Decision **PROPOSED DECISION OF COMMISSIONER PICKER**
(Mailed 12/30/2014)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of San Diego Gas & Electric Company (U902E) for Adoption of its Smart Grid Deployment Plan.	Application 11-06-006 (Filed June 6, 2011)
And related matters.	Application 11-06-029 Application 11-07-001

DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 13-07-024

Claimant: The Utility Reform Network	**For contribution to D.13-07-024**
Claimed: $36,839.50	**Awarded: $20,377.00** (reduced 44.7%)
Assigned Commissioner: Michael Picker	**Assigned ALJ: Administrative Law Judge Division**

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	With D.13-07-024 the Commission culminated the presentation and review of the Smart Grid Deployment Plan (SGDP) submitted by each of the three major electricity investor-owned utilities in California (SDG&E, PG&E and SCE). In D.10-06-047, the Commission had identified certain elements that each SGDP would need to contain. Approximately one year later, the three utilities presented their individual SGDPs, ranging from approximately 175 pages for SCE's plan to SDG&E's approximately 330-page plan. TURN, along with a number of other parties, devoted substantial time to reviewing the plans, identifying areas that could be improved, and proposing standards or criteria the plans should meet or address. In the end, D.13-07-024 found that each of the plans was consistent with the provisions of Senate Bill (SB) 17 and the requirements the Commission had adopted in D.10-06-047. The decision declined to adopt any additional requirements suggested by any of the non-utility parties.

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:	9/7/11	Verified
2. Other Specified Date for NOI:		
3. Date NOI Filed:	10/6/11	10/05/11
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:	P.10-08-016 (see also R.11-11-008 and A.12-11-009)	Verified
6. Date of ALJ ruling:	11/22/10 (1/13/12 and 9/6/13)	Verified
7. Based on another CPUC determination (specify):		
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:	P.10-08-016 (see also R.11-11-008 and A.12-11-009)	Verified
10. Date of ALJ ruling:	11/22/10 (1/13/12 and 9/6/13)	Verified
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.13-07-024	Verified
14. Date of Issuance of Final Order or Decision:	8/2/13	07/25/13
15. File date of compensation request:	9/16/13	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

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

Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
1. This is a proceeding in which the Commission will need to assess the substantial contribution of TURN by going beyond the four corners of the adopted decision. The enactment of SB 17 and the Commission's adoption of D.10-06-047 initiated a process that clearly anticipated active participation of an array of parties and interests in the review of each utility's proposed Smart Grid Deployment Plan. In order to participate in a meaningful way, any party needed to devote substantial time and effort to the proceeding. Just the initial review of the 600-plus cumulative pages of the Plans required many hours. Attending some or all of the workshops extending over a four-day period likewise required many hours. Lesser but still substantial amounts of time were required in order to provide comments or feedback in response to the Scoping Memo and the Workshop Report. At the end of the day, though, the final decision did not reflect much if any of the input provided by other parties. In D.13-07-024, the Commission declined to adopt any additional requirement proposed by any of the parties. Therefore TURN is presenting its discussion of "substantial contribution" in a different manner than the group typically employs to support a request for intervenor compensation. Rather than point to outcomes adopted in the decision that reflect adoption in whole or in part of its position, TURN reviews procedural stages in the proceeding and TURN's	D.13-07-024, p. 2 ("The decision declines to adopt additional requirements, as suggested by parties, that the Smart Grid Deployment Plans must meet.")	Yes, but see comments in Part III.

participation in each of those stages. TURN then explains why under these unusual circumstances the Commission should find it consistent with the letter and spirit of the intervenor compensation statutes to award compensation to TURN and other active eligible intervenors in this proceeding, even if D.13-07-024 did not adopt any of their recommendations.		
2. **Initial SG Deployment Plan Review, Protest Preparation, and Participation in Prehearing Conference.** TURN's initial review of the three SG Deployment Plans indicated several broad areas of specific concern. The first was clarification of what "approval" of a plan meant at this stage. TURN recommended that the Plans be treated as illustrative in nature at this point, without any determination of whether a specific program or effort would be reasonable for purposes of rate recovery of the associated costs. The second was the need for clearer identification of all related costs when a utility presented a specific project or proposal for a Commission finding of reasonableness, consistent with the emphasis on "cost-effective" in SB 17. The third was the need for a better understanding of how each utility proposed to prioritize its SG Deployment activities. That is, rather than assuming that the entire SG Deployment Plan would be funded, assume that only a portion of the plan would be funded and explain how the utility would make decisions about scaling back its proposal in order to achieve the greatest benefit from a lower level of funding. TURN's issue regarding the need to emphasize the illustrative nature of each plan was a focus of part of the attention during the prehearing conference. The	TURN Protest (August 4, 2011) Scoping Memo, p. 11.	Yes, but see comments in Part III.

Scoping Memo specifically agreed with TURN that the SG Deployment plans are "guidance documents" that are not intended to result in actions that would directly require a change in rates.		
3. Comments in Response to Scoping Memo: The Scoping Memo invited parties to provide further comments concerning the strengths and weaknesses of the Deployment Plans, with a specific set of "considerations" that included customer awareness and acceptance, benefits analysis and quantification, and cost estimation. TURN's comments in response to the Scoping Memo addressed the need to address metrics in the continuing absence of the final decision from the "metrics" phase of the Smart Grid rulemaking (the final decision subsequently issued after the conclusion of the workshops in this proceeding). It also proposed adding the topic of identifying and analyzing cost-effectiveness and least-cost issues to the list of topics for the workshop. In the "Initial Staff Comments" provided on November 11, 2011, the CPUC staff assigned to review of the SG Deployment Plans addressed a number of issues based on their review of the Plans and the parties comments to date. These Comments stated that the Plans could benefit from greater detail in terms of prioritization of projects, and the high-level assumptions that went into cost-benefit assessment, including the approach for assessing cost-effectiveness.	Scoping Memo, pp. 15-16. TURN Comments, October 24, 2011. Initial Staff Comments, November 11, 2011, pp. 11-12.	Yes, but see comments in Part III.
4. Preparation for and Participation in Workshops: The Commission conducted workshops over the course of four days, with each day devoted to a different segment of the framework developed for the proceeding (Smart Customer, Smart Market, Smart Utility, Smart Worker). These workshops		Yes, but see

were the primary forum available to parties for review and discussion of the SG Deployment Plans and the Interim Staff Report, as well as the issues and concerns parties had raised in protests and responses to the Scoping Memo.		comments in Part III.
5. Review and Comment on the Workshop Report. The Commission staff issued a workshop report that sought to summarize the information presented during the workshop and presented the staff's recommendations for the SG Deployment Plans. Parties had an opportunity to comment on that report. TURN submitted comments that identified several areas in which the report should bolster its discussion, including an fuller explanation of the shortcomings it had identified in each plan, and the logic that permitted it to propose approval of each plan as submitted despite these acknowledged shortcomings.	Workshop Report, March 1, 2012. TURN Comments on Workshop Report, March 22, 2012.	Yes, but see comments in Part III.
5. Review and Comment on the Proposed Decision. A proposed decision issued in June of 2013. As written the PD would adopt each of the plans as submitted, and reject across-the-board the additional requirements proposed by other parties. TURN and a number of other parties prepared comments that urged the Commission to modify the PD to address a number of the additional proposals other parties had submitted during the course of the proceeding. The PD was modified to include a summary of those comments and a lengthier discussion of the range of parties whose proposals were not being adopted, and why.	TURN Opening Comments on PD, July 1, 2013. D.13-07-024, pp. 102-106.	Yes, but see comments in Part III.
6. Conclusion: The Commission embarked on this proceeding clearly hoping that a range of parties and interests would participate in order to present a full spectrum of views		

about the myriad issues associated with the SG Deployment Plans. And after parties had so participated, devoting substantial amounts of time and resources to gaining sufficient familiarity with the very lengthy deployment plan put forward by each of the three utilities, the final decision adopted none of the recommendations those parties put forward. Under such circumstances, the Commission should adopt a broader approach to its determination of whether a party made a substantial contribution for purposes of warranting an award of intervenor compensation. The intervenor compensation statute places the determination of whether an intervenor made a "substantial contribution" in the judgment of the Commission. Section 1802(i). The Commission has in the past found a substantial contribution for intervenor compensation purposes even where the intervenor's recommended outcome did not prevail on any issue addressed in the Commission's decision. For example, the Commission has recognized that it "may benefit from an intervenor's participation even where the Commission did not adopt any of the intervenor's positions or recommendations." D.08-04-004 (in the review of SCE's contract with Long Beach Generation, A.06-11-007), pp. 5-6. In that case TURN's opposition focused on the need for the generation resource and its cost-effectiveness. The Commission stated, "The opposition presented by TURN and other intervenors gave us important information regarding all issues that needed to be considered in deciding whether to approve SCE's application. As a result, we were able to fully consider the consequences of adopting or rejecting the LBG PPA. Our ability to thoroughly analyze and consider all aspects of the proposed PPA would not have been possible without TURN's participation."		Yes, but see comments in Part III.

Id., at 6. On this basis the Commission found that TURN had made a substantial contribution even though its positions had not been adopted, and awarded TURN intervenor compensation for all of the reasonable hours devoted to the proceeding. Similarly, in D.10-06-046 the Commission awarded TURN very nearly the full amount requested for its work in SCE's application seeking ratepayer funding of a carbon sequestration feasibility study, even though TURN opposed such ratepayer funding. In that proceeding, TURN arguably only prevailed on one of the many issues addressed in D.09-12-014, the decision approving funding for the feasibility study. In some cases the Commission considered TURN's arguments and concluded in favor of the utility, while in others the Commission did not address TURN's arguments because it deemed them moot due to the outcome adopted on other issues. Even though the overall outcome did not embrace TURN's overall recommendation, the compensation award found that TURN's efforts constituted a substantial contribution, even commenting, "TURN substantially helped the decisionmaking in this proceeding." D.10-06-046, p. 5. TURN submits that a similar outcome is warranted here. As described above, TURN participated in a manner consistent with the Commission's efforts to obtain input from an array of parties and interests. At the end of the day, the Commission chose to not adopt any of the additional requirements suggested by the parties. Under such circumstances, the Commission should exercise its judgment to find that TURN made a substantial contribution warranting an award of intervenor compensation for its work in this proceeding.		

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

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA)[1] a party to the proceeding?	**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: Utility Consumers Action Network (UCAN), Greenlining Institute, Joint Parties (representing Black Economic Council, National Asian American Coalition, and Hispanic Business Chamber of Commerce of Los Angeles), Environmental Defense Fund (EDF).		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: TURN's positions were most similar to those presented by UCAN and DRA. TURN worked with the two groups throughout the proceeding in order to minimize duplication and to ensure that where such duplication occurs TURN's pleadings and participation presented distinct and unique arguments in support of the common or overlapping recommendations. As a result, the Commission ended up with a more robust record upon which to evaluate the issue at hand. The Commission should find that TURN's participation was efficiently coordinated with UCAN and DRA so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor.		Verified

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor's Claim of Cost Reasonableness	**CPUC Verified**
The Commission should find TURN's costs of participation reasonable. TURN's request for intervenor compensation seeks an award of approximately $37,000 as the reasonable cost of its participation in the proceeding. The PG&E SG Deployment Plan included preliminary cost estimates in the range of $800 million to $1.25 billion for capital expenditures over the next 20 years, and annual expenses of $25 to $40 million. D.13-07-024, p. 69. SCE's plan described incremental costs of $534 million over the next five years. D.13-07-024, p. 73. SDG&E's plan described costs of approximately $3.5 billion through 2020 (much of which had either been previously authorized or was then-pending in its 2014	Yes, but after 2011 participation was no longer reasonable.

[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), which was approved by the Governor on September 26, 2013.

GRC). D.13-07-024, p. 77. TURN's participation in this proceeding sought to advance the consumer interest in making sure any funds spent on these projects are well spent and achieve the greatest potential ratepayer benefit. Given the amounts that are potentially at stake for the SG Deployment Plans and the relatively small amount of TURN's request for intervenor compensation, the Commission should conclude that TURN's overall request is reasonable.	
b. Reasonableness of Hours Claimed. <u>TURN's Staff Attorney:</u> TURN recorded approximately 90 hours of substantive work for its attorney Mr. Finkelstein, a very reasonable amount under the circumstances. As described below, TURN seeks compensation for approximately 70 hours of that amount. The hourly time sheets attached to this request for compensation indicate distinct time periods that correlate to specific sets of activities. For example, TURN's attorney recorded 24.25 hours during the period beginning with the utilities' service of their SG Deployment Plans and continuing through the prehearing conference. This is a relatively low figure given the length of each utility's plan, and reflects the valuable assistance TURN received from Barbara Alexander, the group's outside consultant, for the review of the plans and preparation of the protest. TURN seeks recovery of the full amount of reasonable hours devoted to this proceeding during this period. The next period in the proceeding focused on preparing responses to the questions raised in the Scoping Memo, and entailed further review of the utility plans, coordination with other parties, and preparation of the comments. TURN's time sheets indicate 10.5 hours devoted to these tasks during this period, an amount again kept relatively low thanks to the input provided by Ms. Alexander. TURN seeks recovery of the full amount of reasonable hours devoted to this proceeding during this period. After that there was the period of preparing for and attending the four days of workshops in early 2012. TURN seeks recovery of 75% of the reasonable hours devoted to workshop preparation (8.75 hours, reduced to 6.6 hours) and attendance (24.5 hours, reduced to 18.4 hours). The parties had an opportunity to submit comments and reply comments on the workshop report. TURN devoted 11.0 hours to the review of the workshop report and preparation of comments thereon, and review of other parties' comments for purposes of preparing reply comments. In recognition of the fact that TURN's comments and reply comments do not appear to have led to any substantial modification of the workshop report, TURN seeks compensation for 50% of the time devoted to these tasks (5.5 hours). Finally, the issuance of the Proposed Decision provided a further opportunity for comment before the Commission adopted. D.13-07-024. TURN recorded 8.75 hours for the review of the PD and preparation of opening comments. In	Yes, but after 2011 participation was no longer reasonable

recognition of the fact that TURN's comments on the PD were expressly dismissed (as were the comments of virtually every other non-utility party), TURN seeks compensation for only 25% of the time devoted to these tasks (2.2 hours). TURN submits that these voluntary reductions to the already quite small number of hours for TURN's staff attorney are appropriate under the unique circumstances here. The Commission should have little trouble concluding that the amount requested is reasonable under the circumstances. Should the Commission have any question about any of these particular tasks or the time TURN devoted to each, TURN requests an opportunity to address such question. <u>Barbara Alexander:</u> Barbara Alexander played an important role in TURN's participation in this proceeding. She performed an initial review of each of the proposed SG Deployment Plans, with an emphasis on the customer outreach and education elements of each utility's proposal. This initial review and the drafting of the memorandum to TURN's attorney resulted in only 13.0 billed hours. Ms. Alexander also devoted a few hours to assisting TURN with the development of its response to the Scoping Memo, and approximately 4 hours for assisting with preparation for the workshops in January 2012. Her total of 19.25 hours reflects the efficiency she was able to harness thanks to her recent work on similar issues in other forums. For the tasks she undertook on behalf of TURN, 19.25 hours (approximately three full work days) is a very low number, and all preceded the workshops in early 2012. TURN submits that Commission should have no trouble finding that figure reasonable for Ms. Alexander's work in this proceeding. <u>Compensation Request Preparation Time</u>: TURN is requesting compensation for 8.5 hours devoted to compensation-related matters, primarily preparation of this request for compensation (8.0 hours). This is a reasonable figure in light of the size and complexity of the request for compensation itself. The need to develop an alternative argument on substantial contribution consumed more time than would typically be required for a request of this magnitude; TURN has voluntarily excluded those hours from the compensation-related hours for which it seeks compensation. Mr. Finkelstein prepared this request for compensation because his greater knowledge of the substantive and procedural elements of this proceeding, combined with his experience with compensation requests associated with similar proceedings, enabled him to prepare the request in a more efficient manner than if it were prepared by one of the other attorneys. In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's relative success on the merits.	
c. Allocation of Hours by Issue For the reasons described above, TURN submits that an allocation of hours by issue is less meaningful for purposes of this request for compensation than is an	Verified

allocation of hours tied to the significant events in the course of the proceeding. TURN has described that allocation in the section on the reasonableness of hours claimed.

Should the Commission believe that an allocation by issue is still warranted under the circumstances, TURN provides the following.

Code	Stands for:
GP	General Participation -- work that would not vary with the number of issues that TURN addresses, such as the initial review of the application or later-served testimony, preparation of protest and participation in prehearing conference.
WS	Workshop – work associated with preparing for and attending the workshops conducted over a 4-day period in early 2012.
PD	Proposed Decision – review of Proposed Decision, preparation of comments thereon.
Comp	Time devoted to compensation-related pleadings
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. TURN's efforts focused largely on two broad issues: the need to better identify and describe the prioritization process each utility would apply in order to determine which Smart Grid projects should go forward in the event of more limited funding availability than each plan presumed (Prioritization), and the need to better identify and describe the process for addressing cost-effectiveness as called for in SB 17 (Cost-Effectiveness). The nature of the work in this proceeding did not lend itself to recording daily entries in a manner that would permit allocation of daily tasks by issue; therefore TURN proposes that the entries designated as "#" be allocated 50% to each of these issues.

B. Specific Claim

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate $	Total $
Robert Finkelstein	2011	34.75	$470	D.12-03-024	$16,332.50	34.75[A]	$470.00[2]	$16,332.50
Robert Finkelstein	2012	30.9	$480	D.13-08-022, p. 24.	$14,832.00	0[A]	$0.00	$0

[2] Approved in D. 14-12-019.

Robert Finkelstein	2013	2.2	$490	Res. ALJ-287	$1,078.00	0[A]	$0.00	$0
Barbara Alexander	2011	15.0	$130	Requested here	$1,950.00	15.0[A]	$130.00[3]	$1,950.00
B.Alexander	2012	4.25	$130	Requested here	$552.50	0[A]	$0.00	$0
					Subtotal: $ 34,745.00			***Subtotal: $18,282.50***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Robert Finkelstein	2011	0.5	$235	½ 2013 hourly rate	$117.50	0.5	$235.00	$117.50
Robert Finkelstein	2013	8.0	$245	½ 2013 hourly rate	$1,960.00	8.0	$245.00[4]	$1,960.00
					Subtotal: $ 2,077.50			***Subtotal: $2,077.50***

COSTS					
#	**Item**	**Detail**	**Amount**		**Amount**
1	Photocopies	Copies for pleadings and other proceeding documents	$6.50		$6.50
2	Postage	Mailing costs for pleadings and other proceeding documents	$10.50		$10.50
		Subtotal:	***$17.00***	***Subtotal:***	**$17.00**
			TOTAL REQUEST: $ 36,839.50		**TOTAL AWARD: $20,377.00**

*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the 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. normal hourly rate.

Attorney	Date Admitted to CA BAR[5]	Member Number	Actions Affecting

[3] Application of first of two 5% step increases to rate of $120 per hour approved in D.12-05-034.

[4] Approved in D.14-12-019.

[5] This information may be obtained at: http://www.calbar.ca.gov/.

			Eligibility (Yes/No?) If "Yes", attach explanation
Robert Finkelstein	June 13, 1990	146391	No

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

Attachment or Comment #	Description/Comment
Attachment 1	**Certificate of Service**
Attach 2	**Daily Time Records for Attorneys and Experts**
Attach 3	**Cost detail**
Attach 4	**Allocation Table**
Comment 1	**Hourly Rates for TURN Attorneys:** TURN seeks hourly rates for Robert Finkelstein, its sole staff attorney in this matter, at levels that the Commission has previously adopted for his work in 2011 and 2012, and at an increased level for 2013 consistent with Resolution ALJ-287.
Comment 2	**Hourly Rates for TURN Consultants:** **Barbara Alexander:** Barbara Alexander charged TURN an hourly rate of $130 for her work in 2011 and 2012 in this proceeding. Ms. Alexander is a Consumer Affairs Consultant with nearly two decades of experience as a consultant, following on a decade with the Maine Public Utilities Commission's Consumer Assistance Division, where she was the division director. In Resolution ALJ -281, the hourly rate range for an expert witness or consultant with 0-6 years of experience starts at $130; the bottom of the range for an expert with thirteen or more years of experience starts at $160 and extends to $400. Thus TURN submits that Ms. Alexander's rate of $130 is clearly below-market for a person of her training and experience.
Comment 3	**Reasonableness of Expenses:** TURN seeks recovery of $17.00 associated with expenses and costs incurred for our work in this proceeding, consisting entirely of postage and photocopying costs for pleadings or other documents associated with its participation in this proceeding.

C. CPUC Disallowances and Comments:

Item	Reason
A	In response to comments filed by the intervenor, TURN is granted compensation for their participation through 2011 in this proceeding. TURN argues that its work was initially identified as within the scope of the proceeding and therefore TURN should be awarded the full amount, or for the hours before the early 2012 workshops when it became clear TURN's issues were no longer likely to be addressed in the final decision. We find TURN's argument for compensation for hours prior to the early 2012 workshops compelling. The Commission agrees that their participation through 2011 was consistent with the scope of the proceeding. However, the main purpose of this proceeding was to approve Smart Grid Deployment Plans, by verifying that the proposed deployment plans satisfied the requirements of Senate Bill 17 (2009) and D. 10-06-047. For this reason, we award TURN $20,377.00.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No

B. Comment Period: Was the 30-day comment period waived?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to Decision 13-07-024.

2. The requested hourly rates for Claimant's representatives 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 $20,377.00

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network is awarded $20,377.00.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2011 calendar year, to reflect 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 November 30, 2013, the 75th day after the filing of The Utility Reform Network's 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):	D1307024		
Proceeding(s):	A1106006, A1106029, A1107001		
Author:	Administrative Law Judge Division		
Payer(s):	Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	09/03/13	$36,839.50	$20,377.00	N/A	Participation Outside Scope of Proceeding

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	TURN	$470.00	2011	$470.00
Barbara	Alexander	Expert	TURN	$130.00	2011	$130.00

(END OF APPENDIX)