

Decision \_\_\_\_\_

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

Order Instituting Rulemaking on the Commission's Own Motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources.

Rulemaking 11-09-011  
(Filed September 22, 2011)

**DECISION GRANTING COMPENSATION TO CLEAN COALITION FOR  
SUBSTANTIAL CONTRIBUTION TO DECISION 14-04-003**

<b>Claimant:</b> Clean Coalition	<b>For contribution to Decision (D.) 14-04-003</b>
<b>Claimed:</b> \$120,340.00	<b>Awarded:</b> \$101,517.50 (reduced 15.6%)
<b>Assigned Commissioner:</b> Michael Picker	<b>Assigned ALJ:</b> Maribeth Bushey

**PART I: PROCEDURAL ISSUES**

<b>A. Brief Description of Decision:</b>	Decision adopting revisions to electric tariff rule 21 to include a distribution group study process and additional tariff forms
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**B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Claimant</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	February 16, 2012	Yes
2. Other Specified Date for NOI:		By 10/27/2011
3. Date NOI Filed:	12/8/11	Yes
4. Was the NOI timely filed?		No, but accepted by Judge
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:		R.10-05-006
6. Date of ALJ ruling:		July 19, 2011

7. Based on another CPUC determination (specify):	D.13-12-021, awarding Clean Coalition compensation in this same proceeding	Affirmed in D.12-09-014 and D.13-12-021
8. Has the Claimant demonstrated customer or customer-related status?		Yes
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:		R.10-05-006
10. Date of ALJ ruling:		July 19, 2011
11. Based on another CPUC determination (specify):	D.13-12-021, awarding Clean Coalition compensation in this same proceeding	Affirmed in D.12-09-014 and D.13-12-021
12. Has the Claimant demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	Decision 14-04-003	Yes
14. Date of Issuance of Final Order or Decision:	4/16/2014	Yes
15. File date of compensation request:	June 9, 2014	Yes
16. Was the request for compensation timely?		Yes

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

#	Intervenor’s Comments	CPUC Discussion
		The Order Instituting Rulemaking (OIR) directed that an intervenor file its Notice of Intent to Claim Intervenor Compensation (NOI) within 30 days of the date the OIR was mailed (since no prehearing conference (PHC) was then planned), or within 30 days of the date of a PHC (if held). (OIR at page 14.) The OIR was mailed on September 27, 2011. Clean Coalition’s NOI was not filed by October 27, 2011. On December 6, 2011, Judge DeAngelis granted Clean Coalition’s request to file its NOI late. The NOI was accepted for filing on December 8, 2011. A PHC was later held on February 16, 2012.
		Customer status was found by Ruling dated July 19, 2011 in R.10-05-006. It was affirmed by Commission awards for intervenor compensation in D.12-09-014 (R.11-05-005) and D.13-12-021 (R.11-09-011). Clean Coalition’s

		<p>December 8, 2011 NOI asserts the same facts regarding customer status that it previously stated in R.11-05-005 and R.11-09-011. No facts are known that would change the Commission’s prior determinations. Clean Coalition is a Category 3 customer.</p>
		<p>A finding of significant financial hardship was made by Ruling date July 19, 2011 in R.10-05-006. A finding of significant financial hardship in one proceeding creates a rebuttal presumption of eligibility in other proceedings commencing within one year of the date of that finding. (P.U. Code Section 1804(b)(1).) R.11-09-011 (this proceeding) was issued on September 27, 2011, less than one year after the finding in R.10-05-006. No facts are known to rebut the presumption of eligibility. Moreover, eligibility was affirmed by Commission awards for intervenor compensation in D.12-09-014 and D.13-12-021.</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).**

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p>The Clean Coalition has been active in the Rule 21 reform process since before this proceeding opened. We were active in the Rule 21 reform process that led to the settlement negotiations, which in turn led to R.11-09-011 being created. D.14-04-003 (“the Decision”) reflects in various ways the Clean Coalition’s substantial contributions.</p> <p>The Clean Coalition submitted comments and attended workshops throughout this proceeding and was active at each opportunity on the issues adjudicated in the Decision. We submitted the following</p>		<p>Yes.</p>

<p>documents:</p> <p>R. 11-09-011 Clean Coalition Comments on DGSP PD (ksw-1, 4 Mar 2014)</p> <p>Clean Coalition Comments on PG&amp;E DTT Technical Bulletin” from Sept. 9, 2013</p> <p>Rule 21 Working Group - Data Points - CC comments (ksw_07, 31 July 2013)</p> <p>Clean Coalition motion to take official notice of disco requests and responses (th_02 April 24 2013).pdf</p> <p>Clean Coalition REPLY comments on DGSP (th_01, March 14 2013)docx.pdf</p> <p>R.11-09-011: Discovery request for SCE; R.11-09-011.pdf: Discovery request for PG&amp;E; R.11-09-011.pdf: Discovery request for SDG&amp;E.pdf</p> <p>Clean Coalition revised comments on amended scoping memo.pdf (Phase II scoping memo)</p> <p>Clean Coalition comments on R.11-09-011 PD adopting Settlement Agreement on Rule 21 (01 ksw, 4 Sept 2012) (incl Phase II topics &amp; schedule)</p> <p>Clean Coalition reply comments on DGSP.pdf (8/21/12)</p> <p>Clean Coalition comments on</p>		
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<p>dist. group study process reports th07, 31 july 2102.pdf</p> <p>Clean Co comments on IA, ISP and PARR th04 6-8.pdf (June 8, 2012)</p> <p>Clean Coalition Comments on OIR th02 10-25-2011.pdf (Rule 21 OIR)</p> <p>Clean Coalition Comments on Rule 21 Workshop, April 29th, 2011.pdf</p>		
<p><i>Application Process and Open Windows</i></p> <p>“While the prospect of initiating a group study without waiting for the next semi-annual window is clearly attractive, the wait would be on average less than 100 days. Since the time required to complete previous studies can easily exceed 100 days, the certainty of a start date offers, on balance, greater value in predictability than offered by the possibility of earlier commencement. We nevertheless support any opportunity for group study schedules to be accelerated if such opportunities are found.” (Clean Coalition Comments on Utility Distribution Group Study Process Reports at 3)</p>	<p>The Decision cited our comments at length on this issue:</p> <p>“Clean Coalition states that SCE’s proposal offers the possibility of a shorter wait time before a study group is formed, perhaps even within 100 days. However, Clean Coalition also states that SCE’s proposal essentially presents a rolling-basis for interconnection request windows and fails to provide sufficient information for planning project development because it lacks sufficiently defined timelines. In addition, Clean Coalition states that SCE’s proposal provides the utility with excessive discretion on when to open a window for requests to establish a group study process. Clean Coalition further suggests that the level of discretion provided to SCE and the resulting uncertainty of a potential study process could discourage the development of distributed generation.” (Decision at 12-13)</p> <p>The Commission agreed with and adopted our recommendations, stating (id.): “We find PG&amp;E’s and SDG&amp;E’s</p>	<p>Yes</p> <p>[Note: Clean Coalition’s page reference is incorrect. Citation is at Decision page 14, not 12-13.]</p>

	<p>proposal of two open windows at fixed-dates during the calendar year provides the level of certainty needed by developers to adequately plan project development. We also find that PG&amp;E’s and SDG&amp;E’s proposal promotes transparency by providing a fixed schedule that is known in advance to the market.”</p>	
<p><i>Extensions to Study Timelines</i></p> <p>“The Commission should require that this idea be fleshed out considerably, specifying what circumstances may lead to additional time being required, and how much, under various circumstances. Deadlines are key for effective interconnection procedures and we witnessed far too much deadline slippage in various interconnection procedures in recent years, particularly for wholesale distributed generation projects like the CREST program.” (Clean Coalition Comments on Distributed Study Process Reports at 5)</p> <p>“We strongly support SCE in taking the opportunity to advance the schedule of a study group (unless a two-cluster per year approach like PG&amp;E proposes is adopted, in which case cluster studies must begin subsequent to each study application window); it makes perfect sense to begin studies as soon as possible if information that is available prior to the completion of a contingent study allows the</p>	<p>The Decision again cited our contributions at length on this issue:</p> <p>“IREC and Clean Coalition state that further clarification is needed regarding the timeline applicable to the Distribution Group Study Process to restrict the utilities’ ability to unduly extend the timelines. As proposed by the utilities, the timeline for processing a group study would be the same as the timeline in Rule 21 applicable to the Independent Study Process. Clean Coalition states that utilities should specifically identify in Rule 21 the circumstances within the context of a Distribution Group Study Process, as opposed to the Independent Study Process, that might trigger extensions to the timeline. For example, Clean Coalition states that, among other things, the volume of study requests might result in the utility needing additional study time and, if so, information on the expected delays should be incorporated into Rule 21 to provide greater transparency.” (Decision at 15-16).</p> <p>The Commission accepted our recommendations on this issue also (id.): “We find that lengthy and unanticipated extensions to timelines for completing interconnection requests reduces overall certainty and transparency of the study process. We find that further clarification of potential</p>	<p>Yes</p> <p>[Note: Clean Coalition’s page references are incorrect. Citations are to Decision pages 17 and 18, not 15-16.]</p>

<p>group study to proceed, thereby avoiding unnecessarily delay. However, SCE should define what would constitute “sufficient information” and more detail should be provided in SCE’s next proposal.” (Clean Coalition Comments on Distributed Study Process Reports at 6).</p> <p>“SCE recommends<sup>1</sup> extending the fixed window DGSP from six months to eight months due to unresolved issues regarding electrically inter-related studies that may hinder interconnection transparency and predictability. SCE notes in support of this recommendation a risk that the Phase II Study for one group will not be complete before SCE must start the Phase I Study for a subsequent, electrically-dependent group.</p> <p>However, the PD, based on the timeline recommended by PG&amp;E, already allows for all applicants in prior study groups to have evaluated the results of Phase I studies and committed to Phase II studies, establishing a clear basis for subsequent new and electrically dependent groups to initiate their Phase I studies. All studies are based upon the known conditions at the time, and this Proceeding seeks to balance the competing values of speed and certainty..... The Clean Coalition does not support changing the default semi-</p>	<p>extension triggers for the Distribution Group Study Process is needed to promote a reasonable level of certainty and transparency in the process.” (Decision at 16).</p>	
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<sup>1</sup> SCE Opening Comments at 5

<p>annual schedule outlined proposed by PG&amp;E and adopted in the PD.” (Clean Coalition Reply Comments on DGSP PD at 3-4)</p>		
<p><i>Electrical Interdependence</i>          “Specifically, the proposals should provide clear criteria for establishing both the ‘electrical area’ in each cluster and for determining electrical dependence from other distribution grid projects. This is necessary information for developers and policymakers. For developers, it is necessary information for reducing the uncertainty with respect to which interconnection procedure should be pursued and to plan better where to locate projects. For policymakers and advocates, it is necessary information for improving interconnection procedures.” (Clean Coalition Comments on Distributed Study Process Reports at 4).</p>	<p>The Decision again cites our recommendations on this issue: “Clean Coalition and Sustainable Conservation state that additional clarification is needed regarding how electrical interdependence is establish by the utilities and how utilities propose to define a ‘group’ for purposes of the Distribution Group Study Process. Specifically, Clean Coalition states that Rule 21 should include a more detailed explanation of the parameters of a geographic area for each study group. Vote Solar Initiative and Sierra Club make similar claims regarding the vagueness of the proposed terms.” (Decision at 17).</p> <p>The Commission declined our recommendation on this issue, however, stating: “We find that no further revisions to Rule 21 are needed at this</p>	<p>Yes. Clean Coalition did not prevail on its recommendation, but assisted in the Commission’s understanding and analysis.</p> <p>[Note: Clean Coalition’s page references are incorrect. Citations are at Decision pages 19, 20 and 32, not pages 17, 18 and 19.]</p>

<p>“We agree with Sierra Club and Vote Solar that terms like ‘electrical area’ need to be defined clearly. We also agree that the electrical area of distribution group study should be consistent with that described in the Pre-Application Report, which requires the IOU to provide information on the capacity of the relevant substation /area bus or bank and circuit. This may be a good solution for providing specific criteria for defining the “electrical area,” as the Clean Coalition recommended in Opening Comments.” (Clean Coalition Reply Comments on Utility Distribution Group Study Process Reports at 4).</p>	<p>time to address the amount of information available to applicants regarding electrical interdependence on the distribution system. We find the terms ‘electrical area’ and ‘engineering judgment’ are sufficiently addressed in Rule 21 although every nuance of these terms is not explained. We also agree that, to a certain extent, the utilities’ subjective judgment is a necessary component of operating the distribution system.” (Decision at 18).</p> <p>However, the Commission did still require the IOUs to submit quarterly reports on various details of the DGSP, acknowledging the merits of our concerns (Decision at 19). Further, in response to our comments, PG&amp;E provided additional clarification in line with our requests, as the Decision notes: “PG&amp;E further states that, in general, areas where there may be interdependence between projects include distribution circuits, substation banks or substations.” (Decision at 18). Combined with the Commission’s coincident adoption of the Clean Coalition’s proposal for Pre-Application Reports in the previous decision and modifications to the Pre-Application Report process in this decision, the Decision generally accepted our recommendations in this area.</p>	
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<p><i>Rule 21 Data Management</i></p> <p>The Clean Coalition called for increased transparency of interconnection data, and ongoing collection of data. The Clean Coalition has consistently been a leading advocate to establish reporting standards in support of evaluation.</p> <p>We also submitted a number of data requests, working with other parties to craft these requests. The data requests led to a number of rounds of discovery responses from the IOUs.</p> <p>We also submitted recommendations on 16 data points to include in reporting, and a rationale for each. (Rule 21 Working Group – Data Points – CC comments 31 July 2013 at 8-9): “Comparing estimated and final actual costs has clear value in evaluating opportunities to improve the accuracy of estimates. Providing this information in relation to the broad categories of Interconnection Facilities, Distribution Upgrades, and Network Upgrades provides useful insight into the relative role of these factors and consequent opportunities to address them.” (Rule 21 Working Group – Data Points – CC comments 31 July 2013 at 3)</p> <p>“While the reasons for missed or extended deadlines may not</p>	<p>The Commission cited our comments in the following statement summarizing these recommendations: “Several parties recommend that the Commission direct the utilities to provide additional public information on the interconnection process to inform enhancements in the process.”</p> <p>The Commission concluded: “We find that additional information will promote improvements in the process and assist the Commission in evaluating the interconnection process established by Rule 21. Therefore, we direct PG&amp;E, SCE, and SDG&amp;E to submit data in a quarterly report to the Commission, referred to as Interconnection Data Quarterly Report.” And: “These reports shall include, among other things, compliance with Rule 21 timelines, interconnection upgrade cost estimates for projects in the Independent Study Process and the DGSP, account true-up data for interconnection cost estimates, an accounting of all exemptions from Rule 21 interconnection fees, including the value of those exemptions, and the number of Rule 21 projects at each step of the Rule 21 process. ” (Decision at 32).</p>	<p>Yes.</p>
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<p>currently be found in a database, where deadlines are missed on a recurring basis, by one or more IOUs, it is important for all parties to understand why deadlines are missed or extended so that appropriate changes can be made. We appreciate the IOUs’ acknowledging the value of this information and their willingness to consider improvements in tracking these issues”. (Rule 21 Working Group – Data Points – CC comments 31 July 2013 at 4)</p> <p>“[S]ince the cost estimates and actual cost numbers are already being provided to applicants and this information is tracked in some manner for each of these steps, it seems that it should not require significant resources to enter the cost data at the same time. We urge the IOUs to clarify what additional resources may be required and why.” (Rule 21 Working Group – Data Points – CC comments 31 July 2013 at 5)</p>		
<p><i>Evaluation and Refinement of the Study Process</i></p> <p>The Clean Coalition has consistently been a leading advocate for ongoing evaluation of interconnection tariff effectiveness and identification of deficiencies, and initiated the discovery process and “meet and confer” sessions with the utilities and ED staff to establish reporting standards in support of</p>	<p>The Commission concluded:</p> <p>“In an effort to achieve our goals to ‘ensure that the interconnection process is timely, non-discriminatory, cost-effective, and transparent,’ the Commission finds that reviewing the successes and deficiencies of the interconnection process adopted today is warranted. Accordingly, PG&amp;E, SCE, and SDG&amp;E shall schedule a meeting within 12 months after the effective date of the Tier 2 Advice Letter to review the Distribution Group Study Process. Further meetings may be held. The Commission directs the Energy Division</p>	<p>Yes.</p> <p>[Note: Clean Coalition’s page reference is incorrect. The citation is at Decision page 26.</p>

<p>evaluation.</p> <p>“We recommend ... review of initial DSGP experience by a Working Group within twelve months.” (Clean Coalition Reply Comments on Utility Distribution Group Study Process Reports at 4).</p>	<p>to participate in this meeting. PG&amp;E, SCE, and SDG&amp;E together with the Energy Division shall prepare a report based on information obtained during the meeting to evaluate how the Distribution Group Study Process ensures that the interconnection process is timely, non-discriminatory, cost-effective, and transparent.” (Decision at 22-23.)</p>	
<p><i>Data requests and discovery</i></p> <p>Subsequent to our working with other parties and the IOUs on data discovery, the Clean Coalition submitted a motion to take official notice of the IOU responses to our data requests (CLEAN COALITION MOTION TO TAKE OFFICIAL NOTICE OF DISCOVERY REQUESTS AND RESPONSES, filed April 25, 2013). The Clean Coalition made a presentation at a Commission workshop, by invitation from CPUC staff, summarizing our data findings, on March 5, 2013.</p>	<p>The data that resulted from the Clean Coalition’s discovery requests was presented by the Clean Coalition, by invitation from CPUC staff (Jamie Ormond), at a workshop on interconnection reform in this proceeding. While, Judge DeAngelis denied our motion by email on Aug. 16, 2013, the Decision adopted new Interconnection Data Quarterly Reporting for the collection of much of the same data sought in our discovery, in addition to specific authorization for ED staff to expand and refine the data reporting as needed.</p>	<p>No.</p> <p>[See Part III.D, Item B below.]</p>
<p><i>Synchronous Generator working group and Direct Transfer Trip issues</i></p> <p>The Clean Coalition was active in the joint CPUC/CEC Rule 21 Working Group, and its Synchronous Generator working group. We made the suggestion in the Sept. 18, 2013, workshop, that a revised Pre-Application Report should allow parties to ask whether a Direct Transfer Trip (DTT)</p>	<p>The Decision adopted our recommendation (Decision at 29): “Additionally, utilities are directed to provide applicants with the option of requesting the utility to determine whether the proposed interconnection will require a Direct Transfer Trip. This request should be included as part of the pre-application report request or supplemental review process and may include an associated cost.”</p>	<p>Yes.</p> <p>[Note: Clean Coalition’s page reference is incorrect. The correct reference is to page 33.]</p>

<p>would likely be required by the utility.</p> <p>We also submitted comments on other issues included in PG&amp;E’s technical bulletin, in “Clean Coalition Comments on PG&amp;E DTT Technical Bulletin” from Sept. 9, 2013.</p>		
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**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

	Claimant	CPUC Verified
<p><b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>2</sup></b></p>	Yes	Yes
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	Yes	Yes
<p><b>c. If so, provide name of other parties:</b> Vote Solar, IREC, Sierra Club, Sustainable Conservation and SEIA</p>		Yes
<p><b>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:</b></p> <p>We collaborated with several parties, as evidenced on the record where it was feasible, including IREC, Vote Solar, Sierra Club and SEIA. We reached out to ORA frequently and ORA participated in many of our interparty collaboration phone conferences. While ORA and often other Parties elected to submit comments independently, our communication informed and aligned our respective recommendations, ultimately leading to a Proposed Decision widely supported by Parties. Multiple Parties joined our recommendations, including those establishing the Pre-Application Report and Data Discovery, and Data Reporting. This resulted in joint comments in some cases, and supported a narrowing of focus and increased consensus in proposals.</p>		Yes

<sup>2</sup> 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.

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<b>a. Intervenor’s claim of cost reasonableness:</b>	<b>CPUC Verified</b>
<p>The Clean Coalition has been an active and leading participant in the Rule 21 process and has provided this Commission with many recommendations that have been incorporated into the new Distribution Group Study Process, the new (and revised) Pre-Application Report, the new Interconnection Data Quarterly Report, and the new Generator Interconnection Agreement and Study Agreement in Phase 2 of this proceeding.</p> <p>By helping to create a workable DGSP and ensuring that site-specific interconnection information is made available to potential applicants, the Clean Coalition has contributed to an additional and more cost-effective interconnection solution for many eligible projects. These cost savings, and the time saved due to a faster interconnection process, will filter down to ratepayers in lower prices for electricity from new projects taking advantage of the Pre-Application Report and DGSP. We can’t at this time quantify this benefit, but if the benefit is realized at all it will far outweigh the costs that the Clean Coalition has incurred through its participation.</p> <p>Likewise, the Interconnection Data Quarterly Report will support efforts by the Commission and Parties to address critical question related to cost certainty and cost allocation. These issues are scoped for this proceeding but were challenging to address due to the lack of record, delaying action on proposals have been submitted. Our efforts in developing this record and establishing reporting are essential for concluding these issues and for effective oversight of interconnection processes by the Commission.</p>	<p>Yes. [See Note A below.]</p>
<p><b>b. Reasonableness of Hours Claimed</b></p> <p>The Clean Coalition remained focused on issues relating to transparency, workability, certainty, and streamlining interconnection processes, as reflected in the record. As just stated, we believe that our contributions will readily be justified in terms of cost savings to ratepayers, as well as additional environmental benefits from an improved interconnection process for renewable energy projects. The time the Clean Coalition spent on this decision is reasonable given the broad range of issues we tackled – and the degree to which the decision relies on our recommendations.</p>	<p>Yes.</p>
<p><b>c. Allocation of Hours by Issue</b></p> <p>In terms of allocation of time between issues in this proceeding, it is very</p>	<p>Yes.</p>

difficult to provide a percentage for each sub-issue because our comments ranged widely over various issues in this proceeding. Based on our records, we estimate that 50% of our time was focused on the DGSP and 50% on related issues, including 30% on our initiative in data release and ongoing reporting to develop a record of interconnection costs and enforcement of tariff schedules, as ordered in the Decision. All of our efforts were focused on ensuring the most effective interconnection reforms in this phase of the proceeding.

### B. Specific Claim:\*\*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Tam Hunt	2012	83.5	\$340	D.13-12-021	\$28,390.00	83.5	\$340	\$28,390.00
Tam Hunt	2013	110.5	\$345	D.13-12-021 and ALJ-287	\$36,398.00	77.5 [B]	\$345	\$26,737.50
Kenneth Sahm White	2012	77.75	\$280	D.13-12-023	\$21,770.00	74.25 [C]	\$280	\$20,790.00
Kenneth Sahm White	2013	72	\$285	D.13-12-023 and ALJ-287	\$20,520.00	55.5 [C]	\$285 <sup>3</sup>	\$15,817.50
Kenneth Sahm White	2014	27.75	\$290	D.13-12-023 and ALJ-287	\$8,048.00	22.75 [C]	\$290	\$6,597.50
Ted Ko	2012	4	\$180	D.13-12-023	\$720.00	4	\$180	\$720.00
Ted Ko	2013	2	\$185	D.13-12-023 and ALJ-287	\$370.00	2	\$185	\$370.00
<b>Subtotal: \$116,216.00</b>						<b>Subtotal: \$99,422.50</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Dyana Delfin-	2014	10	\$95	D.13-12-023	\$950.00	10	\$45 <sup>4</sup>	\$450.00

<sup>3</sup> See Decision 15-04-016.

<sup>4</sup> Application of 2.58% Cost-of-Living-Adjustment (COLA) per Resolution ALJ-303 to last approved hourly rate (2013). Adoption of Delfin-Polk's full 2014 hourly rate of \$90, or half hourly rate of \$45.

Polk								
Tam Hunt	2014	12	\$180	D.13-12-021 and ALJ-287	\$2,160.00	6 [D]	\$177.50 <sup>5</sup>	\$1,065.00
Kenneth Sahn White	2014	7	\$145	D.13-12-023 and ALJ-287	\$1,015.00	4 [D]	\$145	\$580.00
<b>Subtotal: \$ 4,125.00</b>						<b>Subtotal: \$2,095.00</b>		
<b>TOTAL REQUEST: \$120,340.00</b>						<b>TOTAL AWARD: \$101,517.50</b>		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. 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.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p>								
<b>Attorney</b>		<b>Date Admitted to CA BAR<sup>6</sup></b>		<b>Member Number</b>		<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>		
Tam Hunt		January 29, 2002 <sup>7</sup>		218673		No; Please note from January 1, 2005 until April 27, 2009 Hunt was an inactive member of the California State Bar.		

#### D. CPUC Disallowances and Adjustments:

Item	Reason
A	We conclude that the costs awarded here are reasonable in relationship to the benefits (e.g., improved interconnection process that saves participants time and money, with those savings resulting in lower prices paid by the utility to buy electricity from the project; environmental benefits by improved interconnection procedures that may allow one or more renewable projects to become operational that otherwise might not).
B	The 2013 hours listed on Hunt's timesheet sum to 105.5, not the 110.5 listed above. We will therefore use the 105.5 hours reported in the timesheets.  We disallow 2.00 hours for preparing a motion to take official notice of discovery requests (because the discovery material was not a reasonable topic for official notice). We disallow 1.50 hours related to drafting a letter to Commissioners regarding the Phase II schedule. We do this because the standard for compensation is that the

<sup>5</sup> Application of 2.58% COLA to last approved hourly rate (2013). Adoption of Hunt's full 2014 hourly rate of \$355, or half hourly rate of \$177.50.

<sup>6</sup> This information may be obtained at: <http://www.calbar.ca.gov/>.

<sup>7</sup> Clean Coalition listed "2001" in this box in its original claim; however, after research on the California State Bar website, we have reflected the correct date in which Tam Hunt was admitted to the California Bar.

	participation is “productive, necessary, and needed for a fair determination of the proceeding.” (See Public Utilities Code § 1801.3(f) and D.98-04-059 at 31-33.) We further disallow 24.50 hours for work charged to Technical Operating Standards as this work was not related to D.14-04-003.
C	We disallow 2.0 hours in 2012 for travel to a workshop. Time and expenses for routine travel are not compensable. (See D.12-06-012 and D.10-11-032.) No evidence is presented here that this travel was anything other than routine. We disallow 1.5 hours in 2012 for attendance at a storage working group meeting (since the relationship of storage to the issues in this proceeding is not apparent and not made clear by Clean Coalition). We disallow 16.5 hours in 2013 for time charged to Technical Operating Standards (because this work was not related to (and made no substantial contribution to) D.14-04-003, and Clean Coalition fails to show otherwise). We disallow 5.0 hours in 2014 for excessive hours devoted to document preparation, and for work not related to D.14-04-003.
D	We reduce the number of hours for preparing the intervenor compensation claim from 29 to 20. An intervenor’s compensation claim must be a reasonably routine part of an intervenor’s business before the Commission. Twenty-nine hours is more than needed for an efficient preparation of a clear, precise, concise claim.

#### PART IV: OPPOSITIONS AND COMMENTS

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

#### FINDINGS OF FACT

1. Clean Coalition has made a substantial contribution to Decision 14-04-003.
2. The requested hourly rates for Clean Coalition’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 \$101,517.50.

**CONCLUSIONS OF LAW**

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

Comments on today's decision should be waived, and the decision should be made effectively immediately.

**ORDER**

1. Clean Coalition shall be awarded \$101,517.50.
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 Clean Coalition their respective shares of the award, based on their California-jurisdictional electric revenues for the 2013 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 August 23, 2014, the 75<sup>th</sup> day after the filing of Clean Coalition'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**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	N/A
<b>Contribution Decision(s):</b>	D1404003		
<b>Proceeding(s):</b>	R1109011		
<b>Author:</b>	ALJ DeAngelis		
<b>Payer(s):</b>	Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Clean Coalition	6/9/2014	\$120,340.00	\$101,517.50	N/A	Failure to establish reasonable relationship with quantifiable benefits through participation.

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Tam	Hunt	Attorney	Clean Coalition	\$340	2012	\$340
Tam	Hunt	Attorney	Clean Coalition	\$345	2013	\$345
Tam	Hunt	Attorney	Clean Coalition	\$360/\$180	2014	\$355/\$177.50
Sahm	White	Expert	Clean Coalition	\$280	2012	\$280
Sahm	White	Expert	Clean Coalition	\$285	2013	\$285
Sahm	White	Expert	Clean Coalition	\$290/\$145	2014	\$290/\$145
Ted	Ko	Expert	Clean Coalition	\$280	2012	\$180
Ted	Ko	Expert	Clean Coalition	\$185	2013	\$185
Dyana	Delfin-Polk	Paralegal	Clean Coalition	\$95	2014	\$45/\$90

**(END OF APPENDIX)**