

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Conduct a Comprehensive Examination of the California Teleconnect Fund.

Rulemaking 13-01-010
(Filed on January 24, 2013)

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-07-007

Intervenor: Center for Accessible Technology (CforAT)	For contribution to Decision (D.) 15-07-007
Claimed: \$ 78,116.19	Awarded: \$71,953.34 (~7.89% reduction)
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Sophia J. Park

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision resolves the Phase 1 and 2 rulemaking issues for the California Teleconnect Fund (CTF) program by adopting restated program goals and a number of program design reform measures.
--	---

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):	June 19, 2013	Verified.
2. Other specified date for NOI:	30 days after the deadline for filing responsive pleadings (Rule 17.1(a)(2) of the Commission’s Rules of Practice and Procedure)	Verified.

3. Date NOI filed:	April 17, 2013 See comment below.	Verified. See discussion in Part I.C., below.
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:	See below	Verified. <i>See</i> ALJ Ruling in Rulemaking (R.) 13-03-008.
6. Date of ALJ ruling:	See below	June 14, 2013.
7. Based on another CPUC determination (specify):	<p>CforAT has routinely been found to have “Category 3” customer status in that we are authorized by our bylaws “to actively participate and intervene before government entities, including but not limited to the California Public Utilities Commission, on all matters that [the organization] deems appropriate that will affect directly or indirectly the interests of residential customers with disabilities, ratepayers with disabilities, small businesses owned by people with disabilities, including customers who receive bundled electric service from an electrical corporation.”</p> <p>CforAT’s bylaws were submitted to the Commission with our NOI in A.10-03-014, which was filed on</p>	N/A

	<p>August 29, 2011. An additional copy can be provided upon request.</p> <p>CforAT’s most recent determination of customer status appears in D.15-08-038, awarding compensation for work in A.11-03-014 et al.</p>	
<p>8. Has the Intervenor demonstrated customer or customer-related status?</p>	<p>Yes.</p>	
<p>Showing of “significant financial hardship” (§ 1802(g)):</p>		
<p>9. Based on ALJ ruling issued in proceeding number:</p>	<p>See below.</p>	<p>R.13-03-008.</p>
<p>10. Date of ALJ ruling:</p>	<p>See below.</p>	<p>June 14, 2013.</p>
<p>11. Based on another CPUC determination (specify):</p>	<p>CforAT’s most recent determination that it has made a showing of significant financial hardship is now over a year old (see Ruling issued on 8/26/14 in A.14-04-013). Since that time, CforAT has requested new rulings on its status, but none have been issued. At all times before and after the most recent ruling was issued, CforAT has represented the interests of our constituency of utility customers with disabilities (including many low-income customers) for no charge to the community. CforAT relies on the intervenor compensation program to sustain our ability to represent this unique constituency before the Commission.</p>	<p>N/A</p>

2. Has the Intervenor demonstrated significant financial hardship?		Yes. CforAT possessed a one-year rebuttable presumption of eligibility based on the finding in R.13-03-008.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	Decision 15-07-007	Verified.
14. Date of issuance of Final Order or Decision:	July 23, 2015	Verified.
15. File date of compensation request:	September 22, 2015	Verified.
16. Was the request for compensation timely?		Yes.

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
	<p>During the preparation of this Request for Compensation, CforAT discovered that our NOI is not listed on the docket for this proceeding. Upon further review, CforAT located our receipt for submission of our NOI through the electronic filing system (Confirmation No. 63986), dated April 17, 2013, and a copy of the service email showing that the NOI was served on all parties at that time. Copies of the receipt and the email, as well as the NOI and its associated Certificate of Service, are attached to this Request. CforAT has been unable to locate any emails from the Docket Office either accepting or rejecting the NOI in this proceeding. However, CforAT has routinely been found eligible for compensation for its participation before the Commission and all parties in this proceeding were provided with appropriate notice that we would be seeking compensation for our work in this docket. CforAT thus respectfully requests that this documentation showing that our NOI was timely submitted for filing and was also served on all parties to be deemed adequate. If the Commission prefers that further action be taken, CforAT respectfully</p>	<p>CforAT submitted its notice of intent to claim intervenor compensation on April 17, 2013. On June 12, 2013, the Commission's Docket Office rejected CforAT's NOI.</p> <p>In its request for compensation, CforAT affirmed that it did not receive notice of the rejection. Therefore, on December 12, 2015, the Commission re-issued the notice of rejection, allowing intervenor 7 days to cure deficiencies.</p> <p>CforAT submitted a corrected NOI on December 14, 2015. Because CforAT cured the deficiencies found in the original NOI within 7 days of receiving the notice of rejection, Intervenor's NOI was deemed filed on the original filing date: April 17, 2013. (<i>See</i> Rule 1.14(d) of the Commission's Rules of Practice and Procedure.)</p>

	requests an opportunity to take any such action as may be directed.	
--	---	--

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>Program Goals:</p> <ol style="list-style-type: none"> 1. CforAT helped shape the restated program goals for CTF. 2. Procedurally, the ALJ adopted CforAT’s arguments that a restatement of the CTF program goals (Phase 1 of this proceeding) should not be finalized until program design issues were also addressed. 3. CforAT (as part of “Joint Consumers” along with other consumer advocates) subsequently argued that the focus of the restated goals should be to clarify current efforts rather than to expand or redirect the program. 	<ul style="list-style-type: none"> • Center for Accessible Technology’s Opening Comments on Appendix A. of Joint Ruling, filed May 21, 2013 and Center for Accessible Technology’s Reply Comments on Appendix A of Joint Ruling, filed on June 7, 2013 substantively addressed program goals. • In our Prehearing Conference Statement (filed on June 7, 2013 but mistakenly captioned identically to our Reply Comments on Appendix A, filed on the same date), CforAT argued that the Commission should review program data before attempting to revise the program goals. PHC Statement at p. 1. CforAT also addressed this issue at the PHC. Reporter’s Transcript at p. 26:5-18:23. • CforAT’s position was adopted in the Assigned Commissioner’s Scoping Memo and Ruling (Scoping Memo), issued on November 5, 2013. See Scoping Memo at pp. 2-3, consolidating Phase I and Phase II of this proceeding, and citing CforAT (along with other parties) as arguing persuasively for this outcome. • Final Decision at p. 12 (agreeing with Joint Consumers about the focus of restated goals). 	<p>Verified with the exception that CforAT’s Opening Comments on Appendix A and Prehearing Conference Statement are not found on the Proceeding’s Docket Card. Therefore, we find that these documents did not contribute to the Decision. No compensation will be awarded for Intervenor’s work on these documents that were never filed with the Commission.</p>
<p>CBO Issues:</p> <ol style="list-style-type: none"> 4. CforAT worked to ensure 	<ul style="list-style-type: none"> • Much of the activity in this proceeding focused on potential 	<p>Verified.</p>

<p>that disability-related CBOs were aware of the potential changes under consideration for the CTF program and to collect feedback to address issues of concern for organizations that serve our constituency. By reaching out through our network of interested CBOs, we were better able to prioritize and reflect community concerns.</p>	<p>modifications to the eligibility requirements for CBOs to receive support from CTF. Because of the importance of this issue, the Commission engaged in extraordinary efforts to seek input from CBOs that might potentially be impacted. See, e.g. the discussion at the PHC that the Commission would create a special mailbox to solicit CBO input. RT 3:19-4:9.</p> <ul style="list-style-type: none"> • CforAT contributed to this effort via work with disability-related CBOs to encourage them to provide information to the Commission. This included efforts to work with the California Foundation of Independent Living Centers, an umbrella organization that serves Independent Living Centers throughout California, to assist them in supporting the ability of people with disabilities to live independently. • CforAT, along with TURN, also worked with CD to clarify and better understand collected data regarding historical draws on the Fund from CBOs and projections of future anticipated claims on the Fund. 	
<p>Proposals:</p> <p>5. In making proposals to update the CTF program and in reviewing proposals by Energy Division (ED) and other parties, CforAT focused on issues of CBO eligibility, including a focus on the need to consider who is served by a CBO as well as the definition of educational services and the provision of direct versus indirect</p>	<ul style="list-style-type: none"> • See Center for Accessible Technology’s Revised Phase II Proposal, filed on June 18, 2014, as well as CforAT’s initial Phase II proposal, filed on February 11, 2014, for CforAT’s affirmative proposals. • The Final Decision notes some of CforAT’s direct contributions to the changes to CBO eligibility, including the focus on direct versus indirect internet access (Final Decision at p. 28), the rejection of eligibility criteria that rested on zip-code characteristics (Final Decision 	<p>Verified.</p>

<p>service. CforAT also addressed the unique needs of health care providers and gave input on eligibility and other factors affecting other CTF recipient groups.</p>	<p>at p. 28), the exclusion of support for internet access used solely for administrative purposes (Final Decision at p. 30), the exclusion of for-profit hospitals from the Health Care/Health Services CBO category (Final Decision at p. 33). CforAT also supported additional positions adopted in the Final Decision without citation, such as the adoption of a \$5M revenue cap for CBO eligibility (Final Decision at pp. 26-27)</p>	
<p>Consensus Process:</p> <p>6. CforAT supported a proposal initially made by Cox Communication to pursue consensus, and actively participated in “subgroups” of the consensus process on issues of concern, including a subgroup addressing CBO eligibility, a subgroup addressing the definition of “educational services” provided by CBOs and a subgroup addressing the unique concerns of healthcare/health-related CBOs. Most of the Consensus recommendations were eventually incorporated into the Final Decision.</p>	<ul style="list-style-type: none"> • See Joint Consensus Recommendations and Summary Report, filed on September 9, 2014 (by CalTel on behalf of all participants in the consensus process). • The Final Decision repeatedly references and incorporates the consensus recommendations. See e.g. discussion of the definition of “educational instruction” at pp. 22-23 (“The Joint Parties’ Consensus Recommendations included a definition of qualifying ‘educational instruction’ . . . This [proposed definition] provided an excellent foundation for the definition we adopt today”). Similarly, the Joint Parties’ Consensus Recommendations supported creating of a separate category of health care CBOs, which was adopted in the Final Decision (Final Decision at pp. 31-37). 	<p>Verified.</p>
<p>Additional Issues:</p> <p>7. For those issues that were not resolved through the consensus process, CforAT worked with other consumer advocates to provide input on how best</p>	<ul style="list-style-type: none"> • See Joint Consumer Comments and Reply Comments on Phase I Issues, Phase II Issues, and Party Proposals, filed by CforAT, TURN and Greenlining on October 9, 2014 and October 21, 2014, respectively. • See also Joint Consumer Comments 	<p>Verified.</p>

<p>to move forward.</p>	<p>and Reply Comments on the Proposed Decision, filed by CforAT, TURN and Greenlining on May 11, 2015 and May 18, 2015, respectively.</p> <ul style="list-style-type: none"> The Final Decision adopts various recommendations made by the Joint Consumers, including the continued (though reduced) support for voice (Final Decision at pp. 39-43), the discussion of cost containment noting that the objective of the proceeding is not cost cutting for its own sake (Final Decision at p. 53), the rejection of a fixed price per speed methodology for subsidy levels (Final Decision at p. 57), and the new cap on school discounts at a level equal to the federal E-Rate discount (Final Decision at pp. 58-59). 	
-------------------------	---	--

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?¹</p>	<p>Yes</p>	<p>Verified.</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:</p> <p>CforAT’s positions were generally similar to those of TURN and the Greenlining Institute (Greenlining). With virtually all other parties, some of CforAT’s positions were similar and others were not. Many issues in this proceeding were resolved through a consensus process; by its very nature, CforAT’s positions were similar to those of all parties that worked together to achieve consensus.</p>		<p>Verified.</p>

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>d. Intervenor’s claim of non-duplication:</p> <p>Outside of the consensus process, CforAT coordinated closely with TURN and Greenlining, as demonstrated in our detailed time records, to pursue mutual goals and avoid duplication of effort. Many substantive pleadings were filed jointly by the three consumer organizations. Where separate pleadings were filed, the organizations coordinated their input to avoid duplication of effort.</p> <p>During the consensus process, CforAT participated in selected sub-groups and worked diligently with other participants to achieve consensus where possible and to efficiently identify those issues where consensus was not possible.</p>	<p>Verified.</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>Due to high levels of poverty and low levels of employment, among other factors, people with disabilities are a population segment that is among the least likely to have access to high speed internet access at home or at work. Therefore CforAT’s constituency is more likely than average to rely on entities served by CTF to have access to advanced communications services in their local communities.</p> <p>Even as CforAT’s constituency benefits from the access offered by CTF’s recipients, few likely understand the importance of the program, and even fewer would be likely to directly participate before the Commission to address its importance.</p> <p>While it is difficult to assign a dollar figure to the value that CforAT’s constituents obtain by having access to advanced services through CTF-supported resources, there can be no doubt that this population directly benefits from the services offered by CTF recipients well beyond the cost of CforAT’s participation in this proceeding.</p>	<p style="text-align: center;"><u>CPUC Discussion</u></p> <p>Verified.</p>
<p>b. Reasonableness of hours claimed:</p> <p>CforAT participated activity on issues of concern to our constituency in keeping with the procedural developments of this docket. This includes developing proposal, considering proposals by other parties, coordination with other representatives of our constituency, and work in the consensus process, as well as more standard activities such as participating in workshops and various comment cycles in response to the OIR and the Proposed Decision.</p> <p>Initially, prior to release of the Scoping Memo or most of the procedural developments that led to the proposal and consensus process, CforAT estimated that we would dedicate 135 hours of work to this proceeding (including 90 hours by counsel and 45 hours of expert time). As the proceeding developed, CforAT</p>	<p>Verified, <i>but see</i> CPUC Disallowances and Adjustments, below.</p>

<p>spent less expert time (approximately 20 hours total), but more time by counsel (approximately 160 hours) in order to effectively participate in all stages of Phase I and Phase II. Given the nature of the proceeding as it evolved, these hours were reasonable.</p>	
<p>c. Allocation of hours by issue:</p> <p>Program Goals:</p> <p>The goal of Phase I of this proceeding was to update and refresh the goals of the CTF Program. CforAT worked to ensure that the restated program goals would continue to adequately take into consideration the needs of our constituency. Within the program goals, CforAT addressed concerns about CBO eligibility, the focus on who is to be served, and other issues that are also incorporated in the other identified issues below. Time spent on such work is categorized as “Goals.”</p> <p>2013: 14.6 hours (of 38.3) for 38% of time</p> <p>CBO Issues:</p> <p>CforAT worked to ensure that disability-related CBOs were aware of the potential changes under consideration for the CTF program and to collect feedback to address issues of concern for organizations that serve our constituency. Time spent on such efforts is categorized as “CBO.” This category includes time spent pursuing information on the position of such CBOs. It also includes efforts to collect data from CD on historical and projected CBO draws on CTF.</p> <p>2013: 1.4 hours (of 38.3) for 4% of time 2014: 10.9 hours (of 110.4) for 10% of time</p> <p>Proposals:</p> <p>During the course of this proceeding, CforAT developed and updated proposals for the future of the fund, reviewed a draft proposal from CD, and reviewed/commented on proposals from other active parties. These proposals were then the subject of workshops (which led to the consensus process, described below). Time spent on these various proposals is categorized as “Proposal.”</p> <p>2013: 1.9 hours (of 38.3) for 5% of time 2014: 66.1 hours (of 110.4) for 60% of time</p> <p>Consensus Process:</p> <p>Following distribution of proposals by the parties and Energy Division, the parties requested permission to pursue a consensus process to address as many disputed issues as possible. The ALJ authorized such a process, and the active parties split into multiple subgroups to pursue consensus. Each subgroup from the consensus process reported its final results back to the ALJ and other parties, and these consensus efforts directly shaped the outcome reflected in the Final Decision. CforAT participated in the subgroups reflecting its general concerns, primarily</p>	<p>Verified.</p>

<p>regarding CBO eligibility and related topics. Time spent working on the consensus process is categorized as “Consensus.”</p> <p>2014: 12.3 hours (of 110.4) for 11% of time</p> <p>Mix:</p> <p>At various times in this proceeding, parties were asked to address multiple issues simultaneously. This was most notably the case early in the proceeding when the parties first commented on the OIR, and late in the proceeding when parties commented on issues that were not addressed through the consensus process and when the Proposed Decision was issued. In these stages of the proceeding, CforAT participated in order to address all issues relevant to our constituency, including primarily issues of program eligibility, with the greatest focus on CBO eligibility but also addressing other entities. At these times, CforAT also provided input on other issues (such as the need to continue to support voice communications). These filings also included further discussion of program goals (after the determination to combine Phase 1 and Phase 2), discussion of issues that were eventually scoped for inclusion in Phase 3, and procedural matters. The limited time spent on these filings where all issues were combined, for which it would be difficult to separate out individual elements, are categorized as “Mix.”</p> <p>2013: 11.8 hours (of 38.3) for 31% of time 2014: 16.0 hours (of 110.4) for 14% of time 2015: 5.6 hours (of 9.7) for 58% of time</p> <p>General Participation:</p> <p>Time allocated to General Participation includes time spent on procedural matters as well as time spent on matters of concern in the docket generally that were not part of CforAT’s focus (for example, issues related to the services covered by the Fund, and annual resolutions regarding the budget for CTF).</p> <p>2013: 8.6 hours (of 38.3) for 22% of time 2014: 5.1 hours (of 110.4) for 5% of time 2015: 4.1 hours (of 9.7) for 42% of time</p> <p>Expert time:</p> <p>Time spent by Dmitri Belser, CforAT’s Executive Director, (totaling only 6.75 hours total) was allocated between Program Goals (4.75 hours) and CBO issues (1.5 hours), plus half an hour at the initiation of the proceeding strategizing about issues of concern to the disability community.</p> <p>All time spent by Henry J. Contreras of California Foundation of Independent Living Centers, an umbrella organization serving member centers that provide direct services and advocacy for people with disabilities throughout California (14.0 hours total) involved CBO issues.</p>	
--	--

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$ [a]	Hours	Rate \$	Total \$
Melissa W. Kasnitz	2013	38.3	\$440	D.13-11-017	\$16,852	28.8 [1]	\$440.00	\$12,672.00
Melissa W. Kasnitz	2014	110.4	\$450	D.15-01-047	\$48,578	108.00 [2]	\$450.00	\$48,600.00
Melissa W. Kasnitz	2015	9.7	\$450	D.15-01-047 (no COLA for 2014, see ALJ -308, issued on 3/30/15)	\$4,365	9.70	\$450.00	\$4,365.00
Dmitri Belser	2013	6.75	\$230	D.15-03-038	\$1,552.50	5.50	\$230.00	\$1,265.00
Dmitri Belser	2014					1.25	\$235.00	\$293.75
Henry J. Contreras	2014	14.0	\$250	D.15-03-013	\$3,500	6.2 [3]	\$250.00	\$1,550.00
Henry J. Contreras	2015					00.00	\$250.00	\$00.00
Subtotal: \$74,847.50						Subtotal: \$68,745.75		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Melissa W. Kasnitz	2013	1.5	\$220	½ standard rate	\$330.00	1.50	\$220.00	\$330.00
Melissa W. Kasnitz	2015	11	\$225	½ standard rate	\$2,812.50	12.50	\$225.00	\$2,812.50
Subtotal: \$3,142.50						Subtotal: \$ 3,142.50		
COSTS								
#	Item	Detail			Amount	Amount		
	Postage	See attached expense report			\$17.84	\$17.84		
	Printing/Copying	See attached expense report and comment below.			\$78.75	\$47.25		

	Transportation	See attached expense report	\$29.60	\$00.00 [4]
		Total Costs:	\$126.19	\$65.09
TOTAL REQUEST: \$ 78,116.19				TOTAL AWARD: \$71,953.34
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>				
ATTORNEY INFORMATION				
	Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
	Melissa W. Kasnitz	December, 1992	162679	No, but includes periods of inactive status prior to 1997

C. Intervenor's Comments on Part III:

Comment #	Intervenor's Comments
Comment (copy/print expenses)	<p>CforAT's copy/print expenses stem from use of a printer at the offices of DREDF, which are located in the same building (the Ed Roberts Campus, a designated hub for nonprofit organizations serving the needs of people with disabilities). As a small organization, CforAT does not have printers that can easily handle large jobs of the sort that are required at times for effective participation in Commission proceedings. CforAT's printers are sufficient for small jobs and day-to-day production of hard copies, and such costs are absorbed in CforAT's overhead. Additionally, CforAT has entered into an agreement with DREDF for use of its printer, which can handle selected larger print jobs. DREDF charges CforAT \$0.25 per page for such print jobs, which is the rate it receives for reimbursement in litigation. CforAT is aware that the Commission generally reimburses print costs at \$0.10 per page. However, the ability to (selectively) prepare hard copies from a location across the hall continues to make DREDF the best option for CforAT. CforAT respectfully requests that the Commission approve its requested rate of \$0.25 per page for printing limited selections of material from this proceeding, as recorded.</p>

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

D. CPUC Disallowances and Adjustments

Item #	CPUC Comment(s)
[a]	We note that Center for Accessible Technology's claim for intervenor compensation contains mathematical errors and was not properly formatted.
[1]	<p>The Commission disallows 7.6 hours related to Center for Accessible Technology's Opening Comments on Appendix A. This document was not filed with the Commission.</p> <p>The Commission disallows 1.9 hours related to Center for Accessible Technology's Pre-Hearing Conference Statement. This document was not filed with the Commission.</p>
[2]	The Commission does not compensate intervenors for work related to Public Participation Hearings. <i>See e.g.</i> , D.96-08-040, D.04-09-050, D.10-04-024, and D.11-06-034. The Commission disallows 2.40 hours from Kasnitz's 2014 claim.
[3]	The Commission does not compensate intervenors for work related to Public Participation Hearings. <i>See e.g.</i> , D.96-08-040, D.04-09-050, D.10-04-024, and D.11-06-034. The Commission disallows 7.80 hours from Contreras' 2014 claim.
[4]	<p>In D.13-05-031 at 33, the Commission noted that the market rate for photocopying is considerably lower than 25 cents per page and that volume discounts for photocopying can reduce charges to 10 cents per page. As such, CforAT's printing and photocopying costs have been reduced to reflect current and reasonable pricing. Because CforAT's printing in this proceeding was not bulk printing, the Commission finds a cost of 15 cents per page to be reasonable.</p> <p>In addition, the Commission does not compensate for routine travel. <i>See e.g.</i>, D.10-11-032 and D.09-12-040. The Commission defines routine travel as any travel under 90 miles. Kasnitz's travel on BART is routine. The Commission disallows compensation for this cost.</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 (see Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. CforAT has made a substantial contribution to D.15-07-007.

2. The requested hourly rates for CforAT's representatives 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 \$71,953.34.

CONCLUSION OF LAW

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

ORDER

1. Center for Accessible Technology shall be awarded \$71,953.34.
2. Within 30 days of the effective date of this decision, the Commission's Fiscal Office shall disburse the awarded compensation from the Commission's Intervenor Compensation Fund. 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 February 26, 2016, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2016, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D11507007		
Proceeding(s):	R1301010		
Author:	ALJ Park		
Payer(s):	The California Public Utilities Commission's Intervenor Compensation Fund		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	09/22/2015 (claim filed) 12/12/2015 (claim complete)	\$78,116.19	\$71,953.34	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa W.	Kasnitz	Attorney	CforAT	\$440.00	2013	\$440.00
Melissa W.	Kasnitz	Attorney	CforAT	\$450.00	2014	\$450.00
Melissa W.	Kasnitz	Attorney	CforAT	\$450.00	2015	\$450.00
Dmitri	Belser	Expert	CforAT	\$230.00	2013	\$230.00
Dmitri	Belser	Expert	CforAT	\$230.00	2014	\$235.00
Henry J.	Contreras	Expert	CforAT	\$250.00	2014	\$250.00
Henry J.	Contreras	Expert	CforAT	\$250.00	2015	\$250.00

(END OF APPENDIX)