. CEJA is an unincorporated organization that is fiscally sponsored by the Environmental Health Coalition. All of the members of CEJA are non-profit public interest entities. Together, the six member organizations of CEJA are working to achieve environmental justice for low-income communities and communities of color throughout the state of California. In particular, CEJA is pushing for policies at the federal, state, regional and local levels that protect public health and the environment. CEJA is also working to ensure that California enacts statewide climate change policies that protect low-income communities and communities of color.</p>

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>2012 LTPP</u></p> <ul style="list-style-type: none"> CEJA provided a unique perspective that enriched the Commission’s 	<p>J. May Testimony (10/4/13), p. 1-7.</p> <p>Hearing Transcript (10/14/13), p. 186-193.</p>	<p>Verified.</p> <p>As stated in past Commission</p>

<p>deliberations and the record by recommending that the decision be postponed until after a determination of need for new resources is made in Track 4 of Rulemaking 12-03-014 (2012 LTPP). CEJA submitted extensive briefing as well as conducted cross-examination on the issue. The Commission’s analysis on whether to postpone the decision was based upon substantial evidence presented by CEJA.</p>	<p>CEJA/Sierra Club Opening Brief (11/8/13), Summary of Recommendations, p. iii. CEJA/Sierra Club Opening Brief (11/8/13), p. 9-12. CEJA/Sierra Club Reply Brief (11/20/13), p. 2-5. CEJA/Sierra Club Opening Comments on the Proposed Decision (1/23/14), p. 3-4. D.14-02-016, p.3 (“Sierra Club and CEJA point out several intervening events since the issuance of D.13-03-029 that might affect the assessment of local area need, including the closure of the San Onfore Nuclear Generating Station (SONGS).” D.14-02-016, p. 4 (“We are not persuaded to discard the need determination made in D.13-03-029 as part of the 2010 LTPP [footnote omitted] in favor of a yet-to-be-made need determination in the 2012 LTPP.”)</p>	<p>decisions, substantial contribution can occur even when the Commission does not adopt the recommendations of an intervenor. <i>See e.g.</i>, D.06-03-001. What is important is “assist[ing] in the Commission’s analysis” of the issues. <i>Id.</i> (<i>internal quotations omitted</i>). Here, CEJA provided the Commission with such assistance, although reductions to the compensation award are required. <i>See</i> Part III.D, below.</p>
<p><u>Cabrillo II</u></p> <ul style="list-style-type: none"> CEJA informed the Commission that the previous decision, D.13-03-029, assumed that the Cabrillo II turbines would be retired, and that SDG&E has negotiated an 	<p>Hearing Transcript (10/14/13), p. 45-48, 202. CEJA/Sierra Club Opening Brief (11/8/13), Summary of Recommendations, p. iii. CEJA/Sierra Club Opening Brief (11/8/13), 14-15. CEJA/Sierra Club Reply Brief</p>	<p>Verified. The Commission notes, however, that CEJA’s contention did “not meaningfully inform[]” the</p>

<p>agreement allowing them to remain in service. The Commission’s analysis in determining the relevance of the continued operation of the Cabrillo II turbines relied upon CEJA’s briefing and cross-examination.</p>	<p>(11/20/13), p. 10. D.14-03-016, p. 4 (“Sierra Club and CEJA point out that, although D.13-03-029 assumed that the Cabrillo II combustion turbines would be retired in 2013, SDG&E has since negotiated an agreement to allow them to remain in service for a limited period.”) D.14-02-016, p.4-5 (“As for the limited continued operation of the Cabrillo II combustion turbines, the fact that will remain in service for a limited period does not meaningfully inform the issue of whether there is a need for additional local capacity beginning in 2018.”)</p>	<p>Commission’s deliberations. <i>See</i> D.14-03-016 at p. 4-5. As such, CEJA did not substantially contribute to the Cabrillo II discussion and will not be compensated for this work.</p>
<p><u>Cost Reasonableness</u></p> <ul style="list-style-type: none"> CEJA substantially assisted the Commission’s analysis by fully developing the record with regard to price calculation. Although not adopted, CEJA presented two alternative analyses to the calculation of cost. First, CEJA compared the nominal contract price of the amended PPTA in comparison to the original PPTA. Second, CEJA argued that it would have been more cost effective 	<p>CEJA/Sierra Club Opening Brief (11/8/13), p. 16-17. CEJA/Sierra Club Reply Brief (11/20/13), p. 12-14. CEJA/Sierra Club Opening Comments on the Proposed Decision (1/23/14), p. 5-6. CEJA/Sierra Club Opening Comments on the Proposed Decision (1/23/14), p. 7 (“By extending the contract term by five years SDG&E obligates ratepayers to five additional years of capacity payments to Pio Pico. This represents a 25 percent increase in total cost in nominal dollars as compared</p>	<p>Verified. <i>See</i> comments regarding 2012 LTPP, above.</p>

<p>for SDG&E to issue a new RFO specifically seeking local resources to provide. CEJA’s discussion of these two alternatives aided the Commission’s consideration of the reasonableness of cost and contributed significantly to the development of the record.</p>	<p>to a 20-year contract. As SDG&E admits, had the Amended PPTA simply changed the start date per D.13-03-029 and retained the original 20-year contract term, the net present value of costs to ratepayers would be reduced.”)</p>	
<p><u>Increase in Term From 20 to 25 Years</u></p> <ul style="list-style-type: none"> CEJA extensively developed the record and aided the Commission’s decisionmaking by identifying the environmental risks associated with extending the contract terms. Although the Commission rejected CEJA’s position, the Commission’s analysis was substantially informed by CEJA’s discussion of the issue. 	<p>CEJA/Sierra Club Opening Brief (11/8/13), p. 20-22. CEJA/Sierra Club Reply Brief (11/20/13), p. 13-14. CEJA/Sierra Club Opening Comments on the Proposed Decision (1/23/14), p. 7-9.</p>	<p>Verified. CEJA’s input regarding an extension of the contract terms enhanced the Commission’s discussion on the issue. Although the Commission ultimately rejected CEJA’s position, compensation is nonetheless warranted.</p>

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

	Interven or	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.
c. If so, provide name of other parties: See Service List for A.13-05-016 in the attached certificate of service. Sierra Club was the primary party taking positions similar to CEJA.		Verified.
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: CEJA was in a unique position of representing low-income communities of color that would be impacted by the decision. CEJA’s analysis supplemented, complemented, and contributed to other party’s discussion and provided representation to community members who were otherwise not represented in the process. CEJA coordinated extensively with Sierra Club throughout the proceeding to ensure their presentations were supplemental and complementary. For example, CEJA and Sierra Club coordinated discovery, expert report preparation, cross-examination, ex parte meetings, and submitted joint briefs and comments. CEJA also coordinated with ORA regarding evidentiary hearings and briefing. To a lesser degree, CEJA coordinated with other parties.		Verified.

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.

C. Additional Comments on Part II

Intervenor’s Comments	Comment
CEJA	<p>California Public Utility Code 1801.3 requires the intervenor compensation program to 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.”² Section 1802(i) of the California Public Utilities Code defines “substantial contribution” as follows:</p> <p>“the customer’s presentation has substantially assisted the commission in the making of its order or decision because the order of decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer’s participation has resulted in substantial contribution, even if the decision adopts that customer’s contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate’s fees, reasonable expert fees and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.”</p> <p>The Commission has interpreted this requirement to “effectuate the legislature’s intent to encourage effected and efficient intervenor participation.”³ The Commission has historically interpreted this section broadly, and granted compensation if a parties’ showing “assisted the Commission in its analysis of an issue and enriched the record, even if the intervenor’s specific recommendations were not adopted.”⁴ “For example, the Commission could find that the customer made a substantial contribution if a customer provided a unique perspective that enriched the Commission’s deliberations and the record.”⁵ The</p>

² Cal. Public Util. Code Section 1801.3.

³ D.08-04-012 at 4.

⁴ D.08-04-012 at 4-5 (describing standard); D.06-06-026 at pp. 4-5 (describing standard).

⁵ D.13-11-022 at 5-6; D.06-06-026 at 5 (describing standard).

	<p>Commission has further explained that “participation that only indirectly contributes to the commission decision – such as facilitating turn-out for public hearings or inciting participation in the public portion of commission meetings – and might therefore be considered ‘unproductive’ in that it is informal, could be compensable.”⁶ The Commission has also found substantial contribution where it agreed with a parties’ position, but not its policy arguments.⁷</p> <p>“The evident purpose [of the intervenor compensation program] is to ‘encourage’ participation by groups that might be broadly aligned around common positions and proposals, but who have distinct constituencies or distinct abilities to contribute to the conduct of the proceeding at the commission.”⁸</p> <p>Although the Commission did not adopt CEJA’s position, CEJA substantially assisted the Commission’s analysis and enriched the record. CEJA’s unique community perspective brought forth issues that would not have otherwise been examined.</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 Claimant’s participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)</p> <p>CEJA requests \$34,639.40 in fees and costs for its participation in the proceeding. As anticipated in its Notice of Intent to Claim Intervenor Compensation, CEJA participated in all major aspects of the proceeding, including filing multiple briefs, comments, testimony, and conducting discovery. In</p>	<p>CPUC Discussion</p> <hr/> <p>Verified.</p>
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⁶ D.03-03-031 at 18.

⁷ D.08-04-012 at 5 (“Although our decision to bifurcate the proceeding was not specifically based upon TURN’s position that Guardian’s rate could be discounted without discounting the PPP surcharge.”)

⁸ D.03-03-031 at 14.

<p>general, CEJA advocated for the denial of authority for SDG&E to enter into a PPTA with Pio Pico because there is no LCR need for this resource, and thoroughly assisted in the development of the record to aid the analysis of the Commission.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>CEJA participated in all major aspects of the proceeding, including filing multiple briefs, comments, testimony, and conducting substantial discovery. CEJA's total testimony and filings are reflected in numerous pages of analysis.</p> <p>CEJA's attorneys were conscious of using staff with the appropriate amount of work experience for the tasks they performed; tasks that were appropriate for law students were mainly handled by law students, while tasks that required more experience were handled by the more experienced attorneys or experts. This kept fees reasonable. In addition, the hours claimed do not include time spent on issues ultimately not addressed in the decision and time spent mentoring or assisting students. The rates requested for these tasks are at the low end of the ranges authorized by the CPUC for attorneys, experts and law students. The above considerations are reflected in the timesheets attached.</p> <p>The timesheets attached do not, however, demonstrate the degree to which CEJA's representatives have exercised billing judgment to deduct hours necessarily spent, but that did not result in documented enrichment of the record. For example, Ms. Lazerow omitted from this request more than half the time spent preparing the opening brief, and more than one third of the time spent on evidentiary hearings. CEJA could not have made a substantial contribution had Ms. Lazerow not invested this time, but the record does not reflect the contribution, so CEJA is omitting it from the request.</p>	<p>Verified.</p> <p><i>But see "CPUC Disallowances and Adjustments" in Part III.D.</i></p>
<p>c. Allocation of Hours by Issue CEJA broke down its work into seven categories:</p>	<p>Verified.</p>

<p>A. Change of circumstances: need to coordinate with and take into account 2012 LTPP</p> <p>B. Likelihood that existing resources will remain online (esp. Cabrillo II)</p> <p>C. reasonableness of contract (esp. contract term)</p> <p>D. Hearings, Meetings, Coordination with allies</p> <p>E. General</p> <p>F. Intervenor Compensation</p> <p>Percentage of time claimed reflects both the necessity to pursue a full presentation of the case and deductions made to reflect contribution:</p> <p>A: 28%</p> <p>B: 20%</p> <p>C: 11%</p> <p>D: 20%</p> <p>E: 11%</p> <p>F: 10%</p>	<p>As discussed, above, the Commission will not award compensation for CEJA's efforts regarding Cabrillo II. As such, a 20% reduction to the award of intervenor compensation will occur.</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 \$
Shana Lazerow	2013	64.1	\$352	D.13-10-014 ¹	\$22,563.20 <i>[mathematical error corrected by CPUC]</i>	63.58 [2]	\$335.00 [1]	\$21,299.30
Shana Lazerow	2014	9.6	\$359	Res. ALJ-287 ²	\$3,446.40	9.4 [2]	\$335.00 [3]	\$3,149.00
Julia May	2014	14.6	\$158	D.13-10-014 ³	\$2,306.80	14.6	\$170.00 [4]	\$2,482.00
Subtotal: \$						Original Subtotal:		
28,316.40						\$26,930.30		

						20% Reduction: \$5,386.06 [5]		
						Subtotal: \$21,544.24		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Andrew Graf	2014	42.3	\$100	D.13-10-014	\$4,230	42.3	\$100.00 [6]	\$4,230
Subtotal:						Original Subtotal:		
\$4,230.00						\$4,230.00		
						20% Reduction: \$846.00 [5]		
						Subtotal: \$3,384.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Shana Lazerow	2014	7.0	\$179 ⁴	½ of \$359	\$1,253	7.0	\$167.5 [7]	\$1172.50
Andrew Graf	2014	8.4	\$100 ⁴	D.13-10-014	\$8,400 [8]	8.4	\$100.00	\$840.00
Subtotal:						Subtotal:		
\$2093.00						\$2,012.50		
TOTAL REQUEST: \$34,639.40						TOTAL AWARD: \$26,940.74		
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the</p>								

final decision making the award. **Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate			
Attorney	Date Admitted to CA BAR ⁹	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Shana Lazerow	June 04, 1998	195491	No

C. Intervenor's Comments on Part III:

Comment #	Comment
Comment 1	D.13-10-014 awarded a 2012 rate of \$336, and instructed that Ms. Lazerow could request one 5% increase.
Comment 2	Resolution ALJ-287 provides for a 2% COLA increase.
Comment 3	D.13-10-014 awarded a 2011 rate of \$155 for Ms. May. Applying a 2% COLA increase results in a 2013 hourly rate of \$158.
Comment 4	D.04-04-012 cites the usual method of cutting in half the approved rate of an attorney for work they do on applications for intervenor compensation because the task does not need the expertise of an attorney. However, D.04-04-012 did award the full rate approved for law students for time spent on the application for intervenor compensation. Accordingly, we have cut the attorney rate for time spent on the application for intervenor compensation in half, while leaving the law student rate the same. As these rates were approved in D.11-03-025, CEJA request their approval in this proceeding as well.

D. Disallowances and Adjustments:

Item	Reason
[1]	In D.13-10-014, the Commission awarded Lazerow a 2012 rate of \$320,

⁹ This information may be obtained at: <http://www.calbar.ca.gov/>.

	not the \$336 indicated, above. In D.14-07-026, the Commission approved a rate of \$335.00 for Lazerow's work in 2013. This rate will be applied to the present award.
[2]	<p>The Commission does not compensate for time spent on clerical tasks, as they are subsumed in the fees paid to attorneys. <i>See</i> D.11-03-025, cited above by CEJA. In 2013, we find three incidences in Lazerow's timesheet for this type of work: (1) 09/13/14 "forward comments re stds to M Vespa; (2) 09/20/2013 "email co-counsel"; and (3) 11/20/2013 "finalize brief." As such, the Commission disallows .52 hours of Lazerow's time in 2013.</p> <p>In 2014, Lazerow's timesheet indicates that on 02/04/14, 0.2 hours were spent to "coordinate for commission hearing." Such work is not compensable by the Commission.</p>
[3]	Res. ALJ-287, cited by CEJA, approves a 2% cost-of-living-adjustment (COLA) for work performed in 2013. The Commission has not yet approved a COLA for 2014. Lazerow is not entitled to an increased rate and the rate for 2014 will be kept at \$335.00.
[4]	In D.14-06-04, the Commission set May's 2012 rate at \$170. Res. ALJ-287 approved a 2% cost-of-living adjustment (COLA) for work performed in 2013. After rounding, May's 2013 rate remains set at \$170.
[5]	As discussed in Part II.A and Part III.A.c, the Commission will not award compensation to CEJA for work performed regarding the Cabrillo II discussion, since it did not substantially contribute to the Commission's decision-making process. Because it is difficult to parse CEJA's timesheets to determine where reductions should occur, a 20% reduction is made from the total award, corresponding to the percentage of work CEJA indicated was performed on Cabrillo II in Part III.A.c. This 20% reduction is applied to CEJA's attorney, expert, and law student.
[6]	An hourly rate for Graf has not been established by the Commission in the past. In D.13-10-014 and D.14-07-023, law students with comparable levels of experience were awarded a rate of \$100. We apply this hourly rate to Graf's 2014 work.
[7]	The Commission awards ½ of the rate, discussed above, for Lazerow's intervenor compensation work performed in 2014.
[8]	The Commission corrects a mathematical error of CEJA when calculating the requested intervenor compensation award.

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))?	No
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If not:

Party	Party's Comment	CPUC Discussion
	No comments were received.	

FINDINGS OF FACT

1. California Environmental Justice Alliance has made a substantial contribution to D.14-02-016.
2. The requested hourly rates for California Environmental Justice Alliance'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 compensation is \$26,940.74.

CONCLUSION OF LAW

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

ORDER

1. California Environmental Justice Alliance is awarded \$26,940.74.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company shall pay California Environmental Justice Alliance the total award. 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 June 25, 2014, the 75th day after the filing of Claimant's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1402016		
Proceeding(s):	A1306015		
Author:	ALJ Yacknin		
Payer(s):	San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Environmental Justice Alliance (CEJA)	04/11/2014	\$34,639.40	\$26,940.74	No	See Part III.D of this decision.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Shana	Lazerow	Attorney	California Environmental Justice Alliance (CEJA)	\$352.00	2013	\$335.00
Shana	Lazerow	Attorney	California Environmental Justice Alliance (CEJA)	\$359.00	2014	\$335.00
Julie	May	Expert	California Environmental Justice Alliance (CEJA)	\$158.00	2013	\$170.00
Andrew	Graf	Law Student	California Environmental Justice Alliance (CEJA)	\$100.00	2014	\$100.00

(END OF APPENDIX)