

PROPOSED DECISION

Decision _____

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

And Related Matters.

Application 14-11-009
Application 14-11-010
Application 14-11-011

DECISION GRANTING INTERVENOR COMPENSATION TO NATURAL RESOURCES DEFENSE COUNCIL FOR CONTRIBUTION TO DECISIONS 19-06-022 AND 16-11-022

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| <p>Intervenor: Natural Resources Defense Council (NRDC)</p> | <p>For contribution to Decision (D.) 19-06-022, Public Advocates Office’s Petition to Modify D.16-11-022, and ESA Multifamily Working Group</p> |
| <p>Claimed: \$14,520.00</p> | <p>Awarded: \$14,520.00</p> |
| <p>Assigned Commissioner: Clifford Rechtschaffen</p> | <p>Assigned Administrative Law Judge (ALJ): Ava Tran</p> |

PART I: PROCEDURAL ISSUES

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| A. Brief description of Decision: | D.19-06-022 sets out directives and guidance for the investor-owned energy utilities' (IOUs) applications for the California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs for the 2021-2026 Program Years. |
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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 (PHC): | 2/20/2015 | Verified |
| 2. Other specified date for NOI: | n/a | N/A |
| 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: | A.18-05-015 | Verified |
| 6. Date of ALJ ruling: | January 10, 2019 | Verified |
| 7. Based on another CPUC determination (specify): | n/a | N/A |
| 8. Has the Intervenor demonstrated customer or customer-related status? | | Yes |
| Showing of "significant financial hardship" (§ 1802(g)): | | |
| 9. Based on ALJ ruling issued in proceeding number: | A.18-05-015 | Verified |
| 10. Date of ALJ ruling: | January 10, 2019 | Verified |
| 11. Based on another CPUC determination (specify): | n/a | N/A |
| 12. Has the Intervenor demonstrated significant financial hardship? | | Yes |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision: | D.19-06-022 | Verified |
| 14. Date of issuance of Final Order or Decision: | 6/28/2019 | Verified |
| 15. File date of compensation request: | August 27, 2019 | 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(i), § 1803(a), and D.98-04-059).

| Intervenor’s Claimed Contribution(s) | Specific References to Intervenor’s Claimed Contribution(s) | CPUC Discussion |
|--|--|-----------------|
| <p><u>Decision Issuing Guidance to Investor-Owned Utilities for CARE and ESA Applications D.19-06-022</u></p> <p>A. Establishing goals of deeper energy savings and innovative design approaches</p> <p>NRDC advocated for deeper energy savings goals and new program design approaches for the multifamily sector through meetings with Energy Division staff in 2019, presentations to the Multifamily Working Group (MFWG) on the savings potential available in the multifamily sector, and comments in the ESA proceeding.</p> | <p>Meeting with Energy Division, 9/24/18: Discussing suggested guidance and goals for the post-2020 program cycle</p> <p>NRDC Presentation to MFWG, 11/27/18</p> <p>NRDC Comments on Proposed Decision, 05/20/19, pp. 1-10</p> <p>NRDC Reply Comments on Proposed Decision, 05/28/19, pp. 1-4</p> <p>FINAL DECISION, <u>D. 19-06-022</u>:</p> <p>p. 9: “The Commission is specifically interested in a focus on deeper energy savings from measures that are intended to reduce energy use (“resource measures”) and innovative program designs for the multifamily sector, which shall include a low-income Multifamily Whole Building energy efficiency program that is a third party program (i.e., proposed, designed, implemented, and delivered by non-utility personnel).”</p> | <p>Verified</p> |
| <p>B. Third Party Implementation and Single Statewide Implementer for the Multifamily Whole Building Program</p> <p>NRDC defended the direction in the Proposed Decision to require third party design and implementation of the MFWB program and argued against recommendations to eliminate</p> | <p>Meeting with Energy Division, 9/24/18: Discussing principles and rationale for third party administration of multifamily programs</p> <p>NRDC Comments on Proposed Decision, 05/20/19, p. 6</p> <p>NRDC Reply Comments on Proposed Decision, 05/28/19, pp. 1-2</p> <p>FINAL DECISION, <u>D. 17-12-009</u>:</p> <p>p. 20: “[T]he Commission maintains its</p> | <p>Verified</p> |

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| <p>the requirement for the MFWB. We also defended the recommendation to the IOUs to propose a statewide administered program with a single implementer.</p> | <p>direction to select a third party to design and implement the program, and the recommendation to the IOUs to propose a statewide administered program with a single implementer”</p> | |
| <p>C. Extending the Application Deadline and Requiring Stakeholder Presentations</p> <p>NRDC advocated for extending the original September 3 application deadline to allow sufficient time for stakeholder input and innovative program design by the IOUS. We also recommended that the Commission require the IOUs to hold stakeholder workshops before the application deadline to provide an opportunity for stakeholder feedback.</p> | <p>NRDC Comments on Proposed Decision, 05/20/19, p. 7</p> <p>FINAL DECISION, D. 17-12-009:</p> <p>Ordering Paragraph</p> <p>p. 25: The California Alternate Rates for Energy and the Energy Savings Assistance Program and Budget Applications by the large Investor-Owned Utilities Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall be filed with the California Public Utilities Commission no later than November 4, 2019. Applications must include the content identified in this Decision and the Guidance Document at Attachment A to this Decision and must follow the format provided in the Guidance Document.</p> <p>p. 27: “On or before August 30, 2019, Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall hold a joint public workshop, after giving 20 days advance notice to the service list of this proceeding, to obtain interested parties’ input on their preliminary proposals for their post-2020 ESA applications”</p> | <p>Verified</p> |
| <p>C. Leveraging lessons and program design</p> | <p>Meeting with Energy Division,</p> | <p>Verified</p> |

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| <p>approaches from other low-income and multifamily program models</p> <p>NRDC has consistently advocated for looking to other successful low-income programs, including the Massachusetts Low Income Affordability Network Multi-Family Energy Retrofit Program and The Department of Community Services and Development Low-Income Weatherization Program. In addition, NRDC has recommended looking to successful multifamily programs, such as the Solar on Multifamily Affordable Housing program.</p> | <p>9/24/18: Discussing recommendations for the post-2020 program cycle, and recommending leveraging best practices from other successful low-income and multifamily programs</p> <p>NRDC Comments on Proposed Decision, 05/20/19, pp. 1-2</p> <p>FINAL DECISION, <u>D. 19-06-022</u>:</p> <p>p. 6: “We also direct the IOUs to look to low-income program models from other California agencies and other states. The Department of Community Services and Development (CSD) Low-Income Weatherization Program (LIWP) provides low-income households with solar systems and energy efficiency upgrades at no cost.”</p> <p>p. 7: “The Massachusetts Low Income Affordability Network (LEAN) Multi-Family Energy Retrofit program is another model that the IOUs should consider.”</p> | |
| <p>D. Public Advocates Office’s Petition to Modify D. 16-11-022</p> <p>NRDC responded to Public Advocates Office’s Petition for Modification, recommending that the Commission consider establishing a Procurement Review Group as part of the Guidance Document to avoid delaying ESA implementation for the precious cycle or planning for the next cycle.</p> | <p>Reply Comments of NRDC on the Public Advocates Office’s PFM, 03/11/19, pp. 1-3</p> <p>FINAL DECISION, <u>D. 19-06-022</u>:</p> <p>p. 16: “The National Resources Defense Council (NRDC) suggests that the Commission incorporate the petition’s suggested PRG into the Guidance document in order to avoid delaying ESA implementation in the current cycle”</p> <p>p. 18: “The Guidance document highlights the procurement process established by D.18-01-004 and asks the IOUs to address the process the IOUs would utilize in contracting with third-party implementers. The IOUs’ applications should address potential use of the measures proposed in Cal</p> | <p>Verified</p> |

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| | <p>Advocates’ PFM, including but not limited to an independent evaluator, PRG, and/or Commission review of contracts exceeding a certain amount. This will provide the opportunity for the Commission and parties to fully consider the measures proposed by Cal Advocates”</p> <p>Finding of Fact</p> <p>p. 24: “The Guidance document highlights the procurement process adopted in D.18-01-004 and directs the IOUs to address the process the IOUs would utilize in the post 2020 cycle.”</p> | |
| <p>F. Multifamily Working Group</p> <p>NRDC provided feedback on the ongoing reports of the MF working group and contributed to the 2018 Annual Progress Report. NRDC also attended meetings of the MFWG, and presented a potential study highlighting the savings available in the multifamily housing sector.</p> | <p>2018 Annual MFWG Progress Report. p. 3: “The IOUs, NRDC and the MFWG facilitator all contributed to the various sections of this report.”</p> <p>Ad Hoc MFWG Meeting Presentation, 11/27/19</p> | <p>Verified</p> |

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

| | Intervenor’s Assertion | CPUC Discussion |
|---|-------------------------------|------------------------|
| <p>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹</p> | <p>Yes</p> | <p>Yes</p> |
| <p>b. Were there other parties to the proceeding with positions similar to yours?</p> | <p>Yes</p> | <p>Yes</p> |
| <p>c. If so, provide name of other parties: Primarily, we took similar positions to NCLC and CHPC (as well as the Greenlining Institute); and we collaborated quite closely, generally making joint filings.</p> | <p>Verified</p> | |

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

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| <p>d. Intervenor’s claim of non-duplication:</p> <p>I. Discussion as to collaboration with NCLC and CHPC:</p> <p>From the outset of the proceeding, NRDC, NCLC, and CHPC chose to collaborate because our interests are highly similar and collaboration results in increased efficiency as well as less time spent on the litigation. Each of the three groups has different areas of expertise. In terms of every major task in the case – reviewing the Proposed Decision, responding to comments on Proposed Decision, and participating in the Multifamily Working Group – we carefully divided up the work so as not to duplicate each other’s efforts, as more fully described below.</p> <p>In addition, by making joint filings, we significantly reduced the time that would have been incurred in each group drafting its own testimony and pleadings. This would have not only resulted in duplicative time spent on the filings, but also duplicative comments that would have created more work for Energy Division to review.</p> <p>However, we note the inherent tension that arises in two aspects of Commission policy and practice. On the one hand, a party’s “participation ... may be fully eligible for compensation if the participation makes a substantial contribution to a commission order or decision,” even if it “supplements [or] complements... the presentation of another party, including the commission staff.” Pub. Util. Code s. 1802.5. This clearly means that a party can receive full compensation for addressing an issue that other parties in the proceeding have addressed as well. On the other hand, the intervenor program “shall be administered in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented...” Pub. Util. Code s. 1801(f); see also Commission Rule 17.4. The Commission in fact does reduce claims on the basis that a party’s participation was deemed duplicative.</p> <p>In this case, we urge the Commission to recognize the extent to which the collaboration among NRDC, NCLC, and CHPC substantially minimized the time spent in this proceeding, by maximizing each group’s strengths and skills and by carefully managing our collective work and splitting up writing. We note that even with collaboration, there was an inordinate amount of work throughout this proceeding that yielded numerous hours on the part of all parties. A lot of the work in this proceeding was developing new strategies and approaches in addition to established policy positions. Developing such content takes a significant amount of time and should be considered when reviewing the hours.</p> <p>In support of our contention that collaborating reduced hours claimed, we note the following key points:</p> <p>First, NRDC generally did not charge for the full amount of time conferring with NCLC and CHPC, even though that time resulted in the parties avoiding duplication of effort. We conferred with each other regularly to ensure that we carefully divided up work assignments and did not duplicate each other’s work. Only time devoted to coordination on specific deliverables were included in our timesheet. While that may be the case for NRDC, we note that other intervenors may claim for such time. NRDC chose to be highly conservative as we have supplemental funding for our work at the CPUC that other stakeholders do not. We contend that NRDC’s approach in this matter should not be applied to other</p> | <p>Verified</p> |
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| <p>intervenor.</p> <p>Second, when our response to the Proposed Decision was filed, we made very specific assignments so that only one person would work on any particular section, again avoiding overlap. This was carried through to the response to comments on the Proposed Decision, notwithstanding the hours of collaboration to ensure we had alignment in our filing and response.</p> <p>Third, while additional NRDC advocates and senior scientists (in addition to Mr. Muller and Ms. Stamas) put in numerous hours of productive time reviewing and drafting portions of our final comments, we have excluded all of this time, to avoid even the appearance of seeking compensation for duplicative work. NRDC’s advocacy culminating in the most recent decision was primarily spearheaded by two representatives - Maria Stamas and Miles Muller-eliminating internal duplication.</p> <p>II. Discussion on TURN and ORA: TURN and the Public Advocates Office often deferred to NCLC/NRDC/CHPC as taking the lead role on multifamily-specific issues in the ESA program, not commenting at length on the requirement for the Multifamily Whole Building Program in opening or reply comments. NRDC claimed no time for communications or check-ins with TURN and ORA.</p> <p>III. Discussion of NRDC unique perspective: NRDC offers supplemental as well as complementary participation as we are the main environmentally-focused organization in this proceeding, and one of the only stakeholders that participates in all aspects of energy efficiency at the Commission (e.g., program planning, policy foundation, procurement planning, etc.). In addition, NRDC is a national organization and brings the expertise on energy efficiency best practices from other states, regions, administrators, implementers, and think tanks to support the strong foundation in California and improve policies and programs where necessary. Therefore, we offer a unique perspective and represent a different constituency, not otherwise represented, further evidence that our participation is not duplicative.</p> | |
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PART III: REASONABLENESS OF REQUESTED COMPENSATION General
Claim of Reasonableness (§ 1801 and § 1806):

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| <p>a. Intervenor’s claim of cost reasonableness:</p> <p>NRDC contributed substantially to the issues adopted in this proceeding. NRDC’s motivation to participate was largely to ensure that the targeted utility customers would be served effectively by recognizing and thoughtfully addressing the significant barriers to access that low-income Californians face to clean energy access as noted by the California Energy Commission Senate Bill 350 Barriers study.</p> <p>Not only will the utility programs provide bill relief and/or improved comfort and health for low-income families, these savings are critical for the state to meet its climate goals. While the future utility applications to serve the low-income population will result in substantial monetary and non-monetary benefits, we do not have the specifics of such benefits at this time given that this decision is</p> | <p>CPUC Discussion</p> <hr/> <p>Verified</p> |
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| <p>focused solely on the guidance.</p> <p>However, the decision’s direction to ensure a third-party solicitation for a multi-family program is intended to improve the program, thereby increasing benefits to multifamily tenants, while reducing the costs of the program, thereby yielding cost savings for all customers. Once the utilities submit their specific plans to address this population, the Commission will be able to see the demonstrable savings to customers that were a result of this guidance.</p> | | | | | | | | | |
|--|---|-----------|-----------|---------|---|---|-------|-----|-----------------|
| <p>b. Reasonableness of hours claimed:</p> <p><i>NRDC’s Claims are Reasonable and Conservative</i></p> <p>Maria Stamas led NRDC’s efforts in this proceeding with Miles Muller. Ms. Stamas and Mr. Muller worked closely with multiple NRDC staff who consulted regularly on the issues at stake in the proceeding, provided substantive work, technical support, and/or guidance particular to their area of expertise. We claim zero hours for the substantive input from multiple other NRDC staff members, such as Lindsay Robbins, Lara Ettenson, and Mohit Chhabra.</p> <p>The rates requested by NRDC are purposefully conservative and low on the ranges approved by the Commission, even though the levels of expertise would justify higher rates. NRDC maintained detailed time records indicating the number of hours that were devoted to proceeding activities. All hours represent substantive work related to this proceeding.</p> <p>The amounts claimed are further conservative for the following reasons: (1) No time is claimed for internal coordination within NRDC, only for substantive policy development; (2) although NRDC spent time developing and coordinating positions with other stakeholders, we only claim partial time for this coordination over the entire proceeding; (3) we do not claim time for substantive review by NRDC staff, even though their expertise was critical to ensuring productive recommendations; (4) we claim no time for travel, (5) we claim no time spent on citations, creating an exhibit list, or citing to discovery responses, and (6) we do not claim time for both staff being present in meetings despite them focusing on discrete tasks and/or subjects.</p> <p>The amount requested preparing this claim is also conservative because NRDC is primarily only claiming time spent by Mr. Muller - who was the main author of the claim - even though others helped compile various sections of the claim.</p> <p>In sum, NRDC made numerous and significant contributions on behalf of environmental and customer interests, all of which required extensive research and analysis. We took every effort to coordinate with other stakeholders to reduce duplication and increase the overall efficiency of the proceeding. Since our work was efficient, hours conservative, and billing rates low, NRDC’s request for compensation should be granted in full.</p> | <p>Verified</p> | | | | | | | | |
| <p>c. Allocation of hours by issue:</p> <table border="1" data-bbox="235 1764 1166 1898"> <thead> <tr> <th data-bbox="235 1764 267 1837"></th> <th data-bbox="267 1764 917 1837"></th> <th data-bbox="917 1764 1031 1837">Total Hrs</th> <th data-bbox="1031 1764 1166 1837">Total %</th> </tr> </thead> <tbody> <tr> <td data-bbox="235 1837 267 1898">A</td> <td data-bbox="267 1837 917 1898">Decision Issuing Guidance to Investor-Owned Utilities for CARE and ESA Applications D.19-</td> <td data-bbox="917 1837 1031 1898">45.25</td> <td data-bbox="1031 1837 1166 1898">65%</td> </tr> </tbody> </table> | | | Total Hrs | Total % | A | Decision Issuing Guidance to Investor-Owned Utilities for CARE and ESA Applications D.19- | 45.25 | 65% | <p>Verified</p> |
| | | Total Hrs | Total % | | | | | | |
| A | Decision Issuing Guidance to Investor-Owned Utilities for CARE and ESA Applications D.19- | 45.25 | 65% | | | | | | |

| | | | | |
|----------|--|--------------|---------------|--|
| | 06-022 | | | |
| B | Public Advocates Office's Petition to Modify D.16-11-022 | 8.00 | 11% | |
| C | Multifamily Working Group | 15.50 | 22% | |
| D | General issues and Legal Work (e.g. attending general meetings such as PHC and hearings, reviewing comments and testimony, as well as other overarching issues not otherwise delineated) | 1.00 | 1% | |
| | | | | |
| | | | | |
| | Total | 69.75 | 100.0% | |

A. Specific Claim:*

| CLAIMED | | | | | | CPUC AWARD | | |
|--|------|-------|---------|--|------------|---------------------------------|---------|------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| M. Stamas | 2018 | 1.5 | \$230 | D.18-05-039 and Resolution ALJ-357 | \$345.00 | 1.5 | \$230 | \$345.00 |
| M. Stamas | 2019 | 7.5 | \$245 | Resolution ALJ-357 and D.08-04-010 p.8 | \$1,837.50 | 7.5 | \$245 | \$1,837.50 |
| M. Muller | 2018 | 16.25 | \$150 | Resolution ALJ-352 | \$2,437.50 | 16.25 | \$150 | \$2,437.50 |
| M. Muller | 2019 | 44.50 | \$200 | Resolution ALJ-357 | \$8,900.00 | 44.50 | \$200 | \$8,900.00 |
| Subtotal: \$13,520.00 | | | | | | Subtotal: \$13,520.00 | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate | Total \$ |
| M. Muller | 2019 | 10 | \$100 | 1/2 of 2019 rate | \$1,000.00 | 10 | \$100 | \$1,000.00 |
| Subtotal: \$1,000.00 | | | | | | Subtotal: \$1,000.00 | | |
| TOTAL REQUEST: \$14,520.00 | | | | | | TOTAL AWARD: \$14,520.00 | | |
| <p>**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.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate</p> | | | | | | | | |

| ATTORNEY INFORMATION | | | |
|-----------------------------|--|----------------------|---|
| Attorney | Date Admitted to CA BAR² | Member Number | Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation |
| Maria Stamas, Esq. | Admitted (Calif.) 10/17/2014 | 298522 | No |
| Miles Muller | Admitted (Calif.) 1/21/2019 | 324920 | No |

B. Attachments Documenting Specific Claim and Comments on Part III

| Attachment or Comment # | Description/Comment |
|--------------------------------|---|
| Attachment 1 | Staff time records |
| Comment 1 | <p><u>Rationale for Maria Stamas rate for 2018:</u> While Maria Stamas was awarded a rate of \$225 per D.18-05-039, Resolution ALJ-357 indicates \$230 for attorneys in the 3-4 year range. We therefore claim \$230 here for 2018.</p> <p><u>Rationale for Maria Stamas rate for 2019:</u> We request a rate of \$245 for work done in 2019 per Resolution ALJ-357 and D.08-04-010 p.8 that allows for two steps within bands (\$235*1.05 = \$246). Ms. Stamas is now in the latter part of experience in the 3-4 years of experience band and warrants an increased rate, which continues to be conservative for her extensive years of expertise in addition to her attorney experience.</p> |
| Comment 2 | <p><u>Rationale for Miles Muller rate for 2018:</u> We claim a rate of \$150 for Miles Muller in 2018 based on Resolution ALJ-352. In 2018, Mr. Muller was an expert with two years of experience. His resume was included in NRDC's NOI for A.18-06-015.</p> <p><u>Rationale for Miles Muller rate for 2019:</u> We claim a rate of \$200 for Miles Muller in 2019 based on Resolution ALJ-357. Mr. Muller was admitted to the bar in 2019 and therefore is within the 0-1 range for attorney rates. He also now has 3 years of experience, having intervened extensively in multiple CPUC proceedings over the past year. Therefore, we claim a rate just over the low end of the attorney rate to account for his additional experience while remaining highly conservative.</p> |

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))

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| 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

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

1. Natural Resources Defense Council has made a substantial contribution to D.19-06-022.
2. The requested hourly rates for Natural Resources Defense Council's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$14,520.00.

CONCLUSION OF LAW

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

ORDER

1. Natural Resources Defense Council is awarded \$14,520.00.
2. Within 30 days of the effective date of this decision Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southern California Edison Company, shall pay Natural Resources Defense Council their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2018 calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent gas and electric revenue data shall be used. 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 10, 2019, the 75th day after the filing of Natural Resources Defense Council'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): | D.19-06-022, D.17-12-009 | | |
| Proceeding(s): | A.14-11-007 et al. | | |
| Author: | ALJ Tran | | |
| Payer(s): | Southern California Edison Company, Pacific Gas and Electric Company, Southern California Gas Company, and San Diego Gas & Electric Company | | |

Intervenor Information

| Intervenor | Date Claim Filed | Amount Requested | Amount Awarded | Multiplier? | Reason Change/Disallowance |
|-----------------------------------|------------------|------------------|----------------|-------------|----------------------------|
| Natural Resources Defense Council | 8/27/19 | \$14,520.00. | \$14,520.00. | N/A | N/A |

Hourly Fee Information

| First Name | Last Name | Attorney, Expert, or Advocate | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|------------|--------------|-------------------------------|----------------------|---------------------------|--------------------|
| Maria | Stamas, Esq. | Attorney | \$230 | 2018 | \$230 |
| Maria | Stamas, Esq. | Attorney | \$245 | 2019 | \$245 |
| Miles | Muller | Attorney | \$150 | 2018 | \$150 |
| Miles | Muller | Attorney | \$200 | 2019 | \$200 |

(END OF APPENDIX)