

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902M) for Approval of its Energy Storage Procurement Framework and Program As Required by Decision 13-10-040.

Application 14-02-006
(Filed February 28, 2014)

And Related Matters.

Application 14-02-007
Application 14-02-009

DECISION GRANTING COMPENSATING TO SIERRA CLUB CALIFORNIA FOR SUBSTANTIAL CONTRIBUTION TO DECISION 14-10-045

Intervenor: Sierra Club California (Sierra Club)	For contribution to Decision (D.) 14-10-045
Claimed: \$62,854.75	Awarded: \$59,363.75 (5.6% Reduction)
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Colette E. Kersten

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.14-10-045 approved energy storage applications from Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) applications for the 2014-2016 procurement period with the exception of 2.5 MW of dairy biogas proposed by PG&E. The decision also clarifies “eligible” technologies and makes adjustments to the Consistent Evaluation Protocol.
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B. Intervenor 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 (PHC):	May 14, 2014	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	June 12, 2014	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:	R.10-12-007; see also R.14-02-001	Verified.
6. Date of ALJ ruling:	July 5, 2011; see also July 25, 2014	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-02-001	Verified.
10. Date of ALJ ruling:	July 25, 2014	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		<i>See “CPUC Discussion” in Part I.C. below.</i>
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-10-045	Verified.
14. Date of issuance of Final Order or Decision:	October 22, 2014	Verified.
15. File date of compensation request:	December 19, 2014	Verified.
16. Was the request for compensation timely?		Yes.

C. Additional Comments on Part i:

#	Intervenor’s Comment(s)	CPUC Discussion
	Sierra Club is a grassroots environmental organization interested in implementing measures to reduce greenhouse gas emissions and increase reliance on renewable energy sources. The Club’s interest in this proceeding is not related to any business interest. The Club receives funding for environmental advocacy from many sources, including philanthropic donations, member contributions and other sources. The Club has entered into agreements with certain residential rooftop solar installers that will likely result in a small amount of additional funding. However, the Club’s involvement in the present proceeding is completely independent and unrelated to those small amounts of funding.	

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>1. <u>Changes to CEP to consider the greenhouse gas (GHG) impacts of energy storage</u></p> <p>“The presence or absence (yes/no) of attributes that facilitate renewable integration or deliver GHG emissions reductions will not capture the degree to which they help achieve these goals. Better quantitative understandings of attributes Nos. 8 – 11 can provide valuable information about the role that storage might be playing in integrating renewables and reducing GHGs. This information should also be part of the required RFO evaluation criteria for each IOU.”</p> <p>Sierra Club Opening Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings, p. 8 (June 12, 2014).</p>	<p>“Based on Sierra Club’s suggestion, one interim step towards the development of more sophisticated evaluation criteria would be to apply some type of weight to the various qualitative factors listed in the CEP (which are currently marked as “yes” or “no”) and to provide a better indication of how well a storage project meets the specified policy goals. D.13-10-040 concluded that the IOUs should confer with ED Staff to establish the CEP for benchmarking and general reporting purposes. In this regard, we direct the IOUs to work with ED Staff to incorporate a weighting method within the CEP.” D.14-10-045, p. 71.</p> <p>“The CEP does not include weighting of qualitative bid evaluation factors and possibly may not include quantitative factors to account for GHG impacts, impacts of energy storage duration, and costs of aggregation of multiple energy storage projects.” D.14-10-045, pp. 107-108, Finding of Fact 16.</p> <p>“It is reasonable to require the IOUs to include weighting of qualitative bid evaluation factors in CEP and to begin consideration of quantitative factors to account for GHG impacts, impacts of energy storage project duration, and costs of aggregation of multiple energy storage projects, etc. Preliminary review of these and other newly proposed specific quantitative factors doesn’t necessarily demonstrate a commitment to their eventual use in CEP.” D.14-10-045, p. 114, Conclusion of Law #14.</p>	<p>Yes.</p>

<p>2. <u>Request for Workshop on CEP.</u></p> <p>Sierra Club recommended that the schedule “should include at least one workshop on the Consistent evaluation Protocol</p> <p>Protest of Sierra Club in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings, p. 6 (April 7, 2014)</p>	<p>Workshop held on June 2, 2014.</p> <p>Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, p. 7 (setting schedule).</p>	<p>Yes.</p>
<p>Definition of Energy Storage</p> <p>3. <u>Excluding V1G (one way electric vehicle charging) from the energy storage definition</u></p> <p>“V1G technology can aid in effectively managing load during high demand periods, but without the ability to discharge energy to the grid, it does not provide full storage functionality. V1G may be appropriate for a demand response or transportation fuels programs, but it should not qualify to meet any of the energy storage mandate.”</p> <p>Sierra Club Opening Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings,</p>	<p>“However, at this time, we will not include controlled charging as a storage Application in the first solicitation, and we prefer that the first procurement cycle focus on developing the nascent market for bi-directional storage technologies.” D.14-10-045, p. 63.</p> <p>“On the matter of EDF’s claim regarding the equivalency of V1G and storage-based load shifting, we reject it as we regard storage-based “load shifting” to mean that the energy discharged by a storage asset is used to offset other existing load on-site at the expense of increasing the load at an earlier time through the charge cycle of the storage asset; in other words, it does not mean modification or shifting of the charging load of the storage asset itself.” D.14-10-045, p. 64.</p>	<p>Yes.</p>

<p>p. 3 (June 12, 2014).</p> <p>4. <u>Excluding biogas from the energy storage definition</u></p> <p>“Counting biomethane technologies toward energy storage requirements, as PG&E proposes, is not in line with the intent of the energy storage decision to create market transformation for electric energy storage. Biomethane digesters are a one-way conversion of methane into electricity and simply produce electricity from a fuel... Under this the broad definition, all biomass put in storage containers would improperly count as energy storage as well as heat stored in molten salt. Taken to its logical conclusion, putting fossil fuels in a storage tank could also count towards the mandate. To count as electric energy storage, the storage system needs to be able integrate into the grid in both directions for discharge and recharge.”</p> <p>Sierra Club Opening Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings, p. 3 (June 12, 2014).</p>	<p>“Sierra Club warns that a broad definition of energy storage that includes biogas is analogous to ‘putting fossil fuels in a storage tank [that] could also count towards the mandate.’ More specifically, it states that ‘[b]iomethane digesters are a one-way conversion of methane into electricity and simply produce electricity from a fuel.’” D.14-10-045, p. 56.</p> <p>“In this decision, we conclude that a qualifying storage component included with a dairy, agricultural, or food waste biogas project, as described by AECA and GPI, is eligible to be counted toward the targets. However, we find that the “natural gas pipeline” does not qualify as the storage component of a biogas project. If PG&E is unable to identify a suitable storage component in the contracted biogas projects, then PG&E cannot claim credit for these projects against the targets.” D.14-10-045, p. 62.</p>	<p>Yes.</p>
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<p>5. <u>Use of Applications rather than Tier 3 Advice Letters to approve energy storage solicitations in the 2014-2016 Biennial Procurement Period</u></p> <p>“A process that allows the CPUC to engage with stakeholders and solicit meaningful input is necessary to resolve the novel legal, factual, and policy issues that will undoubtedly arise from energy storage procurement program which is new for both the Commission and the IOUs. Thus, D. 13-10-040 was correct in requiring a more robust process in this first round. Sierra Club echoes TURN and ORA in calling for the use of an Application, rather than Tier 3 advice letters, to approve the IOU’s projects from the 2014 solicitation.”</p> <p>Sierra Club Reply Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings, p. 7 (June 19, 2014).</p>	<p>“In this compliance decision for the 2014-2016 Storage Procurement Program, we agree with Sierra Club, TURN, and ORA that the application process is the far superior process to use for approval of contracts for initial storage procurement projects. The application process is a far more transparent process that allows more review, discovery, and needed time to review proposals via a robust stakeholder process with many varied interests.” D.14-10-045, p. 103.</p>	<p>Yes.</p>
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
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: The Utility Reform Network (“TURN”), California Energy Storage Association, (“CESA”) Green Power Institute (“GPI”), Clean Coalition.		Verified.
d. Intervenor’s claim of non-duplication: Sierra Club offered a unique perspective throughout the proceeding, continuing its active participation on the energy storage issue from R.10-12-007. Sierra Club has been a consistent and active environmental group advocating on this issue. Even though its positions often complemented those of the ratepayer advocates, industry associations, and energy storage companies who also participated in the proceeding, Sierra Club represented the interests of its members throughout California, ratepayers who care deeply about protecting the environment and mitigating the impacts of climate change and strongly support a rapid transition to an electric grid fueled by renewable energy. Sierra Club’s position on VIG differed with other environmental groups, the Natural Resources Defense Council and the Environmental Defense Fund, in the proceeding. Sierra Club coordinated with CESA, TURN and GPI, but submitted its own comments in all instances because it had unique perspectives to offer. This coordination made for a better and more robust record. Sierra Club’s comments also differed from those offered by the Office of Ratepayer Advocates, particularly in relation to the Consistent Evaluation Protocol.		Several intervenors in this proceeding offered an environmentalist perspective; however, the record reveals considerable diversity among the positions taken from that perspective. Thus, Sierra Club’s participation did not duplicate the participation of similar interests.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor’s claim of cost reasonableness:	CPUC Discussion
Sierra Club’s request for an award of \$62,854.75 in intervenor compensation is the reasonable cost of its participation in this proceeding. Although Sierra Club did not achieve everything for which it advocated, Sierra Club’s participation made a substantial contribution.	The fees and costs incurred by Sierra Club are 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: public resources), which was approved by the Governor on September 26, 2013.

<p>Sierra Club advocated for a narrow definition of energy storage that would maximize the procurement targets’ benefits to the grid. It also recommended changes to the Commission’s Consistent Evaluation Protocol (CEP), especially in relation to greenhouse gas analysis, and the use of Applications to approve energy storage solicitations. Sierra Club’s specific contributions are detailed above.</p> <p>The Club’s participation in this proceeding will result in benefits to ratepayers that exceed the cost of participation. Although these benefits are not quantifiable, the implementation of the procurement targets will help facilitate a clean energy future and will better effectuate California’s other clean energy law and policies. (See D.13-12-027, p. 11 (awarding Sierra Club California intervenor compensation for energy storage policy work in R.10-12-007 even though those benefits were similarly hard to quantify). The Club’s advocacy on behalf of implementation of the State’s clean energy and environmental goals will benefit the ratepayers over the long term because Californians will reap the environmental and health benefits intended by these laws. Moreover, the Club’s fee request is minuscule in comparison to the cost of the procurement of energy storage that this proceeding authorizes.</p>	<p>in relation to the benefits of its contribution to this proceeding.</p>
<p>b. Reasonableness of hours claimed:</p> <p>In this proceeding, Sierra Club continued its active participation on energy storage issues including having its expert, Dustin Mulvaney from Ecoshift, make a presentation on greenhouse gas analysis issues at the June 2nd workshop organized by Energy Division staff. In addition to its participation at the prehearing conference, two workshops, and ex parte with Commission Peterman’s staff, Sierra Club filed the following documents:</p> <ul style="list-style-type: none"> • Protest of Sierra Club in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings. April 7, 2014. • Sierra Club Opening Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings. June 12, 2014. • Sierra Club Reply Comments on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge Supplemental Questions in Consolidated 2014 Energy Storage Procurement Plan Application Proceedings. June 19, 2014. • Sierra Club’s Reply Comments on Proposed Decision Approving San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company’s Storage Procurement Framework and Program Applications for the 2014 	<p>Certain hours are disallowed. (<i>See Part III.D below</i>).</p>

<p>Biennial Procurement Period. October 7, 2014.</p> <p>Sierra Club California is claiming a reasonable amount of hours (as detailed in the timesheets) for the work of one attorney, an advocate and experts. Sierra Club’s focus on a subset of issues limited the number of hours needed for participation in the proceeding. Moreover, the work was coordinated by William Rostov, Sierra Club’s attorney, to avoid duplication and to ensure that the relevant people worked on issues appropriate to their experience. Additionally, the limited overlap in the work involved meetings, internal review of filings, and ensuring the accuracy of the filings. William Rostov reviewed all of Sierra Club’s hours and in the exercise of reasonable billing judgment, the Club excised hours that appeared excessive, redundant or unnecessary. Finally, Sierra Club is not requesting any compensation for preparation of the NOI.</p> <p>Sierra Club was represented by Earthjustice, a non-profit environmental law firm. Given the highly technical nature of certain aspects of the CEP and the greenhouse gas analysis, Earthjustice worked with EcoShift, an energy consulting firm. Dustin Mulvaney of Ecoshift presented at the staff-led workshop, and his team provided valuable work product for the comments.</p>	
<p>c. Allocation of hours by issue:</p> <p>Sierra Club divided the proceeding into four categories, three issues and preliminary matters, which included preliminary analysis of the proceeding, the prehearing conference and workshop attendance. The workshops by design were broader than the ultimate issues on which Sierra Club worked, but attendance was necessary to effectively participate.</p> <ul style="list-style-type: none"> A. Preliminary matters – 17% B. Common Evaluation Protocol and analysis of greenhouse gases as well as other benefits - 48.21% C. Definition of storage – 28.28% D. Use of Applications rather than advice letters – 4.28% <p>Request for Compensation - 2.23%</p> <p>Sierra Club submits that this is an appropriate allocation of issues. If the Commission finds otherwise, Sierra Club requests the opportunity to supplement this section of the request. Similarly, Sierra Club requests the opportunity to supplement the discussion of the reasonableness of the requested hours, if the Commission finds that a different approach is necessary.</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
William Rostov, Attorney	2014	88.4	\$420	See Comment 1	\$37,128.00	88.4	\$415	\$36,686.00
Adenike Adeyeye, Advocate	2014	69.8	\$150	See Comment 2	\$10,470.00	53.3	\$145	\$7,728.50
Dustin Mulvaney, Expert	2014	55.5	\$205	See Comment 3	\$11,377.50	55.5	\$200	\$11,100
James Barsimantov, Expert	2014	4.5	\$215	See Comment 4	\$967.50	4.5	\$215	\$967.50
Ben Toscher, Expert	2014	10.8	\$140	See Comment 5	\$1,512.00	10.8	\$140	\$1,512.00
<i>Subtotal: \$61,455.00</i>						<i>Subtotal: \$57,994.00</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
William Rostov	2014	3.6	\$210		\$756.00	3.6	\$207.50	\$747.00
Adenike Adeyeye	2014	7.9	\$75		\$592.50	7.9	\$72.50	\$572.75
Dustin Mulvaney	2014	0.5	\$102.50		\$51.25	0.5	100	\$50.00
<i>Subtotal: \$1,399.75</i>						<i>Subtotal: \$1,369.75</i>		
TOTAL REQUEST: \$62,854.75						TOTAL AWARD: \$59,363.75		
<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>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
William Rostov	December 3, 1996	184528	No

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

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Comment 1	<p>Rostov's rate is calculated as follows: Rostov was awarded a rate of \$360 for work in D.13-12-027. Sierra Club requested a 2013 rate of \$390 in its request for compensation for contributions to D.13-10-040. That increase included a 5% step increase pursuant to D.08-04-110 and a 2% COLA pursuant to Resolution ALJ-287. (That request has not been addressed yet.) Rostov's 2014 rate includes a requested 5% step increase pursuant to D.08-04-110. (390 x 5% rounded to the nearest \$5 = 410). This would be Rostov's second 5% step increase. In addition, pursuant to Resolution ALJ-303 the COLA for 2014 is 2.58%. Thus, Rostov's rate is \$420 (410 x 2.58% rounded to the nearest \$5 = 420).</p> <p>Rostov works as a Staff Attorney in Earthjustice's California Regional Office, a non-profit public interest law firm dedicated to protecting the magnificent places, natural resources, and wildlife of this earth, and to defending the right of all people to a healthy environment.³ Earthjustice received no compensation for its representation and will only receive compensation for its services based on the award of intervenor compensation.</p>
Comment 2	<p>Adenike Adeyeye works as a Research and Policy Analyst in Earthjustice's California Regional Office. Adeyeye received a bachelor's degree in environmental studies from Yale University in 2007 and a master's degree in environmental management from the Yale School of Forestry and Environmental Studies in 2011 (resume attached). She falls within the 0-6 year range for experts. Sierra Club requested a 2013 rate of \$135, the minimum amount in the 0-6 year expert range, for Adeyeye in its requests for compensation for contributions to D.13-10-040.</p> <p>In this proceeding, Sierra Club requests \$150 for Adeyeye, which includes a requested 5% step increase pursuant to D.08-04-110 and a 2.58% COLA pursuant to Resolution ALJ-303. This would be Adeyeye's first 5% step increase. (The minimum for 2014 is \$140. \$140 times a 5% increase, rounded to the nearest \$5 = 145.) The COLA adds an additional \$5 after rounding to the nearest \$5. Adeyeye has two and a half years of</p>

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

³ See <http://www.earthjustice.org> for more information.

	experience working in the PUC in the energy storage and long-term procurement plan proceedings.
Comment 3	<p>Mulvaney's rate is calculated as follows: Mulvaney was awarded a rate of \$175 for work in 2010 in D.12-05-032. Sierra Club requested a 2013 rate of \$190 for Mulvaney in its request for compensation for contributions to D.13-10-040. That increase included a 5% step increase pursuant to D.08-04-110 and a 2% COLA pursuant to Resolution ALJ-287. Mulvaney's 2014 rate includes a requested 5% step increase pursuant to D.08-04-110. ($190 \times 5\%$ rounded to the nearest \$5 = 200). This would be Mulvaney's second 5% step increase. Mulvaney's rate is \$205, because the 2014 COLA has also been included ($200 \times 2.58\%$ rounded to the nearest \$5 = 205).</p> <p>Mulvaney is a principle in EcoShift, a consulting firm focusing on energy, climate change, sustainability, and transportation.⁴ Its staff of economists, engineers, and scientists works with clients to identify and promote sustainability and energy strategies that show that success doesn't have to cost the planet. Ecoshift received no compensation for its representation and will only receive compensation for its services based on the award of intervenor compensation.</p>
Comment 4	<p>Barsimantov's rate is calculated as follows: Barsimantov was awarded a rate of \$195 for work in 2010 in D.12-05-032. Sierra Club requested a 2013 rate of \$210 for Barsimantov in its request for compensation for contributions to D.13-10-040. That increase included a 5% step increase pursuant to D.08-04-110 and a 2% COLA pursuant to Resolution ALJ-287. Applying the 2014 COLA, to this rate results in a rate of \$215 for 2014 ($210 \times 2.58\%$ rounded to the nearest \$5 = 215). Barsimantov is a principle in EcoShift.</p>
Comment 5	<p>Ben Toscher is an energy resources specialist at EcoShift Consulting. Ben received his BBA in Finance from the University of Texas at Austin in 2008 and his M.Sc. from the Master's in Renewable Energy program at the University of Jyväskylä, Finland in 2011 (resume attached). Toscher has 1.5 years of relevant work experience, and falls within the 0-6 year range for experts. Sierra Club requests in the minimum of the range, based on 2014 rates found in Resolution ALJ-303.</p>
Attachment 2	Adenike Adeyeye Resume
Attachment 3	Ben Toscher Resume
Attachment 4	Sierra Club's Hourly Timesheets

D. CPUC Disallowances and Adjustments:

Item	Reason
Disallowance of excessive hours claimed and travel time (Adeyeye)	The Commission disallows 16.5 hours (out of a total of 69.8 hours) claimed for the work of Adeyeye. D.14-10-045 resolves the compliance phase of this energy storage proceeding. The 6.5 hours that Adeyeye claims for "researching black starts" on May 27-28, 2014, did not substantially contribute to the decision.

⁴ See <http://www.ecoshiftconsulting.com/> for more information.

	Travel time (.5 hours from the CPUC to Adeyeye’s office on June 2) is not compensable. Lastly, Adeyeye spent an excessive amount of time (18.9 hours) reviewing filings of other parties. Approximately half of this time (9.5 hours) is disallowed. To summarize, after reviewing the hours disallowed above, today’s decision awards compensation for 53.3 hours claimed for Adeyeye’s work.
Hourly Rates for Rostov, Adeyeye, and Mulvaney	The hourly rates awarded Rostov, Adeyeye, and Mulvaney are \$5 per hour less than requested by the Intervenor in Part III.B. The adjustment corrects an error in the calculation of “step” increases. (See D.08-04-010 at 11-13.)

PART IV: OPPOSITIONS AND COMMENTS

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

FINDINGS OF FACT

1. Sierra Club has made a substantial contribution to D.14-10-045.
2. The requested hourly rates for Sierra Club’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 \$59,363.75.

CONCLUSIONS OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.
2. The comment period should be waived, and today’s decision should be made effective immediately, to facilitate prompt payment of the award.

ORDER

1. Sierra Club California shall be awarded \$59,363.75.
2. Within 30 days of the effective date of this decision, the Pacific Gas and Electric Company, the San Diego Gas & Electric Company, and the Southern California

Edison Company shall pay Sierra Club California their respective shares of the award, based on their California-jurisdictional electric revenues for the 2014 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 March 7, 2015, the 75th day after the filing of Sierra Club California'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):	D1410045		
Proceeding(s):	A1402006, A1402007, A1402009		
Author:	Kersten		
Payer(s):	Pacific Gas and Electric, San Diego Gas and Electric, and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Sierra Club California	12/22/2014	\$62,854.75	\$59,373.75	N/A	Disallowance of excessive hours claimed and travel time. Adjustments to correct for an error in the calculation of "step" increases

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
William	Rostov	Attorney	Sierra Club	\$420	2014	\$415
Adenike	Adeyeye	Advocate	Sierra Club	\$150	2014	\$145
Dustin	Mulvaney	Expert	Sierra Club	\$205	2014	\$200
James	Barsimantov	Expert	Sierra Club	\$215	2014	\$215
Ben	Toscher	Expert	Sierra Club	\$140	2014	\$140

(END OF APPENDIX)