

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Joint Application of Comcast Corporation, Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC for Expedited Approval of the Transfer of Control of Time Warner Cable Information Services (California), LLC (U-6874- C); and the Pro Forma Transfer of Control of Bright House Networks Information Services (California), LLC (U-6955-C), to Comcast Corporation Pursuant to California Public Utilities Code Section 854(a).

Application 14-04-013
(Filed April 11, 2014)

And Related Matter.

Application 14-06-012

**DECISION GRANTING COMPENSATION TO
THE GREENLINING INSTITUTE
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-07-037**

Intervenor: The Greenlining Institute	For contribution to Decision 15-07-037
Claimed: \$64,317.00	Awarded: \$56,931.00 (~11.48% reduction)
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Karl J. Bemserfer

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.15-07-037 granted the motion of the Joint Applicants to withdraw their merger application.
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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):	July 2, 2015	July 2, 2014
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	July 30, 2015	July 30, 2014

4. Was the NOI timely filed?		Yes, The Greenlining Institute (Greenlining) timely filed the notice of intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.10-02-005	Verified.
6. Date of ALJ ruling:	March 29, 2010	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, Greenling demonstrated appropriate status.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.10-11-002	Verified.
10. Date of ALJ ruling:	7/16/2013	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, Greenlining demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.15-07-037	Verified.
14. Date of issuance of Final Order or Decision:	July 23, 2015	July 29, 2015.
15. File date of compensation request:	September 28, 2015	Verified. The Commission notes, however, that Greenlining did not file a complete and acceptable claim on September 28, 2015. The claim was not complete until November 17, 2015. As such, the request for compensation is timely, based on the original date of submission, but the date for purposes of determining compliance with Cal. Pub. Util. Code

		§1804(e) is November 17, 2015.
16. Was the request for compensation timely?		Yes, Greenlining timely filed the request for intervenor compensation.

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>A. Commission Jurisdiction (854 and 706)</p> <p>Greenlining argued that the Commission had the authority to review the broadband effects of the merger under Public Utilities Code section 854.</p> <p>Greenlining argued that the proposed transaction would result in a company that continued to deny the Commission’s jurisdiction.</p> <p>Greenlining argued that Joint Applicants’ failure to amend their Application to address the broadband impacts of the proposed transaction was grounds for a motion to dismiss.</p> <p>Greenlining argued that the Commission had jurisdiction to review the broadband effects of the merger under section 706 of the Telecommunications Act.</p> <p>“Judge Bemserfer (or assigned Administrative Law Judge (ALJ)) and the assigned Commissioner issued a Scoping Memorandum by ruling on August 14, 2014, stating that this Commission may evaluate the broadband aspects of the merger between Comcast and Time Warner within the limited authority granted under Pub. Util. Code §§ 854 and 706(a) of the</p>	<p>Protest at 3-4.</p> <p>Protest at 23.</p> <p>Joint Consumers’ Motion to Dismiss at 6.</p> <p>Ex parte letter to ALJ Karl Bemserfer, July 22, 2014.</p>	<p>Verified.</p>

<p>expense of increasing barriers to entry and further entrenching Comcast’s dominance in the broadband marketplace.”</p>		
<p>C. Competition</p> <p>Greenlining argued that the proposed transaction threatened to harm competition, particularly in Los Angeles markets.</p> <p>Greenlining argued that the proposed transaction would harm competition by eliminating a “maverick” provider.</p> <p>Greenlining argued that the proposed transaction would increase the combined company’s power to act as a “network gatekeeper” and determine what content consumers could access.</p> <p>Greenlining argued that the proposed transaction would increase the combined company would use its power as a “network gatekeeper” to hinder competitors’ online video streaming services.</p> <p>Greenlining argued that the proposed transaction would increase the combined company’s power to act as a “network gatekeeper” and forestall device innovation.</p> <p>Greenlining argued that the proposed transaction would result in a combined company that would use its market power over bundled services to harm competition.</p> <p>“Greenlining...also raised the concern that a combined Comcast and Time Warner would have</p>	<p>Protest at 12-13.</p> <p>Protest at 18.</p> <p>Reply Brief at 4, 20</p> <p>Reply Brief at 7, 17</p> <p>Reply Brief at 11.</p> <p>Reply Brief at 15.</p>	<p>Greenlining, TURN, ORA, Writers Guild, Media Alliance, and the Joint Minority parties each addressed harm to competition. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.¹</p>

¹ See Pub. Util. Code §1801.3(f) (stating that intervenor compensation program articles “shall be administered in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.”); see also D.15-05-016.

<p>enormous capacity to damage startup activity, online content, and new innovations through exploiting their terminating access monopoly power as a result of the post-merger entity’s significant increase in market share.”</p>	<p>Decision at 16.</p>	
<p>D. Broadband deployment in unserved and underserved areas</p> <p>Greenlining argued that the proposed transaction would not result in increased broadband deployment to schools and libraries.</p> <p>Greenlining argued that the proposed transaction would not improve deployment of broadband to unserved and underserved areas.</p> <p>“Greenlining...questioned Comcast’s claims regarding merger specific efficiencies, especially as they related to California.”</p> <p>“Greenlining...claimed that Joint Applicants’ assertions of merger efficiencies were unverifiable, vague, selective, not merger-specific and did not hold up to scrutiny.... In addition, Greenlining...claimed that past experience shows that the transaction would cause significant disruptions and substantial diversion of resources to integration efforts. Further, Greenlining...claimed that the proposed transaction would result in a combined company that maintained Comcast’s insufficient commitment to diversity.”</p>	<p>Reply Brief at 13.</p> <p>Reply Brief at 14.</p> <p>Decision at 17.</p> <p>Decision at 17-18.</p>	<p>Verified.</p>
<p>E. Quality of Service</p> <p>Greenlining argued that the proposed transaction would not result in improved quality of service.</p>	<p>Reply Brief at 31</p>	<p>Greenlining/Consumers Union, CforAT, and Media Alliance each addressed service</p>

<p>Greenlining argued that Comcast’s behavior raised serious questions about how Comcast treats its current customers, and how it would treat new customers post-merger.</p> <p>“Greenlining...argued that the merger would bode poorly for broadband and voice customers because it represented a merger of companies that had an objectively poor track record in providing customer service.</p> <p>Greenlining...asserted that the proposed transaction would not improve service quality for consumers.”</p>	<p>Protest at 10; Reply Brief at 32.</p> <p>(Decision at 19).</p>	<p>quality. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>
<p>F. Effects on California Consumers/Internet Essentials</p> <p>Greenlining argued that the proposed transaction would result in Time Warner Cable’s no longer offering Lifeline service in California, reducing the availability of low-cost phone service to low-income customers.</p> <p>Greenlining argued that the Joint Applicants’ extension of the Internet Essentials program would not increase adoption of broadband services by low-income consumers.</p> <p>Greenlining pointed out that Joint Applicants made no commitments to offer standalone Internet access.</p> <p>“Greenlining...claimed that extending the IE program to low-income customers in Time Warner’s territory would not help educate consumers on using computers and the Internet.</p> <p>Greenlining...pointed out that expanding Comcast’s digital literacy training to current Time Warner customers would not</p>	<p>Protest at 13;</p> <p>Reply Brief at 23.</p> <p>Reply Brief at 28.</p> <p>Decision at 20.</p>	<p>Verified.</p>

<p>likely result in a meaningful increase in digital literacy, particularly in light of the fact that Joint Applicants appeared unwilling to make a binding commitment to continue the IE program.”</p>		
<p>G. Mitigation Measures</p> <p>Greenlining argued that there were no mitigation measures sufficient to ensure that the proposed transactions were in the public interest.</p> <p>“The PD would have approved the license transfers subject to multiple conditions responsive to concerns raised by the intervenors regarding the potential adverse impact of the parent corporation merger on customers and suppliers of the merged entity. The APD would have denied the applications based on the same set of concerns.”</p>	<p>Reply Brief at 49; Opening Comments on Proposed Decision; Reply Comments on Proposed Decision.</p> <p>See Comment A.</p> <p>Decision at 22-23.</p>	<p>Greenlining, and the other intervenors, each addressed mitigation measures. This demonstrates that the parties failed to adequately coordinate on this issue, which resulted in a duplicative effort.</p>

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?</p>	<p>Yes</p>	<p>Yes.</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Yes.</p>
<p>c. If so, provide name of other parties: California Emerging Technology Fund, Center for Accessible Technology (CforAT), Common Cause, Consumers Union, Dish Network, Entravision Communications Corporation, Joint Minority Parties, Media Alliance, The Utility Reform Network, and Writers Guild of America, West</p>	<p>Yes.</p>	
<p>d. Intervenor’s claim of non-duplication:</p> <p>Greenlining’s work in this proceeding was fundamentally different from that of ORA or the other consumer advocates, in that it focused specifically on the proposed merger’s impacts on communities of color and low income communities. This perspective influenced many of the positions Greenlining took in the proceeding. Some of the issues, like the effects of the proposed transaction on Lifeline services</p>	<p>Preventable duplication between the parties occurred. The Commission reduced Greenlining’s</p>	

<p>and Comcast’s treatment of current and future customers were unique to Greenlining and its constituency.</p> <p>Throughout the proceeding, Greenlining in regular contact with advocates from TURN, Consumers Union, Center for Accessible Technology, Writers Guild of America, West and other highly active parties to ensure that Greenlining’s work was not duplicative. For example, Greenlining did not focus on economic issues that ORA or TURN focused on. Where parties agreed, they coordinated rather than merely echoing each other. In fact, just over 9% of Greenlining’s reported hours are related to emails or phone calls regarding coordination of efforts. When possible, Greenlining coordinated on joint filings to avoid duplicative efforts (see Comment B).</p> <p>In many instances, Greenlining had a different view of a particular issue than did other active parties, thus offering the Commission several viewpoints and supporting rationales to evaluate. Additionally, Greenlining was active in the federal proceedings examining this merger, which to the best of Greenlining’s knowledge many other parties were not. While the proceedings overlapped substantially in the issues they covered, this provided a broader point of view from which Greenlining argued.</p> <p>Greenlining is claiming compensation only for the work its own attorneys performed.</p>	<p>hours, as discussed below.</p>
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C. Additional Comments on Part:

#	Intervenor’s Comment	CPUC Discussion
A	<p>The Final Decision specifically notes Greenlining and other intervenors’ contribution to that decision:</p> <p>“As detailed in the foregoing procedural history, during the sixteen months that these consolidated proceedings have been open, the intervenors have set forth their positions in comments, testimony, and documentary evidence, which resulted in a development of a full record. A proposed decision (PD) and an alternate proposed decision (APD) were prepared and circulated for comments. Intervenors made extensive comments on both the PD and the APD. The PD would have approved the license transfers subject to multiple conditions responsive to concerns raised by the intervenors regarding the potential adverse impact of the parent corporation merger on customers and suppliers of the merged entity. The APD would have denied the applications based on the same set of concerns.” (Decision at 22-23).</p> <p>As the final Decision notes, Greenlining’s efforts led to a fully developed record in this proceeding, and those efforts made a substantial contribution to both the PD and APD. Additionally, the Final Decision explicitly acknowledges the contribution of Greenlining’s (and other parties’) contribution to the Final Decision: “...the work and contributions to the proceedings by the various parties through their efficient and effective participation should not disappear. Accordingly, despite the grant of the motion, the record for the proceeding shall be preserved.” (Decision at 24).</p>	<p>Verified. The Commission agrees that intervenors, including Greenlining, contributed to the proceeding and intervenors may seek intervenor compensation.</p>

	Finally, the Final Decision notes that “[g]ranting Joint Applicants’ motion to withdraw the applications is functionally equivalent to an order permitting any qualifying intervenor to seek compensation for its contributions to the proceeding” (COL 5), and that “[t]he grant of the motion to withdraw does not preclude an intervenor from seeking intervenor compensation under Pub. Util. Code §§ 1801-1812.” (COL 6)	
B	<p>Greenlining’s joint submissions included:</p> <p>Response to Motion to Dismiss with Center for Accessible Technology (CforAT), The Utility Reform Network (TURN) and Writers Guild of America, West (WGAW)</p> <p>Motion to Dismiss with TURN and Office of Ratepayer Advocates (ORA)</p> <p>Reply Brief with Consumers Union</p> <p>Ex Parte Letter with TURN, CforAT, Media Alliance, WGAW, California Common Cause and ORA.</p> <p>Opening Comments on PD (granting merger with conditions) with Consumers Union</p> <p>Reply Comments on PD (granting merger with conditions) with Consumers Union</p> <p>Opening Comments on PD (motion to dismiss) with Consumers Union</p> <p>Joint Reply Comments on PD (motion to dismiss) with Consumers Union</p>	Verified.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>Given the sheer volume of the transaction, the transaction would have given the expanded Comcast over 85% of the California broadband customer base. Even if each of these customers only saved one dollar each by avoiding higher priced plans, the loss of LifeLine services, the elimination of jobs, etc., the total amount of savings would vastly exceed the amount Greenlining claims here. Accordingly, Greenlining asserts that the cost of its participation is reasonable in light of the enormous consumer benefits realized as a result of participation.</p>	<p style="text-align: center;">CPUC Discussion</p> <hr/> <p>Verified.</p>
<p>b. Reasonableness of hours claimed:</p> <p>Greenlining’s hours were reasonable given the immense volume of information, much of it highly technical or legally complex, that was being considered in this proceeding. Greenlining sought to maintain a streamlined process of work assignments internally, with minimal supervisory involvement, which allowed the key expertise to reside in the active advocate, Mr. Goodman. Each came into the proceeding possessing different, complementary areas of expertise, and each stuck to these areas throughout the proceeding, which eliminated overlapping efforts and ensured that each person was efficient, by working on the areas of his expertise.</p>	<p>Verified, but see CPUC Disallowances and Adjustments, below.</p>

<p>Greenlining staff recorded an unusual amount of time in the General Category because the Commission conducted several workshops and Public Participation Hearings because of this proceeding’s complexity and potentially large impact on California consumers. These added a certain amount of time that would not be present in a strictly on paper proceeding. Additionally, this proceeding involved a large number of procedural motions (including a motion to dismiss), and the Commission conducted a lengthy law and motion hearing to resolve outstanding discovery issues.</p> <p>Where personnel were analyzing data request responses that <i>were</i> relevant to issues discussed above, the time was recorded in the appropriate issue category. However, time spent sorting through discovery to find the relevant information, as well as time spent reviewing the voluminous pleadings in this proceeding, was recorded in the General category.</p> <p>Additionally, Greenlining has recorded a number of hours in the “coordination” category. A large number of parties opposed the merger. Greenlining spent substantial time coordinating with many of those parties. Additionally, Greenlining spent a significant amount of time working with parties who were not familiar with the Commission's merger review process (and, in some instances, were participating at the CPUC for the first time), enabling</p>	
<p>c. Allocation of hours by issue:</p> <p>A. Commission Jurisdiction – 12.6% B. Widened Digital Divide and Broadband Deployment in Unserved and Underserved Areas – 8.0% C. Competitive Effects – 6.2% D. Merger-Specific and Verifiable Efficiencies – 2.5% E. Service Quality – 6.8% F. Effects on Communities of Color – 15.9% G. Mitigation Measures – 15.5% H. General – 22.7% I. Coordination Between Parties – 9.8%</p>	<p>Because of the duplication with other parties, discussed above, the Commission disallows 25% of the hours claimed related to “C. Competitive Effects,” “E. Service Quality,” and “G. Mitigation Measures.”</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours [1]	Rate \$	Total \$
Paul Goodman	2014	115.9	320	D.15-05-050	\$37,088.00	108.52	320.00 [2]	32,726.40
Paul Goodman	2015	48	330	See Comment A.	\$15,840.00	43.20	320.00	13,824.00
Stephanie	2014	12.4	230	A.11-05-017	\$2,852.00	10.97	230.00	2,532.10

Chen								
Stephanie Chen	2015	16.7	310	See Comment B.	\$5,177.00	14.75 [3]	310.00 [4]	4,572.50
Subtotal: \$60,957.00						Subtotal: \$853,655.00		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Paul Goodman— Travel to Los Angeles All-Party	2015	4	165	See Comment A.	\$660.00	4.00	160.00	640.00
Stephanie Chen— Travel to Los Angeles All-Party	2015	4	155	See Comment B.	\$620.00	4.00	155.00	620.00
Subtotal: \$1280.00						Subtotal: \$1,260.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Paul Goodman	2015	12.6	165	See Comment B.	2079	12.6	160.00	2,016.00
Subtotal: \$2079.00						Subtotal: \$2,016.00		
TOTAL REQUEST: \$64,317.00						TOTAL AWARD: \$56,931.00		
<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. 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 ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Paul Goodman	04/24/2002	219086	No
Stephanie Chen	08/23/2010	270917	No

C. Attachments Documenting Specific Claim and Comments on Part III

Comment #	Intervenor's Comment(s)
A	Mr. Goodman's first Commission approved rate was for work done in 2011. Mr. Goodman is now in his fifth year of practice before the Commission. Resolution ALJ-308 sets the range for work done in 2015 for attorneys with 13+ years of experience at \$320-570. \$330 is an appropriate rate for Mr. Goodman's work in 2015.
B	Ms. Chen's first Commission approved rate was for work done in 2010. Ms. Chen is now in her 6 th year of practice before the Commission. Resolution ALJ-308 sets the range for work done in 2015 for attorneys with 5-7 years of experience at \$300-\$320. As 6 is the mid-point between 5 and 7 (years of experience) and \$310 is the mid-point between \$300 and \$320, \$310 is an appropriate rate for Ms. Chen's work in 2015.

D. CPUC Disallowances and Adjustments:

Item	Reason
[1]	Because of the duplication with other parties, the Commission disallows 25% of the hours claimed related to "C. Competitive Effects," "E. Service Quality," and "G. Mitigation Measures."
[2]	D.14-12-061 established Goodman's initial hourly rate. D.14-12-061 determined that Goodman's relevant utility law experience began in 2010 and Goodman did not appear before the Commission until 2011. Resolution ALJ-308 did not adopt a cost-of-living adjustment for 2015. Therefore, the Commission sets Goodman's 2015 rate at \$320.
[3]	Hours claimed for the following communications are disallowed due to the absence of supporting documentation. Pursuant to the scoping memo, this proceeding is subject to the ex parte reporting requirements of Rule 8.3 of the Commission's Rules of Practice and Procedure. The record of this proceeding shows two ex parte notices were filed by the Greenlining Institute, corresponding to ex parte meetings that occurred on June 3, 2014, June 12, 2014, and June 13, 2014. However, there is no record of the following ex parte communications for which Greenlining Institute seeks compensation: <u>Chen</u> 03/07/14 – 0.5 hours meeting with Van Wambeke; 0.5 hours for meeting with Bawa.

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

	03/17/14 – 0.5 hours meeting with Terkurst and Hammond. 03/13/15 – 1 hour meeting with Glegola.
[4]	Chen now has 5-7 years of experience practicing before the Commission. Therefore, we set a 2015 rate of \$310 for Chen.

PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))**

<p>A. Opposition: Did any party oppose the Claim?</p>	<p>Yes. On October 28, 2015, Comcast Corporation (Comcast) filed a response to the claim.</p> <p>Comcast contends that Greenlining’s request claims hours that are not only duplicative of other parties, including ORA, TURN, NAAC, and CETF, but also internally duplicative.</p> <p>On November 12, 2015, Greenlining filed a reply to Comcast’s response. Greenlining argues that it correctly claimed a reasonable amount of hours and did not engage in duplication (because of the scope and accelerated scheduling). Greenlining states that it should be fully compensated for participation in the proceeding.</p> <p>The Commission notes the arguments made by Comcast and Greenlining and has addressed their concerns in this decision.</p>
<p>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</p>	<p>Yes.</p>

FINDINGS OF FACT

1. The Greenlining Institute has made a substantial contribution to Decision 15-07-037.
2. The requested hourly rates for The Greenlining Institute’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 are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$56,931.00.

CONCLUSION OF LAW

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

ORDER

1. The Greenlining Institute shall be awarded \$56,931.00.
2. Within 30 days of the effective date of this decision Comcast Corporation, Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC shall pay The Greenlining Institute their respective shares of the award, based on their California-jurisdictional telecommunications 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 January 31, 2016, the 75th day after the filing of The Utility Reform Network'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 Sacramento, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D1507037		
Proceeding(s):	A1404013		
Author:	ALJ Bemserderfer		
Payer(s):	Comcast Corporation, Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Greenlining Institute	Incorrectly filed on 09/28/2015; published on 11/17/15.	\$64,317.00	\$56,931.00	N/A	See Disallowances & Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Paul	Goodman	Attorney	Greenlining	320.00	2014	320.00
Paul	Goodman	Attorney	Greenlining	330.00	2015	320.00
Stephanie	Chen	Attorney	Greenlining	230.00	2014	230.00
Stephanie	Chen	Attorney	Greenlining	310.00	2015	310.00

(END OF APPENDIX)