

Decision \_\_\_\_\_

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

Application of Pacific Gas and Electric Company To Revise Its Marginal Costs, Revenue Allocation, and Rate Design. (U39M).	Application 13-04-012 (Filed April 18, 2013)
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**DECISION GRANTING INTERVENOR COMPENSATION TO  
AGRICULTURAL ENERGY CONSUMERS ASSOCIATION  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-08-005**

<b>Intervenor: Agricultural Energy Consumers Association (AECA)</b>	<b>For contribution to Decision (D.) 15-08-005</b>
<b>Claimed: \$83,398.16</b>	<b>Awarded: \$84,125.80</b>
<b>Assigned Commissioner: Michael Picker</b>	<b>Assigned ALJ: Stephen L. Roscow</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	D.15-08-005 adopts eight separate settlements relating to Pacific Gas and Electric Company's electric marginal costs, revenue allocation and rate design as proposed by the settling parties and resolves the remaining outstanding issues based on the merits of the litigated positions.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	June 3, 2013	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	July 3, 2013	Verified.
4. Was the NOI timely filed?	Yes, Agricultural Energy Consumers Association (AECA) timely filed the	

**PROPOSED DECISION**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
		notice of intent to claim intervenor compensation.
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.13-04-012	Verified.
6. Date of ALJ ruling:	July 29, 2013	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, AECA demonstrated appropriate status
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.13-04-012	Verified.
10. Date of ALJ ruling:	July 29, 2013	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, AECA demonstrated significant financial hardship.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.15-08-005	Verified.
14. Date of issuance of Final Order or Decision:	August 18, 2015	Verified.
15. File date of compensation request:	October 19, 2015	Verified.
16. Was the request for compensation timely?		Yes, AECA timely filed the request for intervenor compensation. The 60th day following the date of issuance of the Decision fell on a Saturday, allowing AECA to file on the following Monday (October 19, 2015). <i>See</i> Rule 1.15, CPUC Rules of Practice and Procedure.

**C. Additional Comments on Part I (use line reference # as appropriate):**

#	Intervenor's Comment(s)	CPUC Discussion
9	In multiple decisions over the past two decades (D.95-07-093; D.96-08-040; D.96-11-048; D.02-06-014; D.03-09-067, D.06-04-065. D.13-02-019), and most recently in D. 14-12-069, the Commission has found that AECA represents individual member farmers who have annual electricity bills of less than \$50,000, and that members' economic interest has been considered small in comparison to the costs of participation. For purposes of this proceeding, AECA had 309 active individual members (excluding agricultural associations and water district members) with 211 of those members having electricity bills of less than \$50,000. As a result AECA is seeking 68% (211÷309) of the total compensation found reasonable in this proceeding.	Verified.

**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. AECA litigation position set forth in testimony:</p> <p>a. Revise marginal cost and revenue allocation methodologies.</p> <p>b. Maintain the existing differential between peak and off-peak energy charges for super off-peak customers.</p> <p>c. Create agricultural balancing account.</p> <p>d. Address AG-ICE rate sunset and rate shock.</p> <p>e. Miscellaneous agricultural class proposals (e.g., TOU periods, demand and energy charges, advance metering infrastructure, dynamic pricing options).</p>	<p>a. Exh 9, pp. 4-40</p> <p>b. Exh 9, pp. 47-50</p> <p>c. Exh. 9, pp. 21-24</p> <p>d. Exh. 9, pp. 56-58</p> <p>e. Exh. 9, pp. 50-56</p> <p>As described in the following sections, AECA was a party to the Settlements approved by the Commission that resolved through negotiation and</p>	Verified.

	<p>mutual compromise the marginal cost, revenue allocation, rate design, and agricultural rate issues raised by AECA in testimony. (See D.15-08-005, adopting eight settlements, including the Marginal Cost and Revenue Allocation Settlement Agreement and the Agricultural Rate Design Settlement Agreement; links provided at pp. 6 and 7 of D.15-08-005.)</p>	
<p>2. AECA was an active party to the Marginal Cost and Revenue Allocation Settlement Agreement.</p> <p>The Settlement Agreement resolved all marginal cost and revenue allocation issues. While it did not address all of the issues AECA raised in testimony, it covered the saliency of them through the settled rates, and included specific consideration of key issues, such as an agricultural balancing account, and cost of service studies.</p> <p>“As can be seen by the detailed and complex nature of each settlement’s summary, PGE and the relevant interested parties have addressed a series of issues to their mutual satisfaction.”</p> <p>“The active parties hold differing views on numerous aspects of PG&amp;E’s initial marginal cost and revenue allocation proposals in Phase II</p>	<p>D.15-08-005, pp. 8-10, and Marginal Cost and Revenue Allocation Settlement Agreement, p. 2.</p> <p>D.15-08-005, pp. 6-10, and Marginal Cost and Revenue Allocation Settlement Agreement, pp. 1-4, 7, and 15-17.</p> <p>D.15-08-005, p. 8.</p> <p>Marginal Cost and Revenue Allocation Settlement Agreement, p. 1.</p>	<p>2. Verified.</p> <p>AECA’s representation of the terms of the settlement approved in Decision (D.)15-08-005 is accurate and its description of its prior litigation positions is also accurate. Pursuant to D.94-10-029, the Commission has discretion to award compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution to a decision. We find that AECA’s participation in the settlement made a substantial contribution to D.15-08-005.</p>

<p>of this [GRC] proceeding. However the Parties bargained earnestly and in good faith to seek a compromise and to develop this MC/RA Settlement Agreement, which is the product of arms-length negotiations among the Settling Parties on a number of disputed issues. These negotiations considered the interests of all the active parties on marginal cost and revenue allocation issues, and the MC/RA Settlement Agreement addresses each of these interests in a fair and balanced manner.”</p> <p>“The Settling Parties agree that this MC/RA Settlement Agreement is reasonable in light of the testimony submitted, consistent with the law, and in the public interest.”</p>	<p>Marginal Cost and Revenue Allocation Settlement Agreement, p. 3.</p>	
<p>3. AECA was an active party to the Agricultural Rate Design Settlement Agreement.</p> <p>“The Agricultural Settlement Agreement uses the revenue allocation agreed to in the MC/RA Settlement Agreement, and addresses certain rate design issues that were not resolved in that initial settlement.”</p> <p>AECA’s participation in the Settlement Agreement contributed to a lower rate</p>	<p>D.15-08-005, pp. 8-10 and Agricultural Rate Design Settlement Agreement, p. 1.</p> <p>D.15-08-005, pp. 20-21; <i>see also</i> Agricultural Rate Design Settlement Agreement, pp. 2</p> <p>D. 15-08-005, pp. 8-9, and 20-21; Marginal Cost and Revenue Allocation Settlement Agreement, p.</p>	<p>3. Verified.</p> <p>AECA’s representation of the terms of the settlement approved in D.15-08-005 is accurate and its description of its prior litigation positions is also accurate. Pursuant to D.94-10-029, the Commission has discretion to award compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution</p>

<p>increase for the agricultural class (0.95%) compared to proposed 3% increase. (See 1.a, b and e above, raised by AECA testimony.)</p> <p>AECA’s participation in the Settlement Agreement contributed to no new agricultural rates or rate options being established and established an agreement to discuss and develop new rate proposals for 2017. (See 1.a and b above, raised by AECA testimony.)</p> <p>AECA’s participation in the Settlement Agreement contributed to parties agreeing to work together to consider actions to extend the AG-ICE program to transition current customers and make a new program. (See 1.d above, raised by AECA testimony.)</p> <p>AECA’s participation in the Settlement Agreement contributed to different treatment of off-peak/peak differentials than originally proposed by PG&amp;E or any other party. (See 1.b above, raised by AECA in testimony.)</p> <p>AECA’s participation resulted in parties agreeing to additional analyses to examine an Agricultural Class Balancing Account. (See 1.c above, raised by AECA testimony.)</p>	<p>11, Table 1; Agricultural Rate Design Settlement Agreement, Appendix A (<i>see also</i> fn. 2 at p. 9).</p> <p>D.15-08-005, pp 9-10; Agricultural Rate Design Settlement Agreement, pp. 5-7.</p> <p>Agricultural Rate Design Settlement Agreement, p. 13.</p> <p>Agricultural Rate Design Settlement Agreement, pp. 5-7 and 10-12.</p> <p>D. 15-08-015, pp. 9-10; Marginal Cost and Revenue Allocation Settlement, pp. 15-16.</p>	<p>to a decision. We find that AECA’s participation in the settlement made a substantial contribution to D.15-08-005.</p>
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<p>AECA's participation in the Settlement Agreement resulted in parties agreeing to customer, demand and energy charges. (See I.e above, raised by AECA testimony.)</p>	<p>Agricultural Rate Settlement Agreement, pp. 8-9.</p>	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor's Assertion	CPUC Discussion
<p>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>1</sup></p>	Yes	Yes.
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	Yes.
<p>c. If so, provide name of other parties: California Farm Bureau Federation (CFBF)</p>		Agreed.
<p>d. <b>Intervenor's claim of non-duplication:</b> AECA and CFBF have historically submitted separate testimony in CPUC proceedings, raising distinct, non-duplicative issues, including recommended rate changes. During settlement negotiations the two agricultural groups coordinated our efforts. While both parties seek reasonable rates for agricultural customers, AECA has also specifically advocated for rate stability and demand management incentives, and effectively identified flaws in PG&amp;E's development of marginal costs to calculate rates for the agricultural class. AECA has consistently documented allocation inconsistencies and volatility in PG&amp;E's application of EPMC principals to the agricultural class. Here, AECA's efforts resulted in substantially lower rate increases than those proposed by PG&amp;E. In this proceeding, AECA also pursued the creation of demand-side management incentives, such as appropriate off-peak/peak energy rate differentials, discussion of aggregation options to encourage load shifting away from system peaks, and continuation of the AG-ICE program.</p> <p>AECA's efforts to avoid duplication with other parties and dedicated pursuit of important issues should be recognized by the Commission.</p>		Verified.

<sup>1</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.

**C. Additional Comments on Part II (use line reference # or letter as appropriate):**

<b>Intervenor’s Comment</b>	<b>CPUC Discussion</b>
<p>AECA was an active party to the Settlement Agreements on Marginal Costs and Revenue Allocation and Agricultural Rate Design filed, respectively, on July 16, 2014 and December 2, 2014, which were adopted in D.15-08-005.</p> <p>As in previous PG&amp;E Phase II proceedings, the Settlement Agreements did not adopt any of the settling parties’ specific marginal cost principles or proposals as the basis for the Settlement Agreements. The settling parties agreed to the negotiated settlements without litigating their various positions. AECA played a significant role in the final Revenue Allocation proposal reached as a part of the settlement. AECA successfully advocated for a moderated increase for agricultural customers. PG&amp;E had proposed to adjust all agricultural rates by 3% over system average rates. AECA’s efforts in the proceeding, which cast considerable doubt on PG&amp;E’s marginal cost methodologies, calculations and allocations as applied to the agricultural class, directly resulted in the 0.95% agricultural increase ultimately adopted.</p> <p>AECA’s active participation and expertise in the Agricultural Rate Design Settlement directly led to reduced adverse impacts on the agricultural class and more appropriate allocation of class-specific revenue. In addition, AECA successfully created a process for future rate design, enabling actual agricultural customers to participate in creation of any new rates. Additionally, AECA’s participation resulted in a process to discuss the continuation of AG-ICE rates and a potential new AG-ICE program. AECA’s active review and analysis of other parties’ rate design proposals and associated implications also contributed substantially to the Settlement Agreements.</p>	<p>The Commission agrees with AECA’s comments on its contributions to the Settlement Agreements.</p>

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

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

<p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>AECA’s request for intervenor compensation seeks an award of \$83,398.15 (\$122,644.35 X .68). The requested award is reasonable in light of the benefits achieved through AECA’s participation in the proceeding. AECA’s efforts on marginal cost and revenue allocation resulted in a direct decrease from PG&amp;E’s proposed 3% increase to 0.95% for agricultural customers. The adopted agricultural class revenue requirement was based entirely on a broad settlement, which AECA played a significant role in achieving.</p> <p>AECA also played a significant role in the agricultural rate design aspect of this proceeding, and in developing the balancing account</p>	<p style="text-align: center;"><b>CPUC Discussion</b></p> <hr/> <p>Verified.</p>
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<p>study proposal and extending the AG-ICE program. While direct ratepayer benefits are hard to calculate for a potential balancing account, AG-ICE rates could raise between 20% and 70%.</p> <p><b>a.</b> In sum, the Commission should conclude that AECA’s overall request is reasonable in light of the substantial benefits to PG&amp;E’s agricultural customers that are directly attributable to AECA’s participation.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>AECA’s request is reasonable in light of the scope of the proceeding and the length and complexity of settlement negotiations. AECA’s requested amount is far below its NOI total estimate of approximately \$175,000. The reduced amount reflects AECA’s efforts to effectively manage participation costs. AECA is not seeking travel or other costs of participation. In addition, AECA relied on well-priced economic experts to conduct research, respond to discovery, review data responses and conduct bill impact analysis and rate design scenarios, thereby minimizing attorney fees and further keeping costs in check. While this proceeding was not fully litigated through evidentiary hearings, settlement discussions were lengthy and complex, as reflected in the number of conference calls and exchanges necessary to achieve settlement of agricultural rate design issues. Given the number of parties involved in the overall proceeding, and also addressing agricultural class-related issues, and the complexity of the issues at stake, it is not unusual that settlement negotiations extended for many months.</p> <p>AECA submitted comprehensive testimony documenting ongoing shortcomings in PG&amp;E’s marginal cost and revenue allocation methodologies and calculations. AECA’s testimony also comprehensively addressed rate design issues specific to the agricultural class.</p> <p>ACEA submits that documented claimed hours are reasonable, both for each attorney and expert individually, and in the aggregate, and AECA respectfully asks that its request be granted.</p>	<p>Verified.</p>
<p><b>c. Allocation of hours by issue:</b></p> <p>AECA’s allocation of hours by issue is shown.</p>	<p>Verified. The Commission copied the allocation of hours by issue, below:</p> <p>6.00% - General Policy</p> <p>30.80% - Marginal Cost Methods</p> <p>37.90% - Revenue</p>

	Allocation 14.40% - Rate Design 2.20% - Account Aggregation 6.60% - Hydro Balancing Account 2.10% - ICE
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**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Ann L. Trowbridge Attorney	2013	17.70	\$400	D.14-12-069, Res. ALJ-308	\$7,080.00	17.70	395.00 D.14-12-069	\$6,991.50
Ann L. Trowbridge Attorney	2014	11.10	\$400	D.14-12-069, Res. ALJ-308	\$4,440.00	11.10	405.00 Res. ALJ-303	\$4,495.50
Ann L. Trowbridge Attorney	2015	1.10	\$400	D.14-12-069, Res. ALJ-308	\$440.00	1.10	405.00 Res. ALJ-308	\$445.50
Steven Moss Consultant	2013	102.25	\$205	D.14-12-069, Res. ALJ-308	\$20,961.25	102.25	210.00 D.15-09-016	\$21,472.50
Steven Moss Consultant	2014	35.00	\$205	D.14-12-069, Res. ALJ-308	\$7,175.00	35.00	215.00 Res. ALJ-303	\$7,525.00
Richard McCann Consultant	2013	117.50	\$205	D.14-12-069, Res. ALJ-308	\$24,087.50	117.50	205.00 Res. ALJ-287	\$24,087.50
Richard McCann Consultant	2014	33.52	\$205	D.14-12-069, Res. ALJ-308	\$6,871.60	33.52	210.00 Res. ALJ-303	\$7,039.20
Michael Boccadoro Ex. Dir./Adv.	2013	33.20	\$200	D.14-12-069, Res. ALJ-308	\$6,640.00	33.20	205.00 Res. ALJ-287	\$6,806.00
Michael Boccadoro Ex. Dir./Adv.	2014	49.40	\$200	D.14-12-069, Res. ALJ-308	\$9,880.00	49.40	210.00 Res. ALJ-303	\$10,374.00

**PROPOSED DECISION**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Beth Olhasso Asst. Ex. Dir./Adv.	2013	30.25	\$150	D.14-12-069, Res. ALJ-308	\$4,537.50	25.25 [1]	150.00	\$3,787.50
Beth Olhasso Asst. Ex. Dir./Adv.	2014	44.85	\$150	D.14-12-069, Res. ALJ-308	\$6,727.50	44.85	155.00 Res. ALJ- 308	\$6,951.75
Ashley Spaulding Consultant	2013	224.00	\$85	D.14-12-069, Res. ALJ-308	\$19,040.00	224.00	85.00 Res. ALJ- 287	\$19,040.00
Emmeline Kiyam Consultant	2013	11.75	\$76	D.14-12-069, Res. ALJ-308	\$893.00	11.75	75.00	\$881.25
Emmeline Kiyam Consultant	2014	13.50	\$76	D.14-12-069, Res. ALJ-308	\$1,026.00	13.50	75.00	\$1012.50
<b>Subtotal: \$119,799.35</b>						<b>Subtotal: \$120,909.70</b>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Ann L. Trowbridge	2013	2.10	\$200	D.14-12-069, Res. ALJ-308	\$420.00	2.10	197.50	\$414.75
Ann L. Trowbridge	2015	6.50	\$200	D.14-12-069, Res. ALJ-308	\$1,300.00	6.50	202.50	\$1,316.25
Beth Olhasso	2013	4.50	\$75	D.14-12-069, Res. ALJ-308	\$337.50	4.50	75.00	\$337.50
Beth Olhasso	2015	7.50	\$75	D.14-12-069, Res. ALJ-308	\$562.50	7.50	77.50	\$581.25
Michael Boccardo	2013	.75	\$100	D.14-12-069, Res. ALJ-308	\$75.00	0.75	102.50	\$76.88
Michael Boccardo	2015	1.50	\$100	D.14-12-069, Res. ALJ-308	\$150.00	1.50	105.00	\$157.50
<b>Subtotal: \$2,845.00</b>						<b>Subtotal: \$2,884.13</b>		
<b>SUBTOTAL: \$122,644.35</b>						<b>SUBTOTAL: \$123,793.83</b>		

<b>32% Reduction (See Part III.A.a, above): (-\$39,246.19)</b>	<b>32% Reduction (See Part III.A.a, above): \$39,614.03</b>
<b>TOTAL AWARD: \$83,398.16</b>	<b>TOTAL AWARD: \$84,125.80</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. 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>	

<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>2</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>
Ann L. Trowbridge	December 15, 1993	169591	No

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

<b>Comment #</b>	<b>Intervenor's Comment(s)</b>
Comment 1	AECA is not claiming any costs in this request. AECA has used electronic mail communication, phone and conference calls to reduce filing and meeting costs and keep overall costs to a minimum, further adding to the reasonableness of its claim.
Comment 2	Rational for Ann Trowbridge's hourly rate: AECA is requesting an hourly rate of \$400 in 2013, 2014, and 2015 for Ms. Trowbridge. Ms. Trowbridge last received \$400 for work performed in 2013 (D.14-12-069). Her rate remains at \$400 for 2014 and 2015, which places her at the low end of the range for attorneys with 15 plus years of experience (see Res. ALJ-308). Ms. Trowbridge graduated from University of the Pacific, McGeorge School of Law in 1993, and has practiced extensively before the Commission since the late 1990's.
Comment 3	Rational for Michael Boccadoro's hourly rate: AECA is requesting an hourly rate of \$200 for Mr. Boccadoro in 2013, 2014, and 2015. He last received \$200 for work performed in 2013 (D.14-12-069). His rate remains at \$200 for 2014 and 2015. He has over 20 years of experience as an energy policy and resource management expert.
Comment 4	Rationale for Beth Olhasso's hourly rate: AECA is requesting an hourly rate of \$150 for Ms. Olhasso in 2013, 2014, and 2015. She last received \$150 for work performed in 2013 (D.14-12-069). Her rate remains at \$150 for 2014 and 2015. She has over 4 years of relevant experience.
Comment 5	Rationale for Steven Moss' hourly rate: AECA is requesting an hourly rate of \$205 for Mr. Moss in 2013 and 2014, and 2015. He last received \$205 for work performed in 2011

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

<b>Comment #</b>	<b>Intervenor's Comment(s)</b>
	and 2012 (D.14-12-069). His rate remains at \$205 for 2013 and 2014. Mr. Moss has over 20 years of experience in energy consulting.
Comment 6	Rationale for Richard McCann's hourly rate: AECA is requesting an hourly rate of \$205 for Dr. McCann in 2013 and 2014. He last received \$205 for work performed in 2011 and 2012 (D.14-12-069). His rate remains at \$205 for 2013 and 2014. Dr. McCann has over 20 years of experience in energy consulting.
Comment 7	Rationale for Ashley Spaulding's hourly rate: AECA is requesting an hourly rate of \$85 for Ms. Spaulding in 2013. She last received \$85 for work performed in 2011 and 2012 (D.14-12-069). Her rate remains at \$185 for 2013. The requested rate is below the energy expert floor range of \$135 to \$140 for energy experts with 0-6 years of experience and is therefore reasonable.
Comment 8	Rationale for Emmeline Kiyani's hourly rate: AECA is requesting an hourly rate of \$76 for Ms. Kiyani in 2013 and 2014. The requested rate is below the energy expert floor range of \$135 to \$140 for energy experts with 0-6 years of experience and is therefore reasonable. She has over 4 years of relevant experience.
Comment 9	Issue Codes for detailed time sheets and percent of time per issue: GP General Policy: 6.00% MC Marginal Cost Methods: 30.80% RA Revenue Allocation: 37.90% RD Rate Design: 14.40% AA Account Aggregation: 2.20% HYDRO Balancing Account: 6.60% AG-ICE AG-ICE Tariff: 2.10%
Comment 1	AECA is not claiming any costs in this request. AECA has used electronic mail communication, phone and conference calls to reduce filing and meeting costs and keep overall costs to a minimum, further adding to the reasonableness of its claim.

**D. CPUC Disallowances and Adjustments:**

<b>Item</b>	<b>Reason</b>
[1]	Olhasso's timesheet indicates 5 hours in 2013 were spent communicating and briefing AECA members. Such activity did not substantially contribute to the proceeding and is not compensable by the Commission.

**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 (see Rule 14.6(c)(6))?</b>	Yes.

**FINDINGS OF FACT**

1. Agricultural Energy Consumers Association has made a substantial contribution to D.15-08-005.
2. The requested hourly rates for Agricultural Energy Consumers Association’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 \$84,125.80.

**CONCLUSION OF LAW**

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

**ORDER**

1. Agricultural Energy Consumers Association is awarded \$84,125.80.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay Agricultural Energy Consumers Association the total award. 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 January 02, 2016, the 75<sup>th</sup> day after the filing of Intervenor’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 \_\_\_\_\_, at San Francisco, California

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1508005		
<b>Proceeding(s):</b>	R1304012		
<b>Author:</b>	ALJ Roscow		
<b>Payer(s):</b>	Pacific Gas and 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>
Agricultural Energy Consumers Association (AECA)	10/19/2015	\$83,398.16	\$84,125.80	N/A	<i>See</i> CPUC Disallowances and Adjustments, above.

**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>
Ann L.	Trowbridge	Attorney	AECA	\$400.00	2013	\$395.00
Ann L.	Trowbridge	Attorney	AECA	\$400.00	2014	\$405.00
Ann L.	Trowbridge	Attorney	AECA	\$400.00	2015	\$405.00
Steven	Moss	Expert	AECA	\$205.00	2013	\$210.00
Steven	Moss	Expert	AECA	\$205.00	2014	\$215.00
Richard	McCann	Expert	AECA	\$205.00	2013	\$205.00
Richard	McCann	Expert	AECA	\$205.00	2014	\$210.00
Michael	Boccadoro	Advocate	AECA	\$200.00	2013	\$205.00
Michael	Boccadoro	Advocate	AECA	\$200.00	2014	\$210.00

**PROPOSED DECISION**

<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>
Michael	Boccardo	Advocate	AECA	\$200.00	2015	\$210.00
Beth	Olhasso	Advocate	AECA	\$150.00	2013	\$150.00
Beth	Olhasso	Advocate	AECA	\$150.00	2014	\$155.00
Beth	Olhasso	Advocate	AECA	\$150.00	2015	\$155.00
Ashley	Spaulding	Expert	AECA	\$85.00	2013	\$85.00
Emmeline	Kiyan	Expert	AECA	\$76.00	2013	\$75.00
Emmeline	Kiyan	Expert	AECA	\$76.00	2014	\$75.00

**(END OF APPENDIX)**