

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIAOrder Instituting Rulemaking Concerning Energy
Efficiency Rolling Portfolios, Policies, Programs,
Evaluation, and Related Issues.Rulemaking 13-11-005
(Filed November 14, 2013)**DECISION GRANTING COMPENSATION TO NATURAL RESOURCES DEFENSE
COUNCIL ON SUBSTANTIAL CONTRIBUTION TO DECISION 14-10-046**

Intervenor: Natural Resources Defense Council (NRDC)	For contribution to Decision (D.) 14-10-046
Claimed: \$31,427.50	Awarded: \$27,487.50 (12.5% reduction)
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Todd O. Edmister

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision authorizes Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), Southern California Edison Company (SCE) and Southern California Gas Company (SoCal Gas), Marin Clean Energy, Southern California Regional Energy Network and Bay Area Regional Energy Network to collectively spend roughly \$1 billion dollars on energy efficiency (EE) activities in 2015.
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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):	December 11, 2013	Verified.
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	January 10, 2014	January 10, 2014.
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:	R1407002	Verified.
6. Date of ALJ ruling:	December 18, 2014	Verified.
7. Based on another CPUC determination (specify):	n/a	
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:	R1407002	Verified.
10. Date of ALJ ruling:	December 18, 2014	Verified.
11. Based on another CPUC determination (specify):	n/a	
12. Has the Intervenor demonstrated significant financial hardship?		Yes.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.1410046	D.14-10-046
14. Date of issuance of Final Order or Decision:	October 24, 2014	October 24, 2014
15. File date of compensation request:	December 22, 2014	December 22, 2014
16. Was the request for compensation timely?		Yes.

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. <i>Potential and Goals Improvements (B)</i></p>	<ul style="list-style-type: none"> • The Final Decision relied upon the 2013 Potential Study to determine the final efficiency goals but does not reference specific improvements to the underlying goals and potential model. (D.1410046, pp.10-11) • However, in order to improve the level of, quality of, and methodology by which goals were determined, NRDC participated consistently and actively in DAWG activities as that is the venue for influencing the methodologies and assumptions included in the potential study. • NRDC advocacy at the DAWG resulted in actual changes to the level, quality, and methodology of the potential study, in particular to the study of, and inclusion of, more emerging technologies savings potential. <ul style="list-style-type: none"> ○ NRDC joint comments at DAWG (9/13/13) p.4 as appendix to NRDC goals cmts at CPUC (12/20/13) 	<p>The Demand Analysis Working Group (DAWG) DAWG was formed by collaborative stakeholders in 2009. D.14-10-046 acknowledges the DAWG’s work, which ED Staff relied upon in evaluating the Energy Efficiency Potential and Goals Update Study for 2015, produced by a consultant.¹</p>

¹ D.14-10-046, pg. 12.

<p>2. <i>Water Program Recs (C)</i></p>	<ul style="list-style-type: none"> • NRDC recommended to include water savings in cost-effectiveness metrics <ul style="list-style-type: none"> ○ Opening Cmts of NRDC (4/4/14); p.12 ○ Opening Cmts of NRDC on PD (10/6/14); p.10 ○ See D.14-10-046 p.94-95 	<p>Yes.</p>
<p>3. <i>Modifications to rules and approvals (D)</i></p>	<ul style="list-style-type: none"> • NRDC recommends EULs be removed as one improvement to cost-effectiveness <ul style="list-style-type: none"> ○ Opening Cmts of NRDC (4/4/14); p.10 fn 17 ○ Reply Cmts of NRDC (4/17/14); p.6 ○ D.14-10-046 p.68 • NRDC urged the Commission to update SDG&E’s discount rate <ul style="list-style-type: none"> ○ Reply Cmts of NRDC (4/17/14); p.7 ○ D.14-10-046 p.88 • NRDC recommended improvements to the custom program, to be tested with the Prop 39 effort <ul style="list-style-type: none"> ○ Reply Cmts of NRDC (4/17/14); p.5 ○ D.14-10-046 p.50 • NRDC urges approval of budgets with the requirement of using unspent funds to offset revenue requirements (vs. approving a lesser budget offset by unspent funds) <ul style="list-style-type: none"> ○ NRDC Reply cmts on PD (10/13/14) p.4 ○ D.14-10-046 p.118 	<p>D.14-10-046 increased the maximum cap of Expected Useful Life (EULs) to 30-years for removed equipment for schools claiming early retirement; NRDC recommended that the cap for EULs be removed.</p> <p>While NRDC’s recommendation regarding EULs was consistent with the Commission’s decision, the decision did not agree with NRDC’s other recommendations.</p> <p>NRDC advocated deferring the issue of SDGE’s discount rate to Phase III, whereas the decision accepted the most recently adopted cost of capital, approving the most</p>

		<p>current Weighted-Average Cost of Capital for calculating 2015 cost effectiveness.²</p> <p>Although the Commission did not adopt most of NRDC’s referenced proposals, NRDC still substantially contributed.</p> <p>(See II. C. Additional Comments on Part II.)</p>
<p>4. <i>Peer Review Group (E)</i></p> <p>The Peer Review Group process is intended to ensure an open and transparent bidding process for third party providers. There is no formal reference to these ongoing peer review group efforts or results in D.14-10-046 however D.07-11-024 notes that: “To evaluate the reasonableness of the requested compensation, the intervenor should explain the types of programs, policies, practices or documents reviewed in connection with its PRG, Peer Review Group, or Program Advisory Group work and how that work contributed to an outcome that benefited ratepayers.” (p.5)</p> <p>NRDC only claims time for</p>	<ul style="list-style-type: none"> • Worked with CPUC and IOUs to organize a mid-cycle workshop (Dec 2013) to solicit input from 3rd parties and discuss opportunities for 2014 modifications and improvements. <ul style="list-style-type: none"> ○ Provided opportunity to hear stakeholder input, now being used for 2015 improvements ○ SCG/SDG&E modified their 2014 bids to accommodate input re: process challenges ○ Advised on survey to better understand how bidders found improvements and to solicit other recs that will be used for future bid processes • Actively participated in numerous PRG meetings on bids including scope, scoring, process, and choices. <ul style="list-style-type: none"> ○ NRDC - as the only nonprofit on the PRG - was critical to providing feedback 	<p>In D.07-11-024, the Commission eliminated Program Advisory Groups, stating, “In D.07-10-032 issued in R.06-04-010 on October 19, 2007, we eliminated energy efficiency Program Advisory Groups in favor of other processes for considering strategic deployment of energy efficiency programs and measures... The guidelines discussed in this decision are applicable to</p>

² D.14-10-046, pg.88.

<p>activities for the PRG that occurred since the OIR in R.13-11-005, despite being consistently and actively involved in PRG activities throughout all of 2013. There is no other opportunity to claim for this time.</p> <p>NRDC claims for WE&T PAG participation prior to the OIR in R1311005 as it pertains to the IOU filings re: WE&T programs.</p>	<p>and transparency to the process in addition to the CPUC’s participation</p> <ul style="list-style-type: none"> • Active participation and comments in the WE&T PAG process to provided deeper CPUC and IOU process understanding for other stakeholders who do not typically participate. <ul style="list-style-type: none"> ○ Numerous listed PAG mtgs • Offered alternative recs (e.g., integration of MUSH, stakeholder engagement process, etc.) that were considered in the development of the guidance document. <ul style="list-style-type: none"> ○ 12/16/13 Email recommendations to group ○ 1/27/14 informal comments on guidance ideas 	<p>Program Advisory Group activities conducted before the issuance of D.07-10-032.”³</p> <p>Therefore, NRDC’s requests for compensation on the “WE&T Peer Advisory Group”, is rejected.</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?	Yes	Yes.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes.
<p>c. If so, provide name of other parties: Numerous other parties participated in this proceeding, including the four investor owned utilities (IOUs), The Utility Reform Network (TURN), Local Government Sustainability Coalition (LGSEC), Efficiency Council, among others. At various points, other organizations had similar positions to NRDC but no other organization represented the environmental voice as consistently throughout the proceeding.</p>	Accepted.	
<p>d. Intervenor’s claim of non-duplication: NRDC’s advocacy was not duplicative as we worked closely with other parties during any opportunity to work out differences or sign on to comments (e.g., PHC statement, DAWG comments, etc.). In addition, NRDC took steps to ensure no duplication of work within our organization by assigning specific</p>	The CPUC accepts this assertion.	

³ D.07-11-024, pg. 2.

<p>issues, tasks, and workshops/meetings to one team member when possible (e.g., P. Miller for EM&V and DEER, S. Martinez for Goals/Potential, etc.). We also designated one person as the primary writer per issue area, with other team members providing substantive review that in this instance are not requested (yet we reserve the right to include hours spent as substantive review in other proceedings or other efforts in this proceeding).</p>	
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C. Additional Comments on Part II:

#	Intervenor’s Comment	CPUC Discussion
Part II.A	<p>In addition to notes above, NRDC’s hours represent substantial analysis and recommendations that were germane to the issues at hand, and allowed the Commission to engage in a more informed deliberative process, ultimately resulting in a more thoroughly considered decision. However, many of the activities for which we claim hours were not explicitly included in the final decision (e.g., discussion around baseline issues, peer review group, work on workforce education and training program advisory group, etc.). Other recommendations were not explicitly approved in the decision, but were nonetheless important to ensure a robust record for consideration by the Commission.</p>	<p>The Commission has previously held that intervenors can substantially contribute, even if their proposals are not adopted by the Commission. In D.14-06-027, the Commission awarded TURN compensation despite rejection of TURN’s opposition to a request for undergrounding.</p> <p>A substantial contribution can be made “where an unsuccessful intervener has provided a unique perspective adding to the PUC’s understanding of a complex proceeding...the critical factor...is whether the intervener has assisted the PUC in carrying out its statutory mandate to regulate public utilities in the public interest.”⁴</p> <p>The CPUC agrees with this assertion that NRDC substantially contributed to D. 14-10-046. Even when the Commission did not agree with NRDC, NRDC’s participation contributed to a fuller record with its analysis and recommendations, and provided the “unique perspective” which aided the Commission in its consideration of the issues.</p>

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>NRDC consistently advocates for policies to maximize cost-effective energy efficiency, ensure that the benefit of energy efficiency is properly accounted for, and that policies and goals align to enable the utilities to use</p>	<p style="text-align: center;">CPUC Discussion</p> <hr/> <p>NRDC’s cost of</p>
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⁴ The Utility Reform Network v. Public Utilities Com., 166 Cal. App. 4th 522, 535.

<p>efficiency as their first energy resource choice (as required by California law). NRDC’s continued focus in this and other proceedings is on policies that ensure a reliable, affordable, and environmentally sustainable energy resource portfolio that should have lasting benefits to customers. NRDC contributed substantially to the resolution of a number of outstanding issues addressed in this proceeding, which will allow the utilities to implement programs for 2015 that will produce energy savings, and therefore lower costs for customers and reduce pollution.</p> <p>If the utilities meet the energy savings goals as adopted by D.14-10-046, we estimate savings will lower energy bills by \$200 million after accounting for the cost of the programs, reduce emissions equivalent to more than 100,000 cars, and avoid the need for a medium-sized power plant. These programs will provide substantial benefits to customers and be an important contributor to meeting the state’s 2020 greenhouse gas emissions limit required by Assembly Bill 32, the Global Warming Solutions Act of 2006. These benefits vastly exceed the cost of NRDC’s participation in this proceeding.</p>	<p>participation is reasonable, relative to the estimated benefits to ratepayers.</p> <p>NRDC claims 22.45 hours related to DAWG workshops and 4.5 hours for the WE&T advisory group prior to November 14, 2013, the start of the proceeding.</p> <p>D.14-10-046 acknowledges the DAWG’s work, which ED Staff relied upon in evaluating the Energy Efficiency Potential and Goals Update Study for 2015, produced by a consultant.⁵ Rule 17.4(d) allows the inclusion of reasonable costs of participation in the proceeding that were incurred prior to the start of the proceeding.</p> <p>We disallow the hours related to the WE&T advisory group (<i>See</i> III.D. 1).</p>
<p>b. Reasonableness of hours claimed:</p>	<p>The Commission</p>

⁵ D.14-10-046, pg. 12.

<p>The substantial contributions to Commission policy described above would not have been possible without the individual contributions of the following staff. Lara Ettenson, who has nine years of experience in 2014 working on energy efficiency and CPUC proceedings (and directs NRDC's California energy efficiency policy work), provided detailed language on efficiency policy issues, recommendations, and program design, contributed her in-depth expertise of the Commission's efficiency policies and goals, and made sure there was no duplication of work within the team. Sierra Martinez, who has over 6 years of experience participating in CPUC proceedings, wrote NRDC's goals comments on energy efficiency potential and goals. Peter Miller, who has over 25 years of experience working on energy efficiency issues, provided portions of submitted comments and provided substantive input on all draft comments. While we do not claim for any of Mr. Miller's time in this request, we reserve the right to do so in the future.</p> <p>In addition, the rates requested by NRDC are purposefully conservative and low on the ranges approved by the Commission, even though the levels of expertise of would justify higher rates. NRDC maintained detailed time records indicating the number of hours that were devoted to proceeding activities. All hours represent substantive work related to this proceeding.</p> <p>The amounts claimed are further conservative for the following reasons: (1) None of the hours were claimed from time spent by other NRDC staff who consulted regularly on this proceeding; (2) No time was claimed for pure coordination among the staff, or in this case, no time was claimed for internal discussions of substantive issues to outline comments and define advocacy strategy (we reserve the right to request compensation for such activities in the future); (3) NRDC does not claim time for informal conversations with CPUC staff or the majority of stakeholder conversations, unless in an organized manner; (4) NRDC claims half time for each staff person present for a substantive internal conversations; (5) NRDC claims only for PRG activity that occurred after the initiation of the OIR even though activity occurred throughout 2013, (6) we do not claim time for regulatory requirements associated with our advocacy (e.g., time spent writing ex parte notices for the proceeding), (7) no time was claimed for advocacy blogs to influence the outcome of the Commission's final decision, and (8) NRDC does not claim time for the WE&T PRG work to pick the WE&T consultant (although we do claim time for activity on the WE&T PAG).</p> <p>In addition, NRDC does not claim all the time needed to prepare for this claim. D.14-10-046 was nearly 200 pages, all of which Ms. Ettenson reviewed to determine which substantial contributions were integrated into the final decision. NRDC also does not claim time for ongoing timekeeping or maintenance related to intervenor compensation, even though it is time consuming. The amount requested preparing this claim is also conservative</p>	<p>accepts this assertion.</p>
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<p>because it only claims Ms. Ettenson - who was the main author of the claim - even though others helped compile various sections of the claim.</p> <p>In sum, NRDC made numerous and significant contributions which required extensive research and analysis. NRDC took every effort to coordinate with other stakeholders to reduce duplication and increase the overall efficiency of the proceeding. Since NRDC's work was efficient, hours conservative, and billing rates low, NRDC's request for compensation should be granted in full.</p>	
<p>c. Allocation of hours by issue: A (general) = 38% B (quantitative) = 6% C (programs) = 10% D (recommended changes) = 8% E (peer review group/program advisory group) = 38%</p>	<p>Verified.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
L. Ettenson	2013	29.50	\$170	D.13-05-032 D.08-04-010 Res ALJ 287	\$5,015	19.5	\$170 ⁶	\$3,315.00
L. Ettenson	2014	106.5	\$180	D.13-05-032 D.08-04-010 Res ALJ 287	\$19,170	97	\$175	\$16,975.00
S. Martinez	2013	25.75	\$230	D.14-12-067	\$5,922.5	25.75	\$230	\$5,922.50
A. Gonzalez	2013	7.50	\$140	D.13-05-032 D.08-04-010 Res ALJ 287	\$1,050	7.50	\$135 ⁷	\$1,012.50
Subtotal: \$31,157.50						Subtotal: \$27,225.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
L. Ettenson	2014	3.0	\$90.00	D.13-05-032	\$270.00	3.0	\$87.50	\$262.50

⁶ Application of 5% Step increase and 2% Cost of Living Adjustment (COLA) for 2013; D.13-05-032).

⁷ Application 2.2% COLA for 2012 and 2% COLA for 2013

			D.08-04-010 Res ALJ 287			
Subtotal: \$270.00				Subtotal: \$262.50		
TOTAL REQUEST: \$31,427.50				TOTAL AWARD: \$27,487.50		
<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. Intervenors' 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 ⁸	Member Number	Actions Affecting Eligibility (Yes/No?)			
Sierra Angel Martinez	December 4, 2008	260510	No			

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

Attachment or Comment #	Description/Comment
1	Staff Hours and Issue Areas
2	<u>Lara Ettenson's 2013 and 2014 Rate Rationale</u> : NRDC requests a rate of \$170 for 2013. This is based on the awarded amount of \$160 in D.13-05-032 with COLA adjustment of 2% per Resolution ALJ-287 and the first of two allowable steps within a single band per D.08-04-010 (p.8). NRDC requests a rate of \$180 for 2014. Assuming a rate of \$170 for 2013, we apply 2% for COLA and the second of two allowable steps within a single band.
3	<u>Sierra Martinez's 2013 Rate Rationale</u> : NRDC requests a rate of \$230 per D.14-12-067.
4	<u>Amanda Gonzalez's 2013 Rate Rationale</u> : NRDC requests a rate of \$140 for Amanda Gonzalez, which is based on Ms. Gonzalez's 2011 rate of \$125 awarded in D.13-05-032. That rate was the lowest in the range for experts with 0-6 years of experience per Resolution ALJ-267. We then apply one of the two allowable steps within a single band for Ms. Gonzalez per D.08-04-010 (p.8), which results in a 2012 rate of \$130. In 2013, Resolution ALJ-287 indicates an allowable 2% COLA increase. We apply that increase plus the second allowable step per D.08-04-010. Ms. Gonzalez had three years of experience working in the field of Energy Efficiency in research and project management capacities in 2011 and in 2013 had 5 years. We therefore request a rate of \$140 for work done in 2013. Ms. Gonzalez represented NRDC at the Demand Analysis Working

⁸ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	Group meetings and supported in analysis and comment writing. Ms. Gonzalez holds a B.S/M.S in Management Science in Engineering from Stanford University, where she focused on Energy and Environmental Policy and Strategy.
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D. CPUC Disallowances and Adjustments:

Item	Reason
1. Disallowance of Hours Claimed for Work on Peer Advisory Groups	<p><i>See</i> II.A.4 Peer Review Groups.</p> <p>D.07-11-024 discusses the discontinuance of Program Advisory Groups (PAGs):</p> <p>“In D.07-10-032 issued in R.06-04-010 on October 19, 2007, we eliminated energy efficiency Program Advisory Groups in favor of other processes for considering strategic deployment of energy efficiency programs and measures. Energy efficiency Peer Review Groups, however, continue to function.”⁹</p> <p>We disallow all hours which NRDC requests on its time sheet for the “WE&T Peer Advisory Group”. We reduce 10.0 hours from Ettenson’s timesheet in 2013 and 9.5 hours from her 2014 timesheet.</p>
2. Lara Ettenson’s 2013 and 2014 Hourly Rates	<p>NRDC requests a 2013 hourly rate of \$170, which incorporates a 5% step increase and a 2% COLA adjustment per ALJ-287. Ettenson’s new rate is well within the range of \$165-280 for experts with 7-12 years of experience.</p> <p>For 2014, we apply an hourly rate of \$175. NRDC requests an hourly rate of \$180, which incorporates a 5% step increase and a 2.58% COLA per ALJ-303 (not 2%, as applied by NRDC). We decline to authorize another consecutive step increase, as we already grant one 5% step increase for Ettenson’s 2013 rate. This leaves Ettenson, with 9 years of experience, one remaining step increase within her current rate range of 7-12 years. The adopted 2014 hourly rate of \$175 incorporates the 2014 COLA of 2.58%.</p>
3. Amanda Gonzalez’s Hourly Rate	<p>NRDC requests a rate of \$140 based on two 5% step increases for 2012 and again for 2013, plus COLA adjustments for both years, based on Gonzalez’s 2011 hourly rate of \$125. D.08-04-010 allows an intervenor to a step increase for each year’s work, capped at two step increases within a rate range of experience. Gonzalez worked in 2013, but not in 2012.</p> <p>We decline to apply the step increase in 2012, but we apply the 5% requested step increase in 2013. Thus, we only apply one 5% step increase, which leaves her one remaining step increase within the 0-6</p>

⁹ D.07-11-024 at 2.

	year rate range. We also apply the 2% COLA for 2013 (ALJ-287) and 2.58% COLA for 2014 (ALJ-303). Gonzalez' 2013 hourly rate, rounded to the nearest \$5 increment is \$135.
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PART IV: OPPOSITIONS AND COMMENTS

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

1. NRDC has made a substantial contribution to Decision 14-10-046.
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 \$27,487.50.

CONCLUSION OF LAW

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

ORDER

1. The Natural Resources Defense Council shall be awarded \$27,487.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company and Southern California Gas Company shall pay the 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 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 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 _____, 2015, at Sacramento, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1410046		
Proceeding(s):	R1311005		
Author:	ALJ Edmister		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Natural Resources Defense Council (NRDC)	12/22/14	\$31,427.50	\$27,487.50	N/A	Disallowance of hours claimed for work on Peer Advisory Groups (PAG); adjustments to 2014 Hourly Rate of Ettenson, to account for correct 2014 Cost of Living Adjustment (COLA)

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Lara	Ettenson	Expert	NRDC	\$170	2013	\$170
Lara	Ettenson	Expert	NRDC	\$180	2014	\$175
Sierra	Martinez	Attorney	NRDC	\$230	2013	\$230
Amanda	Gonzalez	Expert	NRDC	\$140	2013	\$135

(END OF APPENDIX)