

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions.

Rulemaking 11-03-012
(Filed March 24, 2011)**DECISION GRANTING COMPENSATION TO NATURAL RESOURCES DEFENSE COUNCIL FOR SUBSTANTIAL CONTRIBUTIONS TO DECISIONS (D.) 14-05-021 AND D.14-12-083**

Claimant: The Natural Resources Defense Council (NRDC)	For contribution to Decision (D.) 14-05-021 and D. 14-12-083
Claimed: \$25,578.00	Awarded: \$ 25,105.00 (approximately 2% reduction)
Assigned Commissioner: Carla J. Peterman¹	Assigned ALJ: Julie M. Halligan

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	D.14-05-021 authorized the investor-owned electric and natural gas utilities subject to the California Public Utilities Commission's jurisdiction to sell Low-Carbon Fuel Standard (LCFS) credits and establishes criteria and reporting requirements for the sale of LCFS credits, pursuant to Public Utilities Code Section 853(b). D.14-12-083 adopted a methodology for allocating revenue generated from the sale of Low Carbon Fuel Standard (LCFS) credits by the electric and natural gas utilities. The electric investor-owned utilities were directed to allocate LCFS credit revenue to plug-in electric vehicle (PEV) customers by reducing the purchase cost of a PEV or by applying the revenue as a credit against the customer's electric utility bill annually.
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¹ Commissioner Peterman is the assigned Commissioner as of January 9, 2015. President Peevey was the assigned Commissioner when the Commission issued the two decisions which are the subject of this request. Judge Semcer was previously co-assigned to this proceeding with Judge Halligan.

B. Intervenor 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:	August 1, 2011	Yes. A prehearing conference also occurred on June 2, 2011.
2. Other Specified Date for NOI:	n/a	N/A
3. Date NOI Filed:	July 1, 2011	Yes
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.14-07-002	Yes
6. Date of ALJ ruling:	December 18, 2014	Yes
7. Based on another CPUC determination (specify):	n/a	N/A
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-07-002	R.11-03-012
10. Date of ALJ ruling:	December 18, 2014	December 1, 2011
11. Based on another CPUC determination (specify):	n/a	N/A
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D. 14-12-083	Yes
14. Date of Issuance of Final Order or Decision:	12/23/2014	Yes
15. File date of compensation request:	2/20/15	Yes
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. Claimant’s description of its substantial contribution to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059).

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contributions	CPUC Discussion
<p>a. Authority to sell LCFS credits: NRDC made the following contributions regarding the authority to sell LCFS credits, adopted in D. 14-05-021:</p> <ul style="list-style-type: none"> • NRDC advocated the Commission should grant the utilities the explicit authority to sell LCFS credits to resolve any regulatory certainty. [See comments filed December 18, 2013, p. 1 and comments filed January 6, 2014, p. 1.] • While PG&E asserted LCFS credits were analogous to GHG allowances, NRDC argued LCFS credits are not purchased by utilities and impose no direct cost burden on utility customers and that, accordingly, there was no need for similarly comprehensive or restrictive requirements. [See comments filed December 18, 2013, p. 1-2 and comments filed January 6, 2014, p. 2.] • NRDC argued that restrictions such as scheduled sales, as those suggested by the Green Power Institute (GPI), could undermine the utilities' ability to maximize LCFS credit value. [See comments filed December 18, 2013, p. 1-2 and comments filed January 6, 2014, p. 2.] 	<ul style="list-style-type: none"> • D. 14-05-021 granted the authority NRDC requested. <i>See</i> Ordering Paragraph 1: "Electric and natural gas investor-owned utilities that voluntarily participate in the Low-Carbon Fuel Standard (LCFS) regulation are authorized to sell LCFS credits..." • D. 14-05-021 did not find that LCFS credits were analogous the GHG allowances or that similar requirements should apply, citing to NRDC comments: "NRDC notes that the sale of LCFS credits imposes no direct cost burden on electric utility customers; thus, utilities should be granted the flexibility to maximize the value of credits." (p. 9). <i>See also</i> Finding of Fact 5: "LCFS credits are not purchased by the utility; LCFS credits are only sold. The sale of LCFS credits is not inherently a procurement activity." • D. 14-05-021, p. 14: "The Commission rejects the suggestion by GPI to keep early transactions short-term in nature." <i>See also</i> Conclusion of Law 4: "In order to provide sufficient ratepayer protection, it is reasonable for the Commission to adopt parameters and procedures governing LCFS credit sales by electric and natural gas utilities. It is simultaneously prudent to minimize restrictions on the sale of LCFS credits in an effort to maximize the value of LCFS credits for utility ratepayers." <i>See also</i> Conclusion of Law 5: "The Commission should not adopt any specific limitations on the volume of LCFS credits that must be sold within a given timeframe and the timing of LCFS credit sales." 	Accepted
<p>2. Revenue Return Mechanism Design & Policy Issues—<i>Prohibition on Volumetric Rate Reductions:</i> NRDC opposed</p>	<p>The Commission cited to NRDC's comments to support its prohibition on a reduction of volumetric rates:</p>	Accepted

<p>volumetric PEV rate reductions, on the grounds they would mute conservation signals for non-PEV load and because the vast majority of PEV drivers remain on standard rates and would not benefit from a reduction to PEV rates:</p> <p>“NRDC recommends that the Commission not use credit revenue to simply discount volumetric rates, but return the value to customers via more visible means, such as monthly, quarterly, or annual rebates or on-bill credits.” [Comments filed March 30, 2012, p. 5]</p> <p>The vast majority of PEV drivers remain on standard tiered rates. [See comments filed June 12, 2012, p. 2]</p>	<p>D. 14-12-083, p.29: “As NRDC and the electric IOUs point out, the majority of PEV drivers in IOU service territories are not currently on PEV rates. It is unclear how a rate reduction would reach these customers, since the utility would not likely be able to identify these households.”</p> <p>D. 14-12-083, p.29: “...we find the arguments of NRDC and ICCT persuasive that a rate reduction is unlikely to be high enough to induce customers to switch to PEV rates – particularly since some PEV drivers may have legitimate reasons not to enroll in PEV rates, such as metering costs – and thus this method is unlikely to induce prompt and universal utility notification..”</p> <p>D. 14-12-083, Conclusion of Law 1: “Because a volumetric PEV rate reduction fails to satisfy most of the key objectives for LCFS revenue return, the Commission should prohibit the electric utilities from returning revenue using this method.”</p>	
<p>3. Revenue Return Mechanism Design & Policy Issues– Prohibition on Use of LCFS Revenue to Fund Distribution Infrastructure Upgrade: NRDC opposed the use of LCFS revenue to subsidize infrastructure upgrade costs that would normally be borne by the body of utility customers:</p> <p>“Furthermore, using LCFS credits revenue to fund distribution system upgrades appears to be inherently inconsistent with the Board’s requirement that all LCFS credit revenue be returned to EV customers as direct benefits. Distribution system equipment is generally defined under IOU</p>	<p>D. 14-12-083, p. 30: “Because this type of revenue distribution may not comply with ARB’s regulation and may fail to meet critical policy objectives, we will prohibit utilities from using LCFS revenues as an infrastructure subsidy.”</p>	<p>Accepted</p>

<p>rules as equipment that serves multiple customers. Using LCFS credit revenue to subsidize the cost of shared equipment that serves any load is not a “direct benefit to current EV customers,” but an indirect benefit that would be shared generally by utility customers.” [Comments filed March 30, 2012, p. 6]</p>		
<p>4. Revenue Return Mechanism Design & Policy Issues—<i>Authorization of Annual Credits and Up-Front Rebates:</i> NRDC repeatedly supported the use of LCFS revenue to fund annual credits or up-front rebates, the two revenue return mechanisms eventually authorized by the Commission:</p> <ul style="list-style-type: none"> • Annual rebates would advance the goals of the Commission and ARB. [March 30, 2012, p. 7.] • In comments filed on January 22, 2014, NRDC noted Southern California Edison’s proposed up-front rebate could increase the use of electricity as a transportation fuel and advance many of the commission’s other goals for vehicle grid integration: “In addition to encouraging the use of electricity as a transportation fuel by providing a voucher redeemable for a year of clean fuel, the proposal offers a “carrot” to encourage customers to engage with their utility and an opportunity for SCE to identify PEV customers and educate them as to relevant time-of-use rates 	<p>Ordering Paragraph 1: “Pacific Gas and Electric Company, San Diego Gas and Electric Company, and Southern California Edison Company shall return to customers revenue from the sale of Low-Carbon Fuel Standard credits using either or both of the following methods: a) a one-time, up-front rebate provided when a plug-in electric vehicle is sold or at the start of the program to those who already own plug-in electric vehicles; b) an annual rebate distributed as a credit to the customer owning an electric vehicle.”</p> <ul style="list-style-type: none"> a. 14-12-083, Finding of Fact 11: “An annual credit can achieve both equitable revenue distribution and PEV adoption.” a. 14-12-083, Finding of Fact 12: “An annual credit does not exclude those not on PEV tariffs and may result in universal and prompt notification to the utility regarding the presence of PEV users.” a. 14-12-083, Finding of Fact 18: “Of all the options for returning LCFS revenue, a one-time ownership rebate is likely the best means to encourage PEV adoption because it would be provided to all PEV buyers an up-front amount off the purchase of the PEV.” 	<p>Accepted</p>

<p>and other programs designed to cost-effectively integrate PEV load.” [Comments filed on January 22, 2014, p. 1]</p>	<p>D. 14-12-083, p. 27: “NRDC also recognizes that a one-time rebate could help utilities achieve their notification goals”</p>	
<p>5. Revenue Return Mechanism Design & Policy Issues– Required Education & Outreach: NRDC repeatedly advocated that the LCFS revenue should be returned in a visible manner and the Commission should ensure utility customers are made aware of the value:</p> <p>Visibility to maximize impact should be included as a fifth principle. [See comments filed March 30, 2012, p. 4]</p> <p>“To encourage EV adoption, in line staff’s recommended principles for LCFS credit value, as well as the goals articulated by the Commission in D.11-07-029, it is critical that consumers be made aware of the value provided by the return of revenue from the sale of LCFS credits.” [Comments filed May 14, 2012, p. 2]</p> <p>“NRDC reiterates its recommendation that, if the Commission determines that on-bill credits are the most appropriate mechanism to return value to EV customers, it should require IOUs to take additional steps to make customers aware of the opportunity and the value of the program.” [Comments filed June 12, 2012, p.6-7]</p> <p>“Utilities that propose to return the value of LCFS credits to PEV drivers via annual on-bill credits should explain in Advice</p>	<p>Under Section 4.6 of D. 14-12-083, which details “Implementation Requirements for Electric Utilities,” it is specified that if utilities return revenue via credits, they must specify: “How will the utility ensure that customers are aware they are getting a credit?” [D. 14-12-083 at p. 35] Under subsection 4.6.6, “Program Outreach to Customers and Dealers,” it is further specified: “Utilities should include funding for LCFS-related outreach programs as part of their LCFS implementation plans... The utilities should leverage best practices, through collaboration with industry stakeholders, to ensure that as many alternative fuel vehicle drivers and potential buyers become aware of the LCFS program. The utilities’ implementation plans shall provide examples of messaging, channels, and processes to administer the program.” [D. 14-12-083 at p. 36]</p> <p>See also D. 14-12-083, Appendix A: Requiring utilities file Tier 2 Advice Letters that include a description of: “How will the program be marketed in a competitively neutral manner so that PEV owners, regardless of their load serving entity are aware that they are eligible to receive LCFS revenue.”</p>	<p>Accepted</p>

<p>Letters how they intend to overcome some of the lack of consumer awareness revealed in the “Climate Credit Assessment” for similar on-bill credits.” [Comments filed December 8, 2014, p. 4]</p>		
<p>6. Revenue Return Mechanism Design & Policy Issues– Flexibility: In light of the nascent nature of this program, NRDC advocated the Commission should grant the utilities flexibility and allow them to tailor the return of LCFS revenue to their respective service territories:</p> <ul style="list-style-type: none"> • “NRDC recommends that the Commission implement a revenue return mechanism in the near term that is relatively simple, flexible, and inherently adaptable.” [Comments filed June 12, 2012] • “allowing for individual utilities to experiment with different mechanisms that have the potential to further the Commission’s goals and benefit PEV drivers could result in innovation. The Commission should seek to ensure every proposal can be implemented effectively, but it should not necessarily require uniformity across service territories.” [Comments filed December 8, 2014, p. 4] 	<p>D. 14-12-083, p.30: “SCE, PG&E, GM, NRDC and ARB all ask that the Commission allow utilities flexibility in their revenue return programs, particularly during the initial years of implementation. We will allow the utilities to select among the two options that we approve in this Decision.”</p> <p>D. 14-12-083, Conclusion of Law 5: “It is reasonable to authorize the utilities to develop individual LCFS Implementation Plans to appropriately tailor their LCFS revenue return programs to the needs of PEV drivers in their individual territories”</p>	<p>Accepted</p>

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

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	Yes
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes
c. If so, provide name of other parties: NRDC’s position was most aligned with that of General Motors, which participated for some portion of the three and a half years covered in this claim.		Accepted
<p>d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>Throughout the course of this proceeding, NRDC coordinated with various stakeholders, including ORA, utilities, automakers, PEV driver associations, other NGOs, and the Air Resources Board. NRDC was the only national environmental NGO to remain engaged in the proceeding for the full three and half years dedicated to “Track 2” (the track dealing with LCFS revenue return). NRDC, which was one of the original sponsors of AB32 and remains active in “Track 1” of the proceeding dealing with Greenhouse Gas Allowance allocation issues, brought a unique combination of experience and expertise to this proceeding. Likewise, by virtue of our involvement in the adoption of LCFS regulations at the Air Resources Board, which largely shaped Track 2 of the proceeding, and by virtue of our expertise in clean fuels standards, NRDC brought an important and unique perspective to the Commission. Given the singular and valuable nature of NRDC’s contribution to the proceeding, the Commission should not discount any of NRDC’s work due to duplication with other organizations or within NRDC, as described in detail below in Part 3.A.b.</p>		We do not make any reductions for duplication of effort.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

<p>a.</p> <p>NRDC has long championed the LCFS as a means to reduce the environmental impact of transportation fuels and increase the use of low carbon fuels, such as electricity. We worked at the Air Resources Board to shape the regulations requiring that electric utilities return revenue derived from the sale of LCFS credits to plug-in electric vehicle (PEV) drivers. Accordingly, we brought a unique perspective to the Commission’s proceeding determining how exactly that value would be provided to PEV drivers. Throughout the three-and-a-half years covered in Track 2 of this proceeding, NRDC has continuously advocated that revenue be returned in a manner that maximizes its impact, its visibility, and its potential to accelerate the PEV market, in line with California’s broader climate goals. In the face of considerable delays in the proceeding, NRDC remain engaged and urged the Commission to act expeditiously. Specifically, we demonstrated the value that PEV drivers were being deprived of in light of the lack of clarity with respect to the utilities authority to sell LCFS credits, partially prompting the Commission to issue a decision granting utilities the explicit authority to sell LCFS credits.</p> <p>With respect to the mechanism by which revenue would be returned to PEV drivers, we advocated against means, such as a volumetric rate reduction or the funding of distribution infrastructure, that would not accelerate the PEV market, could undermine other Commission priorities, and that did not comport with the goals of the LCFS program. The Commission ultimately disallowed those means, and granted the authority to return revenue via annual credits or up-front rebates, the two means for which NRDC advocated. Both annual credits and up-front rebates could provide significant value to PEV customers and accelerate the electrification of the transportation sector in line with the goals adopted in Commission Decision 11-07-029.</p> <p>In line with NRDC’s repeated calls for requirements that the utilities take steps to ensure PEV drivers are made aware of the value derived from the sale of LCFS credits, the Commission required the utilities to report exactly how they will ensure as many PEV customers as possible are made aware of the opportunity. Likewise, the Commission heeded NRDC’s call for flexibility to allow the utilities to develop best practices and maximize the value of LCFS credits. If done right, returning the value of LCFS credits could also provide a carrot for PEV customers to engage with their utilities, increase the adoption of time-of-use rates that encourage charging that minimizes adverse distribution system impacts, and facilitate strategic service planning to minimize the costs of accommodating PEV charging.</p>	<p style="text-align: center;">CPUC Verified</p> <hr/> <p style="text-align: center;">With the minor adjustments made in this decision, NRDC’s costs are reasonable and reflective of its participation in this proceeding.</p>
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<p>The intelligent integration of widespread PEV charging facilitated by the return of LCFS credit revenue can increase the utilization of existing assets, putting downward pressure on rates to the benefit of all utility customers (see analysis included in California Transportation Electrification Assessment Phase 2:Grid Impacts, E3, 10.23.14, p. 17).</p> <p>NRDC’s contribution to the record and final decisions in this proceeding vastly exceeds the cost of NRDC’s participation.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>NRDC has only submitted hours for a single, relatively junior attorney, despite the fact several other attorneys and experts reviewed documents submitted to the Commission, thus eliminating any internal duplication. For instance, throughout the course of the proceeding, NRDC relied upon the input of Simon Mui, Ph.D., who is one of the world’s foremost experts in clean fuels standards, such as the LCFS. However, none of Dr. Mui’s hours are included in this claim. The hours claimed for Max Baumhefner are conservative estimates of the actual time required to remain engaged in this proceeding for the duration of Track 2.</p>	<p>Verified as to the hours submitted to the Commission by NRDC.</p>
<p>c. Allocation of Hours by Issue</p> <p>Since its inception in 2011, Track 2 of this proceeding has covered a great deal of diverse policy issues, however, NRDC only submits hours for the two issues directly covered in D.14-05-021 and D.14-12-083—the authority to sell LCFS credits, and the mechanism by which value would be returned to PEV drivers. Of those issues, NRDC spent 6% of its hours on the authority to sell LCFS credits and 94% on the mechanism by which value would be returned to PEV drivers.</p>	<p>Accepted</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Max Baumhefner, Attorney	2011	5.50	185	Res. ALJ-267 D.12-11-048	\$1,018 ²	5.50	\$185	\$1,017.50
Max Baumhefner, Attorney	2012	67.00	200	Res. ALJ-281 D.08-04-010	\$13,400	67.00	\$200	\$13,400.00
Max Baumhefner, Attorney	2013	6.75	210	Res. ALJ-287 D.08-04-010	\$1,418	6.75	\$210	\$1,417.50

² In this claim, and its claim for 2013 and 2014 hours, NRDC rounds its claim to the nearest dollar (e.g., requesting \$1,018.00, instead of \$ 1,017.50, etc.). NRDC should not so round in the future.

Max Baumhefner, Attorney	2014	38.50	225	Res. ALJ-303 D.08-04-010	\$8,663	36.50	\$225	\$8,212.50
Subtotal: \$24,498.00						Subtotal: \$24,047.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Max Baumhefner, Attorney	2015	9	120		\$1,080	9	\$117.50 (1/2 the approved hourly rate of \$235.)	\$1,057.50
Subtotal: \$1,080.00						Subtotal: \$1,057.50		
TOTAL REQUEST: \$25,578.00						TOTAL AWARD: \$ 25,105.00		
<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 are compensated at 1/2 of preparer's normal hourly rate.</p>								
ATTORNEY INFORMATION								
Attorney	Date Admitted to CA BAR ³			Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation			
Max Baumhefner	July, 2010			270816	No			

C. CPUC Disallowances and Adjustments:

Item	Reason
1	<p>Hourly Rate for Mr. Baumhefner</p> <p>Baumhefner, the sole attorney for which NRDC requests compensation, received a B.A. from Pomona College in 2001. Baumhefner gained experience directly applicable to advocacy before the CPUC during his tenure in Commissioner Timothy Simon's office in 2008. In 2009, he received a J.D. from U.C. Berkeley School of Law (Boalt Hall) and was admitted to the California Bar in July 2010.</p> <p>2011 and 2012: The Commission awarded Baumhefner a rate for 2011 of \$185 in D.12-11-048 and D.14-12-076 as he was a 1-2 year lawyer. NRDC requests this rate here for Baumhefner's work in 2011 and we approve it. NRDC also requests a rate of \$200 for Baumhefner's 2012 work, applying the second 5% increase per D.08-04-010 and the 2.2% cost-of-living allowance (COLA) approved in Resolution ALJ-281. We</p>

³ This information may be obtained at: <http://www.calbar.ca.gov>.

	<p>agree a rate of \$200 is appropriate for Baumhefner’s work performed in 2012 in this proceeding.</p> <p>2013: NRDC requests a rate of \$210 for Baumhefner’s 2013 work because in 2013 he became an attorney with 3+ years of experience. This rate is at the lowest end of the band identified in Resolution ALJ-287 as reasonable for a 2013 rate for an attorney with 3-4 years of experience. Per D.08-04-010 at 8, Baumhefner can qualify for a rate increase when “[m]oving to a higher experience level: where additional experience since the last authorized rate moved a representative to a higher level of experience.” We therefore approve a 2013 hourly rate for Baumhefner of \$210.</p> <p>2014: NRDC requests a rate of \$225 for Baumhefner’s 2014 work, which includes the first of two 5% step increases for the category of an attorney with 3-4 years of experience (<i>see</i> D.08-04-010), plus a COLA of 2.58% per Resolution ALJ-303. We find the \$225 rate reasonable for Baumhefner’s 2014 work in this proceeding.</p> <p>2015: NRDC requests a rate of \$240 for Baumhefner’s 2015 work, which includes the second of two approved 5% steps plus a COLA of 2.58% per Resolution ALJ-303. We set an hourly rate of \$235 for Baumhefner’s 2015 work. This is based on applying the second 5% step increase to his 2014 hourly rate approved above. Resolution ALJ-308 did not adopt a COLA for work performed in 2015. Therefore, we do not apply the requested COLA here.</p>
2	<p>We reduce Baumhefner’s claimed 2014 hours by 2 hours for his work in reviewing the final decision, D.14-12-083, as this work occurred after the Commission voted out D.14-12-083.</p>

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(2)(6))?	Yes

FINDINGS OF FACT

1. NRDC has made a substantial contribution to D.14-05-021 and D.14-12-083.
2. The requested hourly rates for NRDC’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 \$25,105.00.

CONCLUSION OF LAW

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

ORDER

1. Natural Resources Defense Council shall be awarded \$25,105.00.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company shall pay Natural Resources Defense Council their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning May 6, 2015, the 75th day after the filing of Natural Resources Defense Council's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, 29015, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision? No
Contribution Decision(s):	D1405021 and D1412083	
Proceeding(s):	R1103012	
Author:	ALJ Halligan	
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier	Reason Change/Disallowance
Natural Resources Defense Council (NRDC)	2/20/15	\$25,578.00	\$25,105.00	N/A	Reduction of hourly rate; minor reduction of hours; eliminate rounding in mathematical calculation of reasonable compensation.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Max	Baumhefner	Attorney	NRDC	\$185	2011	\$185
Max	Baumhefner	Attorney	NRDC	\$200	2012	\$200
Max	Baumhefner	Attorney	NRDC	\$210	2013	\$210
Max	Baumhefner	Attorney	NRDC	\$225	2014	\$225
Max	Baumhefner	Attorney	NRDC	\$240	2015	\$235

(END OF APPENDIX)