Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2016.	Application 14-11-003 (Filed November 14, 2014)
And Related Matter.	Application 14-11-004

DECISION AWARDING INTERVENOR COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 16-06-054

Intervenor: The Utility Reform Network	**For contribution to Decision (D.) 16-06-054**
Claimed: $ 468,348.86	**Awarded:** $468,544.12
Assigned Commissioner: Michael Picker	**Assigned ALJ: John S. Wong and Rafael L. Lirag**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 16-06-054 resolved the test year 2016 general rate cases for Southern California Gas Company (SCG) and San Diego Gas & Electric Company (SDG&E). Most of the disputed issues were resolved through proposed settlements supported by a wide range of parties, including TURN. The decision also resolved two income tax related issues, one of which had been explicitly omitted from the proposed settlements and involved ratemaking treatment of changes in repairs deductions. The decision adopted a 2016 revenue requirement for each utility representing the reasonable costs of providing safe and reliable utility service to their customers in that year. The decision also adopted post-test year increases for 2017 and 2018.

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):	1/8/15	Verified.

2. Other specified date for NOI:		
3. Date NOI filed:	2/5/15	Verified.
4. Was the NOI timely filed?		Yes, the Utility Reform Network (TURN) timely filed the notice of intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	Made as part of NOI filed here, citing materials submitted in A.10-11-015 (SCE 2012 GRC)	Verified.
6. Date of ALJ ruling:	See Part I comment, below	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, TURN demonstrated appropriate status.
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001, as cited in NOI here	Verified.
10. Date of ALJ ruling:	9/5/14	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, TURN demonstrated significant financial hardship.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-06-054	Verified.
14. Date of issuance of Final Order or Decision:	7/1/16	Verified.
15. File date of compensation request:	8/30/16	Verified.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for intervenor compensation.

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

#	Intervenor's Comment(s)	CPUC Discussion

4, 8, 12	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding, consistent with the explanation in the Commission's Intervenor Compensation guide (p. 12) that such rulings may not issue absent a request for a finding of "significant financial hardship," a deficiency in the NOI, or when the ALJ desires to provide guidance.	Verified. TURN is eligible for compensation in this proceeding.

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
Overview: This GRC proceeding covered an array of issues associated with the Sempra Utilities' gas and electric utility service. TURN sponsored testimony from four witnesses on a wide variety of those issues.[1] As described in more detail below, TURN's efforts resulted in a substantial contribution on the issues addressed in TURN-sponsored testimony. With one notable exception, the disputed issues addressed in TURN's testimony were resolved through a proposed settlement that the Commission adopted in D.16-06-054. The proposed settlement was presented with five distinct but intertwined agreements, each of which was designated as a separate "attachment" incorporated into the settlement. The adopted resolution of revenue requirement issues relies on Attachment 1, which included the Settlement Agreement itself, as well as a breakdown of the settlement amounts by functional area (Exhibit A in the appendix). TURN acknowledges that this is a different approach to identifying our substantial contribution to the Commission's decision, but submits that it makes sense under the circumstances. TURN is reasonably confident that anyone who played an active role in this proceeding would agree that TURN's substantial contributions were apparent throughout, even if they are not called out explicitly in the settlement agreement documentation. The Commission should have no trouble determining that TURN's substantial contribution on the wide array of issues addressed in this GRC warrants the requested award of compensation.	Attachment 1 to the Settlement Agreement The appendix in Attachment 1 refers only to the litigation positions of the utility and ORA, and the adopted outcome. This approach sufficed for purposes of providing the Commission with the information it needed to assess the reasonableness of the proposed settlement. However, it means that the material supporting the proposed settlement does not refer to the position of TURN or any other intervenor in describing the proposed outcome in terms of amounts authorized for each functional area. The agreement specifies that the utility and ORA "considered and incorporated the positions taken in testimony sponsored by TURN and UCAN to the extent these positions were different from and additive to those put forward in ORA's testimony." (Attachment 5, Sec. I.A.) The decision acknowledges each of these elements of the settlement agreements. (Sections 4.1.5 (for SDG&E) and 4.2.5 (for SCG)). Under these circumstances, TURN describes its substantial contributions in three different ways. For TURN recommendations that included a revenue requirement adjustment	Verified.

[1] TURN also worked closely with Utility Consumers' Action Network (UCAN) to broaden our issue coverage despite devoting fewer resources to this GRC than is typically the case.

	subsumed in the adopted settlements, TURN will cite its testimony and the relevant section of Attachment 1 of each settlement agreement, and (where addressed in the final decision) the relevant section of the final decision. For TURN's non-revenue requirement recommendations incorporated in the settlements, TURN will cite its testimony and Attachment 5 of the settlement agreements. Finally, for the income tax issue that was litigated and decided on its merits in D.16-06-054, TURN will cite its testimony, briefs, and the final decision.	
1. Overall outcome –The settlement agreement for SDG&E, as further modified in the final decision, produced a test year 2016 revenue requirement of $1.791 billion, or $104 million less than the amount in SDG&E's update testimony. The settlement agreement for SoCalGas, as further modified in the final decision, produced a test year 2016 revenue requirement of $2.204 billion, or $127 million less than the amount in SCG's update testimony. TURN's revenue requirement recommendations, to the extent they were incorporated into the amounts in the appendix to Attachment 1, contributed materially to these reductions for the test year 2016 revenue requirements.	D.16-06-054, pp. 3-4.	Verified. TURN's representations of the terms of the settlements approved in this consolidated proceeding, as discussed here and below, are accurate and its description of its prior litigation positions is also accurate. Pursuant to (D.) 94-10-029, the Commission has discretion to award compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution to a

		decision. We find that TURN's participation in the settlement made a substantial contribution to D.16-06-054.
2. Distributed Generation Impact Study: TURN recommended that SDG&E perform a detailed and appropriate study of Distributed Generation (DG) impacts on circuit peak loads, to better estimate the potential for DG resources to reduce circuit peaks and thereby avoid or defer future distribution capital investments. The parties agreed that SDG&E will perform and present a study of the distributed generation impacts on circuit peak loads prior to the filing of its next GRC application.	Ex. TURN-409 (Direct Testimony of Eric Borden – Reformatted Version). SDG&E Settlement Agreement, Attachment 5. D.16-06-054, p. 89 and FOF 35.	Verified.
3. Gas Distribution O&M – Monitoring and Control: TURN proposed a forecast of $2.146 million per year (a reduction of approximately $2.7 million from the utility's proposal), largely based on normalizing a non-recurring expense. The SCG Settlement covered this cost category, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-402 (Direct Testimony of John Sugar), pp. 29-30. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 6, 45 and 263.	Verified.
4. Gas Distribution Capital – Main Replacements and DREAMS Program: TURN proposed reducing the forecasted amounts for 2014-16 to use the Main Replacement unit costs for the very similar work performed in the DREAMS program, and to capture the efficiency that should be achieved due to the interrelated nature of the traditional Main Replacements and the newer DREAMS program. The SCG Settlement covered this cost category, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-402 (Direct Testimony of John Sugar), pp. 31-39. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 10-11, 56 and 272-3.	Verified.
5. **Compensation Expenses – Short-term and Long-term Incentive Compensation:** TURN proposed reducing funding for short-term incentive payments to around 40% of the amount requested by the utilities (reductions of approximately $29 million for SCG, $30 million for SDG&E, and $4 million for corporate center). TURN also proposed $0 in ratepayer funding for long-term incentive	Ex. TURN-402 (Direct Testimony of John Sugar), pp. 1-23. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 10, 56-57, and 272-273. SDG&E Settlement, Attachment 1,	Verified.

costs. The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.	SDG&E Settlement Comparison Exhibit, pp. 12-13, 235-236, and 322.	
6. **Support Services – O&M Costs – Fleet Services:** TURN recommended reductions to the four components of fleet ownership costs for both SCG and SDG&E based on a six-year average plus further adjustments. The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-405 (Direct Testimony of Garrick Jones), pp. 2-11. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 8 and 267. SDG&E Settlement, Attachment 1, SDG&E Settlement Comparison Exhibit, pp. 11, 186-189 and 319.	Verified.
7. **Support Services – Real Estate – Gas Company Tower Rents:** TURN proposed a reduction to the Gas Company Tower rent amount included in SCG's forecast for shared real estate expenses, based on a confidential provision in the utility's lease agreement. The SCG Settlement covered this cost category, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-406 (Direct Testimony of Garrick Jones -- **Confidential**), pp. 11-15. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 8-9, 165, and 268.	Verified.
8. **Compensation Expenses – "Other Benefit Program" Expenses:** TURN proposed reductions to the forecasts for the variety of activities, including Special Events, included in the Other Benefit Program category, based on use of a six-year average, with further adjustments to achieve consistency with outcomes adopted in the Sempra Utilities test year 2012 GRC (D.13-05-010). The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-405 (Direct Testimony of Garrick Jones), pp. 14-17. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 10, 211 and 270. SDG&E Settlement, Attachment 1, SDG&E Settlement Comparison Exhibit, pp. 12-13, and 322.	Verified.
9. Corporate Center Cost Allocation: TURN proposed revisions to the multifactor basic allocation used to allocate costs that cannot be directly assigned to SDG&E, SCG, and unregulated activities. TURN also corrected the calculation for purposes of assigning to shareholders 50% of the expense for Directors and Officers (D&O) insurance, and addressed the allocation of costs of governmental programs and the corporate responsibility report.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 6-12. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 10, 181-182 and 271. SDG&E Settlement, Attachment 1, SDG&E Settlement Comparison Exhibit, pp. 13, 247, and 323.	Verified.

The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.		
10. Taxes -- Repairs Deduction: TURN challenged SCG's and SDG&E's tax treatment for their repair costs for 2012, 2013 and 2014 in relation to the forecast tax expense for 2016. TURN argued that the utilities' treatment resulted in its ratepayers bearing extra tax expense in 2016 and continuing for decades into the future. TURN argued that SDG&E and SCG should have informed the Commission of the change in tax treatment, and that its recommendation was not retroactive ratemaking because it had an entirely prospective impact. Regarding repairs deduction issues, the Commission agreed with TURN's recommendation and the arguments presented in support of that recommendation and in opposition to the Sempra Utilities' claims. Instead of adopting TURN's proposed remedy, the Commission instead adopted an alternative approach that calculated a rate base reduction of $75 million for SDG&E and $60 million for SoCalGas, resulting in revenue requirement reductions of $9.4 million and $7.4 million, respectively.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 12-28. Opening Brief of TURN, UCAN and SDCAN. Reply Brief of TURN, UCAN and SDCAN. D.16-06-054, §6.13.2.2.5.2 (pp. 194-195).	Verified.
11. Rate Base – Cash Working Capital – Balance Sheet Items: TURN's testimony challenged SDG&E's inclusion of prepayments of property taxes in its cash working capital calculations. SDG&E's rebuttal testimony did not oppose the $3.4 million adjustment to rate base. TURN's testimony challenged the Sempra Utilities' inclusion of pre-CWIP project costs (preliminary surveys and investigations) in rate base, particularly for the Manzanita wind project that SDG&E planned to sell. The proposed settlement limited rate recovery associated with the Manzanita project to the return on cash working capital for these costs in this GRC cycle.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 31-32. Ex. SDG&E-236 (Rebuttal Testimony of Jack Lewis), p. JSL-2. D.16-06-054, pp. 218-219, citing Attachment 5 to the SDG&E Settlement.	Verified.
12. Rate Base – Cash Working Capital: TURN challenged the Sempra Utilities' calculation of lag days based on the increased lag in payments to suppliers and federal income tax lag.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 32-35. SCG Settlement, Attachment 1, SCG	Verified.

The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.	Settlement Comparison Exhibit, pp. 12, 232 and 275. SDG&E Settlement, Attachment 1, SDG&E Settlement Comparison Exhibit, pp. 13, 280 and 323.	
13. **Rate Base – Cash Working Capital – Commodity Cost Unbundling**: TURN challenged the Sempra Utilities unbundling of commodity costs between electric and gas operations, and between electric distribution and generation functions (for SDG&E), and between distribution and sales (for SoCalGas). In their rebuttal testimony, the Sempra Utilities agreed to unbundling modifications consistent with those proposed in TURN's testimony.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 35-38. Ex. SDG&E-236 (Rebuttal Testimony of Jack Lewis), p. JSL-2 Ex. SCG-243 (Rebuttal Testimony of Michael Foster), p. MWF-16	Verified.
14. **Rate Base -- Customer Deposits**: TURN recommended that a five-year average of customer deposits be removed from rate base for each utility. In the alternative, TURN supported application of the outcome from the recent PG&E GRC, where deposits were treated as an element of long-term debt with a lower interest rate than remaining debt. The SCG and SDG&E Settlements covered these cost categories, and the proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 38-44. SCG Settlement, Attachment 1, SCG Settlement Comparison Exhibit, pp. 12, 232 and 275. SDG&E Settlement, Attachment 1, SDG&E Settlement Comparison Exhibit, pp. 13, 280 and 323.	Verified.
15. Base Year Accounting Adjustments: TURN proposed a number of adjustments to remove from the authorized revenue requirement costs forecasted for clothing and gear branded with each utility's name and logo, tickets to sporting events, organizational dues and sponsorships. The SCG and SDG&E Settlements covered these cost categories as they arose throughout various areas of the utilities' testimonies. The Commission addressed these costs in the Customer Services section of the discussion of SDG&E's case. Rather than list each place where these adjustments might appear, TURN cites the Customer Services section of the decision and submits that TURN's proposed reduction was subsumed in the overall revenue requirement.	Ex. TURN-400 (Direct Testimony of William Marcus), pp. 44-49. D.16-06-054, pp. 131-132 (Section 6.8.1.5)	Verified.
16. Third Post Test-year in GRC Cycle: TURN joined comments opposing the separate settlement between ORA and SDG&E, and ORA and SCG, seeking a third post-test year in this GRC cycle. The Commission rejected the settlement here due to the intervening outcome adopted in D.16-06-005 (in	Joint Comments of TURN and UCAN on PTYR Settlement, October 12, 2015. D.16-06-054, pp. 227-228, and COL 59.	Verified.

R.13-11-006).		
17. Advice Letters: SoCalGas and SDG&E separately filed advice letters in late 2015 seeking a memorandum account to track costs associated with restoring service to affected customers in the event of storm-related outages associated with El Nino. TURN protested the advice letters on the basis that the costs of such service restoration are already covered by the authorized GRC revenue requirement, and the requested relief runs afoul of the then-pending proposed settlements. The Sempra Utilities withdrew their advice letters. After D.16-06-054 issued, SoCalGas and SDG&E separately filed advice letters seeking to implement the Tax Memorandum Account called for in the decision. TURN protested the advice letters based on their seeking cost tracking in excess of what was described in the decision. In their replies to the protest, the utilities modified their proposal to address TURN's protest.	SoCalGas Advice Letter 4906 SDG&E Advice Letter 2833-E/2422-G TURN Protest to SDG&E (1/6/16) TURN/SCGC Protest to SCG (1/6/16) SoCalGas Advice Letter 4994 SDG&E Advice Letter 2928-E/2496-G TURN Protest to SDG&E (8/11/16) TURN/SCGC Protest to SCG (8/11/16)	Verified.
18. **Procedural Matters:** In addition to the substantive outcomes representing TURN's substantial contribution, TURN's participation made substantial contributions on several procedural matters. For example, at the outset TURN filed a motion seeking establishment of a memorandum account to track the income tax differences associated with the changes for the accounting of repair deductions. As a result of the motion being granted, the 2015 repair deduction benefits were captured for ratepayers.	TURN Motion for Memorandum Accounts, 12/18/14 D.16-06-054, p. 7 and Finding of Fact 1.	Verified.

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?	**Yes**	Yes.
b. Were there other parties to the proceeding with positions similar to yours?	**Yes**	Yes.
c. If so, provide name of other parties: Utility Consumers' Action Network (UCAN), San Diego Consumers' Action Network (SDCAN), Joint Minority Parties (JMP)		Agreed.
d. Intervenor's claim of non-duplication: TURN's work in a GRC is typically coordinated with other like-minded groups. Here, those coordination efforts were even more pronounced than usual. From the outset of this GRC, TURN was aware that it would have fewer attorneys and witnesses working on the proceeding, so effective		Agreed. TURN did not engage in excessive

coordination would play a greater role than usual in enabling TURN to maximize coverage of issues for ratepayer representatives. Our time records include a number of entries (all of those coded as "coord" and also embedded in some of those coded "GP") for efforts devoted to communicating with ORA and the other intervenors about matters such as procedural strategies and issue area allocation. As is our regular practice in GRC-type proceedings, TURN closely coordinated with ORA from the earliest stages of the GRC in order to avoid and minimize duplication. Avoiding duplication entirely with ORA is nearly impossible (since the staff seeks to address nearly all issue areas covered by the utility application). Therefore the coordination effort with ORA aims to minimize duplication, and to ensure that where such duplication occurs TURN's witnesses are presenting distinct and unique arguments in support of the common or overlapping recommendations. TURN worked particularly closely with UCAN throughout the course of the proceeding. From the earliest stages of the proceeding, TURN and UCAN agreed to rely upon each other to cover identified issue areas that applied to both utilities. For example, UCAN took the lead on post-test year ratemaking for 2017 and 2018, while TURN took the lead on the tax issues involving the repairs deduction. Again, this minimized the risk that TURN and UCAN would overlap with their showings. Similarly, TURN played the lead role in briefing the repairs deduction issue as a matter to be resolved outside of the proposed settlement, with UCAN and SDCAN playing important consulting and reviewing roles that ensured they had input and helped improve the arguments, but with devotion of far smaller numbers of hours than TURN devoted to the briefs. In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.	duplication with other parties.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor's claim of cost reasonableness:	**CPUC Discussion**
TURN's request for intervenor compensation seeks an award of approximately $470,000 million as the reasonable cost of our participation in the proceeding. While this is a substantial amount, it is relatively small for TURN's work in a major energy utility's GRC. For example, in the SCE test year 2015 GRC, TURN requested and was awarded more than three times that amount. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested here is reasonable. The requested compensation amount is a small fraction of the savings directly and indirectly attributable to TURN's work. As noted in the substantial contribution section, the overall revenue requirement settlement considered and incorporated the proposals made in TURN testimony. Therefore, TURN can take some credit for the overall revenue requirement reduction of $104 million for SDG&E and $127 million	Verified.

for SCG in each utility's test year 2016 revenue requirement (comparing the adopted amount to the litigation position of each utility). Even clearer is the benefit to each utility's ratepayers of the adopted outcome of the repairs deduction issue, with over $9 million of annual savings for SDG&E customers and $7 million for SCG customers for several decades to come. TURN's requested compensation is a small fraction of these amounts. In sum, the Commission should conclude that TURN's overall request is reasonable, particularly in light of the substantial benefits to SCG and SDG&E ratepayers that were attributable to TURN's participation in the case.	
b. Reasonableness of hours claimed: TURN's hours claimed in this GRC request for compensation is substantially lower than was the case in other recent GRCs. This is a product of several factors. TURN approached the GRC knowing it would make a scaled-down presentation (with fewer attorneys and a reduced commitment of outside expert witnesses). The fact that the parties were able to achieve a settlement of nearly all disputed issues prior to filing opening briefs also contributed to the reduced number of hours (although, as explained later, this request still contains a small number of brief-related hours on issues subsumed in the settlement). Within the more limited scope resulting from the more limited resources devoted to this GRC, TURN's attorneys and consultants recorded a substantial number of hours for their work. TURN still addressed a broad array of issues (consistent with that of UCAN and, in this way, tied for second to ORA in terms of breadth of coverage). And in order to make a high quality showing on a broad array of issues, TURN devotes substantial time to all stages of the proceeding and all steps required for effective advocacy. The utilities' applications were supported by thousands of pages of testimony and workpapers, sponsored by dozens of utility witnesses. The final exhibit list indicated more than 400 exhibits. The evidentiary hearings spanned several weeks, with TURN playing a very active role throughout. The post-hearing efforts included the time devoted to settlement discussions and development, and briefing of the repairs deduction issue that was excluded from the settlement. The Proposed Decision also triggered a substantial amount of work, as TURN took a leading role in supporting the outcome on the repairs deduction issue, and in crafting responses from the settling parties when the Proposed Decision included an outcome that was arguably a change to the proposed settlement. In nearly all cases, TURN's work was tied to one of the numerous substantial contributions described in the preceding section. However, in a few instances TURN has included hours associated with the initial work on issues that TURN ultimately did not pursue in testimony or briefs. The time entries reflect examples such as the Sempra Utilities' proposed funding and activities in the areas of employee training, information technology, and pensions. The Commission should find these hours reasonable and include them in the compensation award. While TURN does not claim to have made a specific substantial contribution on each of these issue areas, the initial investigation into such areas should be recognized as reasonable part of TURN's participation and the overall substantial contribution to D.16-06-054. In a proceeding with a broad scope of issues such as this one, the Commission should reasonably expect that TURN will initially identify potential disputes that, upon further	Verified, but see CPUC Disallowances and Adjustments, below. The Utility Reform Network's (TURN's) claim for intervenor compensation raises an important issue for the Commission – should the Commission compensate intervenors for documents that are not filed with the Commission and are not part of the record of the proceeding? Although intervenors' contentions do not need to be adopted by the Commission for a substantial contribution to be made (See e.g., D.89-03-063, D.92-08030, D.01-06-063, and D.06-03-001), the cases cited above make clear that substantial contribution typically requires a review of the record. Our review of past intervenor compensation decisions, found that

investigation and analysis, prove to be matters TURN chooses not to pursue further through testimony or briefs. Reasonable amounts of hours devoted to such efforts should be recognized as an appropriate component of an award of compensation, as such efforts are an essential part of TURN's overall participation in the proceeding.[2] The number of hours for each TURN representative was reasonable under the circumstances present here, as described below: <u>TURN Attorneys:</u> Robert Finkelstein played numerous roles on behalf of TURN in this GRC. He served as TURN's lead and coordinating attorney throughout this proceeding. He was also responsible for nearly all of the issue categories for purposes of testimony review, hearing room work (cross-examination), and settlement discussions or briefing, as required. TURN seeks compensation for approximately 500 of his hours here, or the equivalent of approximately 12-13 weeks of full-time work spread out over the last few months of 2014, the first nine months of 2015, and portions of 2016. Marcel Hawiger, TURN staff attorney, and Eric Borden, TURN's staff analyst, were responsible for development and presentation of TURN's position regarding the need to reflect distributed generation benefits when assessing the need for electric distribution capacity and investment. TURN seeks compensation for 44.25 hours for Mr. Hawiger, and 60.25 hours for Mr. Borden, the equivalent of 1 to 1.5 weeks of full time work, respectively. TURN's request for compensation also includes just under 20 hours for Hayley Goodson and a few hours for Thomas Long, TURN's Legal Director. Ms. Goodson recorded her limited hours in the earliest stages of the application to assist in TURN's scoping of issues for coverage, and in mid-May 2015 when she stepped in to assist with final review and presentation of TURN's testimony when Mr. Finkelstein was less available due to vacation. Mr. Long's limited hours went to the scoping of TURN's involvement, consultation regarding the settlement negotiations, and review of the Proposed Decision on reporting requirements. TURN submits that the recorded hours are reasonable, both as described above and as demonstrated in the wide-ranging substantial contribution TURN made in this proceeding. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request. <u>JBS Energy:</u> JBS Energy once again played an instrumental and essential role in TURN's participation in this GRC, even though they covered a narrower range of issues. Even with the narrower scope, the firm's work was a critical part of TURN's success in this proceeding. The Commission should have little trouble concluding that the requested amount of hours and the associated intervenor compensation is a very cost-effective investment for SCG's and SDG&E's ratepayers. Four members of JBS Energy's staff worked on the Sempra Utilities' GRC on behalf	in D.12-03-024 the Commission granted compensation for unfiled briefs. Specifically, in D.12-03-024, the Commission granted compensation for opening briefs that were rendered moot by the adoption of a settlement. Here, TURN worked on opening briefs that it claims would have been submitted if the settlement negotiations failed. Had TURN filed its briefs, the Commission would analyze their merit under the substantial contribution test. Here the unfiled briefs, which addressed issues that were rendered moot as part of the settlement, must be reviewed in the context of settlements. Our review of claimed settlement hours is, in theory, similar to the analysis performed for substantial contribution, (however with claimed settlement hours the alleged contributions do not need to be found on the record). In both instances the Commission can, and will, reduce such costs or hours when they lack justification or

[2] TURN notes that its compensation request in the test year 2015 GRC for SCE included such hours, called out in a very similar way. The Commission awarded compensation for those hours.

of TURN, with three of them sponsoring testimony. William Marcus's testimony covered issues associated with corporate center cost allocation, cash working capital, other base year accounting adjustments, and the recommendation regarding ratemaking adjustments to income taxes due to the repairs deduction treatment. John Sugar sponsored testimony on gas transmission and distribution spending, with emphasis on the overlapping programs for distribution integration management and the new DREAMS program, and in incentive compensation issues. Garrick Jones sponsored testimony on fleet expenses Gas Company Tower rents, and other benefit program expenses. Greg Ruszovan has highly-developed data analysis, compilation and presentation skills, and played a critical role in developing and performing some of the analysis reflected in the testimony and workpapers sponsored by other JBS Energy firm members. The Commission should find reasonable the requested amounts for the members of JBS Energy.

Pre-Settlement Work on Post-Hearing Brief: As noted earlier, the hours for TURN's representatives include hours associated with initial work on briefs during the period when the post-hearing briefing dates had not yet been changed. As it turned out, the proposed settlements eliminated the need for briefing on all issues other than the repairs deduction issue omitted from the settlement. However, at the close of hearings in July 2015 the procedural schedule called for opening briefs in a relatively few weeks. Mr. Finkelstein (33 hours) and Mr. Hawiger (6 hours) of TURN and Mr. Sugar (28 hours) of JBS Energy each recorded hours that were associated with efforts leading toward drafting a brief, including transcript and other record material review, outlining of arguments, and drafting the initial version of the brief on particular topics.[3]

As Mr. Finkelstein's hourly records attached hereto indicate, TURN's involvement in the settlement efforts dates from early August 2015. TURN, joined by other intervenors including ORA and UCAN, sought a suspension of the briefing schedule by motion filed on August 14, 2015. An e-mail ruling extending the briefing due dates by approximately three weeks issued on August 18, 2015. TURN recorded no further time on brief-related activities for matters covered by the proposed settlement agreements after that date.

The Commission should find that such hours are reasonable for inclusion in the request and in the award of compensation here. TURN acted reasonably at all times based on the information available. So long as the briefing dates set at the close of hearings remained in effect, TURN needed to proceed as if briefs would be required, even if initial settlement discussions were already underway. Once the briefing dates were postponed, TURN ceased work on the briefs, confident that if the settlement discussions failed to reach fruition, the new dates would permit TURN to have enough time to return to and complete the briefs. And once the settlement conference was convened for the proposed settlement (August 28, 2015), it was clear that the settlement discussions would likely resolve all disputed issues except for the repairs deduction issue, thus eliminating the need to return to the briefing effort that had been underway. TURN submits that it acted reasonably throughout the period of uncertainty regarding whether or not briefs would be required, and limited the number

result in unreasonable claims. In the context of unfiled documents, the Commission will, for example, determine whether or not an intervenor had an opportunity to submit documents into the formal record of a proceeding, look at the overall hours claimed and, as is most relevant for our purposes here, examine the costs associated with preparing the documents to see if such costs are reasonable. In these instances, the Commission will disallow or reduce the costs associated with the unfiled documents when warranted.

In proceedings where briefs are prepared but not filed because of successful settlement discussions, our determination of the reasonableness of intervenor's work on the unfiled documents will require a review of the briefing schedule implemented by the assigned ALJ. The key factors here are: (1) when hearings ended; (2) the original date for filing opening briefs; (3) when/if a request was made for

[3] Mr. Finkelstein's time records indicate approximately 35 hours associated with such tasks; Mr. Hawiger's time records indicate approximately 6 hours; and Mr. Sugar's time records indicate approximately 30 hours.

of hours by ceasing all briefing efforts once the briefing schedule was postponed by ALJ ruling. Furthermore, the Commission should recognize that if it wants intervenors to actively participate in settlement discussions, their participation should not place at risk the ability to recover reasonable amounts of time devoted to initial work on a brief that ends up not being filed because the settlement discussions prove fruitful. If by settling the intervenors effectively lose the ability to receive compensation for such briefing efforts, even though it was entirely reasonable for them to be engaging in those efforts under the circumstances, intervenors will have a disincentive to participate in such settlement efforts. The more appropriate outcome would award intervenors for reasonable hours devoted to such pre-settlement brief development, so long as the intervenor can demonstrate said reasonableness. TURN submits that it has done so here. <u>Compensation Request Preparation Time</u>: TURN is requesting compensation for 20.5 hours devoted to compensation-related matters, primarily preparation of this request for compensation (20.0 hours). While higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the size and complexity of the request for compensation itself. The number of hours devoted to a request for compensation is driven in large part by the number of individuals and daily time entries involved in the substantive work. Here, the scaled-back participation by TURN enabled the request to be prepared with approximately 75-80% of the 25-28 hours typically sought for a GRC request. (See, for example, TURN's compensation requests addressed in D.15-08-023 (PG&E 2014 GRC), D. 13-08-022 (SCE 2012 GRC) and D.14-05-015 (Sempra Utilities 2012 GRC).) In D.16-04-011 (SCE 2015 GRC), TURN had requested compensation for 27.25 hours for Mr. Finkelstein's work preparing the request for compensation. The Commission reduced that amount by 6.0 hours, stating that "the claim for intervenor compensation is excessive," and that "TURN could have utilized a less expensive attorney to prepare the claim."[4] D.16-04-011, pp. 26-27. TURN believes the "excessive" label is unsupported, given the similarity between the hours requested in the SCE 2015 GRC and the very similar amounts requested and awarded for compensation request preparation time in previous GRCs. And while it is true that an attorney with a lower billing rate could have prepared the claim, TURN submits that this likely would have led to a far greater number of hours, thus offsetting at least some and perhaps all of the savings that might be achieved. Mr. Finkelstein prepared this request for compensation because his extensive knowledge of nearly all aspects of this proceeding, combined with his experience with GRCs in general, enabled him to prepare the request in a more efficient manner than if it were prepared by one of the other attorneys who would have been required to devote time to getting "up to speed" in order to adequately perform this task. Furthermore, since the Commission awards only 50% of the regular billing rate for compensation-related tasks, Mr. Finkelstein's compensation efforts	the suspension of the briefing schedule; and (4) when the request for suspension of the briefing schedule is granted/denied. We will consider these factors in light of the number and complexity of the issues in dispute at the conclusion of hearings. In this proceeding, (1) hearings ended on July 15, 2015; (2) opening briefs were due on August 28, 2015; (3) TURN made a request for a suspension of the briefing schedule on August 14, 2015; and (4) the assigned ALJ revised the briefing schedule on August 18, 2015. In this large and complex general rate case, the 45-day window between the close of hearings and the due date for opening briefs made it prudent for TURN to undertake settlement discussions and brief-writing concurrently. Given the limited time allowed for briefing, it appears TURN's other courses of action, not working on briefs or putting off settlement discussions until after

[4] The Commission also stated that "much of TURN's discussion in Part III did not aid the Commission's understanding of TURN's contributions to the proceeding." In that compensation request the discussion in Part III (as well as Part II, which addresses substantial contribution directly) was modeled on previous requests for compensation in major energy utility GRCs, where the Commission had not noted any such problem with TURN's discussion. Therefore, absent further explanation of what was deemed lacking, TURN is at a loss to understand what was perceived to be deficient in this regard.

already come at a steeply-discounted rate. For these reasons, TURN submits that the number of hours devoted to the compensation request preparation, and the choice of Mr. Finkelstein as the person to prepare the request, were both reasonable and should be compensated in full. In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's relative success on the merits.	briefs were done, would have compromised TURN's litigation position and/or reduced the opportunity for settlement. Our intervenor compensation rules are not intended to force parties to choose between compromising their litigation position (here by not allowing them sufficient time to prepare briefs) and foregoing settlement discussions. Here, we find it reasonable for TURN to have engaged in settlement discussions and brief writing concurrently in acknowledgment that if settlement discussions failed or did not address all the issues, there would be little time left to prepare briefs. Thus, TURN's claimed hours regarding preparation of the opening, but unfiled, brief are reasonable and constitute part of the settlement efforts entered into by TURN. As a rule, when a settlement motion is granted or the assigned ALJ approves a suspension of the briefing schedule, it is unreasonable for an intervenor to continue work on the briefs; if work continues, the

	Commission will disallow compensation for the unreasonably claimed hours. Here the assigned ALJ revised the briefing schedule on August 18, 2015, in response to the requested suspension of the briefing schedule and TURN discontinued its work on the opening brief once the ruling issued. Had TURN not ceased work, the Commission would have found TURN's hours to be unreasonable and the Commission could not award compensation for the specific hours claimed.
c. Allocation of hours by issue: TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, procedural matters, and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in this proceeding. **Code** — **Stands for:** GP — General Participation -- work that is essential to TURN's participation but would not vary with the number of issues that TURN addresses, for the most part. This code covers matters such as the initial review of the application and testimony, ORA testimony, intervenor testimony, and rebuttal testimony. It also includes the initial inquiry into issues areas that TURN opted not to pursue (such as employee training, information technology, and pension) or ceded to other intervenors taking similar positions (office closure). Here TURN has included discovery-related tasks and other procedural tasks of a more general nature. GH — General Hearing -- Hearing-related (preparation and participation), but not issue-specific. There are a number of general tasks that fall upon any intervenor actively participating in evidentiary hearings, such as dealing with scheduling and similar issues. In addition, due to the nature of GRC hearings and witness scheduling, TURN's attorneys spent time in the hearing room waiting for the witness to take the stand or for TURN's slot in the cross-examination queue to arrive. To the extent	Verified.

	possible, TURN's attorneys used the time in the hearing room to perform other substantive work (such as preparing for the NEXT witness in queue), with the time recorded to the related substantive issue.	
Comp Ex	Comparison Exhibit – Preparation of TURN positions for inclusion in Comparison Exhibit; review of draft of exhibit	
PD	Proposed Decision -- work on reviewing, analyzing, commenting on, lobbying on, strategizing on the Proposed Decision and revisions thereto. Here the work coded "PD" had elements of settlement work, as much of the effort was tied to identifying settling parties' obligation under the settlement agreement to address the PD's proposed modification of matters arguably covered by the settlement. Rather than attempt to discern PD work from "settlement" work in this category, TURN assigned the PD activity code to all such hours.	
Proc	Procedural -- Procedural matters such as non-hearing scheduling matters, joint briefing outline, NDA and other confidentiality issues, etc. In this GRC, this code covers TURN's initial motion for a memorandum account to track tax-related revenue requirements.	
Coord	Coordination with other parties – meetings, e-mails and phone calls w/ ORA and other intervenors about issue coverage, etc. In this GRC TURN has included tasks associated with meter sets-related discovery that provided material TURN's witness worked to incorporate in the UCAN testimony on customer forecasts for the utilities.	
Policy	Substantive work on policy issues, including review of policy and safety/risk assessment testimony and related cross-examination	
ACR	Review of the utility responses to Energy Division's DRs, and preparation of comments on their entry into the record, pursuant to the Assigned Commissioner's Ruling of 9/21/15	
CC	Corporate Center, including allocation method for corporate center costs, and review of costs subject to that allocation.	
CRE	Corporate Real Estate – here largely issues surrounding forecasts for Gas Company Tower rents	
CWC	Cash Working Capital and related rate base issues, including treatment of customer deposits as a source of capital	
ED	Electric distribution, primarily TURN's analysis of the impact of distributed generation on distribution system capacity and expenditures, and the need for further study on this topic	
ENRMA	El Nino Response Memorandum Account – TURN's challenge to the advice letters seeking to establish a memo account for costs arguably already subject to GRC forecasts.	
Fleet	Fleet services cost forecasts.	
GT&D	Gas transmission and distribution – includes TIMP/DIMP and DREAMS-related issues	
HR	Human Resources – review of requests for pensions and benefits, medical costs, workers comp, relocation benefits, etc. In this GRC, TURN's work in this category focused on review of the pension showing and testimony on other benefits.	
ICP	Incentive Compensation Plans – includes short- and long-term incentive payment issues	

N/L/C	Name/Logo/Charitable Contributions -- Ratemaking treatment of promotional items with utility name or logo, and charitable contributions and organization memberships	
PTYR	Review of and preparation of comments on SEU/ORA Settlement on third post-test year	
Sett	Participation in negotiation, development of presentation, pleadings and other tasks associated with the proposed settlement agreements adopted in D.16-06-054.	
Tax	Tax-related issues, including primarily the repairs deduction issue	
Comp	Time devoted to compensation-related pleadings	
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a relatively small portion of the total hours (approximately 4%). TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries in equal 25% shares to the broader issue-specific categories described above that were most likely to have work covered by a # entry (GT&D, ED, Fleet and ICP).	
TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.		

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours [1]**	**Rate $**	**Total $**
Robert Finkelstein	2014	17	$505	D.15-08-023	$8,585.00	17.00	505.00	8,585.00
R. Finkelstein	2015	412.8	$505	2014 Rate	$208,186.25	412.80	505.00	208,464.00
R. Finkelstein	2016	63.5	$510	Res. ALJ-329	$32,385.00	63.50	510.00	32,385.00
Marcel Hawiger	2014	1.75	$410	D.15-08-023	$717.50	1.75	410.00	717.50
M. Hawiger	2015	42.5	$410	2014 Rate	$17,425.00	42.50	410.00	17,425.00
Hayley Goodson	2014	3.25	$355	D.15-08-023	$976.25	2.75	355.00	976.25
H. Goodson	2015	15.75	$355	2014 Rate	$5,591.25	15.75	355.00	5,591.25
Thomas Long	2014	0.5	$570	D.15-06-021	$285.00	0.50	570.00	285.00
T. Long	2015	0.75	$570	2014 Rate	$427.50	0.75	570.00	427.50

T. Long	2016	0.25	$575	Res. ALJ-329	$143.75	0.25	575.00	143.75
Eric Borden	2015	60.25	$180	D.16-05-015	$10,845.00	60.25	180.00	10,845.00
William Marcus	2014	9.25	$265	D.15-08-023	$2,451.25	9.25	270.00	2,497.50
W. Marcus	2015	107.89	$280	**Requested in R.14-07-002**	$30,209.20	107.89	270.00 *See* D.15-12-043.	29,130.30
W. Marcus	2016	4.75	$280	2015 Rate	$1,330.00	4.75	275.00 *See* Res. ALJ-329.	1,306.25
John Sugar	2014	21.92	$215	D.15-08-023	$4,708.50	21.92	215.00	4,712.80
J. Sugar	2015	454.33	$220	**Justify here**	$99,952.60	454.33	220.00 [1]	99,952.60
Garrick Jones	2015	194.8	$180	D.15-11-019	$35,064.00	194.78	185.00 *See* D.16-05-015.	36,034.30
Greg Ruszovan	2015	10.81	$215	**Requested in R.14-07-002**	$2,322.00	10.81	215.00	2,324.15
					***Subtotal:* $ 461,605.0515**			***Subtotal:* $ 461,803.15**

INTERVENOR COMPENSATION CLAIM PREPARATION **

Item	Year	Hours	Rate $	Basis for Rate*	Total $	Hours	Rate	Total $
R. Finkelstein	2015	0.5	$252.50	½ of approved 2014 rate	$126.25	0.50	252.50	$126.25
R. Finkelstein	2016	20.0	$255.00	½ of requested 2016 rate	$5,100.00	20.00	255.00	$5,100.00
					***Subtotal:* $5,226.25**			***Subtotal:* $5,226.26**

COSTS

#	Item	Detail	Amount	Amount
	Photocopying	Copies of TURN pleadings for service, exhibits for hearings, and (where applicable) copying charges from consultant billings	$776.30	776.30
	Postage	Expenses for postage for this proceeding	$30.54	30.54
	Phone	Charges associated with TURN's work in this proceeding, including costs of conference calls	$12.81	12.81

	Computerized Research	Computerized research costs, primarily associated with review of Sempra Utilities' rebuttal testimony in preparation for hearings	$695.06	695.06
			***Subtotal:* $1,514.71**	***Subtotal:* $1,514.71**
			TOTAL REQUEST: $ 468,348.86	**TOTAL AWARD: $468,544.12**

**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[5]	Member Number	Actions Affecting Eligibility (Yes/No?)
Robert Finkelstein	June 13, 1990	146391	No.
Marcel Hawiger	January 23, 1998	194244	No.
Hayley Goodson	December 5, 2003	228535	No.
Thomas Long	December 1986	124776	No

C. Intervenor's Comments on Part III:

Comment #	Intervenor's Comment(s)
Comment 1	**2014, 2015 and 2016 Hourly Rates for All TURN Staff Representatives** For 2014 and 2015 hours, TURN has used the hourly rates already approved for work performed in each respective year by TURN's attorneys and staff analyst (using the 2014 authorized rate for both 2014 hours and 2015 hours, consistent with the 0% COLA for 2015 adopted in Resolution ALJ-308). For 2016 hours, TURN is requesting compensation using the 2015 rates increased by the 2016 COLA of 1.28%, as authorized in Resolution ALJ-329 (rounded to the nearest $5 increment).
Comment 2	**2014, 2015 and 2016 Hourly Rates for JBS Energy** For 2014 hours, TURN has used the hourly rates already approved for work performed by members of JBS Energy. For 2015 hours, TURN has used the hourly rate already approved for Garrick Jones. The 2015 rate for William Marcus and Greg Ruszovan are each the subject of a pending request for compensation in R.14-07-002 (filed April 5, 2016). Rather than repeat the justification for the increased rate here, TURN requests that the explanation set forth in that pending request be

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

	treated as if it were fully incorporated here, should the decision on this request issue before a decision in R.14-07-002. The 2015 hourly rate for John Sugar of JBS Energy is requested here for the first time. TURN requests an hourly rate of $220 for work Mr. Sugar performed in 2015. This is the same rate that JBS Energy billed TURN for his work during this period. The Commission awarded compensation to TURN using a $215 hourly rate for Mr. Sugar's work in 2014 in D.15-08-023 (in the PG&E test year 2014 GRC, A.12-11-009). If the Commission were to deem the JBS-adopted increase to Mr. Sugar'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 the nearest $5 increment) is $225 (that is, $5 higher than the rate requested here). 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. Sugar has over three decades of experience in energy program and financial analysis, both with the California Energy Commission and, since 2011, with JBS Energy. (His qualifications appear in Ex. TURN-403 (Attachments to John Sugar Testimony).) Yet the requested rate of $220 is in the lowest quartile of the established range for experts with his level of experience. The Commission should find reasonable the requested hourly rate of $220 for 2015 work of John Sugar. The 2016 hourly rate for William Marcus is the same as requested for 2015, since the firm charged TURN the same hourly rate for 2016 work as it did in 2015.
Comment 3	**Expenses –** TURN has included the reasonable expenses incurred associated with our participation in this proceeding. The photocopying, postage, and phone expenses were all associated exclusively with TURN's work in this proceeding. TURN also incurred computerized research costs associated with the preparation of its testimony and pleadings, and review of non-California decisions cited in utilities' rebuttal testimony.

D. CPUC Disallowances and Adjustments:

Item	Reason
[1]	The Commission notes that TURN's request for intervenor compensation contains numerous errors concerning rounding of hours, dollar amount claimed, and requested hourly rates. The Commission corrected these errors, resulting in a higher award than the award requested by the intervenor.
[2]	The Commission approves a rate of $220.00 for Sugar and notes that this raise constitutes as the equivalent of a 5% step-increase. Sugar is entitled to one more step-increase in his current experience level. The Commission does not alter rates at random intervals and has policies in place for requesting changes to rates. *See e.g.* Res. ALJ-329.

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. The Utility Reform Network has made a substantial contribution to D.16-06-054.

2. The requested hourly rates for Intervenor's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

4. The total of reasonable compensation is $468,544.12.

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 $468,544.12.

2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2015 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 13, 2016, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

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

4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		**Modifies Decision?**	No
Contribution Decision(s):	D1606054		
Proceeding(s):	A1411003, A1411004		
Author:	ALJ Wong, ALJ Lirag		
Payer(s):	San Diego Gas & Electric Company and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network (TURN)	August 30, 2016	$468,348.86	$468,544.12	N/A	*See* CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	TURN	$505.00	2014	$505.00
Robert	Finkelstein	Attorney	TURN	$505.00	2015	$505.00
Robert	Finkelstein	Attorney	TURN	$510.00	2016	$510.00
Marcel	Hawiger	Attorney	TURN	$410.00	2014	$410.00
Marcel	Hawiger	Attorney	TURN	$410.00	2015	$410.00
Hayley	Goodson	Attorney	TURN	$355.00	2014	$355.00
Hayley	Goodson	Attorney	TURN	$355.00	2015	$355.00
Thomas	Long	Attorney	TURN	$570.00	2014	$570.00
Thomas	Long	Attorney	TURN	$570.00	2015	$570.00
Thomas	Long	Attorney	TURN	$575.00	2016	$575.00
Eric	Borden	Expert	TURN	$180.00	2015	$180.00
William	Marcus	Expert	TURN	$265.00	2014	$270.00
William	Marcus	Expert	TURN	$280.00	2015	$270.00
William	Marcus	Expert	TURN	$280.00	2016	$275.00
John	Sugar	Expert	TURN	$215.00	2014	$215.00
John	Sugar	Expert	TURN	$220.00	2015	$220.00
Garrick	Jones	Expert	TURN	$180.00	2015	$185.00
Greg	Ruszovan	Expert	TURN	$215.00	2015	$215.00

(END OF APPENDIX)