

PROPOSED DECISION

Agenda ID#14827 (Rev. 1)
 Quasi-Legislative
 5/12/16 Item #36

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Reliability Reporting Pursuant to Public Utilities Code Section 2774.1.	Rulemaking 14-12-014 (Filed December 18, 2014)
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**DECISION GRANTING COMPENSATION
 TO THE UTILITY REFORM NETWORK
 FOR SUBSTANTIAL CONTRIBUTION TO DECISION 16-01-008**

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 16-01-008
Claimed: \$ 17,808.10	Awarded: \$16,653.85 (reduced 6.5%)
Assigned Commissioner: Michael Picker	Assigned ALJ: ALJ Division¹

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision updates existing electric reliability reporting requirements for California electric utilities. The decision amends electric reliability reporting requirements to define the utility district level as the local area from which electric outage information is collected. The decision also clarifies and streamlines electric reliability reporting requirements and describes data that utilities must provide to the Commission in an annual Electric Reliability Report.
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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):	March 27, 2015	Verified.
2. Other specified date for NOI:	Pursuant to Rule	Verified.

¹ This proceeding was previously assigned to Judge Amy Yip-Kikugawa.

	17.1(a)(2) and the Order Instituting Rulemaking (OIR), the NOI was timely filed within 30 days of the filing of Reply Comments on the OIR, February 6, 2015.	
3. Date NOI filed:	March 9, 2015	Verified.
4. Was the NOI timely filed?		Yes, The Utility Reform Network (TURN) 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.14-05-001	Verified.
6. Date of ALJ ruling:	May 1, 2014	September 5, 2014
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, TURN demonstrated appropriate status.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001	Verified.
10. Date of ALJ ruling:	May 1, 2014	September 5, 2014
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes, TURN maintains a rebuttable presumption of

		significant financial hardship, as found in the Ruling in proceeding R.14-05-001.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D. 16-01-008	Verified.
14. Date of issuance of Final Order or Decision:	January 20, 2016	Verified.
15. File date of compensation request:	March 21, 2016	Verified.
16. Was the request for compensation timely?		Yes, the 60 th day for filing fell on a Sunday. Intervenor is allowed to file on the following business day. See CPUC Rules of Practice and Procedure, Rule 1.15.

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
1	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission’s Intervenor Compensation guide, “normally, an ALJ Ruling need not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g); (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN’s NOI.	Verified. TURN has met the eligibility requirements to seek an award of intervenor compensation in this proceeding. No ALJ ruling on the NOI is required.

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. Oversight/Accountability</p> <p>This Rulemaking explored the need for CPUC oversight for reliability reporting and the utilities’ communication practices with its customers. Throughout the proceeding, TURN recommended that the Commission review the processes used by the utilities to make decisions regarding maintenance priorities.</p> <p>TURN also advocated for the Commission’s Energy Division (ED) to have the opportunity to review and provide input on the utilities’ reliability reports. The Decision ultimately adopted TURN’s recommendation in substantial part by requiring the investor owned utilities (IOUs) to submit a draft reliability report, 45 days before the final due date, to the ED Director so staff can ensure the report complies with the reporting requirements and have the opportunity to provide input before the report is made public.</p> <p>TURN also emphasized the need for utility accountability to the public and recommended that customers have access to the information and the opportunity to ask questions. The Decision adopted this</p>	<ul style="list-style-type: none"> - TURN Opening Comments on OIR, January 23, 2015, p. 3. - TURN Comments on PD, December 7, 2015, p. 3. - D.16-01-008, p. 16 & p. 31, OP #2. - Reply Comments of TURN on the OIR, February 6, 2015, p. 4. - D. 16-01-008, p.32, OP 7; p. 24, FN 35. 	<p>Verified.</p>

<p>recommendation by requiring that the utilities conduct at least one annual public in-person presentation about the information in their annual reports. The Decision also mandates that webinar participation be made available which was a TURN proposal.</p>	<ul style="list-style-type: none"> - D. 16-01-008, p. 24; p. 32, OP 8. - TURN Comments on PD, December 7, 2015, p. 4. 	
<p>2. Definition of Local Area/Accessibility (Local Area) Defining the local area for the purpose of reliability reporting was a key issue in this proceeding that was addressed in both workshops. At the first workshop, and in TURN’s opening comments on the OIR, TURN advocated for the local area to be defined at the city or community level. TURN also proposed that when city or community reporting cannot be done, that utilities should provide a way for customers to easily determine which district their residence is located in. The Decision acknowledges that reporting at the city level would be easier for customers to understand but operational and logistical challenges make difficult to implement. The Decision adopts the utility district as the local area for reporting, but per TURN’s recommendation requires the utilities to make reliability reporting information “available to their customers upon request and should post the procedures for making public requests on their websites.”</p>	<ul style="list-style-type: none"> - D. 16-01-008, p. 6, FN 7. - See Workshop 1 Report, p. 6. - TURN Opening Comments on OIR, pp. 1-2. - D. 16-01-008, pp. 8-9. - D. 16-01-008, p.6 & p. 30, COL # 1. 	<p>Verified.</p>

<p>3. Reporting Metrics (Metrics)</p> <p>The issue of how to treat data about “Major Event Day(s)” was addressed in Workshop 2 of this proceeding. TURN recommended that the Commission clarify whether to include or exclude Major Event Days from reliability reporting because it has a material impact on the data included in the IOUs annual reliability reports. The Commission adopted TURN’s recommendation.</p> <p>The California Association of Small and Multi Jurisdictional Utilities raised the issue of the need for different reporting requirements regarding worst performing circuits for smaller utilities. TURN supported this proposal because it is unduly burdensome to require utilities with a small number of circuits to report on the 10 worst performing circuits. In D.16-01-008, the Commission determined it was appropriate for the large IOUs to have different reporting requirements regarding worst performing circuits than the smaller utilities.</p> <p>Workshop 2 also dealt with the issue of the years of data that should be considered when determining the worst performing circuits. TURN advocated for using multiple years of data in making the determination, which the</p>	<ul style="list-style-type: none"> - TURN Reply Comments on the OIR, February 6, 2015, p. 5. - TURN Comments on the Workshop 2 Report, June 26, 2015, p. 2. - D. 16-01-008, p. 26; p. 32, OP 11. - TURN Comments on the Workshop 2 Report, June 26, 2015, p. 4. - D. 16-01-008, p.10; p. 30, FOF #15; p. 32, OP 9 & 10. - TURN Comments on the Workshop 2 Report, June 26, 2015, pp. 2-3. - D. 16-01-008, p. 30, FOF #13. 	<p>Verified.</p>
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<p>Commission adopted.</p>		
<p>4. Streamlining Decision 16-01-008 combines the reliability reporting requirements from two past decisions. TURN advocated for combining all of the past requirements and having the utilities file a single annual report as a more efficient use of the utilities resources and to make it easier and more convenient for customers and stakeholders to access the materials. TURN supported requiring all utilities to report reliability data using the same indices, which was adopted.</p>	<ul style="list-style-type: none"> - D. 16-01-008, p. 17; p. 31, COL #3. - TURN Comments on the Workshop 1 Report, May 20, 2015, p. 2. - TURN Comments on the OIR, January 23, 2015, p. 3. - D. 16-01-008, p. 20. 	<p>Verified.</p>
<p>5. Remediation The definition of Cost Effective Remediation was a topic for Workshop 2. At the second Workshop and in comments on the Workshop, TURN advocated for the IOUs to include an explanation of how they identify/select cost-effective remediation projects in easily understandable terms for their ratepayers. Decision 16-01-008 adopts TURN’s proposal as an interim approach and requires the utilities to “define and provide an easy to understand explanation of the cost-effectiveness methodology it used to select a circuit repair or replacement project from among the available options in its annual electric reliability report.” The Commission determined that it will utilize the interim approach until the</p>	<ul style="list-style-type: none"> - TURN Comments on the Workshop 2 Report, June 26, 2015, p. 3. - D.16-01-008, p. 14; p. 32, OP 5, referencing Appendix B, pp. 3-4. - D. 16-01-008, p. 14. 	<p>Verified.</p>

<p>cost-effectiveness methods currently under consideration in the Integrated Distributed Energy Resources, R.14-10-003, and Distributed Resource Planning, R.14-08-013, proceedings are finalized, which TURN supported.</p>	<p>- TURN Comments on PD, p. 2.</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?</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>Verified.</p>
<p>c. If so, provide name of other parties: Office of Ratepayer Advocates; City of Manhattan Beach and City of Torrance</p>		<p>Yes.</p>
<p>d. Intervenor’s claim of non-duplication: TURN largely argued for entirely unique positions on contested issues in the proceeding and was the primary advocate for ratepayers actively involved in this proceeding. ORA and the cities of Manhattan Beach and Torrance were not very active in this proceeding; each only filed opening comments on the OIR and did not participate in the workshops. Because other customer focused intervenors were not actively involved throughout the proceeding, TURN’s work was not duplicative, and the Commission should not conclude that any reductions in compensation are warranted based on duplication of effort.</p>		<p>Agreed, TURN did not engage in duplicative efforts.</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>TURN’s request for intervenor compensation seeks an award of approximately \$17,800 as the reasonable cost of our participation in the proceeding to date.</p> <p>TURN’s advocacy, reflected in D.16-01-008, addressed policy and process matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to</p>	<p style="text-align: center;">CPUC Discussion</p> <hr/> <p>Verified.</p>
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<p>ratepayers from our work related to D.16-01-008. While it is difficult to place a dollar value on such issues, TURN submits that our participation should result in substantial benefits in the form of making the reliability reporting process more transparent and accessible for customers. TURN’s work also contributed to streamlining the reliability reporting process and clarifying the requirements, which is a more efficient use of utility resources and thus, saves ratepayers money. TURN’s work also ensured that the Decision correctly acknowledged the requisite level of oversight authority the Commission has regarding reliability reporting and the utilities’ cost-effective remediation processes.</p> <p>In sum, the Commission should conclude that TURN’s overall request is reasonable given the issues at stake in the rulemaking and the adopted outcomes.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>The amount of time devoted by TURN staff to this proceeding is fully reasonable. TURN did not retain outside consultants to assist with this case and devoted only a reasonable number of hours to reviewing rulings, drafting pleadings, reading comments submitted by other parties, and evaluating proposed decisions. TURN did not conduct formal discovery or perform significant amounts of independent research. TURN’s pleadings were highly substantive, particularly given the amount of time devoted to the task of preparing each pleading.</p> <p>The modest number of hours devoted to the range of technical and research-intensive issues in this case demonstrates the efficiency of TURN’s staff. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. Given the level of success achieved by TURN in this proceeding across a range of issues, the amount of time devoted by TURN advocates is fully reasonable.</p> <p><u>Reasonableness of Staffing</u> TURN’s primary attorney was Elise Torres, assisted on one occasion by Tom Long who gave Ms. Torres feedback regarding comments on the OIR when Ms. Torres was relatively new to TURN. The staffing of this proceeding was consistent with Ms. Torres joining TURN in the Fall of 2014, warranting a senior attorney working with her at the beginning stages of her involvement; TURN has not included time of TURN’s more experienced staff for the other less formal consultation and supervision Ms. Torres received from them.</p> <p><u>Compensation Request</u> TURN’s request also includes 8.5 hours devoted to the preparation of compensation-related filings. The time devoted to preparing this</p>	<p>Verified, but see CPUC Disallowances and Adjustments, below.</p>

<p>compensation request is appropriate given the record in this proceeding and the relative inexperience of TURN’s attorney with preparing compensation requests, and should be found to be reasonable.</p>	
<p>c. Allocation of hours by issue: TURN has allocated all of our attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p>GP – 14 hours – 18% of total General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses.</p> <p>This includes reviewing the initial rulemaking, utility filings and motions, the Workshop 1 and 2 agendas, and the PD. TURN also includes in this category time devoted to attending and preparing for the PHC.</p> <p>Oversight/Accountability (Acct.)– 6 hours – 8% of total Includes research regarding current reporting protocols and levels of CPUC oversight. Also includes researching and drafting sections of pleadings advocating for utility accountability to customers regarding reliability data, including: Comments on the OIR and Comments on the PD. Includes attending and participating in Workshop 2 held on May 26, 2015.</p> <p>Definition of Local Area/Accessibility (Local Area) – 17 hours – 20% of total Work researching the proper definition of local area and advocating for reporting to be done at the city/community level. Also includes researching and drafting sections of pleadings regarding requirements to present reporting data in an understandable way for customers, including: Comments on the OIR and Comments on the Workshop 1 Report. Includes attending and participating in Workshop 1 held on April 24, 2015.</p> <p>Reporting Metrics (Metrics) – 14 hours – 18% of total Work researching and providing feedback on the proper indices to use for reliability reporting. Also includes researching and drafting sections of pleadings on the topic of reliability metrics and reporting standards, including: Comments on the OIR and Comments on the Workshop 2 Report. Includes attending and participating in Workshop 2 held on May 26, 2015.</p> <p>Streamlining – 5 hours – 7% of total</p>	<p>Verified.</p>

<p>Work researching and providing feedback on the various reporting requirements and proposing options for streamlining all reporting into one annual report. Also includes researching and drafting pleadings on the topic of reliability indices and reporting requirements, including: Comments on the OIR and Comments on the Workshop 1 Report.</p> <p>Remediation – 12 hours – 16% of total Work advocating for CPUC oversight regarding the utilities’ cost-effective remediation processes. Researching and drafting pleadings on the topic of cost-effective remediation, including: Comments on the OIR, Comments on the Workshop 2 Report and Comments on the PD. Includes attending and participating in Workshop 2 held on May 27, 2015.</p> <p>Research – 8 hours – 11% of total Includes time spent reviewing past commission decisions and other reports relevant to the proceeding to better understand key issues and the current state of reliability reporting on topics not directly attributable to the categories described above. Also includes reviewing and analyzing of Workshop 1 and Workshop 2 reports.</p> <p>COMP – 8.5 hours Work preparing TURN’s notice of intent to claim intervenor compensation and the final request for compensation and supporting documents.</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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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 \$
Elise Torres	2014	4.75	\$215	See Comment 1	\$1,021.25	4.75	\$215.00 ²	\$1,021.25
Elise	2015	71.75	\$215	See Comment 1	\$15,426.25	68.87	\$215.0	\$14,807.05

² Decision (D.) 16-04-037 adopted the rate of \$215 per hour for Torres. We apply this newly adopted rate here for Torres’ work in this proceeding.

Torres						[2]	0	
Tom Long	2015	.75	\$570	D.15-06-021	\$427.50	0.75	\$570.00	\$427.50
Subtotal: \$16,875.00						Subtotal: \$15,828.25		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Elise Torres	2016	8.5	\$107.50	@ 50% of \$215	\$913.75	7.5	\$107.50	\$806.25
Subtotal: \$ 913.75						Subtotal: \$806.25		
COSTS								
#	Item	Detail			Amount	Amount		
1	Copies	Copying of pleadings for ALJ and Commissioner Offices			\$8.40	\$8.40		
2	Postage	Postage for pleadings to CPUC			\$10.95	\$10.95		
Subtotal: \$19.35						Subtotal: \$19.35 TOTAL AWARD: \$16,653.85		
TOTAL REQUEST: \$17,808.10								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR³			Member Number		Actions Affecting Eligibility (Yes/No?)	
Elise Torres		December 9, 2011			280443		No, but inactive from January 28, 2013, until January 1, 2014.	
Tom Long		December 11, 1986			124776		No	

C. Intervenor’s Comments on Part III:

Comment #	Comment
Comment 1	Hourly Rates for Elise Torres

³ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

2014 and 2015

TURN's request for Ms. Torres' hourly rate for 2015 is pending before the Commission in compensation requests filed in A.12-08-007, on October 27, 2015 and in R.13-12-011, on November 24, 2015; but for the convenience of the Commission, TURN provides here the same justification provided in that previous request. TURN requests an hourly rate of \$215, which we submit is a reasonable rate for an attorney of her training and experience. TURN is requesting the same rate of \$215 apply for Ms. Torres' work in 2014 and 2015. We note that Resolution ALJ-308 adopting rates for 2015 did not increase rates from 2014.

Ms. Torres is a 2011 graduate of UC Hastings School of Law and has been a member of the California bar since 2011. At UC Hastings, she completed a concentration in Public Interest Law and was the Notes and Comments Editor of the Hastings Environmental Law Journal.

Upon graduation in mid-2011, Ms. Torres received the prestigious Bridge Fellowship and completed her fellowship at the Center for Biological Diversity as an associate attorney, focusing on land use and endangered species protection in California. Ms. Torres was the lead associate on California Environmental Quality Act and Endangered Species Act litigation during her 6-month Fellowship term. Through this position Ms. Torres refined her legal writing and oral advocacy skills. From January 2012 through June 2012, Ms. Torres was a discovery attorney for Quinn-Emmanuel in San Francisco and worked on significant intellectual property litigation. In that capacity she became expert at all facets of discovery including assessing the relevance of materials and compiling evidence to support key litigation positions.

In June 2012, Ms. Torres joined the Office of Ratepayer Advocates at the CPUC as a Regulatory and Legislative Analyst. Although not employed as an attorney *per se*, her responsibilities as a regulatory analyst included researching and analyzing utility applications and drafting testimony, briefs and comments on proposed decisions. She also testified on behalf of ORA at evidentiary hearings, and gained valuable experience negotiating on ORA's behalf in settlement meetings and lobbying for ORA's positions in ex parte meetings with Commissioners and Commissioner advisors. Thus she gained valuable experience and skills directly relevant to her future work as an attorney in CPUC proceedings.

In April 2014, Ms. Torres joined the California Department of Insurance as a staff attorney. There she represented the Department in administrative proceedings and reviewed re-insurance company applications for compliance with regulations and corporate governance requirements. In that capacity she became expert in advocacy in administrative proceedings and the California Administrative Procedure Act.

In September 2014, Ms. Torres joined TURN as a Staff Attorney, and immediately assumed responsibility for an ongoing caseload, serving as TURN's primary attorney in a number of active proceedings, and as co-counsel in several

others, including the 2015 SCE GRC (A.13-11-003) and the Net Energy Metering 2.0 rulemaking (R.14-07-002). At the start of career at TURN, Ms. Torres assumed the role as TURN's lead attorney on the SDG&E Electric Vehicle Infrastructure application (A.14-04-014), SCE Electric Vehicle Infrastructure application (A.14-10-014), the Integrated Demand Side Resources rulemaking (R.14-10-003), the Water-Energy Nexus rulemaking (R.13-12-011) and the Alternative Fuel Vehicle Infrastructure rulemaking (R.13-11-007).

TURN submits that the \$215 rate we are requesting for Ms. Torres for work performed in 2014 and 2015 is conservative and very reasonable. Ms. Torres joined TURN with significant experience in consumer advocacy at the CPUC and in attorney positions that honed her discovery, case strategy, legal writing and other litigation skills that are all directly relevant to the work an attorney performs in a CPUC proceeding. The quality and quantity of her experience enabled her to assume substantial responsibility for TURN's advocacy work in important proceedings such as this one, with a much shorter learning curve than would have been required by a less-experienced attorney or one not familiar with public utility regulation.

When Ms. Torres started at TURN in September of 2014, she had over 1 year of experience as a practicing attorney and almost 2 additional years of directly relevant utility regulation experience as an analyst for ORA. At the end of 2015, Ms. Torres had approximately 2.5 years of experience as a practicing attorney. Under the circumstances, TURN submits the ORA experience should be given partial credit and treated as the equivalent of approximately 1 year of directly relevant legal experience, as it gives her particularly relevant knowledge and utility regulation experience for purposes of participating and advocating in Commission proceedings on behalf of TURN. Thus in September of 2014, for purposes of determining where she falls on the adopted scale, the Commission should find Ms. Torres had over 2 years of experience as an attorney and at the start of 2015, the Commission should find Ms. Torres had the equivalent of 2.5 years of experience as an attorney. The 2014 and 2015 range for attorneys with 0-2 years of experience is \$165 – \$220 (Res. ALJ-308 unchanged from Res. ALJ-303 issued for 2014 rates). TURN's request of \$215 is within this range and is conservative given that Ms. Torres' experience at the end of 2014 is near the top of the range, and her experience at the end of 2015 is above the range, and her additional experience as a regulatory analyst at the CPUC.

For comparison purposes, "close peers" of Ms. Torres that have had rates recently set by the Commission include Rebecca Davis of Clean Coalition (California Bar admission in 12/10, awarded \$205 as an hourly rate in 2011, her first year, and \$210 in 2012, her second year – D.13-12-021, pp. 10-12); Karla Gilbride of Disability Rights Advocates (Bar admission in 7/09 who was awarded \$200 as an hourly rate in 2010, her first year, and \$205 in 2011, her second year – D.13-12-026, pp. 10-12); and Nicole Blake of Consumer Federation of California (Bar admission in 1/10 who was awarded \$200 as an hourly rate in 2011, before the end of her second year). In each of these cases, the adopted rate was just below the upper end of the range for attorneys with 0-2 years experience. The \$215 rate

	<p>sought here is similarly just below the upper end of the current range of \$165-\$220 for 2014 and 2015 work. The rate of \$215 for Ms. Torres' work in 2014 and 2015 is reasonable and should be granted by the Commission.</p> <p>2016</p> <p>For 2016 hours (all of which are for compensation-related work), TURN is also requesting compensation using the rate authorized for 2015. TURN requests that the requested rates NOT be deemed the adopted rates for Ms. Torres for 2016, as TURN may seek a higher 2016 rate for her work in future requests for compensation.</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
[1]	The Commission does not compensate attorneys for work that is clerical, as compensation has been factored into the approved hourly rates. The Commission disallows the following hours: 0.75 hours on 1/23/15; 0.75 hours on 2/6/15; 0.63 hours on 3/9/15; 0.75 hours on 12/7/15; and 1 hour (compensation time) on 3/16/16.

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. The Utility Reform Network has made a substantial contribution to D.16-01-008.
2. The requested hourly rates for Intervenor'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 \$16,653.85.

CONCLUSION OF LAW

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

ORDER

1. The Utility Reform Network shall be awarded \$16,653.85.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, and Liberty Utilities shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2015 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 June 4, 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. Rulemaking 14-12-014 is closed.

This decision is effective today.

Dated _____, at Sacramento, California.

APPENDIX A

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1601008		
Proceeding(s):	R1412014		
Author:	ALJ Division		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, and Liberty Utilities.		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network (TURN)	03/21/2016	\$17,808.10	\$16,653.85	No.	See Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Elise	Torres	Attorney	TURN	\$215.00	2014	\$215.00
Elise	Torres	Attorney	TURN	\$215.00	2015	\$215.00
Elise	Torres	Attorney	TURN	\$215.00	2016	\$215.00/\$107.50
Tom	Long	Attorney	TURN	\$570.00	2015	\$570.00

(End of Appendix A)