

Decision \_\_\_\_\_

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

Application of Southern California Edison Company (U338E) to Establish Marginal Costs, Allocate Revenues, Design Rates, and Implement Additional Dynamic Pricing Rates.	Application 14-06-014 (Filed June 20, 2014)
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**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR CONTRIBUTION TO DECISION 16-03-030**

<b>Intervenor: The Utility Reform Network (TURN)</b>	<b>For contribution to Decision (D.) 16-03-030</b>
<b>Claimed:</b> \$77,762.87	<b>Awarded:</b> \$77,798.49
<b>Assigned Commissioner:</b> Michel P. Florio	<b>Assigned ALJ:</b> Stephen C. Roscow

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	In D.16-03-030, <i>Decision Adopting Settlements on Marginal Cost, Revenue Allocation, and Rate Design</i> , the Commission addressed the application of Southern California Edison Company (SCE) to establish marginal costs, allocate revenues, and design rates for service provided to its customers during its Test Year 2015 General Rate Case cycle. The decision adopts without modification proposed settlement agreements related to rate design for residential and small commercial customers, medium and large power commercial customers, agricultural and pumping customers, and street light and traffic control customers. The decision also approves, with modifications, the proposed settlement addressing marginal costs and revenue allocation. The rates approved in D.16-03-030 will take effect no earlier than April 1, 2016, except where otherwise provided in the decision.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	Intervenor	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	September 17, 2014	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	October 17, 2014	Verified
4. Was the NOI timely filed?		Yes
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	A.12-11-009	Verified
6. Date of ALJ ruling:	Sept. 6, 2013	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
<b>Showing of “significant financial hardship” (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009	Verified
10. Date of ALJ ruling:	Sept. 6, 2013	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.16-03-030	Verified
14. Date of issuance of Final Order or Decision:	March 18, 2016	Verified
15. File date of compensation request:	May 17, 2016	Verified
16. Was the request for compensation timely?		Yes

**PART II: SUBSTANTIAL CONTRIBUTION**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<u>SCE’s Proposal to Include Residential Rate Design Proposals Pending in Other</u>	<ul style="list-style-type: none"> <li>Scoping Memo, p. 5</li> <li>TURN Protest, pp. 2-3</li> </ul>	Verified. “Based on discussion at the PHC, we confirm that

<p><b><u>Proceedings</u></b></p> <p>The Commission adopted TURN’s procedural recommendation for dealing with SCE’s residential rate design proposals pending in other proceedings (R.12-06-013 and A.13-12-015). SCE had appended these proposals to its testimony in this proceeding, so that the Commission could consider them here if it did not decide them in R.12-06-013 and A.13-12-015. The Commission agreed with TURN that it was more appropriate to exclude those proposals but to permit SCE to make a motion to reopen the record of this proceeding and submit additional testimony to the extent the Commission left certain issues unresolved in R.12-06-013 or A.13-12-015.</p>		<p>SCE’s request to be afforded a future opportunity to introduce items not resolved by the Commission in R.12-06-013 or A.13-12-015 should be preserved in the manner suggested by TURN. Scoping Memo at 5.</p>
<p><b><u>Residential Rate Design – Rejection of SCE’s Proposed Changes to Baseline Quantities</u></b></p> <p>TURN opposed SCE’s proposal to adopt separate baseline allowances for single family (SF) and multi-family (MF) all-electric customers within each climate zone, including a much lower baseline allowance for MF all-electric customers than for SF customers. SCE’s proposal would have resulted in more of MF customers’ usage being billed at upper tier rates, thus increasing bills. TURN argued that many of the residential rate design changes pending (at that time) in R.12-06-013 are likely to disproportionately affect lower-</p>	<ul style="list-style-type: none"> <li>• D.16-03-030, pp. 19, 22 (pointing to the prepared testimony, the settlement agreement and comparison exhibits, and further testimony by witnesses for SCE, ORA, and TURN in hearings, in support of the finding that the settlement agreement is reasonable)</li> <li>• Motion of SCE and Settling Parties for Adoption of Residential and Small Commercial Rate Design Settlement Agreement, filed 10/7/15, Attachment A, Residential and Small Commercial Rate Design Settlement Agreement § 4(A)(6) and Appendix A, p. A-</li> </ul>	<p>Verified</p>

<p>usage customers living in MF dwelling units, many of whom have lower incomes than larger customers. As such, it would be unreasonable to adopt SCE’s baseline proposal in this proceeding without considering the related proposals pending in R.12-06-013, as doing so would ignore the cumulative impacts on MF customers of a series of potentially simultaneous rate design changes.</p> <p>D.16-03-030 adopts the multi-party settlement agreement on residential rate design issues, which resolved this contested baseline allowance issue, among other issues. The settlement continues SCE’s current practice of using the same baseline allowance for all customers within a climate zone, rather than distinguishing between SF and MF all-electric residents, to the likely benefit of CARE customers and smaller users.</p>	<p>2 (Comparison of Status Quo, Parties’ Positions and Settlement)</p> <ul style="list-style-type: none"> <li>• Testimony of Garrick F. Jones and William B. Marcus on Behalf of TURN, pp. 56-57</li> </ul>	
<p><b><u>Marginal Cost / Revenue Allocation Settlement</u></b></p> <p>In D.16-03-030, the Commission adopted the multi-party settlement, with modifications, resolving all marginal cost and revenue allocation issues. The MC/RA settlement reflects a compromise of positions held by TURN and other parties. The settling parties were able to reach agreement on the allocation of SCE’s total revenue requirement among the rate groups, thereby avoiding the need to litigate and resolve the differences among the</p>	<ul style="list-style-type: none"> <li>• D.16-03-030, p. 17 (pointing to the prepared testimony, the settlement agreement and comparison exhibits, and further testimony by witnesses for SCE, ORA, TURN and CLECA/CMTA in hearings, in support of the finding that the settlement agreement, as amended, is reasonable)</li> <li>• Motion of SCE and Settling Parties for Adoption of Marginal Cost and Revenue Allocation Settlement Agreement, filed 8/14/15, Attachment A, Marginal Cost</li> </ul>	<p>Verified</p>

<p>parties regarding the methodologies and forecasts used to derive marginal customer costs, marginal generation capacity costs, marginal energy costs, and marginal distribution demand costs. While the settlement agreement adopts marginal cost inputs proposed by various settling parties (including TURN), ultimately, the effect of each of these inputs is muted by the revenue allocation capping mechanism, which played a crucial role in achieving an outcome acceptable to all settling parties.</p> <p>Included with the MC/RA settlement agreement filed with the Commission was a comparison of parties' positions and the settlement outcome on the various marginal cost and revenue allocation issues. As these tables indicate, TURN's specific recommendations are reflected in the settled outcomes.</p> <p>For instance, TURN (and certain other parties) recommended the NCO methodology for calculating marginal customer costs, while SCE and the large customer representatives opposed this methodology. TURN also recommended a lower RECC calculation than SCE. The settlement adopts a hybrid approach which reflects TURN's advocacy in several regards: a 50:50 ratio of TURN's NCO marginal customer cost calculations and TURN's RECC. The settlement also adopts marginal generation capacity costs of \$108. This value is lower</p>	<p>and Revenue Allocation Settlement Agreement</p> <ul style="list-style-type: none"> <li>• Amendment of SCE and Settling Parties to Marginal Cost and Revenue Allocation Settlement Agreement, filed 9/9/15, Revised Appendix A, (Comparison of Status Quo, Parties' Positions, and Settlement)</li> <li>• Testimony of Garrick F. Jones and William B. Marcus on Behalf of TURN, pp. 2-44 (marginal costs) and pp. 44-56 (revenue allocation)</li> </ul>	
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<p>than that proposed by every party but TURN and ORA. TURN's proposal, \$68, was the lowest number, placing downward pressure on the settled outcome to the benefit of residential customers.</p> <p>As for revenue allocation, the settlement would exclude CARE from the allocation of SGIP program costs, as proposed by TURN (Settlement, Para. 4(B)(5)(h)). It would also employ revenue allocation capping above and below the Functional SAPC (referred to as "collaring"). TURN similarly proposed a cap of no more than 5%, with a floor of 8% less than system average, whereas the settlement includes a "collar" for distribution revenues of plus or minus 3% and a "collar" for generation revenues of plus or minus 2%. The settlement additionally would remove the GHG credit revenues before applying the delivery service collar, while TURN proposed the removal of these revenues before all capping (Settlement, Para. 4(B)(2)(a)). TURN was instrumental in creatively devising and modeling various revenue allocation scenarios during settlement negotiations, which ultimately produced the settlement agreement adopted by D.16-03-030.</p> <p>But perhaps most significant of all is the end result for residential customers. Under the MC/RA Settlement Agreement, SCE will apply a Distribution revenue allocator of 51.2% (capped) and a</p>		
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<p>Generation revenue allocator of 43.3% (capped) to the residential class. (MC/RA Settlement Agreement, Table RA-7). In contrast, SCE proposed to apply a Distribution revenue allocator of 52.65% and a Generation revenue allocator of 43.40% to the residential class. (SCE-3, p. A-1). The settled revenue allocations extend beyond Distribution and Generation, but TURN points to these as examples. When applied to SCE’s Jan. 1, 2016 revenue requirement, as estimated by SCE in its Response to the Request of ALJ Roscow for Supplemental Information, filed Nov. 17, 2015, <i>for illustrative purposes</i>, the differences between these two revenue allocators produce a roughly \$75 million reduction in revenue requirement allocated to residential customers. Actual benefits will vary depending on SCE’s actual total revenue requirements and the impacts of the additional revenue allocation policies encompassed by the settlement agreement.</p>		
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor’s Assertion	CPUC Discussion
<p><b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b></p>	Yes	Verified
<p><b>b. Were there other parties to the proceeding with positions similar to yours?</b></p>	Yes	Verified
<p><b>c. If so, provide name of other parties:</b> The Center for Accessible Technology (CforAT) also addressed the interests of residential customers, though specifically the interests of residential customers with disabilities.</p>		Verified

<p><b>d. Intervenor’s claim of non-duplication:</b></p> <p>Similar to previous SCE GRC Phase 2 proceedings, TURN coordinated closely with ORA throughout the proceeding, including conferring on strategy, working closely together throughout settlement negotiations pertaining to marginal costs/revenue allocation and residential rate design, dividing issue coverage during the 8/18/15 workshop (ORA was on the Marginal Cost panel, while Bill Marcus represented TURN on the Revenue Allocation Panel), and coordinating our responses to the 8/10/15 ALJ ruling seeking input on the forum for holding the residential fixed charge workshop process required by D.15-07-001. This level of coordination ensured that TURN’s efforts complemented those of ORA. Furthermore, in the marginal cost and revenue allocation settlement process, TURN provided unique technical expertise and coordinated with ORA and other intervenors to achieve an acceptable outcome on all disputed issues.</p> <p>CforAT addressed residential rate design issues in testimony but was not a party to the settlement agreement. CforAT did not address MC/RA issues.</p> <p>For these reasons, TURN submits that we avoided undue duplication in our participation in this proceeding and complemented the efforts of other parties, where feasible.</p>	<p>Verified</p>
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**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>As demonstrated in the Substantial Contribution section above, TURN’s participation led to meaningful benefits for residential ratepayers. By avoiding SCE’s proposal to separately calculate the baseline allowance for multifamily and single family all-electric customers, TURN’s participation prevented bill increases for lower-income customers and smaller users, at a time when such users are already facing numerous rate design changes coming out of R.12-06-013. TURN also played a crucial role in helping to achieve a marginal cost/revenue allocation settlement that confers substantial economic benefits upon residential customers.</p> <p>Taken together, the benefits obtained by TURN far exceed the cost of TURN’s participation in this proceeding, which was less than \$80,000. TURN’s claim should be found to be reasonable.</p>	<p><b>CPUC Discussion</b></p> <hr/> <p>Verified</p>
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<p>As such, the Commission should find that TURN's efforts have been productive.</p>	
<p><b>b. Reasonableness of hours and direct expenses claimed:</b></p> <p>TURN assigned this proceeding to staff attorney Hayley Goodson. Ms. Goodson has represented TURN in numerous GRC Phase 2 proceedings, including the last two SCE GRC Phase 2 proceedings. Because of her familiarity with the subject matter at hand, as well as the typical settlement negotiation process in GRC Phase 2 proceedings, she was particularly well-suited to efficiently covering this proceeding. Ms. Goodson devoted approximately 70 hours to this proceeding, which equates to less than two weeks of full-time work.</p> <p>Ms. Goodson enlisted the assistance of TURN attorney Matthew Freedman on residential rate design matters intersecting with the Commission’s Residential Rates OIR, R.12-06-013, given Mr. Freedman’s familiarity with that proceeding. Mr. Freedman devoted approximately 5 hours to this proceeding.</p> <p>Given the complexity of the issues presented in Phase 2 of a GRC, TURN retained the services of JBS Energy, Inc. to assist with the preparation of testimony on a wide range of issues. JBS Energy consultants, led by Bill Marcus, have extensive experience in General Rate Cases and were able to effectively analyze very challenging data. TURN relied heavily on JBS Energy in this proceeding.</p> <p>Bill Marcus and Garrick Jones of JBS Energy assisted TURN with reviewing SCE’s application, and they prepared testimony on Marginal Costs, Revenue Allocation, and Residential Rate Design. Mr. Jones prepared testimony on the quantification of marginal generation and distribution costs, revenue allocation, and residential rate design. Mr. Marcus testified on marginal customer cost issues. Mr. Marcus also played a central role in the workshop held on 8/18/15; he delivered the presentation on revenue allocation and provided input on other workshop topics in response to questions from ALJ Roscow. Finally, Mr. Marcus and Mr. Jones also assisted TURN during settlement negotiations.</p> <p>TURN devoted substantial time to settlement negotiations on Marginal Cost and Revenue Allocation. Settlement negotiations spanned from March 2015 until August 2015, when the motion for adoption of the settlement agreement was filed. In that process, several key individuals worked through details, assisted with modeling, and developed a framework for agreement. Bill Marcus was one of these key people</p>	<p>Verified</p>

<p>without whom a final settlement may not have been possible. Mr. Marcus also represented TURN on the panel testifying in support of the MC/RA settlement on 11/3/15.</p> <p>Settlement negotiations related to residential rate design were far less time-consuming, given the limited number of issues presented in this proceeding. Those negotiations took place between July 2015 and October 2015, when the motion for adoption of the settlement agreement was filed. TURN actively participated in those negotiations, and Mr. Marcus represented TURN on the panel testifying in support of the Residential Rate Design settlement on 11/3/15.</p> <p>Mr. Jones and Mr. Marcus together devoted approximately 250 hours of time to assisting TURN in this proceeding, which equates to slightly more than 6 weeks of full-time work.</p> <p>Given TURN’s substantial contributions in this proceeding, as well as the lead role played by TURN’s staff and expert consultants during settlement negotiations, the Commission should find that the number of hours claimed by TURN is reasonable.</p> <p>Should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.</p>													
<p><b>c. Allocation of hours by issue:</b></p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 4, which shows the allocation of TURN’s time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.</p> <table border="1" data-bbox="235 1486 1149 1892"> <thead> <tr> <th>Code</th> <th>Description</th> <th>Allocation of Time</th> </tr> </thead> <tbody> <tr> <td>#</td> <td>The work in in this category was substantive in nature but not specific to any one issue area addressed by TURN.</td> <td>10.2%</td> </tr> <tr> <td>Comp</td> <td>Intervenor Compensation: work preparing TURN's NOI and Request for Compensation</td> <td>3.4%</td> </tr> <tr> <td>FC</td> <td>This work was related to responding to the 8/10/15 ALJ ruling seeking input on the forum for holding the residential fixed charge workshop process required by D.15-07-001.</td> <td>1.5%</td> </tr> </tbody> </table>	Code	Description	Allocation of Time	#	The work in in this category was substantive in nature but not specific to any one issue area addressed by TURN.	10.2%	Comp	Intervenor Compensation: work preparing TURN's NOI and Request for Compensation	3.4%	FC	This work was related to responding to the 8/10/15 ALJ ruling seeking input on the forum for holding the residential fixed charge workshop process required by D.15-07-001.	1.5%	<p>Verified</p>
Code	Description	Allocation of Time											
#	The work in in this category was substantive in nature but not specific to any one issue area addressed by TURN.	10.2%											
Comp	Intervenor Compensation: work preparing TURN's NOI and Request for Compensation	3.4%											
FC	This work was related to responding to the 8/10/15 ALJ ruling seeking input on the forum for holding the residential fixed charge workshop process required by D.15-07-001.	1.5%											

GH	The work in this category includes participation in hearings.	3.6%	<p>If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.</p>
GP	The work in this category includes activities associated with general participation in this proceeding, such as TURN's initial review of the applications, reading ALJ procedural rulings, and reading parties' preliminary pleadings as necessary to determine whether TURN should address the issues raised.	3.7%	
MC	The work in this category addressed marginal cost methodologies and forecasts.	43.8%	
MC/RA	The work in this category addressed a combination of issues related to marginal costs and revenue allocation which were not readily separable.	17.6%	
PD	This work was related to the Proposed Decision which preceded D.16-03-030, where such work was not readily allocated to a specific issue code.	0.3%	
RA	The work in this category addressed revenue allocation among customer classes.	6.5%	
ResRD	The work in this category addressed default residential rate design (excluding PTR, TOU, and MHP rate design issues).	2.9%	
Sett	The work in this category related to settlement negotiations but was not specifically allocatable to the MC/RA settlement or the ResRD settlement	3.2%	
WS	The work in this category related to the workshop held on 8/18/15	3.2%	
<b>TOTAL</b>		<b>100%</b>	

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman, TURN Attorney	2014	3.25	\$410	D.15-06-021; D.15-08-023	\$1,332.50	3.25	\$410	\$1,332.50

Matthew Freedman, TURN Attorney	2015	2.25	\$410	D.15-06-021; D.15-08-023	\$922.50	2.25	\$410	\$922.50
Hayley Goodson, TURN Attorney	2014	10.50	\$355	D.15-08-023	\$3,727.50	10.50	\$355	\$3,727.50
Hayley Goodson, TURN Attorney	2015	49.25	\$355	D.15-08-023 (adopting 2014 rate of \$355), adjusted by the 2015 0% COLA per Res. ALJ-308	\$17,483.75	49.25	\$355	\$17,483.75
Hayley Goodson, TURN Attorney	2016	1.00	\$355	Apply 2015 requested rate of \$355; do not adopt as 2016 rate	\$355.00	1.00	\$360	\$360.00
Garrick Jones, JBS Energy, Inc.	2014	20.22	\$180	D.15-11-019 (adopting a rate of \$180 commencing in Oct. 1, 2014)	\$3,639.60	20.22	\$180	\$3,639.60
Garrick Jones, JBS Energy, Inc.	2015	170.98	\$180	D.15-11-019	\$30,776.40	170.98	\$180 <sup>[A]</sup>	\$30,776.40
William Marcus, JBS Energy, Inc.	2014	6.34	\$265	D.14-05-015 (adopting a rate of \$265 commencing March 1, 2013)	\$1,680.10	6.34	\$265	\$1,680.10
William Marcus, JBS Energy, Inc.	2015	56.50	\$280	See Comment #4	\$15,820.00	56.50	\$280 <sup>[A]</sup>	\$15,820.00
<b>Subtotal: \$75,737.35</b>						<b>Subtotal: \$75,742.35</b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
Hayley Goodson, TURN Attorney	2014	1.00	\$177.50	1/2 of requested hourly rate for 2014	\$177.50	1	\$177.50	\$177.50
Hayley Goodson, TURN Attorney	2016	10.25	\$177.50	1/2 of requested hourly rate for 2016	\$1,819.38	10.25	\$180.00	\$1,845.00
<b>Subtotal: \$1,996.88</b>						<b>Subtotal: \$2,022.50</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
	Copies	Copies of filings and documents related to A.14-06-014			\$15.40	\$15.40		
	Phone	Phone calls related to A.14-06-014			\$5.60	\$5.60		
	Postage	Mailing costs for filings related to A.14-06-014			\$7.64	\$7.64		

<b>TOTAL REQUEST: \$77,762.87</b>		<b>TOTAL AWARD: \$77,793.49</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. 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>			
<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>1</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation</b>
Hayley Goodson	December 2003	228535	No
Matthew Freedman	March 2001	214812	No

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

<b>Attachment or Comment #</b>	<b>Description/Comment</b>
Attachment 1	<b>Certificate of Service</b>
Attachment 2	<b>Timesheets for TURN's Attorney and Experts</b>
Attachment 3	<b>TURN Direct Expenses Associated with D.16-03-030</b>
Attachment 4	<b>TURN Hours Allocated by Issue</b>
Comment 1	<p><b>Hourly Rates for TURN Attorney Hayley Goodson</b></p> <p><b><u>2014</u></b> TURN seeks an hourly rate of \$355 for Ms. Goodson's work in 2014, consistent with the rate adopted by the Commission for her 2014 work in D.15-08-023.</p> <p><b><u>2015</u></b> For Ms. Goodson's work in 2015, TURN seeks an hourly rate of \$355. This rate reflects the application of the 2015 COLA adopted in Resolution ALJ-308 (0%) to the rate the Commission adopted for Ms. Goodson's work in 2014 in D.15-08-023.</p> <p><b><u>2016</u></b> Given the relatively small number of hours incurred by Ms. Goodson in 2016 related to D.16-03-030, TURN seeks only the hourly rate requested for 2015 (\$355) for these hours. TURN asks that the Commission NOT treat the decision on this compensation request as setting a 2016 hourly rate for Ms. Goodson, as TURN will seek and justify an actual 2016 hourly rate for her in a future compensation request.</p>

<sup>1</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Comment 2	<p><b>Hourly Rates for TURN Attorney Matthew Freedman</b></p> <p><b><u>2014</u></b></p> <p>TURN seeks an hourly rate of \$410 for Mr. Freedman’s work in 2014. This is the rate adopted by the Commission for his 2014 work in D.15-06-021 and D.15-08-023.</p> <p><b><u>2015</u></b></p> <p>For Mr. Freedman’s work in 2015, TURN seeks an hourly rate of \$410, consistent with his 2014 rate adopted in D.15-06-021 and D.15-08-023, and the 0% COLA for 2015 authorized in Resolution ALJ-308.</p>
Comment 3	<p><b>Hourly Rates for Garrick Jones, JBS Energy</b></p> <p><b><u>2014</u></b></p> <p>TURN requests an hourly rate of \$180 for work Mr. Jones performed in 2014. The is the rate charged by JBS Energy for Mr. Jones’s work starting October 1, 2014, and the rate adopted by the Commission in D.15-11-019 for his work commencing Oct. 1, 2014. Because all of Mr. Jones’s work in this proceeding occurred after Oct. 1, 2014, it is appropriate to apply this previously authorized rate of \$180.</p> <p><b><u>2015</u></b></p> <p>TURN requests that the Commission authorize the same rate of \$180 for Mr. Jones’s work in 2015 as was authorized in D.15-11-019 for his work in late 2014 (commencing Oct. 1, 2014).</p>
Comment 4	<p><b>Hourly Rates for William B. Marcus, JBS Energy</b></p> <p><b><u>2014</u></b></p> <p>TURN requests an hourly rate of \$265 for work Mr. Marcus performed in 2014. This is the same rate that JBS Energy billed TURN for his work between March 1, 2013 and December 31, 2014. In D.14-05-015 (the SoCalGas and SDG&amp;E test year 2012 GRCs, A.10-12-005/006), the Commission adopted this \$265 rate for Mr. Marcus’s work in 2013. TURN asks that that same rate be applied to Mr. Marcus’s work in 2014 in this proceeding because it reflects his actual billing rate.</p> <p>TURN notes that the Commission in D.15-08-023 adopted a 2014 rate for Mr. Marcus of \$270, despite that TURN had requested a rate of \$265. TURN requests that the Commission here not apply the higher rate because it is inconsistent with the rates actually charged by JBS Energy for Mr. Marcus’s work in 2014.</p> <p><b><u>2015</u></b></p> <p>TURN requests an hourly rate of \$280 for work Mr. Marcus performed in 2015. This is the same rate that JBS Energy billed TURN for his work during this period. TURN makes the same showing here in support of a 2015 rate of \$280 for Mr. Marcus as we made in the request for compensation we filed in R.14-07-002 on Apr. 5, 2016. That request is currently pending.</p> <p>As explained above, the Commission awarded compensation to TURN using a \$265 hourly rate for Mr. Marcus’s work in <u>2013</u> in D.14-05-015. JBS Energy increased Mr. Marcus’s hourly rate as of January 1, 2015, by \$15 to \$280. If the Commission were to deem the JBS-adopted increase to Mr. Marcus’s billing rate as one of the 5% “step” increases available under its intervenor compensation hourly rate policies and procedures, the resulting rate (rounded to</p>

	<p>the nearest \$5 increment) is \$280. Furthermore, the Commission adopted a 2.58% COLA increase for 2014 rates in Resolution ALJ-303; applying that increase to Mr. Marcus’s 2013 rate, then adding a 5% “step” increase, would produce an hourly rate of \$285.</p> <p>In Resolution ALJ-308, the Commission adopted a range of 2015 hourly rates of \$170-\$420 for expert witnesses with more than thirteen years of experience. Mr. Marcus has over three decades of experience in providing utility ratemaking analysis of the highest caliber and quality, yet his requested rate of \$280 is in the second lowest quartile of the established range for experts with his level of experience.</p> <p>The Commission should find reasonable the requested hourly rate of \$280 for 2015 work of William Marcus.</p>
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**D. CPUC Disallowances and Adjustments:**

Item	Reason
A	The Commission finds reasonable a rate of \$180 per hour for Jones in 2014 and \$280 per hour for Marcus in 2015, based on reasoning and documentation provided by TURN.

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

**FINDINGS OF FACT**

1. TURN has made a substantial contribution to D.16-03-030.
2. The requested hourly rates for TURN’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 \$77,793.49.

**CONCLUSION OF LAW**

1. 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 \$77,793.49.
2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay The Utility Reform Network 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 July 31, 2016, the 75<sup>th</sup> 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 San Francisco, California.

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

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1603030		
<b>Proceeding(s):</b>	R1406014		
<b>Author:</b>	ALJ Roscow		
<b>Payer(s):</b>	Southern California Edison 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>
The Utility Reform Network	May 17, 2016	\$77,762.87	\$77,793.49	N/A	Increased Rates

**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>
Matthew	Freedman	Attorney	TURN	\$410	2014	\$410
Matthew	Freedman	Attorney	TURN	\$410	2015	\$410
Hayley	Goodson	Attorney	TURN	\$355	2014	\$355
Hayley	Goodson	Attorney	TURN	\$355	2015	\$355
Hayley	Goodson	Attorney	TURN	\$355	2016	\$360
Garrick	Jones	Expert	TURN	\$180	2014	\$180
Garrick	Jones	Expert	TURN	\$180	2015	\$180
William	Marcus	Expert	TURN	\$265	2014	\$265
William	Marcus	Expert	TURN	\$280	2015	\$280

**(END OF APPENDIX)**