

Decision \_\_\_\_\_

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

In the Matter of the Application of Southern California Gas Company (U904G) For Approval of The Branch Office Optimization Process.	Application 13-09-010 (Filed September 16, 2013)
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**DECISION AWARDING INTERVENOR COMPENSATION TO  
THE UTILITY REFORM NETWORK  
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 16-06-046**

<b>Intervenor: The Utility Reform Network (TURN)</b>	<b>For contribution to Decision (D.) 16-06-046</b>
<b>Claimed: \$63,362.54</b>	<b>Awarded: \$63,362.54</b>
<b>Assigned Commissioner:</b> Carla J. Peterman	<b>Assigned ALJ:</b> W. Anthony Colbert

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	In D.16-04-046, <i>Decision Granting, in Part, and Denying in Part, Southern California Gas Company's Request for Permission to Close Six Branch Offices</i> , the Commission addressed the application of Southern California Gas Company (SoCalGas) for approval of The Branch Office Optimization Process, as well as authorization to close six of its 47 branch offices now and permission to seek future closures through a Tier 2 Advice Letter process rather than an application. The decision grants SoCalGas's request to close the Bellflower, Monrovia, and Santa Monica branch offices, and denies its request to close the Santa Barbara and San Luis Obispo branch offices. The decision grants the request to close the Palm Springs branch office pending SoCalGas's successful implementation of a process for identification verification consistent with the Fair & Accurate Credit Transaction Act (FACTA) requirements that does not require customers to appear in-person or fax documents to the utility. The decision additionally clarifies that approval of the closure of certain branch offices does not mean that the Branch Office Optimization Process necessarily demonstrates that particular offices should be closed, since that process does not produce sufficient information regarding specific customer needs and preferences. Finally, because SoCalGas withdrew its request to seek future closures by Advice Letter, the Commission did not need to reach that issue.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	December 3, 2013	Verified.
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	December 20, 2013	Verified.
4. Was the NOI timely filed?		Yes, The Utility Reform Network timely filed the notice of intent to claim intervenor compensation.
<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, TURN demonstrated appropriate status.
<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, TURN demonstrated significant financial hardship.
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.16-06-046	Verified.
14. Date of issuance of Final Order or Decision:	June 27, 2016	Verified.
15. File date of compensation request:	August 26, 2016	Verified.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for intervenor compensation.

**PART II: SUBSTANTIAL CONTRIBUTION**

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

<b>Intervenor’s Claimed Contribution(s)</b>	<b>Specific References to Intervenor’s Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
<p><b><u>SoCalGas’s Proposed Branch Office Optimization Process (BOOP)</u></b></p> <p>In D.16-06-046, the Commission agreed with TURN that SoCalGas’s proposed BOOP should not create a presumption that particular branch offices should be closed. The Commission’s reasoning followed TURN’s. The Commission noted that the BOOP “does not produce sufficient information regarding specific customer needs and preferences” and does not consider the proximity of the nearest branch office, which should be considered “until there is a clear demonstration by SoCalGas that there is no possible need for customers to visit a branch office.” TURN criticized the BOOP failing “to consider the needs, preferences, and convenience of those customers who actually use the branch offices,” and for only considering the proximity of Alternative Payment Locations (APLs), when APLs are not a substitute for branch offices (only branch offices offer the opportunity for in-person non-payment transactions).</p> <p>The Commission also took issue with the relative nature of the BOOP’s transaction reviews and screens, and required SoCalGas to focus on absolute metrics in evaluating transaction level changes, area income, and the percentage of CARE, disabled, or senior customers served by each branch office, citing the critique of TURN (which was also presented by other parties).</p>	<ul style="list-style-type: none"> <li>• D.16-06-046, pp. 49-50</li> <li>• TURN Opening Brief, pp. 8-20</li> </ul>	<p>Verified.</p> <p>TURN jointly filed the Opening Brief with the Center for Accessible Technology.</p>

<p><b><u>SoCalGas’s Proposal to Close Six Branch Offices</u></b></p> <p>TURN opposed SoCalGas’s proposal to close all six of the branch offices at issue here, citing concerns about impacts on low-income, elderly, and disabled customers, lack of information in the record about why customers use the branch offices for payment and/or nonpayment transactions, the availability of reasonably comparable alternatives, specifically for non-payment transactions, distances and transit accessibility of alternative branch offices, and declining call center service levels. While the Commission in D.16-06-046 concluded that SoCalGas should be permitted to close three of the six, the Commission embraced several aspects of TURN’s analysis in its deliberations, including but not necessarily limited to the following.</p> <p><b>1. Consideration of Nearest Branch Office</b></p> <p>First, the Commission considered the distance to the nearest branch office as a critical element in considering whether to permit closure, consistent with TURN’s showing on the continued necessity of branch offices in assisting certain customers with FACTA identity verification. The Commission denied closure of the Santa Monica and San Luis Obispo offices, citing the distance to the nearest branch office (38 and 30 miles, respectively), and permitted closure of the Palm Springs branch office, the next farthest of the six from another branch office, only after SoCalGas demonstrated that customers no longer needed to visit branch offices to address FACTA compliance.</p> <p><b>2. Importance of Customer Needs</b></p>	<p><b><u>Consideration of Nearest Branch Office</u></b></p> <ul style="list-style-type: none"> <li>• D.16-06-046, pp. 43-44 (denying closure of San Luis Obispo and Santa Barbara because of the distance to the nearest branch office); p. 45 (“Going forward, we are concerned that should SoCalGas request authority to close additional branch offices, customers may be asked to travel even farther distances to conduct the occasional in-person transaction.”); Finding of Fact 17 (“The need for some degree of in-person contact with a SoCalGas customer service representative remains, particularly where FACTA requirements continue [to] require identity verification that cannot always be performance online or over the telephone.”).</li> <li>• Ex. TURN-4, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 12-13 (establishing the need for branch office visits in some circumstances); pp. 6-8 (critiquing SoCalGas’s focus on APLs, when they cannot serve as substitutes for branch offices).</li> <li>• TURN/CforAT Opening Brief, pp. 28, 31 (pointing to the distance from the San Luis Obispo and Santa Barbara branch offices – 30 and 38 miles, respectively -- as heavily weighing against their closure); p. 33, fn. 133 (pointing to the 21-mile distance from the Palm Springs office to the nearest one).</li> </ul> <p><b><u>Importance of Customer Needs and Preferences</u></b></p>	<p>Verified.</p>
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<p><b>and Preferences</b></p> <p>The Commission agreed with TURN that the preferences of the specific customers who use the branch offices must be taken into account in considering closure. The lack of this information prevented the Commission from authorizing the closure of more of the six offices.</p> <p><b>3. Conditional Authorization of Palm Springs Branch Office</b></p> <p>The Commission concluded that SoCalGas should be able to close the Palm Springs branch office, given the proximity of another branch office within 21 miles, but not until it satisfactorily implemented an alternative method of identity verification such that no customer would need to visit a branch office for FACTA compliance. The Commission pointed to the high number of service order transactions at that office. While TURN opposed closure, the Commission recognized the importance of addressing the need for FACTA-related visits to the branch office before permitting closure, as urged by TURN.</p> <p>The Commission also agreed with TURN that SoCalGas’s supplemental testimony, presented after the issuance of the original proposed decision in December 2015, did not establish that SoCalGas had met the condition set forth in that PD for closure of the Palm Springs branch office. As such, the Commission retained the conditional approval and associated requirements for SoCalGas to demonstrate eligibility to close that office in the future.</p>	<ul style="list-style-type: none"> <li>• D.16-06-046, pp. 39-40 ([W]e cannot ignore the fact that the record shows that some customers still prefer to use the branch offices for transactions, the majority of which are payment transactions. Neither the transaction data nor the Branch Office Survey indicate with any degree of reliability the reason these customers prefer the branch offices. ... Without more customer-specific data, we are reluctant to permit SoCalGas to close all of the branch offices requested.”).</li> <li>• Ex. TURN-4, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 16-17.</li> <li>• TURN/CforAT Opening Brief, pp. 8-11; pp. 27-38 (analyzing the specific proposed closures and discussing what little is known about customer preferences, other than their satisfaction with the branch offices).</li> </ul> <p><b><u>Conditional Authorization of Palm Springs Branch Office Closure</u></b></p> <ul style="list-style-type: none"> <li>• D.16-06-046, Finding of Fact 11, 12 (discussing the 21-mile distance to the next branch office from Palm Springs and that Palm Springs had the highest level of service order transactions among the six branch offices); Conclusions of Law 2, 3 (conditionally authorizing closure); pp. 50-53 (addressing SoCalGas’s supplemental testimony on FACTA compliance options).</li> <li>• TURN/CforAT Opening Brief, p. 33 (discussing the continued high</li> </ul>	
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	<p>volume of non-payment transactions at the Palm Springs Branch Office as weighing against closure).</p> <ul style="list-style-type: none"> <li>• TURN/CforAT Comments on the Supplemental Testimony of SoCalGas, pp. 3-7.</li> </ul>	
<p><b><u>Showing Required for Future Requests by SoCalGas to Close Branch Offices</u></b></p> <p><b>1. Advice Letter vs. Application</b></p> <p>SoCalGas originally requested Commission authorization to permit it to utilize a Tier 2 Advice Letter process, in combination with its proposed BOOP, for any future requests to close branch offices. TURN vehemently objected to this approach as inappropriate given the purpose of the Advice Letter process, the limited opportunity for review, and the informal and thus far-less transparent nature of that process relative to a formal Commission proceeding. As D.16-06-046 explains, SoCalGas withdrew its request in response to intervenor testimony.</p> <p><b>2. Contents of Showing</b></p> <p>Additionally, the Commission in D.16-06-046 adopted a number of TURN’s recommendations regarding the showing SoCalGas should make in future requests to close branch offices. The Commission required SoCalGas to include the following information:</p> <ul style="list-style-type: none"> <li>• A survey of the customers who use the branch offices to determine their number and reasons why they use the branch offices. (OP 12)</li> <li>• A study of the impacts to low-income, elderly, and disabled customers of proposed closures. (OP 11)</li> </ul>	<p><b><u>Advice Letter Process</u></b></p> <ul style="list-style-type: none"> <li>• D.16-06-046, pp. 20, 49</li> <li>• Ex. TURN-04, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 22-23</li> <li>• TURN Protest, pp. 6-8</li> </ul> <p><b><u>Showing Required</u></b></p> <ul style="list-style-type: none"> <li>• D.16-06-046, Ordering Paragraphs 9, 10, 11, 12.</li> <li>• Ex. TURN-04, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 23-24.</li> <li>• TURN/CforAT Opening Brief, pp. 43-45.</li> </ul>	<p>Verified.</p>

<ul style="list-style-type: none"> <li>• Data on alternative payment and service order transaction channels used by customers formerly served by closed branch offices, including APL transaction volumes and level of service performance of the IVRU, contact center, and My Account, before and after closures. (OP 9)</li> <li>• Identification of performance standards and actual performance metrics for the Customer Contact Center, and complaints associated with all customer service channels. (OP 10)</li> </ul> <p>TURN similarly advocated that SoCalGas be required to provided the following information, in addition to data previously required by the Commission on transaction trends:</p> <ul style="list-style-type: none"> <li>• An analysis of why customers use the branch office for payment and/or non-payment transactions;</li> <li>• Any analysis of the impacts of any proposed office closure on customers who are low-income, elderly, and/or have disabilities.</li> <li>• A report on Call Center customer service levels, including utility targets and performance for all of the metrics typically addressed in general rate cases or PBR proceedings, such as average speed of answer, average handle time, CSR level of service, average level of service, level of busies encountered, etc.</li> </ul>		
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor’s Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>1</sup></b>	Yes	Verified.
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Verified.
<b>c. If so, provide name of other parties:</b> The Office of Ratepayer Advocates (ORA), The Center for Accessible Technology (CforAT), the Greenlining Institute (Greenlining), and the Utility Workers Union of America (UWUA)		Yes.
<b>d. Intervenor’s claim of non-duplication:</b>  TURN coordinated as closely as possible with the other intervenors in this proceeding, all of whom had positions similar to TURN’s (albeit to varying degrees). TURN communicated regularly with ORA, UWUA, CforAT, and Greenlining, sharing discovery, discussing policy positions and strategy, and looking for formal opportunities to coordinate our showings on issues of common interest.  As a result of initial efforts at coordination, TURN and CforAT jointly sponsored direct testimony prepared by TURN witnesses Gayatri Schilberg and Hayley Goodson (Ex. TURN-4), and TURN joined CforAT in sponsoring part of the reply testimony of CforAT witness Dmitri Belser (Ex. CforAT-01). TURN and CforAT additionally coordinated our cross-examination during hearings, and filed all post-hearing pleadings jointly, including our opening brief, reply brief, response to SoCalGas’s motion to supplement the record, and comments on SoCalGas’s supplement testimony. This close coordination ensured no undue duplication between TURN and CforAT, and offered substantial efficiencies for both parties.  While ORA was also a party, it did not make sense for TURN and ORA to coordinate in the same way as TURN did with CforAT because TURN and ORA reached different conclusions regarding the best outcomes for customers regarding some of the branch offices. Likewise, while TURN and UWUA both determined that all six branch offices should remain open, TURN and UWUA presented different theories and analyses supporting our recommendations. Finally, Greenlining, addressed a narrower set of issues than TURN, and did not file briefs. TURN submits that our showing was complementary with Greenlining’s on the issues both organizations addressed, including SoCalGas’s proposed Branch Office Optimization Process, and the proximity and convenience of alternatives to the branch offices proposed for closure for payment transactions.  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.		Agreed, TURN sufficiently coordinated with other parties, particularly CforAT, to avoid duplication.

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

<sup>1</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

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

	<b>CPUC Discussion</b>
<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. TURN, along with other intervenors, helped to prevent the closure of the San Luis Obispo and Santa Barbara branch offices, and delayed the closure of the Palm Springs branch office (until SoCalGas meets the conditions set by the Commission), thus allowing these branch offices to continue serving customers whose needs and preferences are best served by this channel. As the Commission has previously noted, those customers tend to be the most vulnerable, including low income customers, elderly customers, and customers with disabilities. Furthermore, TURN helped to ensure that the Commission will have the information it needs to carefully and thoughtfully review any future requests by SoCalGas to close branch offices, and to do so in a formal proceeding, which affords the public and parties appropriate transparency and due process, in contrast to the expedited, informal vehicle proposed by SoCalGas.</p> <p>Taken together, the benefits obtained by TURN far exceed the cost of TURN’s participation in this proceeding, which was less than \$65,000. TURN’s claim should be found to be reasonable.</p> <p>As such, the Commission should find that TURN’s efforts have been productive.</p>	<p>Verified.</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 represented TURN in two prior proceedings wherein a utility had proposed to close local customer service offices. Because of her familiarity with the subject matter at hand, she was particularly well-suited to efficiently cover this proceeding. Ms. Goodson devoted approximately 155 hours to this proceeding (excluding time preparing this request), which equates to less than four weeks of full-time work.</p> <p>Ms. Goodson enlisted the assistance of Gayatri Schilberg of JBS Energy in reviewing SoCalGas’s application, conducting discovery and analysis, preparing testimony, and supporting TURN during evidentiary hearings. Like Ms. Goodson, Ms. Schilberg had significant prior experience addressing local office closure issues before the Commission. Ms. Goodson and Ms. Schilberg jointly drafted and sponsored testimony on behalf of TURN (and CforAT). Ms. Schilberg devoted approximately 35 hours of time to assisting TURN in this proceeding, which equates to less than 1 week of full-time work.</p> <p>TURN also partnered with CforAT in preparing four documents filed after hearings. TURN and CforAT jointly prepared opening and reply briefs. Ms. Goodson and CforAT attorney Melissa Kasnitz each wrote portions of both briefs, thus substantially reducing the time each would otherwise have devoted to brief writing. TURN later took the lead on drafting both parties’ joint response to SoCalGas’s motion to supplement the record and related comments on the SoCalGas supplemental testimony, substantially reducing the time CforAT</p>	<p>Verified.</p>

<p>needed to devote to those filings. TURN’s timesheets reflect the benefits of the shared workload associated with briefing, as well as TURN’s leading role on the latter two filings.</p> <p>Given TURN’s substantial contributions in this proceeding, 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"> <thead> <tr> <th>Code</th> <th>Description</th> <th>Allocation of Time</th> <th>with “#” allocated</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. Work given this code can be approximately allocated across the other substantive issue areas as follows: 50% to Close, 40% to BOOP, and 10% to Future.</td> <td>35.9%</td> <td></td> </tr> <tr> <td>BOOP</td> <td>This work was related to evaluating SCG's proposed Branch Office Optimization Process.</td> <td>8.2%</td> <td>22.6%</td> </tr> <tr> <td>Close</td> <td>This work was related to evaluating SCG's proposal to close 6 branch offices, including customer impacts and related cost issues.</td> <td>25.6%</td> <td>43.6%</td> </tr> <tr> <td>Comp</td> <td>Intervenor Compensation: work preparing TURN's NOI and Request for Compensation</td> <td>6.0%</td> <td>6.0%</td> </tr> <tr> <td>Future</td> <td>This work was related to the showing SCG should present in future requests to close branch offices, as well as the procedural vehicle for any such future requests.</td> <td>0.1%</td> <td>3.7%</td> </tr> <tr> <td>GH</td> <td>The work in this category was related to participation in hearings.</td> <td>5.6%</td> <td>5.6%</td> </tr> </tbody> </table>		Code	Description	Allocation of Time	with “#” allocated	#	The work in in this category was substantive in nature but not specific to any one issue area addressed by TURN. Work given this code can be approximately allocated across the other substantive issue areas as follows: 50% to Close, 40% to BOOP, and 10% to Future.	35.9%		BOOP	This work was related to evaluating SCG's proposed Branch Office Optimization Process.	8.2%	22.6%	Close	This work was related to evaluating SCG's proposal to close 6 branch offices, including customer impacts and related cost issues.	25.6%	43.6%	Comp	Intervenor Compensation: work preparing TURN's NOI and Request for Compensation	6.0%	6.0%	Future	This work was related to the showing SCG should present in future requests to close branch offices, as well as the procedural vehicle for any such future requests.	0.1%	3.7%	GH	The work in this category was related to participation in hearings.	5.6%	5.6%	<p>Verified.</p>
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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' pleadings as necessary to determine whether TURN should address the issues raised.	15.7%	15.7%
PD	This work was related to the Proposed Decision which preceded D.16-06-046, where such work was not readily allocated to a specific issue code.	4.0%	4.0%
Sett	The work in this category related to settlement negotiations.	4.3%	4.3%
<b>TOTAL</b>		<b>100%</b>	<b>100%</b>

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.

**B. Specific Claim:**

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2013	22.75	\$345	D.15-05-019; D.15-08-023	\$7,848.75	22.75	345.00	7,848.75
Hayley Goodson, TURN Attorney	2014	114.50	\$355	D.15-08-023	\$40,647.50	114.50	355.00	40,647.50
Hayley Goodson, TURN Attorney	2015	6.50	\$355	D.15-08-023 (adopting 2014 rate of \$355), adjusted by the 2015 0% COLA per Res. ALJ-308	\$2,307.50	6.50	355.00	2,307.50
Hayley Goodson, TURN Attorney	2016	8.25	\$355	Apply 2015 requested rate of \$355; do not adopt as 2016 rate	\$2,928.75	8.25	355.00	2,928.75
Thomas J. Long,	2013	0.25	\$555	D.14-05-015	\$138.75	0.25	555.00	138.75

**PROPOSED DECISION**

TURN Legal Director								
Robert Finkelstein, TURN General Counsel	2014	0.25	\$505	D.15-08-023	\$126.25	0.25	505.00	126.25
Gayatri Schilberg, JBS Energy, Inc.	2014	32.84	\$215	D.15-08-023	\$7,060.60	32.84	215.00	7,060.60
<b>Subtotal: \$61,058.10</b>						<b>Subtotal: \$ 61,058.10</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	2013	1.00	\$172.5 0	1/2 of requested hourly rate for 2013	\$172.50	1.00	172.50	172.50
Hayley Goodson, TURN Attorney	2016	10.75	\$177.5 0	1/2 of requested hourly rate for 2015 (to be applied in 2016 for this comp request)	\$1,908.13	10.75	177.50	1,908.13
<b>Subtotal: \$2,080.63</b>						<b>Subtotal: \$2,080.63</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
	Lexis Legal Research	legal research associated with A.13- 09-010			\$107.04	107.04		
	Phone	phone/fax expense associated with A.13-09-010			\$9.82	9.82		
	Photocopying	copying expense associated with pleadings in A.13-09-010			\$93.00	93.00		
	Postage	cost to mail pleadings related to A.13- 09-010			\$13.95	13.95		
<b>TOTAL REQUEST: \$63,362.54</b>						<b>TOTAL AWARD: \$63,362.54</b>		
**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 1/2 of preparer's normal hourly rate

<b>ATTORNEY INFORMATION</b>			
<b>Attorney</b>	<b>Date Admitted to CA BAR<sup>2</sup></b>	<b>Member Number</b>	<b>Actions Affecting Eligibility (Yes/No?)</b>
Hayley Goodson	December 5, 2003	228535	No.
Thomas Long	December 11, 1986	124776	No.
Robert Finkelstein	June 13, 1990	146391	No.

**C. Intervenor's Comments on Part III:**

<b>Comment #</b>	<b>Intervenor's Comment(s)</b>
Comment 1	<p><b>2016 Hourly Rate for TURN Attorney Hayley Goodson</b></p> <p>Given the relatively small number of hours incurred by Ms. Goodson in 2016 related to D.16-06-046, 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>

**D. 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))**

<b>A. Opposition: Did any party oppose the Claim?</b>	No.
<b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b>	Yes.

**FINDINGS OF FACT**

1. Intervenor has made a substantial contribution to D.16-06-046.
2. The requested hourly rates for Intervenor'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.

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

4. The total of reasonable compensation is \$63,362.54.

**CONCLUSION OF LAW**

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

**ORDER**

1. Intervenor shall be awarded \$63,362.54.
2. Within 30 days of the effective date of this decision, Southern California Gas 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 November 9, 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>	D1606046		
<b>Proceeding(s):</b>	A1309010		
<b>Author:</b>	ALJ Colbert		
<b>Payer(s):</b>	Southern California Gas 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 (TURN)	August 26, 2016	\$63,362.54	\$63,362.54	N/A	N/A

**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>
Hayley	Goodson	Attorney	TURN	\$345	2013	\$345
Hayley	Goodson	Attorney	TURN	\$355	2014	\$355
Hayley	Goodson	Attorney	TURN	\$355	2015	\$355
Hayley	Goodson	Attorney	TURN	\$355	2016	\$355
Thomas J.	Long	Attorney	TURN	\$555	2013	\$555
Robert	Finkelstein	Attorney	TURN	\$505	2014	\$505
Gayatri	Schilberg	Expert	TURN	\$215	2014	\$215