Decision 17-04-006 April 6, 2017

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.	Application 14-11-007 (Filed November 18, 2014)
And Related Matters.	Application 14-11-009 Application 14-11-010 Application 14-11-011

DECISION DENYING COMPENSATION TO THE GREENLINING INSTITUTE

Intervenor: The Greenlining Institute	**For contribution to Decision (D.) 16-11-022, D.16-04-040, and D.15-12-047**
Claimed: $66,298.00	**Awarded: $0.00**
Assigned Commissioner: Michael Picker	**Assigned ALJ: W. Anthony Colbert**

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	D.16-11-022, *Decision on Large Investor-Owned Utilities' California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Program Applications,* the Commission authorized CARE and ESA Program activities and budgets for Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) for program years 2017 through 2020. The Commission authorized mid-cycle activities, including the continuation of several working groups created pursuant to D.12-08-044 to help create a guidance document for the next program cycle of the ESA Program. (Final Decision) D.16-04-040, *Decision Adopting Measures in Response to the Aliso Canyon Natural Gas Leak Emergency*, the Commission directed SoCalGas and SCE to intensify their

	ESA Program efforts in the geographic regions mostimpacted by the gas leak. (Aliso Canyon Decision) D.15-12-047, *Interim Decision on the Community Help and Awareness of Natural Gas and Electricity Services Pilot Program, the Ongoing Program, and Related Funding*, the Commission approved the establishment of the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) program as an ongoing program. (CHANGES Decision)

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):	2/20/2015	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	3/23/2015	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.10-02-005	N/A
6. Date of ALJ ruling:	3/29/2010	N/A
7. Based on another CPUC determination (specify):	n/a	
8. Has the Intervenor demonstrated customer or customer-related status?		N/A
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	n/a	N/A
10. Date of ALJ ruling:	n/a	N/A
11. Based on another CPUC determination (specify):	See Sec. C, comment #1	N/A
12. Has the Intervenor demonstrated significant financial hardship?		N/A

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-11-022	Verified
14. Date of issuance of Final Order or Decision:	11/21/16	Verified
15. File date of compensation request:	1/20/2017	1/23/2017
16. Was the request for compensation timely?		No

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	In its NOI, Greenlining requested a ruling on its Showing of Significant Financial Hardship. To date, ALJ Colbert has not made a decision on this request. Greenlining is an organization authorized in its Articles of Incorporation to represent the interests of both residential and small telecommunication customers, with particular focus on low-income and of-color communities and customers. A copy of Greenlining's Articles of Incorporation was previously filed with the Commission in R.10-02-005 (as an attachment to our NOI, filed March 5, 2010). As such, Greenlining is a Category 3 customer as defined in D.98-04-059. Greenlining qualifies as a Category 3 customer. It passes the "comparison test" by demonstrating that the economic interest of its members and constituencies in the CARE/ESAP proceeding is relatively small compared to the cost of its effective participation. In this proceeding, Greenlining worked to ensure that the ESA program continues to provide	The Greenlining Institute did not timely file the request for intervenor compensation. An intervenor may file a request for compensation within 60 days of the issuance of a decision. *See* Pub. Util. Code § 1804(c). Here, the final decision issued on December 09, 2015 and the final date for filing a request for compensation was January 20, 2017. Greenlining did not file before/by 5 PM on January 20, 2017. Commission Rule of Practice and Procedure 1.15 treats documents filed after 5 PM as having been filed on the next business day. Intervenor's request was therefore not timely. Commission records show that Greenlining Institute did not attempt to access the Commission's electronic filing system until 5:01 PM, after the deadline had passed. There has been at least one prior instance where the Commission granted an award on a claim that was untimely filed. However, we have since determined that the Commission does not have the discretion to grant awards on claims that are not filed in accordance with §1804(c). *See* D.15-07-017. Greenlining has previously received intervenor compensation in other Commission proceedings, and is therefore aware of the filing requirements. Greenlining Institute was also previously denied for a late-filed claim in D.16-10-032. The Public Utilities Code and the Commission's Rule of Practice and Procedure are clear. If a request for compensation is not filed and served within 60 days of the issuance of a final decision or the order closing the proceeding, the request is not timely and the intervenor is not eligible for compensation. Greenlining's request was not timely served and therefore, the Commission must deny the request for compensation.

	customers with health, safety, and comfort services, as well as energy-saving measures in order to lower customer bills and help both the Commission and the customers to manage increasing energy-related expenses due to the Aliso Canyon gas leak and the impact of the recent Rate Reform. Such savings will accrue to customers each month, a few dollars at a time. Customers who lack the technical and procedural experience to effectively participate at the CPUC are unlikely to do so for their own individual interests, as the cost to do so would be significantly higher than the dollars they would save. These are customers who may otherwise go unrepresented but for Greenlining's participation. Thus, Greenlining asserts that it has successfully demonstrated significant financial hardship as appropriate for a Category 3 customer.	

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
1. **<u>CHANGES:</u>** Greenlining urged the Commission to secure the Community Help and Awareness of Natural Gas and Electricity Services Pilot's (CHANGES) budget and approve the transition of this pilot as an ongoing statewide program. The CHANGES program is funded through CARE and provides outreach,	Greenlining Opening Comments on CHANGES, 12/7/15; Reply Comments, 12/14/15. The CHANGES Decision, the Commission approved the establishment of CHANGES while the Final Decision reaffirmed it, Conclusion of Law 10; Order 183-184.	N/A

education, and bill issue assistance on natural gas and electricity bills and services to limited English proficient (LEP) consumers in the language of their choice through a statewide network of community-based organizations (CBOs). The CHANGES Decision, D.15-12-047, made CHANGES an ongoing statewide program, effective January 1, 2016. However, until a long-term Commission funding source can be established it will be funded as a reimbursement from the CARE Program. This is reaffirmed by the Final Decision.		
2. **<u>ESAP RULES:</u>** a. 3 Measure Minimum Rule Greenlining argued that the utilities' proposed WTP factors and the LINA's 52% Unwillingness Factor are inappropriate to adopt, because known barriers to participation must be addressed before the percentage of customers who are truly unwilling or unable to participate can be properly calculated. Greenlining argued that the LINA itself notes that much of its own unwillingness estimate is due to program barriers that should be resolved before unwillingness can be calculated.	Greenlining's Protest, p. 4; 6/29/15 Responses to Additional Questions, pp. 1-2; Opening Brief, pp. 1-2. Final Decision, Order 10-12.	N/A

Greenlining argued that new water-energy measures could prompt previously unwilling customers to participate, because they were (at the time) keenly aware of their water usage during the ongoing drought. Greenlining also argued that landlords might be more interested in participating if water energy benefits are included.		
b. Go Back Rule		
Greenlining supported proposals to modify or eliminate the Go-Back Rule to allow treatment of previously treated homes, as long as homes that have never been treated at all remain a priority.	D.16-11-022 eliminated the Go-Back Rule and authorized treatment of previously treated homes. (p. 66) 6/29/15 Responses to Additional Questions, pp. 2.	
Greenlining argued that customers with the highest energy burdens or who are the most energy insecure should be prioritized for re-treatment if the Go-Back rule is eliminated or modified. Greenlining argued that new measures and measures that were refused by previous tenants should be prioritized wherever possible in re-treated homes.	In eliminating the Go-Back Rule, the Final Decision ordered the utilities to first target higher need customers for re-treatment, but without limiting eligibility for other customers. (p. 66) Greenlining's Opening Comments on PD and APD, p. 2. The Final Decision eliminated the Go-Back Rule and authorized treatment of previously treated homes. (p. 66)	
Greenlining advocated for the APD's elimination of the Go-Back Rule, as preferable to the PD's proposal to modify the rule but largely stay the course.	Protest, p. 7; Opening Comments on PD and APD, p. 3. D.16-11-022 eliminated the 3MM Rule and ordered that energy education be provided for all eligible customers. (pp. 79-84)	
Greenlining advocated in favor		

of eliminating the 3MM Rule, arguing that the rule was an outdated attempt at achieving cost effectiveness. Because we have better CE tools today, Greenlining argued in favor of eliminating the Rule entirely. At a minimum, and even if the Commission eliminated the 3MM rule, Greenlining argued that energy education should be included for all eligible customers.		
3. <u>WILLINGNESS TO PARTICIPATE FACTOR</u> Greenlining argued that the utilities' proposed WTP factors and the LINA's 52% Unwillingness Factor are inappropriate to adopt, because known barriers to participation must be addressed before the percentage of customers who are truly unwilling or unable to participate can be properly calculated. Greenlining argued that the LINA itself notes that much of its own unwillingness estimate is due to program barriers that should be resolved before unwillingness can be calculated. Greenlining argued that new water-energy measures could prompt previously unwilling customers to participate, because they were (at the time) keenly aware of their	Greenlining's Protest, p. 4; 6/29/15 Responses to Additional Questions, pp. 2-3; Opening Brief, pp. 2-3; Reply Brief, pp. 1-2. Agreeing with Greenling, the Final Decision noted the 2013 LINA's finding that barriers must be addressed before the Willingness to Participate factor can be properly determined. (pp. 256-258). It also notes that elimination of the Go-Back and3MM Rules will increase interest in participation among previously ineligible customers. The Final Decision adopts a "willing and feasible to participate" standard and sets that target at 60%. (p. 270) Greenlining Opening Brief, p. 3.	N/A

water usage during the ongoing drought. Greenlining also argued that landlords might be more interested in participating if water energy benefits are included.		
4. <u>COST-EFFECTIVENESS</u> Greenlining supported the Cost Effectiveness Working Group White Paper and Addendum generally, but expressed concerns that the ESACET and Resource Measure TRC tests did not properly consider and value health, safety and comfort benefits. Such benefits are not only a Commission priority but a statutory requirement, and Greenlining argued that they must be protected in cost effectiveness calculations. Greenlining argued that measures first must be sorted into energy and non-energy categories, before any cost-effectiveness test can be applied to energy measures. Greenlining argued that a robust stakeholder feedback process must be included in the Commission's evaluation of cost-effectiveness, in order to fully consider the impact of contemplated program changes on program participants and contractors. Greenlining argued that the Commission should adopt an	Greenlining's Comments on CE Energy Working Group Recommendations (6/29/15), pp. 2-3; Reply Comments on PD and APD, p. 3. The Final Decision found that the Working Group had made good progress, but, similar to what Greenlining stated, the Commission said that more work remained to be done to refine the ESACET to properly reflect the ESA program's dual goals of energy efficiency savings and health, safety and comfort improvements. The Decision ordered the Working Group to continue working on this and other specific tasks, and propose a schedule for completing its work. (pp. 217-221) Comments on Clean Energy Working Group Recommendations (6/29/15), pp. 3-4; Reply Brief, p. 9; Reply Comments on PD and APD, p. 3. D.16-11-022 agrees that measures must be sorted into resource and non-resource categories, and agreed that the Working Group still needed to complete this task before finalizing its cost effectiveness tests. (pp. 217-221) Comments on Clean Energy Working Group Recommendations (6/29/15), pp. 4-5; 6/29/15 Responses to Additional Questions, pp. 7-8.	N/A

energy savings goal that prioritizes health, safety and comfort measures and also maximizes energy efficiency and savings.	In adopting savings goals, D.16-11-022 noted that the ESA program must balance its dual goals of achieving energy savings and providing vital health, safety and comfort measures in low income homes. (pp. 45-46)	
5. <u>ME&O</u> Greenlining opposed the utilities' request for local ME&O funding because the applications failed to identify a consistent way of tracking and measuring the impact of the IOUs' M&O efforts. Greenlining stated that that there has been very little evidence that M&O has had any success related to enrollment of eligible customers. Greenlining urged the Commission to create objectives and metrics to track the utilities' ME&O budget and program implementation.	Greenlining Opening Brief, p. 3-8. Greenlining Reply Brief, 3-9. In the Final Decision, the Commission agreed with Greenlining and rejected the IOUs' request for increased ME&O funding. The Commission directed the IOUs to provide more detailed M&O plans, as well as further clarification for their budget requests. It stated that until the marketing plans are developed and vetted by stakeholders and considered by the Commission, the IOUs are limited to the low-income marketing budgets to no more than the annualized amounts that were approved for 2012 – 2014, or to 110% of the maximum annual, actual expenditures during that period, p.164.	N/A
Greenlining also recommended clarifying the ESAP statewide ME&O plan across all program administrators and for now, reject all of the IOUs' requested statewide ME&O budget requests. It was not clear why each utility had a different statewide ESAP budget request and why none of them offered an explanation as to how the funds had been and will be spent.	Greenlining Opening Brief, p. 3-8. Greenlining Reply Brief, 3-9. In the Final Decision, the Commission concluded that all statewide ESA Program ME&O efforts should be included in the D.16-03-029 decision (Statewide ME&O Proceeding), rather than the present proceeding. The Commission did not find justification for approving any of the IOUs' requests for statewide ME&O funding, p.166.	

6. <u>STUDIES</u> a. <u>LINA</u> Greenlining collaborated with CfortAT, who is the most active advocate in this proceeding's LINA development. D.14-08-030 stated the required issues that the LINA study must cover. Greenlining only focused on making sure that the LINA identifies the most beneficial programs. b. <u>Energy Education Study Phase II</u> Greenlining opposed the utilities' funding request for a Phase II Energy Education study. Greenlining pointed out and recognized the inconsistencies across the IOUs with respect to the existing delivery models for in-home energy education as well as planned implementation strategies for Phase 1 recommendations.	*See* Greenlining's Public Comments on LINA Research Plan Draft, 2/5/2016. Greenlining's Opening Brief, p.8 In the Final Decision, the Commission acknowledged Greenlining's concerns relating to the inconsistencies across the IOUs with respect to the existing delivery models for in-home energy education as well as planned implementation strategies for Phase 1 recommendations. As such, it denied the requested budget of $350,000 for a subsequent (Phase II) Study.	N/A
7. <u>PILOTS</u> 1. MCE Greenlining supported MCE's LIFT pilot and offered modifications including, among others, recommendations to ensure that no ESA Program funds be spent on Health and Safety	Greenlining, Opening Brief at 16. Op 198, approving MCE's pilot.	N/A

upgrades, to ensure robust reporting, to demonstrate the efficacy of energy education, to ensure details are provided for CBO engagement, and to create an advisory board for the pilot. 2. Undocumented Residents Greenlining opposed SCG's proposal to conduct a regional study of undocumented residents' trust barriers, in relation to enhancing ESA or CARE Program participation. The study includes interviewing undocumented residents to inform SoCalGas' marketing and outreach to this customer segment. The projected cost is estimated at approximately $40,000 based on a $20 per minute in-depth interview, funded from both CARE and ESA Programs. SoCalGas proposes enough funding to conduct approximately 24 in-depth interviews that would each last 60 minutes.	Greenlining, Protest at 7. Greenlining, Rebuttal Testimony at 2. Commission grant SoCalGas's study of undocumented residents in its service areas, particularly in light of the large undocumented population in the areas SoCalGas serves, however we direct that this work be rolled into the scope of the next LINA study, rather than approve it as a separate study. P.226	
8. <u>Aliso Canyon</u> Greenlining responded to the Commission's Aliso Canyon ACR addressing program responses to the gas leak emergency. Supported by CforAT, Greenlining prompt action on the overall docket, and also addressed specific program issues such as allocation of funding for	Greenlining and CforAT's Opening Comments on Aliso Canyon ACR March 24, 2016. Greenlining and CforAT's Reply Comments on Aliso Canyon ACR April 19, 2016. Consistent with Greenlining's recommendations, the Aliso Canyon	N/A

emergency responses and the need to ensure that program health, comfort and safety goals are not undermined by a disproportionate focus on energy savings goals. We argued that the costs should be placed on the shareholders rather than the ratepayers.	Decision notes the need for a fast resolution of this issue (p. 31, COL 1) while balancing the significance of the ESA Program's quality of life goals, as well as the energy-saving goals (p. 29, FOF 1) while establishing interim program modifications in the impacted area. As Greenlining and CforAT recommended, the Commission also required the utilities to track expenses in a memorandum account for future allocation (p. 35, OP 11), and to calculate energy savings in the aggregate rather than on a household basis (p. 33, OP 5).	

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**	N/A
b. Were there other parties to the proceeding with positions similar to yours?	**Yes**	N/A
c. If so, provide name of other parties: The Utility Reform Network (TURN), Center for Accessible Technology (CforAT), Office of Ratepayers Advocates (ORA), Natural Resources Defense Council (NRDC), and Energy Efficiency Council (EEC).		N/A
d. Intervenor's claim of non-duplication: Immediately after the Applications and Protests filing period, Greenlining met with ORA, TURN, and CforAT to discuss the organizations' priorities and to create a plan on how to ensure that our advocacy will not lead to duplication of efforts. Greenlining periodically checked in with these parties over the course of the proceeding to make sure that we achieve this intention. Greenlining also often communicated with parties that engaged in similar issues but have differing interests or goals from Greenlining's (such as EEC, NRDC, CHPC, and NCLC) in order to avoid inadvertent duplication of work and more importantly, to help the Commission work towards creating the best policies for low-income customers.		N/A

PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

a. Intervenor's claim of cost reasonableness:	**CPUC Discussion**
It is difficult to assign a dollar value to the benefits that customers receive as the result of Greenlining's advocacy in the Commission's low-income energy programs. The legislators did not intend for the ESA program to only be source of energy savings but to also ensure that it provides health, safety, and comfort services and measures to Californians who need these energy services the most. There has been no calculator to determine the monetary value of the energy-related health, safety, and comfort benefits that ESAP provides. The Commission itself has repeatedly asserted that it will continue to uphold ESAP's statutory mandate and intent. Greenlining submits that despite the inability to quantify the benefits of its participation in dollars, the benefits to all ratepayers who decide to take energy savings actions by participating in ESAP will accrue over time to a value that certainly exceeds the reasonable cost of Greenlining's participation.	N/A
b. Reasonableness of hours claimed: Greenlining ensured that its hours in participating in this proceeding remained reasonable by directly communicating with most of the active stakeholders in the present proceeding, in order to resolve issues related to CARE/ESA programs in an efficient, and when appropriate, in a collaborative manner. Greenlining's primary and sole representative in this proceeding is Ms. Miller who focused on local and statewide marketing, education, and outreach (ME&O) and ESAP-related issues. Ms. Miller prioritized issues that have statewide impacts and only tackled local issues related to ME&O and proposed pilots. As such, Greenlining urges that the hours it spent participating in this proceeding were reasonable and warrant full compensation as requested.	N/A
c. Allocation of hours by issue: 1. CHANGES 0.9% 2. ESA Program Rules (3MM/Go Back) 13.8% 3. Willingness to Participate 10.1% 4. Cost-effectiveness 12.3% 5. Marketing, Education, and Outreach 25.0%	N/A

6. Studies 8.3% 7. Pilots 5.9% 8. Aliso Canyon 6.3% 9. General/Procedural 17.3%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Carmelita L. Miller	2014	30.5	$180	See Comment 3	5,490	N/A	N/A	N/A
Carmelita L. Miller	2015	190	$200	See Comment 4	38,000	N/A	N/A	N/A
Carmelita L. Miller	2016	58	$220	D.16-10-038	12,760	N/A	N/A	N/A
Stephanie Chen	2014	1.5	$230	A.11-05-017	345	N/A	N/A	N/A
Stephanie Chen	2015	12.6	$310	D.16-09-032	3,906	N/A	N/A	N/A
Stephanie Chen	2016	8.7	$315	D.16-09-032	2,740.50	N/A	N/A	N/A
					***Subtotal:* $63,241.50**			***Subtotal:* $ 0.00**
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
Carmelita L. Miller	2015	2.7	$200	See Comment 4	270	N/A	N/A	N/A
Carmelita L. Miller	2017	15.9	$220	D.16-10-038	1,749	N/A	N/A	N/A
Stephanie Chen	2015	0.80	$310	D.16-09-032	124	N/A	N/A	N/A
Stephanie Chen	2017	5.8	$315	D.16-09-032	913.50	N/A	N/A	N/A
					***Subtotal:* $3,056.50**			***Subtotal:* $0.00**
					TOTAL REQUEST: $66,298			**TOTAL AWARD: $0.00**

*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[1]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Carmelita L. Miller	December 2013	295398	No
Stephanie Chen	August 2010	270917	No

C. CPUC Disallowances and Adjustments:

Item	Reason
A	Greenlining's claim was filed late, and they are therefore ineligible to seek intervenor compensation in this proceeding. See Discussion in Part I.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	No

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

Party	Comment	CPUC Discussion
Greenlining Institute	Greenlining asks that the Commission waive the 5:00 PM filing deadline for its intervenor compensation request and accept the document as submitted on 01/20/2017. Greenlining alleges that it attempted to access the filing system prior to the 5:00 PM deadline, but did not receive confirmation until after 5:00 PM. Greenlining states that a waiver of the rule would be just and be for good cause, due to its participation in this proceeding.	The Commission finds Greenlining's arguments for a waiver of the filing wholly unpersuasive. The Commission has no evidence that Greenlining attempted to file before the 5 PM deadline. By its own admission, Greenlining states that it waited until less than 15 minutes prior to the 5 PM deadline to begin to attempt to file its claim, although it had 60 days to do so. These facts do not support a deviation from the Commission's rules. Intervenors such as Greenlining are well aware of the Commission's rules. Specifically, Greenlining was on notice of our filing requirements, as it has previously had a claim denied due to tardiness (*see* D. 16-10-032). The Commission grants intervenors ample time to file claims for intervenor compensation, and will not waive the rules for intervenors that treat these rules as mere suggestions. Waiting until the last minute of the last day to attempt to file is less than prudent.

FINDINGS OF FACT

1. Greenlining Institute's Request for Intervenor Compensation was filed after the January 20, 2017 5:00 p.m. deadline.

CONCLUSION OF LAW

1. Greenlining Institute's Request for Intervenor Compensation was filed late.

2. Greenlining Institute's Request for Intervenor Compensation fails to satisfy all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Greenlining Institute is awarded $0.00.

2. This decision is effective today.

Dated April 6, 2017, at Santa Rosa, California.

MICHAEL PICKER
President
CARLA J. PETERMAN
LIANE M. RANDOLPH
CLIFFORD RECHTSCHAFFEN
Commissioners

I dissent.

/s/ MARTHA GUZMAN ACEVES
Commissioner

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D1704006	**Modifies Decision?**	
Contribution Decision(s):	D1611022, D1604040, D1512047		
Proceeding(s):	A1411007, A1411009, A1411010, A1411011		
Author:	ALJ Colbert		
Payer(s):	N/A		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Greenling Institute	01/23/2017	$66,298.00	$0.00	N/A	Late Filed Claim

(END OF APPENDIX)