

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA



**FILED**

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Application of San Diego Gas & Electric Company for authority to update its gas and electric revenue requirement and base rates effective on January 1, 2008 (U 902 M)

Application 06-12-009  
(Filed December 8, 2006)

Application of Southern California Gas Company for authority to update its gas revenue requirement and base rates effective on January 1, 2008 (U 904 G)

Application 06-12-010  
(Filed December 8, 2006)

Order Instituting Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Services and Facilities of San Diego Gas & Electric Company and Southern California Gas Company

Investigation 07-02-013  
(Filed February 20, 2007)

DISABILITY RIGHTS ADVOCATES'  
NOTICE OF INTENT TO CLAIM COMPENSATION

March 9, 2007

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Pursuant to Section 1804(a) of the Public Utilities Code, Disability Rights Advocates (DisabRA) hereby gives notice of our intent to claim compensation in these consolidated proceedings. DisabRA is a non-profit legal center dedicated to the advancement of civil rights for people with disabilities in the United States and throughout the world. The information provided below shall demonstrate that DisabRA meets the requirements to be found eligible for compensation.

DisabRA is an organization that has previously represented the interests of customers with disabilities before this Commission, and has been found eligible to receive intervener compensation in multiple proceedings.<sup>1</sup> DisabRA's articles of incorporation specifically authorize our representation of the interests of disabled customers. More specifically, these articles state that we are a 501(c)(3) organization established to engage in public interest litigation and advocacy to protect the rights of people with disabilities. Therefore, pursuant to Section 1802(b), DisabRA is a "customer" as that term is used in the intervenor compensation statutes.<sup>2</sup>

Pursuant to D. 98-04-059, Finding of Fact 13, an intervenor must show that it will represent customer interests that would otherwise be underrepresented. As set forth in detail below, DisabRA has raised four issues in these proceedings that uniquely affect customers with disabilities: access to public rights-of-way, access to the utilities' in-person payment centers, access to the utilities' websites and access to emergency communications from the utilities. No other party to these proceedings is likely to focus

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<sup>1</sup> Recent proceedings in which DisabRA has been found eligible include A.05-12-002 (PG&E General Rate Case) (*See* Ruling issued March 7, 2006) and A.06-06-032 (*See* Ruling issued November 9, 2006).

<sup>2</sup> In D.98-04-059, the Commission directed intervenors to state in their NOIs which of three customer "categories" they fall within. DisabRA fits the third category as a "group or organization that is authorized by its bylaws or articles of incorporation to represent the interest of residential ratepayers." DisabRA's articles of incorporation were previously submitted in conjunction with proceedings R.03-04-003 and R.04-12-001. These articles remain unchanged. Additional copies of the articles can be provided upon request.

on any of these issues. As these proceedings move forward, DisabRA might learn of and address additional issues that affect consumers with disabilities. Some of those issues might be common to low-income customers or other customers. With respect to any such issues, in order to avoid any undue duplication, DisabRA will seek to coordinate its efforts with other parties that share our positions.

The requirements of Section 1804(a)(2) of the Code are addressed below.

- (1) Section 1804(a)(2)(A)(i) – A statement of the nature and extent of the customer’s planned participation in the proceeding as far as it is possible to set it out when the notice of intent is filed.

As the Commission has recognized repeatedly in the past, the scope of a GRC proceeding is necessarily broad. However, DisabRA will focus its efforts in these proceedings on issues that are significant to people with disabilities, as indicated in DisabRA’s Protest, filed in these proceedings on January 9, 2007:

- (1) DisabRA will be prepared to present the Commission with information regarding SDG&E and SoCalGas’ (collectively hereinafter, the “Utilities”) legal and ethical obligations to: (a) keep public rights-of-way that are affected by their construction work and operations accessible to people with disabilities; (b) ensure that their in-person payment stations are accessible to people with disabilities; (c) ensure that their websites are accessible to people with disabilities; and (d) ensure that their emergency communications directed at customers are accessible to people with disabilities.

- (2) DisabRA will be prepared to present the Commission with information regarding the dangers of the Utilities’ failure to meet these obligations.

- (3) DisabRA will be prepared to present the Commission with information regarding the Utilities’ actual failure to meet these obligations.

(4) DisabRA will be prepared to present the Commission with information regarding what the Commission can do in the context of these proceedings to ensure that the Utilities meet these obligations.

- (2) Section 1804(a)(2)(A)(ii) -- An itemized estimate of the compensation that the customer expects to request, given the likely duration of the proceeding as it appears at the time.

DisabRA will seek compensation at 2007 rates for work performed in connection with these proceedings.<sup>3</sup> DisabRA currently estimates that it will devote roughly 140 hours of DisabRA attorney Roger Heller's time (at a proposed hourly rate of \$290), and 80 hours of Managing Attorney Melissa W. Kasnitz's time (at a proposed hourly rate of \$390). DisabRA also currently estimates that it will devote roughly 20 hours of a law clerk's time (at a proposed hourly rate of \$100), and that its out-of-pocket costs for these proceedings will be approximately \$3500, including administrative costs, filing fees and fees paid to outside experts.<sup>4</sup>

DisabRA estimates that its personnel will devote the following proportions of their time to the following issues in these proceedings:

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<sup>3</sup> The proposed 2007 rates herein are based on rates approved previously by the Commission for DisabRA, adjusted pursuant to the measures adopted by the Commission in D.07-01-009.

<sup>4</sup> DisabRA's expert expenses in these proceedings will depend, to some degree, on the extent to which DisabRA and the Utilities are able to resolve the issues that DisabRA has raised without the need for evidentiary hearings. However, even if the parties are able to resolve all such issues without the need for evidentiary hearings, DisabRA expects that it would still require some expert assistance to negotiate the various access issues raised. Assuming that the parties are able to resolve all of DisabRA's issues without the need for evidentiary hearings, DisabRA estimates modest expert expenses of approximately \$2000. That amount is included in the \$3500 estimate for out-of-pocket expenses above.

<b>Issue</b>	<b>% of Time</b>
General/Procedural/Case Management	30%
Disability Access Issues <sup>5</sup>	70%
<ul style="list-style-type: none"> <li>• Rights-of-Way</li> </ul>	<ul style="list-style-type: none"> <li>• 25%</li> </ul>
<ul style="list-style-type: none"> <li>• In-Person Payment Centers</li> </ul>	<ul style="list-style-type: none"> <li>• 25%</li> </ul>
<ul style="list-style-type: none"> <li>• Website Access</li> </ul>	<ul style="list-style-type: none"> <li>• 10%</li> </ul>
<ul style="list-style-type: none"> <li>• Emergency Communications</li> </ul>	<ul style="list-style-type: none"> <li>• 10%</li> </ul>

Together, these hours, rates and expenses produce a total projected budget of \$77,300 for these proceedings.

Of course, the amount of time that DisabRA needs to devote to, and DisabRA's expenses for, these proceedings will depend, to some degree, on the extent to which DisabRA and the Utilities are able to resolve the issues that DisabRA has raised without the need for evidentiary hearings. At present, the parties are working to resolve those issues without the need for evidentiary hearings. DisabRA is optimistic that they will be able to do so, and DisabRA's time and expense estimates herein are based on the assumption that they will be able to do so. Of course, if the parties are unable to resolve some or all of the issues raised by DisabRA in these proceedings without the need for evidentiary hearings, then DisabRA's budget for these proceedings, including its anticipated expert expenses, will change accordingly. The reasonableness of hourly rates

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<sup>5</sup> All of the substantive issues that DisabRA has raised in these proceedings relate to disability access. For purposes of this notice, DisabRA believes that it would be satisfactory under, and consistent with, the new rules adopted by the Commission in D.06-12-041, to categorize the substantive issues for which DisabRA will be participating in these proceedings, generally, under the single heading, "Disability Access Issues." Nevertheless, for the Commission's benefit, DisabRA has further attempted herein to approximate the time that its personnel will spend in these proceedings on the specific substantive issues that DisabRA has raised.

requested for DisabRA's representatives will be addressed in our Request for Compensation.

- (3) Section 1804 (a)(2)(B) – A showing that participation in the hearing or proceeding would pose a significant financial hardship.

Participation in these proceedings constitutes a significant financial hardship for DisabRA. The definition of the term “significant financial hardship” is found in Section 1802(g) of the Code:

“Significant financial hardship” means either that the customer cannot without undue hardship afford to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation, or that, in the case of a group or organization, the economic interest of the individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding.

DisabRA represents the disabled customer class, a group that would not otherwise be adequately represented in these proceedings. The Commission has recognized that adequate representation requires not only the broad efforts of the CPUC Division of Ratepayer Advocates, which represents all customer classes, but also the participation of parties with special interests. DisabRA represents the overall interests of more than 6,000,000 disabled Californians, many of whom are greatly affected by the obligations of the Utilities that DisabRA is addressing in these proceedings as well as the Utilities’ failures to meet those obligations. However, the economic interest of individual members of this group is small when compared to the costs of effective participation in PUC proceedings.

As a non-profit organization, DisabRA does not accept fees from its clients and receives no government funding. DisabRA relies primarily upon awards of attorneys’ fees in litigation where DisabRA represents the prevailing party, as well as donations from private individuals, private foundations and corporate contributions as its sources of income. DisabRA also receives grants for certain special projects that advance the needs

of disabled persons. However, no funds from any of these sources have been obtained to directly support DisabRA's participation in these proceedings.<sup>6</sup> Therefore, DisabRA's participation in these proceedings represents a significant financial burden. Absent eligibility for intervenor compensation, DisabRA would not have adequate resources to advocate for people with disabilities before the PUC. As a result of this hardship, DisabRA intends to seek compensation for participation in these proceedings.<sup>7</sup>

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<sup>6</sup> In 2005, DisabRA received a grant from the Community Technology Foundation of California (CTFC) for general support of its work before the Commission in the area of telecommunications. However, this general grant does not provide support for participation in any specific proceeding, nor would application of these funds be appropriate for these energy-related proceedings.

<sup>7</sup> More detailed information about DisabRA's financial position can be provided when DisabRA submits its actual request for compensation. However, it should be noted that the test for significant financial hardship looks to the economic interests of the individual members of the group being represented in comparison to the costs of effective participation, not the resources of the organization representing the interested group. Of course, it would not be cost-effective for individual people with disabilities to appear before the Commission to address the accessibility issues raised by DisabRA in its Protest.

## CONCLUSION

The information provided above satisfies the requirements of Section 1804(a) and supports a finding of “significant financial hardship.” In addition, DisabRA has demonstrated that it will represent a group with interests that would otherwise be underrepresented in these proceedings. DisabRA asks the Commission for a prompt determination of its eligibility for compensation in these proceedings.

Signed: March 9, 2007

Respectfully submitted,

/s/

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## VERIFICATION

I, Roger Heller, am a representative of Disability Rights Advocates and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true to the best of my knowledge, except for those matters that are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the day of March 9, 2007 at Berkeley, California.

                  /s/                    
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Filer: San Diego Gas & Electric Company  
List Name: LIST  
Last changed: March 8, 2007**

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