Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) for Authority to Implement Optional Pilot Program to Increase Customer Access to Solar Generated Electricity.	Application 12-01-008 (Filed January 17, 2012)
And Related Matters.	Application 12-04-020 Application 14-01-007

DECISION GRANTING THE INTERVENOR COMPENSATION CLAIM OF SUSTAINABLE ECONOMIES LAW CENTER FOR SUBSTANTIAL CONTRIBUTION TO DECISION 16-05-006

Intervenor: Sustainable Economies Law Center (SELC)	**For contribution to Decision (D.) 16-05-006**
Claimed: $27,096.80	**Awarded: $27,096.80**
Assigned Commissioner: Michael Picker	**Assigned ALJ: Michelle Cooke**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.16-05-006 completes implementation of Senate Bill (SB) 43 (Wolk, Stats. 2013, ch. 413), which requires that the three large electrical utilities implement the Green Tariff Shared Renewables (GTSR) program comprising of two options: the Green Tariff option and the Enhanced Community Renewables (ECR) option. The Decision refines the GTSR program adopted in Decision 15-01-051, which set forth the initial steps for PG&E, SDG&E, and SCE to administer the Green Tariff and ECR components of the GTSR program. D. 16-05-006 addresses Phase IV of the proceeding, primarily concerning the ECR option, including participation of ECR projects in the Renewable Auction Mechanism (RAM) and other refinements to the GTSR program. In addition, the Decision adopts a forecasting methodology to establish a 20-year estimate of bill credits and charges for the GTSR program as required in SB 793 (Wolk, Stats. 2015, ch. 587).

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):	9/25/2013	Verified.
2. Other specified date for NOI:	12/12/2013	Verified.
3. Date NOI filed:	12/10/2013	Verified.
4. Was the NOI timely filed?		Yes, Sustainable Economies Law Center (SELC) 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:	A.12-01-008	Verified.
6. Date of ALJ ruling:	1/9/2014	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, SELC demonstrated appropriate status.
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-01-008	Verified.
10. Date of ALJ ruling:	1/9/2014	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, SELC demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-05-006	Verified.
14. Date of issuance of Final Order or Decision:	5/19/2016	Verified.
15. File date of compensation request:	7/18/2016	Verified.
16. Was the request for compensation timely?		Yes, SELC timely filed the request for

	intervenor compensation.

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

#	Intervenor's Comment(s)	CPUC Discussion
Line #5 & #9	SELC's showing of financial hardship and customer status is contained in our NOI. (See **ALJ ruling on SELC's Showing of Financial Hardship, issued on January 9, 2014 in A.12-01-008 and A.12-04-020**; see also **ALJ Richard Clark's November 12, 2013 electronic-mail ruling**, granting SELC's Motion Requesting Party Status and allowing 30 days from that date for SELC to file a Notice of Intent to Claim Intervenor Compensation.)	Verified.

PART II: SUBSTANTIAL CONTRIBUTION

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

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Among a large number of intervenors, SELC provided a unique perspective to the Commission that emphasized achieving SB 43's purpose by implementing ECR programs that removed market barriers to community-owed energy projects. **<u>1. Affordability</u>** SELC submitted extensive recommendations to achieve SB 43's goal of expanding access to the benefits of renewable energy by designing an affordable program and rate structure that would promote adoption of community-based projects for low and moderate income customers. SELC addressed how potential ECR business models pose barriers for low-income customer participation, such as upfront costs or limited access to financing. SELC suggested multiple options	**SELC Opening Comments on Track A, August 7, 2015, at 3-6.**	Verified.

to make the GTSR program affordable to more customers, including pooling diverse subscribers, partnering with community-based organizations, and encouraging renewable energy cooperatives.	**SELC Opening Comments on Track A, August 7, 2015, at 7-12.**	
While the Decision did not adopt SELC's specific recommendations, the Commission examined the comments offered by SELC and other parties regarding affordability, leading to its decision to, at a minimum, continue the approach of applying discount programs such as CARE and FERA to the GTSR program.	**D.16-05-006, at 20.**	
SELC presented evidence and argued for the implementation of long-term contracts with locked-in rates to attract diverse customers and increase cost predictability.	**SELC Opening Comments on Track A, August 7, 2015, at 12-13.**	
The Commission mentioned SELC's argument and agreed to allow locked-in generation rates and long-term contracts.	**D.16-05-006, at 20-21** (mentioning SDG&E, CEJA, and SELC's support for long-term contracts and locked-in rates). "We find it reasonable to allow Enhanced Community Renewables customers to sign-up for contracts with their provider for up to 20 years as this is a mutual, private arrangement." **D.16-05-006, at 21.**	
SELC provided an analysis of the legislative purpose and recommended implementation of SB 793, which requires up to a 20-year subscription option and up to 20-year pricing estimates. SELC argued that SB 793 requires not only an option of up to a 20-year subscription period, but also for rate forecasts for any subscription term less than or equal to 20 years – not just one	**SELC Opening Comments on Additional Track A Issues (SB 793/RAM ALJ Ruling), November 20, 2015, at 6-10.**	

estimate for exactly 20 years in the future. In addition to allowing contracts for up to 20 years, the Commission agreed with SELC and directed the utilities to provide estimates for each year over a 20-year period, starting from 2016.	"…the utilities should utilize the 2016 price as the starting point for the 20 year forecasts and escalate based on the five year rolling average." **D.16-05-006, at 26-27** (providing a formula for arriving at a value for each year and requiring annual updates).	
2. **Procurement** Through a range of comments, SELC supported efforts to improve the ECR procurement structure and rules, including choice and design of procurement mechanism, preferential procurement of EJ projects, and procurement of non-solar resources. SELC assisted in the refinement of the procurement mechanism for ECR projects by recommending that utilities continue to use a version of the current ReMAT process as opposed to RAM because of the substantial adjustments necessary to make RAM consistent with SB 43. The Commission decided to require RAM solicitations for ECR procurement but with modifications addressing some of SELC's concerns (discussed below).	**SELC Opening Comments on Track A, August 7, 2015, at 13** (recommending ReMAT and commenting that RAM is better suited for procurement from large projects as opposed to EJ projects less than 1MW and ECR projects that would ideally be small in order to truly be community-based). **SELC Opening Comments on Additional Track A Issues (SB 793/RAM ALJ Ruling), November 20, 2015, at 10-11** (addressing the specific adjustments necessary for RAM and thus continuing to recommend ReMAT). "we direct PG&E, SCE, and SDG&E to each hold two Renewable Auction Mechanism solicitations each year to procure Enhanced Community Renewables and Enhanced Community Renewables-Environmental Justice projects until the program sunsets in	Verified.

	December 31, 2018." **D.16-05-006, at 10 and footnote 8.**	
The Decision also recognized the potential value of ReMAT by allowing utilities to use ReMAT at their discretion.	"we do not require the utilities to procure Enhanced Community Renewables projects using ReMAT solicitations or hold parallel ReMAT and Renewable Auction Mechanism solicitations, but they may do so at their discretion." **D.16-05-006, at 10.**	
SELC raised a major concern with using RAM—that procurement of EJ and ECR projects may suffer if those projects had to compete with larger projects in an auction that only considered bid price. SELC recommended that whatever procurement process the Commission decided to use must consider benefits other than its bid value.	"The ECR procurement tool must consider and preferentially treat factors of energy generation proximity and economic benefit proximity rather than solely being based on the cost of generation." **SELC Opening Comments on Additional Track A Issues (SB 793/RAM ALJ Ruling), November 20, 2015, at 11.**	
The Commission addressed the concern that SELC and others raised by requiring the utilities to select EJ projects whose bid prices where within a specified range above previously accepted auction bids.	"The utilities are directed to award contracts to all Enhanced Community Renewables projects whose bid price is at or below 120 percent of the maximum executed contract price up to the capacity offered at that solicitation. For Enhanced Community Renewables-Environmental Justice projects, the utilities must award contracts to all projects whose bid price is at or below 200 percent of the maximum executed contract price up to the Environmental Justice capacity offered at that solicitation." **D.16-05-006, at 11.**	
The Commission also addressed SELC's concern that RAM would only consider cost by directing utilities to use a least-cost best-fit methodology in the event that the capacity offered by the utility in a given RAM solicitation is exceeded.	**D.16-05-006, at 13.**	
SELC recommended that any decision the Commission takes	"SELC recommends that any decision the Commission takes with respect to	

with respect to procurement mechanisms include a specific requirement that the IOUs preferentially procure capacity from EJ projects and community-based ECR projects. The Decision partially agrees and directs preferential procurement of EJ projects. SELC commented that the ECR program should allow projects using renewable resources other than solar, including solar coupled with energy storage, in order to ensure success of the program and expansion of benefits to communities. The Commission agreed with SELC's position and opened ECR procurement to non-solar projects.	procurement mechanisms include a specific requirement that the IOUs preferentially procure capacity from EJ projects and community-based ECR projects." **SELC Opening Comments on Additional Track A Issues (SB 793/RAM ALJ Ruling), November 20, 2015, at 11.** "For these reasons, we provide a preference to Enhanced Community Renewables-Environmental Justice projects in the bid selection process." **D.16-05-006, at 15-16.** See also **D.16-05-006, at 42** (Ordering Paragraph 2). **SELC Opening Comments on Track B, November 9, 2015, at 16-18.** "By opening the Renewable Auction Mechanism to Enhanced Community Renewables projects we have also effectively opened eligibility to other non-solar projects to participate in GTSR." **D.16-05-006, at 12-13.**	
3. **<u>CalEnviroScreen</u>** SELC participated in the CalEnviroScreen Working Group to the determine how the CalEnviroScreen screening methodology should be used to identify areas eligible for projects under the EJ reservation specified in SB 43. By helping to coordinate the activities of the Working Group and contributing to drafting the Joint Statement of the Working	**Joint Statement on CalEnviroScreen, June 15, 2015, at 3-5.**	Verified.

Group, SELC helped to ensure the appropriate implementation of CalEnviroScreen. The Working Group recommended establishing census tracts based on the tool and not changing them for a given solicitation, as well as continuing to count a project toward the EJ reservation regardless of changes to EJ definition. SELC reiterated its agreement with the Joint Statement, recommending that the GTSR program use the resulting CES 2.0 score as-is, rather than attempt to modify the tool by adding or removing indicators, or by changing their weighting. The Commission adopted the Joint Statement and SELC's recommendation regarding use of the CalEnviroScreen tool and continued consideration of EJ projects regardless of changes to the tool or program rules.	**SELC Opening Comments on Track A, August 7, 2015, at 14.** "Should a project be deemed to count towards the Environmental Justice reservation of the GTSR Program based upon the approved rules at the time of the solicitation, that project should continue to be considered as such, even if the CalEnviroScreen tool is amended, or other changes occur in regards to the definition of Environmental Justice under the GTSR program. Future solicitations will use the then-current version of CalEnviroScreen." **D.16-05-006, at 30.**	
4. **<u>Securities</u>** SELC extensively contributed to the Commission's consideration of objective standards to evaluate and accept securities opinions from law firms outside of the AmLaw 100. SELC provided thorough comments regarding potential securities litigation risks, potential securities exemptions mitigating those risks, and the weaknesses of	**SELC Opening Comments on Track B, November 9, 2015, at 6-10** (arguing that the AmLaw 100 standard is uncorrelated to how competent a given	Verified.

the AmLaw 100 securities opinion approach and other approaches.	lawyer is to offer a securities opinion and inconsistent with SB 43 because it presents a substantial financial and procedural barrier to EJ and ECR projects). **SELC Response to SEIA Safe Harbor Motion, March 28, 2016, at 2-6** (arguing generally that the balance of risks does not necessitate securities opinions and specifically about the shortcomings of the AV-rated law firm standard and safe harbor criteria). **SELC Opening Comments on Proposed Decision, May 2, 2016, at 2-4** (discussing the need to balance ECR participation and affordability with rules that aim to limit potential litigation costs). **Joint Reply Comments on Proposed Decision, May 9, 2016, at 5** (addressing the defects of using the "AV Preeminent" standard).	
SELC provided multiple alternative objective standards to evaluate and accept securities opinions from law firms outside of the AmLaw 100, such as requiring that securities opinions are obtained from attorneys who have practiced securities law for a certain duration of time and not requiring a securities opinion from low-risk ECR projects. SELC particularly fleshed out the alternatives in its comments on the Proposed Decision. While the Commission did not alter the AmLaw 100 securities opinion requirement, it did examine SELC's concerns, recognizing the inadequacy of the current standard by calling on	**SELC Opening Comments on Track B, November 9, 2015, at 10-11** (providing alternative objective standards that would protect customers while promoting SB 43's purpose). **SELC Opening Comments on Proposed Decision, May 2, 2016, at 6-8** (suggesting alternative standard of accepting securities opinions from any attorney with three or more years of securities law practice and not requiring any securities opinion from low-risk nonprofit and cooperative projects, projects that have registered securities in California, and projects certifying qualification for securities law exemptions). "We would welcome a fully fleshed out proposal to modify this element of D.15-01-051 if the parties are able to reach agreement on a proposal to limit	

Commission Staff and parties to deliberate further on an alternative that balances securities risks and ECR development costs.	customer and ratepayer risk and simultaneously reduce cost to developers. To this end, we direct Energy Division and Legal Division to host a workshop within two months of the effective date of this Decision to provide a facilitated forum for the parties to discuss and develop a petition to modify D.15-01-051." **D.16-05-006, at 34.**	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	**CPUC Discussion**
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?[1]	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.
c. If so, provide name of other parties: California Environmental Justice Alliance (CEJA), Clean Coalition, Solar Energy Industries Association (SEIA)		Verified.
d. Intervenor's claim of non-duplication: SELC's intervention focused on affordability, rates, procurement, CalEnviroScreen, and securities components of the ECR program. While other intervenors provided comments on those issues, SELC uniquely argued from a position of seeking to ensure that low and moderate income customers can develop community-based projects to own and control their own sources of renewable energy. SELC avoided duplication of effort with similarly-positioned parties, submitted differing analysis and arguments in its comments, and coordinated with other intervenors wherever possible. The Solar Energy Industries Association (SEIA) similarly advocated for positions that would reduced developer costs and promote affordable ECR projects to customers; however, SEIA represented larger corporate third party developers, whereas SELC advocated for small to medium-sized groups of customers seeking to own their own ECR projects through entities such as cooperatives and nonprofit organizations. For instance, while SEIA also raised concerns with the AmLaw 100 securities opinion requirement, SELC differed in its analysis and approach, recognizing that even the AV-rated law firm standard that SEIA proposed would be significantly problematic for the customers SELC represents.		Agreed. SELC did not engage in excessive duplicative efforts with other parties.

[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.

SELC shared more similar positions with CEJA and Clean Coalition. However, the contributions of these parties were different and complementary. While SELC represented low and moderate income customers from the perspective of enabling shared ownership and control of community-based energy facilities, CEJA specifically represented customers of low income communities and communities of color, and Clean Coalition represented customers from the perspective of experts in the development of small, distributed generation policy. SELC communicated often with Clean Coalition and CEJA to avoid undue duplication of effort while coordinating the overall effectiveness our advocacy to improve the ECR and EJ components of the GTSR program to ensure the development of local energy projects with benefits that would flow to disadvantaged communities in particular. SELC participated in multiple phone conference calls and coordinated by email with CEJA and Clean Coalition to discuss issue area allocation for each round of comments. Furthermore, SELC avoided duplication by twice filing jointly – first in the Joint Statement on CalEnviroScreen (June 15, 2015) and second in Joint Reply Comments on the Proposed Decision (May 9, 2016). In addition, SELC, CEJA, and Clean Coalition jointly requested and participated in ex parte meetings with four Commissioners' advisors rather than meeting separately. The parties used this time efficiently to advocate for shared positions by concentrating on different specific issues and supplementing each other's presentations. Overall, this and SELC's other efforts to avoid duplication with other parties supported SELC's focused and unique contribution to this proceeding's final decision.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION
A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	**CPUC Discussion**
SELC's participation in this proceeding was directed at policy and environmental matters, and therefore ascertaining direct benefits, in terms of actual dollars, to ratepayers is impossible. The greatest driver of the need to expand renewable energy production in California is to reduce reliance on fossil fuel generation and continue to minimize the state's contribution to human-induced climate change. The environmental need to expand *local* renewable energy generation specifically is to reduce the environmental impact of large-scale renewables. It is not feasible to value such environmental benefits. Nevertheless, SELC's written submissions as an individual party, as well as through actions carried out with Clean Coalition and CEJA, helped significantly improve the affordability and cost-effectiveness of the ECR program. Making EJ-ECR and ECR projects more viable expands the likely pool of ECR customers, spreading marketing and other operational costs over more customers, thus even further driving down overall costs of the ECR program. Greater participation will also encourage more developers to	Verified.

propose projects that are closer to load and thereby reduce transmission costs for utilities and customers. Further refining the securities opinion requirement will also reduce developer and ECR customer costs while still protecting utilities and ratepayers from securities litigation risks. More importantly, the benefits of expanded access to local renewable energy will increase economic benefits to customers in disadvantaged communities, even though it is not possible to value those benefits at this time. As the Commission noted, "part of the purpose behind establishing a capacity carve out in the statute for projects located in Environmental Justice areas is to ensure that disadvantaged communities share in the benefits of renewable development through potential creation of jobs and future tax revenue in disadvantaged areas" (D.16-05-006, at 15) and providing preference to ECR-EJ projects "promotes local renewable development benefits flowing to disadvantaged communities" (D.16-05-006, at 37). SELC represents customers with a concern for the environment and local economic resilience, especially those interested in supporting ECR programs that spur local ownership and economic innovation that decreases dependence on fossil fuel and maximizes energy independence. These customers, and all California ratepayers within the investor-owned utilities' service territories, have benefited from SELC's participation in this proceeding because SELC's advocacy has helped increase the likelihood that ECR programs spur local economic and environmental benefits. Therefore, the actual costs of SELC's participation are reasonable compared to the benefits achieved for ratepayers as a result of the participation.	
b. Reasonableness of hours claimed: SELC limited its hours of work on this proceeding and divided and delegated work internally among a small staff team. Linda Barrera was the lead attorney for SELC's participation in Track A, and Subin Varghese was the lead advocate during Track B. Jasmine (Yassi) Eskandari-Qajar focused on participation in the CalEnviroScreen working group. Janelle Orsi, SELC's most senior attorney, provided only high-level input, significantly minimizing her hours. SELC has excluded time for other attorneys and staff at SELC who have provided feedback on comments, and SELC has excluded time spent on procedural and administrative time such as filing and serving comments. While Linda Barrera was the lead attorney she helped coordinate with SELC staff and other attorneys and advocates working for Clean Coalition and CEJA. Subin Varghese joined as a new staff member for SELC in September 2015 and took over as the lead advocate of SELC's participation in the proceeding, coordinating with staff and other parties from then onwards. Ms. Barrera has experience representing ratepayers in proceedings before the Commission which supported her efficient involvement in this proceeding. Subin Varghese, a recent law school graduate, has participated indirectly in Commission proceedings during legal internships. While his reduced compensation rate already reflects his lesser experience than Ms. Barrera, hours spent by Mr. Varghese to become more familiar with the Commission's	Verified.

policies and procedures are not included in this compensation request. Although Ms. Barrera is eligible for compensation at a higher hourly rate ($300), SELC is applying a reduction of that rate ($215). To make efficient use of time and resources, whenever possible, Ms. Barrera delegated to Ms. Eskandari-Qajar to coordinate with other intervenors during Track A. Furthermore, SELC relied on research conducted by a law student volunteer, Tyler Sullivan, eliminating the need to seek compensation for his work. In addition to the efficiency and costs savings noted above, SELC strived to narrow its participation to areas where it could more likely bring a unique perspective and contribution. Overall, the hours SELC spent during its intervention were limited and reasonable.	
c. Allocation of hours by issue: SELC allocated its hours in Attachment 2, by the following issues: **Affordability: 24.31% of hours** Work to write comments regarding expanding access to the benefits of renewable energy by designing an affordable ECR program and rate structure that would promote community-based projects for low and moderate income customers. Time allocated on Affordability: 24.31%. **Procurement: 25.23% of hours** Work to write comments regarding improving the ECR procurement structure and rules, including choice and design of procurement mechanism, preferential procurement of EJ projects, and procurement of non-solar resources. Time allocated on Procurement: 25.23%. **CalEnviroScreen: 10.32% of hours** Work to contribute to joint statement regarding how the CalEnviroScreen screening methodology should be used to identify areas eligible for projects under the EJ reservation specified in SB 43. Time allocated on CalEnviroScreen: 10.32%. **Securities: 40.14% of hours** Work to write comments regarding objective standards to evaluate and accept securities opinions from law firms outside of the AmLaw 100. Time allocated on CalEnviroScreen: 40.14%.	Verified.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Linda Barrera, attorney	2015	34.55	$215	D. 15-09-019	$7,428.25	34.55	215.00	7,428.25
Jasmine	2015	16.22	$140	New Rate	$2,270.80	16.22	140.00	2,270.80

Eskandari-Qajar, advocate				Request, see Attachment 3				
Janelle Orsi, attorney	2015	3.08	$300	New Rate Request, see Attachment 3	$924.00	3.08	300.00	924.00
Janelle Orsi, attorney	2016	0.95	$305	New Rate Request, see Attachment 3	$289.75	0.95	305.00	289.75
Subin Varghese, advocate	2015	51.30	$140	New Rate Request, see Attachment 3	$7,182.00	51.30	140.00	7,182.00
Subin Varghese, advocate	2016	56.40	$140	New Rate Request, see Attachment 3	$7,896.00	56.40	140.00	7,896.00
					***Subtotal:* $25,990.80**			***Subtotal:* $25,990.80**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Subin Varghese, advocate	2016	15.8	$70	Half of new rate request	$1,106.00	15.8	70.00	1,106.00
					***Subtotal:* $1,106.00**			***Subtotal:* $1,106.00**
					TOTAL REQUEST: $27,096.80			**TOTAL AWARD: $27,096.80**

**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.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[2]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?)**
Linda Barrera	6/1/2009	263104	No.
Janelle Orsi	1/9/2008	254897	No.

C. PART IV: OPPOSITIONS AND COMMENTS

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

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. Sustainable Economies Law Center has made a substantial contribution to D.16-05-006.

2. The requested hourly rates for Sustainable Economies Law Center'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 are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is $27,096.80.

CONCLUSION OF LAW

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

ORDER

1. Sustainable Economies Law Center shall be awarded $27,096.80.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company shall pay Sustainable Economies Law Center their respective shares of the award, based on their California-jurisdictional electric revenues for the 2015 calendar year, to reflect the year in which the

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

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 October 1, 2016, the 75th day after the filing of Intervenor's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**Modifies Decision?**	
Contribution Decision(s):	D1605006		
Proceeding(s):	A1201008, A1204020, and A1401007		
Author:	ALJs Cooke		
Payer(s):	Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Sustainable Economies Law Center (SELC)	7/18/2016	$27,096.80	$27,096.80	N/A	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Linda	Barrera	Attorney	SELC	$215.00	2015	$215.00
Jasmine	Eskandari-Qajar	Advocate	SELC	$140.00	2015	$140.00
Janelle	Orsi	Attorney	SELC	$300.00	2015	$300.00
Janelle	Orsi	Attorney	SELC	$305.00	2016	$305.00
Subin	Varghese	Advocate	SELC	$140.00	2015	$140.00
Subin	Varghese	Advocate	SELC	$140.00	2016	$140.00

(END OF APPENDIX)