

Decision 18-11-047 November 29, 2018

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

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902E) for Approval of SB 350 Transportation Electrification Proposals.	Application 17-01-020
And Related Matters.	Application 17-01-021 Application 17-01-022

**DECISION GRANTING COMPENSATION TO UTILITY CONSUMERS'
ACTION NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS
18-01-024 & 18-05-040**

Intervenor: Utility Consumers' Action Network	For contribution to Decision D.18-01-024 and D.18-05-040
Claimed: \$ \$94,622.73	Awarded: \$95,122.73
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Michelle Cooke and Sasha Goldberg

PART I: PROCEDURAL ISSUES:

A. Brief description of Decision (Priority Review Projects):	<p>D.18-01-024 approved, with modifications, 15 of the 17 Priority Review Projects (PRP's) proposed by Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E). This decision is part of the Commission's efforts to meet the clean energy and transportation electrification goals of Senate Bill 350. This decision focused solely on the PRP's which are short-term (e.g. one-year) investments with limited budgets.</p> <p>This proceeding remained open to consider the large electric utilities' standard review projects and other issues defined in the scoping memo.</p>
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<p>A. Brief description of Decision (Standard Review Projects):</p>	<p>D.18-05-040 approved with modifications, transportation projects proposed by California’s three largest electric utilities and approved budgets totaling \$738 million with \$29.5 million set aside for evaluation of the projects.</p> <p>This decision closed the transportation electrification applications.</p>
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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:	March 16, 2017	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	April 17, 2017	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4)):		
5. Based on ALJ ruling issued in proceeding number:	A.17-01-012	Verified
6. Date of ALJ ruling:	April 24, 2017	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b))		
9. Based on ALJ ruling issued in proceeding number:	A.17-01-012	Verified
10. Date of ALJ ruling:	April 24, 2017	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes

Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.18-05-040	Verified
14. Date of issuance of Final Order or Decision:	June 6, 2018	Verified
15. File date of compensation request:	August 1, 2018	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION:

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059).

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>D.18-01-024 Priority Review Projects</p> <p>1. UCAN conducted discovery requests regarding the total costs for the Priority Review Projects (See UCAN DR-01; Q1(a,b)). UCAN argued against allowing funding for the priority review projects that exceeded the \$4 million cap per project and \$20 million overall cost cap when including O&M costs.</p> <p>With UCAN and others raising this issues, the Commission had to address the fact that the ACR was silent as to whether the direct costs or lifetime costs of the project needed to meet the \$20 million total/\$4 million project limits and explicitly find that it was reasonable to use the direct costs as the basis</p>	<p>Opening Brief p. 5: ...we believe it should be made clear that SDG&E’s proposed projects do not meet the ACR’s cost restrictions either for each individual project or for overall portfolio costs....UCAN asserts that an adjusted \$26,428,000 cost does not meet the ACR’s direction to not exceed a total budget overall of \$20 million.</p> <p>D.18-01-024 p. 89-90: Several parties raised concerns that SDG&E’s direct project costs during the 2018-2019 pilot implementation period are below \$4 million each, but including the O&M costs through 2050 cause four of the six projects to exceed \$4 million, even before reflecting loaders and escalation as described in Exhibit SDG&E-6, Table MAC-5 (citing UCAN among others).... While the ACR was silent as to whether the direct costs of lifetime costs of the project needed to meet</p>	<p>Verified</p>

<p>for determining whether the project meets the intent of the ACR. However, the Commission also acknowledged the need to contain costs by requiring a one-way balancing account to record all costs, including O&M expenses, taxes, etc.</p>	<p>the \$20 million total/\$4 mission project limits, we find that it is reasonable to use the direct costs as the basis for determining whether the project meets the intent of the ACR.</p>	
<p>2. UCAN opposed utility ownership of the electric vehicle service equipment (EVSE) and argued instead that SDG&E adopt the “make ready” model with site hosts upgrading their own property rather than the utility seeking to increase rate base.</p> <p>The Commission acknowledged the concerns regarding SDG&E’s proposal for end-to-end utility ownership of the charging infrastructure associated with its PRP’s. While the Commission agreed to allow SDG&E to “test and evaluate” different ownership models, it also required the utility to phase in ownership and investment for some projects because it found there was insufficient data to determine if new investment and ownership in infrastructure and equipment was necessary to meet the stated goals of the program. In other instances, the utility was</p>	<p>Opening Brief p. 5: In addition to the excessive costs, UCAN would like to point out that with very few exceptions, SDG&E has proposed the controversial step of seeking to own the ratepayer funded TE equipment for the projects that they have proposed.</p> <p>D.18-01-024 p. 15: “Unlike the PG&E and SCE proposals, SDG&E proposes end-to-end utility ownership of the charging infrastructure associated with its PRP’s, including ownership of the Electric Vehicle Supply Equipment. Many parties oppose this model...At this point in the state’s path towards widespread transportation electrification, we find value in testing, evaluating, and comparing a variety of models to identify and address the different barriers associated with certain market segments.</p> <p>Pg. 18: Given the large number of existing electric GSE at the airport and the lack of data regarding the operations of these vehicles, SDG&E should first collect additional information about the existing equipment and understand why SDIA has not expanded its</p>	<p>Verified</p> <p>Verified</p>

<p>directly to specifically seek out partners that would not otherwise be able or willing to fund their own TE infrastructure to ensure SDG&E ownership was expanding the reach of the project.</p>	<p>electric GSE fleet before providing incentives to support expansion of the fleet.</p> <p>Pg. 30: SDG&E is directed to partner with locally-owned businesses or MBE/WBEs that cannot or are not willing to own the additional infrastructure associated with the program, to support up to 30 more electric vehicles</p>	<p>Verified</p>
<p>3. UCAN argued that SDG&E should be required to utilize additional non-utility funding as directed in the Assigned Commissioner’s Ruling (ACR) on 9.14.16</p> <p>For the San Diego International Airport (SDIA) project, the Commission directed SDG&E to work with SDIA to identify site hosts willing to own and operate the EVSE and pursue funding sources for new electric GSE.</p>	<p>Comments on PD p. 2: ...the ACR encouraged projects that “seek to leverage non-utility funding.” However, none of SDG&E’s approved projects use non-utility funding.</p> <p>D.18-01-024 p. 19: “SDG&E should also work with SDIA to identify, and prioritize site hosts that are willing to own and operate the EVSE. During this time, SDG&E and the SDIA should continue to work with SDIA’s tenants to pursue funding sources for new electric GSE, as described in SDG&E’s application and supporting testimony.”</p>	<p>Verified</p>
<p>4. UCAN argued for a more detailed balancing test analysis so that the benefits of electric utility ownership of charging infrastructure could be balanced against the potential competitive limitation.</p> <p>The Commission expressed concerns regarding SDG&E’s Green Taxi/Shuttle/Rideshare</p>	<p>Comments on PD p. 4: ...the PD errs by allowing SDG&E to own and operate infrastructure and chargers without a more detailed balancing test analysis... The balancing test [articulated in D.11-07-029 and further defined in D.14-12-079] required that the benefits of electric utility ownership of charging infrastructure should continue to be balanced against competitive limitation.</p> <p>D.18-01-024 p. 32: “As proposed, it is unclear how SDG&E’s Green</p>	<p>Verified</p>

<p>project and limited its approval to focus only on the shuttle company component.</p>	<p>Taxi/Shuttle/Rideshare align with the goals of SB 350. Many parties expressed concerns about this proposal including the 1) benefits to ratepayers; 2) competitive issues, and; 3) viability of the project accelerating widespread TE... While we believe it is an important endeavor to electrify the taxi and TNC sector, given the record in this case, we are limiting our approval of this project to focus only on the shuttle company component.”</p> <p>p. 35: Furthermore, SDG&E does not provide adequate information to assess whether its proposal to install, own, and operate charging infrastructure for four electric taxis and up to 50 TNC drivers will accelerate transportation electrification.</p>	
<p>5. UCAN, along with other intervenors, argued that the appropriate cost recovery mechanism should be a one way balancing account rather than SDG&E’s proposed two-way balancing account.</p> <p>The Commission agreed that the one-way balancing account was the appropriate cost recovery mechanism and required SDG&E and other utilities to refund any overcollections for PRP costs.</p>	<p>Reply Brief p. 6: UCAN agrees with the assessments of ORA and TURN noted above and we ask that the Commission approve a one-way balancing account for SDG&E’s priority review projects.</p> <p>D. 18-01-024; Pg. 93, Ordering Paragraph #5, p. 112: “San Diego Gas & Electric Company (SDG&E) is authorized to establish a new one-way balancing account to record the actual Operations and Maintenance expenses, payroll taxes, and capital revenue requirement...associated with the approved Priority Review Projects as summarized in Table 1.</p>	<p>Paragraph #15 Verified</p>

<p>D.18-05-000 Standard Review Project</p> <p>1. UCAN, along with other intervenors, urged the Commission to modify SDG&E’s proposal into a rebate program that would minimize overall costs and maximize overall benefits as required by PUC §740.12(b).</p> <p>The Commission agreed that the Residential Charging Program (RCP) should be modified into a 5-year rebate program.</p>	<p>Opening Brief, p. 6. In Commissioner Peterman’s ruling she also noted that [PUC §740.12(b)] requires that the programs proposed by electrical corporations shall seek to minimize overall costs and maximize overall benefits...UCAN has examined SDG&E’s home charging proposal and has found that SDG&E’s proposal is flawed in its design, is too costly and is not cost effective for the ratepayer. We urge the Commission to modify SDG&E’s proposal into a rebate program that would be less administratively burdensome, less expensive and more cost effective.</p> <p>D.18-05-000 Ordering Paragraph #3, p. 151: San Diego Gas & Electric Company Residential Charging Program is approved with the modifications outlined in Section 3.5, Table 5...<i>SDG&E should file an implementation plan for a 5-year rebate program not to exceed 60,000 rebates for EVSE, to be open for customer enrollment no later than mid-2019.</i> (see first bullet point of Table 5, p. 61)</p>	<p>D.18-05-040 Verified</p>
<p>2. UCAN worked with its expert to conduct discovery requests regarding SDG&E cost estimates. This data (UCAN Ex. 12; DR-02, Q9) allowed UCAN to emphasize the high cost of the proposed program by pointing out in its opening brief and at hearings that SDG&E requested nearly \$100 million in overhead to operate its proposed</p>	<p>Opening Brief, p. 10: ...when SDG&E adds in the overhead loaders and escalation to this program, the costs to the ratepayers balloons by an additional \$100 million, totaling \$341,626,000.</p> <p>Opening Brief, p. 11: This answer from Mr. Calabrese shows just how unnecessarily expensive it will be for the ratepayers to fund SDG&E’s proposed program. Not only will SDG&E be capitalizing the charger and installation costs which puts the</p>	

<p>program and would charge a 48.9 percent overhead for the capitalized L2 chargers installed through the RCP.</p> <p>The Commission noted UCAN’s concern in its decision and found that “persistent capitalization” is expensive for ratepayers and not necessary to meet the goals of the TE program.</p> <p>The Commission required SDG&E to treat any rebate monies connected to its RCP as expenses rather than capital assets.</p>	<p>costs into ratebase and therefore earns a rate of return, but they are also charging an overhead rate of 48.9%.</p> <p>D.18-05-000, p. 27 As noted in UCAN’s opening brief and reiterated during hearings, SDG&E requested nearly \$100 million in overhead to operate its proposed program. SDG&E contends it would charge a 48.9 percent overhead for the capitalized L2 chargers installed through its RCP. [T]he 48.9 percent will be charged multiplied times the direct cost of the charger.</p> <p>p. 133: While the Commission supports a role for the IOUs in accelerating TE, the Commission does not believe that capitalizing all EV charging infrastructure is always necessary to remove barriers to widespread electrification. Furthermore, the Commission expects additional applications from IOUs to support widespread TE and it is unclear if persistent capitalization of TE infrastructure will lead to unaffordable rates for all ratepayers if done at scale to meet the State’s TE goals</p> <p>D.18-05-000 Ordering Paragraph #15, p. 155: San Diego Gas & Electric Company must treat any rebate monies associated with its Residential Charging Program as expenses rather than capital assets.</p>	<p>D.18-15-040 Verified</p> <p>D.18-05-040 Verified</p>
<p>3. UCAN expressed concern about utility ownership of behind the meter service equipment. UCAN worked with its</p>	<p>Opening Brief, p. 14 ...UCAN as well as ORA, TURN, and ChargePoint all favor modifying SDG&E’s proposal from utility ownership of behind the meter</p>	<p>Verified</p>

<p>expert to conduct discovery questions regarding SDG&E’s capitalization requests. (UCAN Ex. 11; DR-03, Q4 (a)). UCAN, along with ORA, TURN and ChargePoint, urged the Commission to modify SDG&E’s proposal from utility ownership to a rebate program which would improve efficiency and reduce costs to ratepayers.</p> <p>The Commission modified the proposal to disallow utility ownership of Electric Vehicle Supply Equipment.</p>	<p>service equipment into a rebate program that would be easier to administer and significantly less costly to the ratepayers.</p> <p>D.18-05-000 Ordering Paragraph #16, p. 155: San Diego Gas & Electric Company shall not own any of the proposed Electric Vehicle Supply Equipment or the customer-side make-ready infrastructure in relation to its approved Residential Charging Program.</p>	<p>D.18-05-040 Verified</p>
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
<p>a. Was the Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates) a party to the proceeding??¹</p>	<p>Yes</p>	<p>Verified</p>
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	<p>Yes</p>	<p>Verified</p>
<p>c. If so, provide name of other parties: The Utility Reform Network (TURN), ChargePoint, The National Asian American Coalition, The National Diversity Coalition, Small Business Utility Advocates (SBUA)</p>	<p>GPI, CEC, etc.</p>	

¹ The Office of Ratepayer Advocates (ORA) was renamed the Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates), pursuant to Senate Bill 854, which the Governor approved on June 27, 2018.

<p>d. Intervenor’s claim of non-duplication:</p> <p>For the Priority Review Projects:</p> <p>This proceeding included Priority Review Projects from all of the three large investor owned utilities: Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E). Unlike other intervenors, UCAN focused solely on the projects proposed by SDG&E as UCAN provides ratepayer advocacy for San Diego Gas and Electric Ratepayers. This focus avoided duplication of efforts to review the PG&E and SCE proposed projects and allowed UCAN to address larger aspects of SDG&E’s projects.</p> <p>Further, TURN and ORA addressed some of the details of SDG&E’s PRP’s while UCAN focused on the larger concepts of utility ownership of EVSE, total project costs, and the utilization on non-utility funding in an effort to save ratepayers money. UCAN’s presentation sought to add to the record in a unique way by emphasizing the costs to San Diego ratepayers and need for non-utility funding for specific SDG&E projects where UCAN had knowledge of the community needs.</p> <p>For the Standard Review Projects:</p> <p>In this proceeding UCAN’s advocacy helped develop the record by clarifying the additional \$100 million in costs for SDG&E projects that would be added to the proposal if it was not modified. While UCAN was able to coordinate with other intervenors regarding the Summary of Recommendations, UCAN supplemented the record and enhanced the discussion by providing cost details for SDG&E projects through material gained during discovery at the hearings and in its opening brief.</p>	<p>Noted</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION:

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

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>For the Priority Review Projects: In this proceeding UCAN’s advocacy on behalf of San Diego ratepayers ensured that the utility’s short term projects met the goals of the TE program while not overburdening ratepayers. For example, UCAN’s comments contributed to the Commission’s clarification of direct costs vs. adjusted costs and whether using the adjusted costs to determine if the projects exceeded statutory budget caps met the intent of the ACR (Commission said the adjusted costs did meet the intent of</p>	<p><u>CPUC Discussion</u></p> <p>Verified; UCAN’s advocacy in this proceeding was limited to issues on SDG&E’s priority and standard review projects.</p>
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<p>the ACR.) UCAN also advocated for more non-utility funding to be sourced for the projects ensure that not only are ratepayers only footing a reasonable cost of these projects, but that other stakeholders in the community meaningfully participate and invest in these important social projects. For example, the Commission directed SDG&E and SDIA to work with tenants to pursue funding sources for GSE. UCAN also argued for a balancing test to determine the benefits to ratepayers due of utility infrastructure ownership vs. potential competitive limitations. The Commission limited one of the projects (SDG&E’s Green Taxi/Shuttle/Rideshare) due to the concerns expressed by the parties that part of the proposal did not satisfy the balancing test of several key social criteria and could harm ratepayers through overpaying for a project with narrow benefits and large expenses.</p> <p>For the Standard Review Projects: In this proceeding UCAN’s advocacy, through its expert work, discovery and briefing, supplemented the record by clarifying that SDG&E sought to add \$100 million in costs beyond the costs of the project if the proposal was not modified. UCAN enhanced the discussion by pointing out that the project would be much more expensive if the costs went into ratebase and therefore should be modified. Moreover, UCAN’s work, along with other intervenors, encouraged the Commission to make significant changes to the SDG&E project, including adopted a rebate program and minimizing utility-owned infrastructure, to reduce risk to ratepayers of unanticipated expenses from these projects. UCAN believes that our participation helped inform the Commission of these critical issues and provide value to the record.</p> <p>UCAN’s participation on behalf of San Diego ratepayers helped inform the Commission of these critical issues and provide value to the record potentially saving ratepayers money by reducing costs of the program, but also ensuring that these important projects will be successful to achieve key societal goals. UCAN urges the Commission to find that our costs of participation of \$94,622.73 are more than reasonable given our substantial contribution for San Diego ratepayers.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>In this proceeding, UCAN is claiming 326 total hours, including time for Intervenor Compensation preparation. This includes all hours spent reviewing the Priority Review Projects and the Standard Review Projects. UCAN’s request includes approximately 50 hours for Jane Krikorian who bills at a lower</p>	<p>Verified.</p>

rate than Don Kelly. UCAN's time records reflect the fact that Ms. Krikorian and Mr. Kelly roughly split their time so that Ms. Krikorian focused on the PRPs while Mr. Kelly worked more closely with other parties and its expert Mr. Croyle on the SRPs. Mr. Kelly also reviewed Ms. Krikorian's work and generally crafted strategy and case direction. Mr. Croyle, UCAN's expert in this case, worked closely with staff to develop discovery questions that informed UCAN's cross examination and briefing. Mr. Croyle also began to develop opening testimony but the schedule was suspended to begin settlement discussions and UCAN's testimony was never submitted. However, the reasonable amount of Mr. Croyle's hours were well spent as it informed, and synthesized UCAN's case for settlement and ultimate hearing and briefing work. This data-intensive and technical effort required coordination among the parties and support UCAN's comments and briefing related to both decisions.

Parties dedicated time to potential settlement on SR projects. As an active party to the proceeding, UCAN participated in preliminary settlement discussions, review of settlement proposals and coordination on strategy with other intervenors to protect San Diego ratepayer interests. UCAN only participated in settlement discussions related to SDG&E specific proposals. While settlement was not ultimately reached, UCAN believes this time was well spent to better understand utility proposals, parties' positions and to support the settlement process as valuable in these large multi-party cases. Additionally, this time helped inform Mr. Kelly's hearing preparation for extensive cross-examination of five SDG&E witnesses during four separate days of hearings. Mr. Kelly's hearing preparation hours are reasonable considering his active participation during the scheduled hearings.

UCAN submits that the hours claimed were reasonably necessary to achieve the substantial contributions of informing the record and protecting ratepayer interests.

c. Allocation of hours by issue:		Verified
% of Hours per Issue	Issue	
3%	1. General Prep (GP)	
10%	2. Hearings, Workshops, and Conferences (HWC)	
55%	3. Filings (F)	
9%	4. Discovery (D)	
6%	5. Settlement (S)	
16%	6. Evidentiary Hearings (EH)	
1%	7. Coordination (C)	
<hr/> 100%		

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Donald Kelly	2016	.25	\$355	D.18-06-024	\$88.75	0.25	\$355.00	\$88.75
Donald Kelly	2017	170.75	\$365	D.18-06-024	\$62,323.75	170.75	\$365.00	\$62,323.75
Donald Kelly	2018	16.75	\$375	D.18-06-024	\$6,281.25	16.75	\$375.00	\$6,281.25
Jane Krikorian	2017	40.25	\$155	D.16-06-028	\$6,238.75	40.25	\$155.00	\$6,238.75
Jane Krikorian	2018	1.5	\$155	D.18-06-024	\$232.50	1.50	\$155.00	\$232.50
David Croyle	2017	45.25	\$250	D.18-01-021	\$10,562.50	44.25 [A]	\$250.00	\$11,062.50 [B]
David Croyle	2018	5	\$270	D.18-01-021	\$1,350	5.00	\$270.00	\$1,350.00
Courtney Cook	2017	.25	\$155	D.18-06-024	\$38.75	0.25	\$155.00	\$38.75
<i>Subtotal: \$ 87,116.25</i>						<i>Subtotal: \$87,616.25</i>		

OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Donald Kelly	2017	15.5	\$182.5	D.18-06-024	\$2,828.75	15.50	\$182.50	\$2,828.75
Donald Kelly	2018	9.5	\$187.5	D.18-06-024	\$1,781.25	9.50	\$187.50	\$1,781.25
<i>Subtotal: \$4,610.00</i>					<i>Subtotal: \$4,610.00</i>			
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Jane Krikorian	2018	15.25	\$77.5	D.18-06-024	\$1,181.88	15.25	\$77.50	\$1,181.88
Courtney Cook	2018	4.25	\$80	D.18-06-024	\$340	4.25	\$80.00	\$340.00
<i>Subtotal: \$1,521.88</i>					<i>Subtotal: \$1,521.88</i>			
COSTS								
#	Item	Detail		Amount	Amount			
	Travel, Copy, misc.	Travel expenses, copy charges and other misc. charges.		\$1,374.60	\$1,374.60			
<i>Subtotal: \$1,374.60</i>					<i>Subtotal: \$1,374.60</i>			
TOTAL REQUEST: \$94,622.73					TOTAL AWARD: \$95,122.73			
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ²		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation		
Donald Kelly		December 5, 1990		151095		No		

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

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

Attachment or Comment #	Description/Comment
1	Certificate of Service

D. CPUC Disallowances and Adjustments:

Item	Reason
[A]	Reported hours for Croyle for the 2017 year was 44.25 hours.
[B]	Mathematical Error.
[C]	While UCAN substantially contributed to Decision(s) 18-01-024 and 18-05-040, their contribution was limited to the SDG&E application. UCAN’s focus in this proceeding was on those programs and investments that directly impact SDG&E ratepayers. Due to UCAN’s particular focus on SDG&E’s priority and standard review programs, it is reasonable that the total award amount for UCAN’s intervenor compensation claim be absorbed by the ratepayers of SDG&E and not those located in the other investor owned utilities’ service territories.

PART IV: OPPOSITIONS AND COMMENTS:

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

1. Utility Consumers’ Action Network has made a substantial contribution to D.18-01-024 and D.18-05-040.
2. The requested hourly rates for Utility Consumers’ Action Network’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. UCAN’s advocacy and substantial contribution in this proceeding focused on SDG&E’s priority review and standard review application.

5. The total of reasonable compensation is \$95,122.73.

CONCLUSION OF LAW

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

ORDER

1. Utility Consumers' Action Network is awarded \$95,122.73.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company ratepayers shall pay Utility Consumers' Action Network their respective shares of the award, based on their California-jurisdictional electric revenues for the 2017 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 October 16, 2018, the 75th day after the filing of Utility Consumers' Action Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated November 29, 2018, at San Francisco, California.

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

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D1811047	Modifies Decision?	No
Contribution Decision(s):	D1801024 & D1805040		
Proceeding(s):	A1701020, A1701021, 1701022		
Author:	Cooke, Goldberg		
Payer(s):	San Diego Gas & Electric Company ratepayers.		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier ?	Reason Change/Disallowance
Utility Consumers' Action Network	08/01/2018	\$94,622.73	\$95,122.73	N/A	Hours Reported and Math Errors.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Donald	Kelly	Attorney	UCAN	\$355.00	2016	\$355.00
Donald	Kelly	Attorney	UCAN	\$365.00	2017	\$365.00
Donald	Kelly	Attorney	UCAN	\$375.00	2018	\$375.00
Jane	Krikorian	Advocate	UCAN	\$155.00	2017	\$155.00
Jane	Krikorian	Advocate	UCAN	\$155.00	2018	\$155.00
David	Croyle	Expert	UCAN	\$250.00	2017	\$250.00
David	Croyle	Expert	UCAN	\$270.00	2018	\$270.00
Courtney	Cook	Paralegal	UCAN	\$155.00	2017	\$155.00
Courtney	Cook	Paralegal	UCAN	\$160.00	2018	\$160.00

(END OF APPENDIX)