Decision _____

FILED
07-16-12
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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

Order Instituting Rulemaking to Examine the Commission's Post-2008 Energy Efficiency Polices, Programs, Evaluation, Measurement, and Verification, and Related Issues.	Rulemaking 09-11-014 (Filed November 20, 2009)

INTERVENOR COMPENSATION CLAIM OF NRDC AND DECISION ON INTERVENOR COMPENSATION CLAIM OF NRDC

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Claimant: Natural Resources Defense Council			**For contribution to D.12-05-015**
Claimed ($): $61,914.13			**Awarded ($):**
Assigned Commissioner: Mark Ferron			**Assigned ALJ: Darwin Farrar and Julie Fitch**
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons.			
		Signature:	**/s/ Lara Ettenson**
Date:	**07-16-12**	**Printed Name:**	**Lara Ettenson**

PART I: PROCEDURAL ISSUES

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A. Brief Description of Decision:	D.12-05-015 adopted energy saving goals for the four large California investor owned utilities and provided program and policy guidance for the forthcoming efficiency program applications to be filed July 2, 2012. These applications include a suite of energy efficiency programs for customers and the related budgets for 2013 and 2014.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

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	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	March 18, 2010	
2. Other Specified Date for NOI:	n/a	
3. Date NOI Filed:	April 16, 2010	
4. Was the NOI timely filed?		

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.09-08-009	
6. Date of ALJ ruling:	January 28, 2010	
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.11-05-017 et al.	
10. Date of ALJ ruling:	October 28, 2011	
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.12-05-012	
14. Date of Issuance of Final Order or Decision:	May 18, 2012	
15. File date of compensation request:	July 16, 2012	
16. Was the request for compensation timely?		

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

#	Claimant	CPUC	Comment

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Claimant except where indicated)

A. In the fields below, describe in a concise manner Claimant's contribution to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059). (For each contribution, support with specific reference to the record.)

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Contribution to D.12-05-015	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
• The following italicized headers correspond to the substantive issue areas used to categorize staff timesheets.		
1. EE All Issues (A) ➢ NRDC argued that given the new composition of the programs and available savings identified in the efficiency potential, the Commission should not restrict the utilities to an 80% resource to 20% non-resource program composition split. (as noted in the original PD on p.11)	• NRDC (04/09/12), p.13 • D.12-05-015, p.11: The Commission modified the proposed decision to remove the explicit expectation that the program portfolio would be composed of 80% resource and 20% non-resource: "We "offset" this with resource programs accounting for the remaining 80% of the portfolio budget, leading to an overall cost-effective portfolio. We continue this model (though not necessarily this specific ratio) for 2013-2014."	
➢ NRDC consistently raised the issue that the Commission's policies that direct the utilities how to calculate efficiency savings and plan for EE programs must align with the Commission's goals of long term savings and comprehensive programs.	• NRDC Comments (12/23/11), p.2; (04/09/12) p.1; (04/16/12), p.1 • NRDC email to President Peevey and Commissioners summarizing issues 05/08/12 (see Ex Parte notice in R.09-11-014 dated 05/10/12) • D.12-05-015, p.436-Ordering Paragraph (OP)171: The final decision includes an additional Ordering Paragraph that allows the utilities to proposed alternative portfolios that offer solutions to address outstanding policy issues not resolved in the final decision.	
2. Process Improvements (B) ➢ NRDC argued that while third party programs should continue throughout the transition period, the process needs to be reformed for long-term improvements.	• NRDC Comments (11/08/11), p.10-11; D.12-05-015, p.153 • D.12-05-015, p.22 and D.12-05-015, p.157: The Commission agreed and directed the IOUs to "propose a reformed third-party solicitation process to be used for new	

➢ NRDC recommended establishing collaborative forums (such as a modified program advisory group) to discuss program design and other issues that arise.	solicitations beginning in 2013." • NRDC Comments (12/03/10), p.3-4 & 7; (11/16/11), p.2,3; (12/23/11), p.5 • D.12-05-015, p.367: "We see merit in considering proposals to reinstitute the Programs Advisory Groups."	
3. *Streamlining (C)* ➢ NRDC suggested that rather than eliminate programs that could provide real benefits to customers and the environment, the utilities should simplify and consolidate.	• NRDC Comments (11/08/11), p.12; D.12-05-015, p.158-159 • D.12-05-015, p.160: "NRDC's suggestion to focus on consolidating, rather eliminating, programs has merit. We agree with NRDC that streamlining and standardizing delivery of programs could create less confusion among programs and possibly encourage new entry into the market."	
4. *DEER (E)* ➢ NRDC argued that the required DEER net-to-gross values assume the Energy Upgrade California (EUC) program would be happening without program intervention, which all parties and the Commission agree is not the case.	• NRDC Comments (04/09/12), p.5 • D.12-05-015, p.169: The Commission modified the PD to provide a higher net-to-gross for EUC. "Consistent with the commitment we are making to this program, we direct Commission Staff to use a default Net-to- Gross ratio of 0.85 for Energy Upgrade California custom projects (though not as a strict "floor") similar to the approach we take in this decision for Emerging Technology Net-to-Gross ratios."; D.12-05-015, p.407-OP44	
5. *Local Government and Third Party Programs (F)* ➢ NRDC argued that the proposed decision (which explicitly prohibited additional third party programs for the 2013-2014 period - see p.22 of original PD) be amended to allow for new third party programs if appropriate and also to rework the process to ensure easier access for new entrants.	• NRDC Comments (11/08/11), p.9; D.12-05-012, p.152 and 157 • D.12-05-015, p.154: "We agree with the majority of parties that IOUs should expand their commitment to third-party implementation"; D.12-05-012, p.406-OP40	

6. *Potential Study (G)* ➢ NRDC argued that additional emerging technologies should be included in the final potential study. ➢ NRDC does not agree with the potential reductions to the refrigerator recycling program and contends that the results of the program evaluation were inappropriately applied.	• NRDC Comments (01/12/12), p.9; D.12-05-012, p.69 • D.12-05-015, p.70: "Many of the changes recommended by parties were incorporated into the Final Potential Study. For instance, the assessment of emerging technologies was expanded to include ten new measures." • NRDC Comments (01/12/12), p.26 [also first presented (11/22/11) p.2 in the Demand Analysis Working Group (DAWG) process] • D.12-05-015, p.71: "It appears the draft potential study methodology misinterpreted the evaluation results."	
7. *Cost Effectiveness (I-M)* ➢ NRDC argued that a linear approach to renewables avoided cost is more appropriate than a step-wise function.	• NRDC Comments (10/27/11), p.4 • D.12-05-015, p.36: The Commission agreed "we plan to incorporate this approach in future portfolio cycles."	
8. *Programs (N)* ➢ HVAC: NRDC argued that the utilities should ensure that all permits are pulled when necessary. ➢ Plug load: NRDC suggested that the IOUs include plans for programs that push greater plug load savings towards meeting the state's ZNE goals.	• NRDC Comments (01/06/12), p.7-8; D.12-05-015, p.171 • D.12-05-015, p.174 - 175; D.12-05-015, p.409-OP53. While the Commission did not take NRDC's recommendation in full, they did direct additional efforts for permit verification. • NRDC Comments (12/23/11), p.8 • D.12-05-015, p.203: "We are persuaded by NRDC's proposal that a more aggressive plug loads program would benefit California's residential zero Net Energy aims." And D.12-05-015, p.412-OP63	

➢ Appliance Recycling: NRDC argued that (1) there are still opportunities to *cost effectively* remove old appliances from the market, (2) the utilities are still in need to run programs as experts in the industry note that many retailer programs do not in fact recycle the appliances as the utilities do, and (3) suggested that the Commission add recycling of clothes washers to the list of appliances for the program.	• NRDC Comments (11/08/11) p.4 • D.12-05-015, p.205: The Commission agreed: "while per-unit savings of recycling refrigerators have declined, savings opportunities remain from refrigerator and freezer recycling." And "These data suggests…that ARP programs remains cost-effective." • D.12-05-015, p.206: The Commission added clothes washers to the program.	
➢ Zero-net energy: NRDC argued there needs to be a more comprehensive and strategic timeline towards achieving the state's ZNE goals to ensure that we maximize the more cost-effective energy efficiency and reduce the need for the more expensive renewables.	• NRDC Comments (12/23/11), p.7 • D.12-05-015, p.212 "We agree with NRDC that a Zero Net Energy Roadmap should include and be based on best estimates for cost-effective combinations of onsite renewable energy and energy efficiency."	
➢ Lighting: NRDC argued that if there is still potential for basic compact fluorescent lamps, programs should target those savings to ensure the utilities are capturing all cost-effective efficiency.	• NRDC Comments (11/08/11), p.2; (01/06/12), p.6-7; and D.12-05-015, p.230 • D.12-05-015, p.231-2: The Commission agreed. "We conclude we should not ignore available cost effective savings that basic Compact Fluorescent Lamps can still provide."	
➢ Marketing: NRDC recommended that the Commission build off of the infrastructure of Energy Upgrade California, as well as Flex Your Power and Flex Alert.	• NRDC Comments (11/02/11), p.3-4 and D.12-05-015, p.294 • D.12-05-012, p.298 and 300: "We see value in continuing the emergency response portion of Flex Your Power - Flex Alert." and "We direct the utilities to focus on transforming the Energy Upgrade California brand from the name of one program to more of an umbrella brand."	

9. *Financing (P-R)* ➢ NRDC offered multiple financing suggestions including (1) improve access to energy usage and (2) provide sufficient information to the customer regarding bill neutrality as a requirement to qualify for a loan.	• NRDC Comments (11/08/11), p.6; (01/25/12), p.7-9 • D.12-05-015, p.132 "NRDC submitted a constructive suggestion for the Commission to require that a customer must be presented with an estimate of the expected energy savings and bill impacts of the energy efficiency project at the time the customer agrees to the project." • D.12-05-015, p.139 "NRDC presented, in its comments, a compromise that makes sense and we will adopt." • D.12-05-015, p.401 - OP24	
10. *Water-energy nexus (S)* ➢ NRDC urged the Commission to address leakage through detection programs.	• NRDC Comments (11/08/12), p.8 • D.12-05-015, p.288: "We direct the IOUs to propose 2013-2014 efforts…on leak loss detection"; D.12-05-012, p.423-OP115	

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

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	**Yes**	
b. Were there other parties to the proceeding with positions similar to yours?	**Yes**	
c. If so, provide name of other parties: Numerous other parties participated in this proceeding, including the four investor owned utilities, DRA, TURN, LGSEC, Efficiency Council, NAESCO, Solar City, Opower, and CCSE.		
d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: When possible, NRDC worked cooperatively with other parties to either resolve key issues before filing comments or to ensure no duplication in comments. We also worked with other parties when positions aligned. In particular, NRDC worked with NAESCO, CA State University, Efficiency Council, LGSEC, the IOUs, and EnerNoc to submit reply comments to the first request for comment on extension year (June 30, 2011). The preparation of parties' joint position fed directly into NRDC's opening comments, therefore positions were consistent and the time for NRDC comments was reduced. In addition, NRDC took steps to ensure no duplication of work within our organization by assigning specific issues, tasks, and workshops/meetings to one team member when possible (e.g., P. Miller for EM&V and DEER, S. Martinez for Goals/Potential, etc). We also		

designated one person the primary writer per issue area, with other team members providing substantive review (e.g., additional policy recommendations, context, new language, etc.) and/or technical analysis.	

C. Additional Comments on Part II (use line reference # or letter as appropriate):

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#	Claimant	CPUC	Comment
9	NRDC		In addition to the substantial contributions noted above, there were also numerous references to NRDC's substantive comments throughout D.12-05-015 (see for example, pp.38, 43, 58, 94, 178, 275, 322). In addition, NRDC's hours represent substantial analysis and recommendations, many of which were not incorporated into the final decision, yet were important to build the record and to contribute to the conversation and effort to advance efficiency in California.

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)

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

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a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
NRDC consistently advocates for policies to maximize cost-effective energy efficiency, ensure that the benefit of energy efficiency is properly accounted for, and that policies and goals align to enable the utilities to use efficiency as their first energy resource choice (as required by California law). NRDC's continued focus in this and other proceedings is on policies that ensure a reliable, affordable, and environmentally sustainable energy resource portfolio that should have lasting benefits to billpayers. NRDC contributed substantially to the resolution of a number of outstanding issues addressed in D.12-05-015, which will allow the utilities to design programs for 2013-2014 that will produce energy savings, and therefore lower costs for customers and reduce pollution. If the utilities meet the energy savings goals as adopted by D.12-05-015, we estimate savings from 2013-2014 will reduce greenhouse gas emissions by nearly 2 million metric tons of carbon dioxide, equivalent to the emissions from nearly 400,000 cars a year, an important contribution to meeting the state's 2020 greenhouse gas emissions limit required by Assembly Bill 32, the Global Warming Solutions Act of 2006. Moreover, D.12-05-015 notes on p.96 that the peak savings will reach more than 700 MW, which avoids the energy needed from more than one large (500 MW) power plant. Based on the recently filed IOU applications for 2013-2014 programs (which were based on D.12-05-015), the proposed programs are projected to save customers over $1 billion in avoided energy costs (after accounting for the costs of the programs). These benefits vastly exceed the cost of NRDC's participation in this proceeding.	

b. Reasonableness of Hours Claimed.

NRDC's Claims are Reasonable and Conservative

The substantial contributions to Commission policy described above would not have been possible without the individual contributions of each of the three main members the NRDC team. Lara Ettenson, who has seven years of experience in 2012 working on energy efficiency and CPUC proceedings (and directs NRDC's California energy efficiency policy work) provided detailed language on efficiency policy issues, program design, contributed her in-depth expertise of the Commission's efficiency policies and goals, and made sure there was no duplication of work within the team. Sierra Martinez, who has over four years of experience participating in CPUC proceedings, wrote a substantial portion of NRDC's technical comments on energy efficiency potential and goals. Peter Miller, who has over 25 years of experience working on energy efficiency issues, led comments on evaluation, data assumptions, and measurement issues. In addition to the main contributors, NRDC's Center for Market Innovation expert Philip Henderson provided key financing expertise relevant to California's efforts and Siddhartha Oza provided important research and analysis pertaining to key program design issues.

The rates requested by NRDC are purposefully conservative and low on the ranges approved by the Commission, even though the levels of expertise of 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. When we claim two staff for attending the same external meeting (e.g., meeting with Commissioners), we do so because each staff member possesses a distinct area of expertise that could not be sufficiently represented by the other participants. In these instances, we claim 1/2 time if 2 participants attend or 1/3 time if there were three participants. This allows our claim to remain conservative, while also acknowledging the role of each participant in the meeting. When staff 'reviewed' other staff work, this involved detailed comments, additional language, clarity of position, and effectiveness of recommendations, to ensure that the work product delivered to the Commission was substantive and useful. This activity was not merely grammar checking, but added significant value to the end product. To further ensure our claim is conservative, we do not claim time for staff review of comments, only for the time it took to integrate the review recommendations into the final comments as noted in (5) below.

The amounts claimed are further conservative for the following reasons: (1) None of the hours were claimed from time spent by other NRDC staff who consulted regularly on this proceeding. This included Jamy Bacchus, Drew Bennett, Sheryl Carter, Pierre Delforge, David Goldstein, Noah Horowitz, Noah Long, Peter Miller, Ed Osann, and Devra Wang, all of whom provided substantive work and/or guidance particular to their area of expertise; (2) No time was claimed for pure coordination among the staff, only for discussions of substantive issues to outline comments and define advocacy strategy; (3) we do not claim time for informal conversations with CPUC staff or other stakeholders throughout the proceeding unless they amount to more than 2 hours in a short time period or as part of a settlement agreement (note: we do claim meetings with Commissioners and/or advisors); (4) we claim half time for each staff person present for a substantive internal conversations, (5) while we claim for the integration of

substantive recommendations from colleagues, we do not claim time for substantive review (i.e., we claim time for L.Ettenson to integrate P. Miller's substantive suggestions into the final comments, but not for P. Miller's time to making those suggestions) (5) we do not claim time for regulatory requirements associated with our advocacy (e.g., time spent writing ex parte notices for the proceeding), (6) no time was claimed for advocacy blogs to influence the outcome of the Commission's final decision. In addition, we do not claim all the time needed to prepare for this claim. D.12-05-015 reached more than 400 pages, all of which Ms. Ettenson reviewed to determine which substantial contributions were integrated into the final decision. We also do not claim for ongoing timekeeping or maintenance related to intervenor compensation, even though it is time consuming. The amount requested preparing this claim is also conservation because (1) NRDC is only claiming time spent by Ms. Ettenson - who was the main author of the claim - even though others helped compile various sections of the claim and (2) we use Ms. Ettenson's lowest rate as the basis for the preparation portion of this claim (as identified in Comment 2 below). In sum, NRDC made numerous and significant contributions 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.	
c. Allocation of Hours by Issue: See Attachment 1	

B. Specific Claim:

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CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate**	**Basis for Rate***	**Total $**	**Hours**	**Rate**	**Total $**
L.Ettenson	2010	19.5	$130	Comment 2	$2535			
L.Ettenson	2011	103	$135	Comment 2	$13950			
P.Miller	2011	10	$180	Comment 3	$1770			
S.Martinez	2011	22	$200	Comment 4	$4406.67			
P.Henderson	2011	7.25	$300	Comment 5	$2175			
S.Oza	2011	34.5	$125	Comment 6	$4312.5			
A.Gonzalez	2011	28	$125	Comment 7	$3500			
L.Ettenson	2012	75	$155	Comment 2	$11592.71			
P.Miller	2012	16	$180	Comment 3	$2887.5			
S.Martinez	2012	25	$210	Comment 4	$5201			
P.Henderson	2012	27.75	$315	Comment 5	$8741.25			
				Subtotal:	$61,071.63		***Subtotal:***	

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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 $
n/a								
n/a								
					Subtotal:	n/a	***Subtotal:***	

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INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total $	Hours	Rate	Total $
L. Ettenson	2009	1	$62.50	D.10-09-014; Res ALJ 267 1/2 of normal rate	$62.50			
L. Ettenson	2012	12	$65	Comment 2 1/2 of normal rate	$780.00			
					Subtotal:	$842.50	***Subtotal:***	

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COSTS					
#	Item	Detail	Amount	Amount	
	n/a				
			Subtotal:	n/a	***Subtotal:***	
			TOTAL REQUEST $:	**$61,914.13**	**TOTAL AWARD $:**	

When entering items, type over bracketed text; add additional rows as necessary.
*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.
**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.

C. Attachments Documenting Specific Claim and Comments on Part III (Claimant completes; attachments not attached to final Decision):

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Attachment or Comment #	Description/Comment
Attachment 1	Staff time records and allocation of time by issue area
Attachment 2	Staff Resumes (only for NRDC Staff that do not currently have resumes on record)
Comment 1	Decision 12-05-015 is the culmination of two and half years of work addressing a myriad of energy efficiency policy issues. While D.12-05-015 addresses a number of those issues, NRDC worked on other matters that were not addressed or resolved in D.12-05-015. (e.g., EE Strategic Plan, Community Choice Aggregation, and Macroconsumption metrics). We claim hours only for issues directly addressed in D.12-05-015 and reserve the right to claim the remaining time if the remaining issues are resolved in subsequent decisions. In addition, NRDC requested separate claims for intervenor compensation for work done in R.09-11-014 (e.g., for D.11-10-014 and D.11-12-038) and therefore our time here only includes hours that have not yet been requested.

Comment 2	**Rationale for Lara Ettenson's rate** 2010 Rate: The Commission previously awarded Ms. Ettenson a 2009 hourly rate of $125 in D.10-05-014. One 5% step increase from the $125 rate (2009) equals $130 for the 2010 rate per D.08-04-010 (p.8). This rate is still conservative at the lower half of the range adopted in Res ALJ-267 for experts with zero to six years of experience for 2010 ($125-185). In 2010, Ms. Ettenson had more than five years of experience in energy and environmental policy in. We use this as the base rate for the preparation of this claim. 2011 Rate: For 2011, we request one additional 5% step increase (which will be the second of the two allowable step increases within any given level of experience per D.08-04-010). Assuming a 2010 rate of $130 based on the above rationale, we request $130*1.05 or $135. 2012 Rate: In 2012, Ms. Ettenson now has 7 years of experience and therefore requests a rate of $155, which is the lowest of the published range in Res ALJ-267 for experts with 7-12 years of experience. Per D.08-04-010, intervenors can qualify for a rate increase when "moving to a higher experience level: where additional experience since the last authorized rate moved a representative to a higher level of experience." (D.08-04-010, p.8) Ms. Ettenson has a Master's in Public Administration from Columbia University School of International and Public Affairs and a Bachelor's degree in Biology and Environmental Studies from Oberlin College.
Comment 3	**Rationale for Peter Miller's rate** 2011 and 2012 Rate: Mr. Miller was awarded a rate of $180 in D.12-02-011. We request that rate here for both 2011 and 2012 work. Mr. Miller is a Senior Scientist at NRDC focusing on renewable energy, energy efficiency, and climate policies. He has worked on energy and environmental policy for 25 years and holds a Physics degree from Reed College and a Master's degree from Dartmouth College. Mr. Miller is also PhD candidate in Environmental Planning with a focus on conservation planning and climate change.
Comment 4	**Rationale for Sierra Martinez's rate** 2011 Rate: In 2011, Mr. Martinez was a third-year attorney. We accordingly request a rate of $200 here, which is at the low range of Attorneys with 3-4 years of experience ($200-235) adopted in Res ALJ-267. Per D.08-04-010, intervenors can qualify for a rate increase when "moving to a higher experience level: where additional experience since the last authorized rate moved a representative to a higher level of experience." (D.08-04-010, p.8) 2012 Rate: Mr. Martinez is now a fourth year attorney. We request one step increase of 5%, which is allowable within "any given level of experience" per D.08-04-010 (p.8). Assuming a rate in 2011 of $200 based on the above rationale, we request a rate of $200*1.05 or $210 for Mr. Martinez for work done in 2012. Mr. Martinez represents NRDC at state and local fora to promote energy efficiency and renewable energy resources as solutions to climate change that stimulate California's economy. Mr. Martinez holds a B.A. from Stanford University and a J.D. from Stanford Law School, where he focused on environmental and energy law.

Comment 5	**Rationale for Philip Henderson's rate** 2011 Rate: This is the first request for Philip Henderson. We request $300 which is conservative at bottom of the range adopted in Res ALJ-267 for lawyers with 13+ years of experience for 2011. 2012 Rate: For 2012 we request $315, which includes one 5% increase for Philip at 300*1.05 = 315 per D.08-04-010, p.8. These rates are conservative because Mr. Henderson currently has 15 years of experience in mortgage finance and consumer financial regulatory law. Mr. Henderson has a JD from University of Virginia and a Bachelor's degree in Economics from Univ. of North Carolina Greensboro.
Comment 6	**Rationale for Siddhartha Oza's rate** 2011 and 2012 Rate: We claim $125, which is the lowest rate for experts with 0-6 years adopted in Res ALJ-267. Mr. Oza represents NRDC as an advocate for energy efficiency and clean energy solutions at California's state and local regulatory organizations. Mr. Oza holds a B.S. from Stanford University, where he concentrated on environmental economics, policy and science.
Comment 7	**Rationale for Amanda Gonzalez's rate** 2011 Rate: We claim $125, which is the lowest rate for experts with 0-6 years adopted in Res ALJ-267. Ms. Gonzalez has three years of experience working in the field of Energy Efficiency in research and project management capacities. Currently, as a Project Manager at Energy Solutions on the Codes and Standards team, she represents NRDC at the state level to promote energy efficiency and renewable energy resources to build a more environmentally sustainable and prosperous economy for California. Ms. Gonzalez holds a B.S/M.S in Management Science in Engineering from Stanford University, where she focused on Energy and Environmental Policy and Strategy.

D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):

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#	Reason

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))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	

If so:

Party	Reason for Opposition	CPUC Disposition

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(2)(6))?	

If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.

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

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

4. The total of reasonable contribution is $_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Claimant is awarded $_____.

2. Within 30 days of the effective date of this decision, _____ shall pay Claimant the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated."] Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 75th day after the filing of Claimant's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.

4. This decision is effective today.

Dated _____, at San Francisco, California.

Attachment 1 - Staff Time records and R.09-11-014 and Allocation of Time by Issue

	Issue Area	Hrs	%
A	EE All Issues (e.g., align policies, rules, and goals, etc)	16.25	4.4%
B	Extension - All Issues	63.75	17.3%
C	Streamlining (e.g., complexity of DEER, workpaper review, program offerings, etc.)	3.25	0.9%
D	Process recommendations (e.g., allow for collaboration, establish working groups, rolling cycle, etc.)	19.75	5.4%
E	DEER updates (e.g., interactive effects, connection to goals, NTG, freerider idea etc.)	31.25	8.5%
F	Local Government partnerships/Third Party programs	10.75	2.9%
G	Potential Study (e.g., Navigant study, ED questions, E&T, CFLs, etc.)	43.95	11.9%
H	Goals (e.g., gross vs. net, C&S)	35.75	9.7%
I	Cost-effectiveness (CE) – All Issues	20.85	5.7%
J	CE - Avoided cost update (ACU) discount rate	6.75	1.8%
K	CE – ACU switching to component base	4.00	1.1%
L	CE - ACU T&D	0.50	0.1%
M	CE - ACU renewables	3.50	1.0%
N	Programs (e.g., EUC C&S, lighting, ZNE, plug loads, appliance recycling, ME&O, HVAC)	22.25	6.0%
O	Workforce issues (e.g., standards, wage, prequalification, quality assurrance, etc.)	6.00	1.6%
P	Financing All Issues	36.50	9.9%
Q	Financing on bill financing/repayment	7.25	2.0%
R	Financing stay with meter/shut off	2.75	0.7%
S	Water-energy nexus	8.00	2.2%
T	Market Transformation (MT) – All Issues (e.g., performance metrics, market transformation indicators, etc.)	24.75	6.7%

Lara Ettenson - 2010-2012																								
Date	Activity	Description	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	Total Hours	Notes
11/08/10	Review Docs	Review the original Performance Metric advice letter, protest, response in advance of the PM/Market Transformation Indicator resolution E-4385																				1.5	1.5	work began for Metrics and MTIs under A.08-07-021, but was incorporated into the scope of R.09-11-014
11/09/10	Review Docs	Review resolution and attached PMs and MTI. Outline comment topics for discussion with team																				2.5	2.5	
11/15/10	Strategize	Meet with team to prioritize comments																				0.5	0.5	
11/17/10	Write Comments	Draft comments on recommended metrics and indicators as well as general approach to defining and following up on the use of metrics																				4	4	
11/22/10	Write Comments	Finalize comments per team input on rationale and policy background																				1.5	1.5	
11/23/10	Review Docs	Reviewed ACR 11/17/10 on goals, strategic plan, and cost effectiveness update (19 pages)	1																				1	
11/23/10	Write Comments	drafted outline of comments	0.5																				0.5	
11/23-25/2010	Write Comments	wrote comments on extension of cycle, cost effectiveness, process, etc.	0.5	0.75		1.5					1												3.75	
11/30/10	Write Comments	update and expand upon policy issue discussion per team edits	0.75																				0.75	comments due 12/3/10
12/05/10	Doc Review	reviewed party comments	1.5																				1.5	
12/05/10	Write Comments	drafted cmts for team discussion			0.75	0.75																	1.5	
12/07/10	Write Comments	incorporated edits and additions from colleagues reviewing cmts and finalized cmts	0.5																				0.5	comments due 12/10/10
			A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	Total Hours	
	$ 2,535.00	LAE Total Hours 2010 (Claimed $130/hr)	4.75	0.75	0.75	2.25	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	10	19.5	
		% issue area	24.4%	3.8%	3.8%	11.5%	0.0%	0.0%	0.0%	0.0%	5.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	51.3%	100.0%	

02/10/11	Doc Review	ED provided a white paper regarding extension year questions. Reviewed and initially drafted ideas on response in advance of all day workshop panel		1.75																				1.75
02/16/11	Attend workshop	Attended and sat on panel to discuss different party perspectives of next steps		7																				7.00
05/11/11	Settlement Conversations	DRA began talks regarding extension year		2																				2.00
05/27/11	Doc Review	Review ruling "ALJ Ruling Regarding 2013 Bridge Funding and Mehcanics of Portfolio Extenstion"		1																				1.00
06/03/11	Settlement Conversations	DRA and TURN took themselves out of the settlement conversations, but NAESCO continued to lead the settlement with LGSEC, NRDC, Efficiency Council, CCSE, and IOUs.		1																				1.00
06/06/11	Settlement Conversations	NAESCO led settlement to discuss comments		1																				1.00
06/09/11	Settlement Conversations	NAESCO led settlement to resolve outstanding differences on issues		1																				1.00
06/10/11	Write Comments	Write outline of opening comments re: extension year for team review building off of settlement talks with joint parties (which reduced hours to write opening comments).		0.75		0.25	0.75																	1.75
06/15/11	Finalize Comments	incorporate team's substantive discussion recommendations and written edits re: inclusion of policy position arguments and recommendations for extension guidance		0.75		1.25	1.25																	3.25
06/20/11	Doc Review	Read replies		1.25																				1.25
06/20/11	Write Comments	draft reply to party comments on extension for team review					0.75									1.75								2.50
06/20/11	Settlement Conversations	NAESCO led settlement to discuss areas of alignment for reply comments		1																				1.00
06/27/11	Settlement Conversations	NAESCO led settlement		1																				1.00
6/16-6/30	Write Comments	wrote substantive edits to draft comments re: the settlement reply comments		2																				2.00
06/30/11	Write Comments	revised NRDC reply comments re: extension guidance (which focused only on items not agreed to in joint party comments) based on team edits/suggestions to add context and modify position and/or argument		0.25			0.25									0.75								1.25
08/04/11	Doc Review	review navigant's initial potential and goals scope							1.5	1.5														3.00
08/05/11	Strategize	outline scope of comments on goals/potential for consultant							0.5															0.50
08/09/11	Write Comments	provide context and expand recommendations for modifications to potential study scope; respond to various questions posed by the scoping document							1.5															1.50
08/22/11	Comm/Advisor Meeting	met with Ferron's advisors re: timeline, policy issues, recommendations, etc. (claim 1/2 time b/c PM was also there)	0.50																					0.50
10/5/2011	Doc Review	reviewed avoided cost ruling on complex issues that haven't been updated since 2005 (includes reading references in ruling as well as other research to best understand the history of the proposed recommendations for comment)									3													3.00
10/10/2011	Write Comments	drafted initial Avoided Cost comments for team review.									0.25	0.75			0.25									1.25
10/12/11	Write Comments	update SM's potential comments to more thoroughly explain recommendations and link to previous positions, context, and recommendations							2															2.00
10/13/2011	Doc Review	read ACR on market, education, and outreach (ME&Ó) and draft points for comments														0.75								0.75
10/18/2011	Write Comments	integrate substantial quantitative information from Sierra Martinez's edits for the avoided costs comments									0.25	0.25	0.25	0.25	0.25									1.25
10/25/2011	Review Docs	read 18 page ACR that addressed 11 points of questions for bridge year consideration		1.25																				1.25
10/25-31/2011	Write Comments	drafted detailed comments for team to review. Each of the 11 questions/sections required at leat 3-4 advocacy points		1	0.75	2	1	1.75		0.75	0.25					2.25		1.25			0.75			11.75
10/26/2011	Write Comments	draft comments in reply to the ACR questions, providing specific suggestions and ideas for how to advance the marketing strategy/outreach program in CA														2								2.00
10/27/2011	Write Comments	integrate additional information learned from outreach conversations re AC into final comments		0.75							0.75													1.50
11/1/2011	Write Comments	incorporate additional team language, recommendations, and context for ME&O comments														0.5								0.50
11/1/2011	Doc Review	read stakeholder AC comments									2.5													2.50
11/1/2011	Write Comments	outlined reply AC comment topics and divide topics with Sierra Martinez									0.25													0.25
11/1/2011	Write Comments	draft AC comments (excluding portion Sierra Martinez drafted)									0.75	0.75												1.50
11/4/2011	Write Comments	integrate comments from Sierra Martinez and edits from team; concepts are complex and require integration and citations to ensure comments are substantial									2													2.00
11/4/2011	Review Docs	review documents for the MTI workshop on 11/7 (both new documents and original advice letter and comments from 11/2010)																					2	2.00
11/7/2011	Attend workshop	attend and participate in the day workshop on MTI																					7	7.00
11/10-11/12	Review Docs	Reviewed all 18 comments (ranging from 6 pages - 20+ pages)		5																				5.00
11/12/2012	Write Comments	write reply comments on transition/extension year guidance			0.5	0.75		1								0.5	0.25	0.25						3.25
11/14-15/12	Write Comments	incorporated updated language and additional suggested focus from team review and finalize comments		0.75																				0.75
11/15/2011	Review Docs	ppts, documents, notes sent by energy division - reviewed all documents for preparation to write comments																					2	2.00
11/15/2011	Comm/Advisor Meeting	Met with M.Colvin re: bridge year issues (claim 1/3 time since SM and PM were in the mtg as well)		0.33																				0.33
11/16-11/19/11	Write Comments	comments on the need to refocus effort to future programs vs. trying to integrate indicators ontop of programs that are essentially 2/3 of the way complete. Need a working group to apply indicators during program design,																					3.25	3.25
12/7/2011	Doc Review	read the ALJ ruling and the 40 page attachment document						2.5																2.50
12/9-12/21	Strategize	work with other stakeholders (e.g., DRA, LGSEC, Efficiency Council, IOUs, etc.) to better understand issues before submitting comments to ensure comments are as productive as possible and account for issues that were discussed						2.5																2.50
12/20/2011	Write Comments	draft original comments (not previously drafted policy positions) on the general observations of the process, need for discussion, focus on transparency and flexibility, develop a working group to help with details and program design/implementation. Specifically, draft comments (and incorporate language from other program staff not included in time keeping) on supporting energy upgrade california, use local governments to help continue that, program modifications (e.g., lighting) should focus on achieving all cost-effective EE, potential, and the need for market intervention, the CPUC needs to work with CEC and others to design goals to focus ZNE activities and include additional appliances/plug loads for ZNE programs.		2		0.75							2.25											5.00
12/23/2011	Doc Review	read the IOUs, LGs, and social justice groups, labor in detail and skimmed other comments and summary compiled by SO		4																				4.00
			A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**Total Hours**
	$ 13,950.00	**LAE Total Hours 2011 (Claimed $135/hr)**	**0.50**	**36.83**	**1.25**	**5.00**	**4.00**	**7.75**	**5.50**	**2.25**	**10.00**	**1.75**	**2.50**	**0.25**	**0.50**	**8.50**	**0.25**	**1.50**	**0.00**	**0.00**	**0.75**	**14.25**	**103.33**
		% issue area	**0.5%**	**35.6%**	**1.2%**	**4.8%**	**3.9%**	**7.5%**	**5.3%**	**2.2%**	**9.7%**	**1.7%**	**2.4%**	**0.2%**	**0.5%**	**8.2%**	**0.2%**	**1.5%**	**0.0%**	**0.0%**	**0.7%**	**13.8%**	**100.0%**

1/3-5/2012	Write Comments	wrote recommendations on general principles to guide decision for bridge year; process for improving approval of programs, reduce complexity of assumptions/processes, etc.; discussion re: prequalification standards, training; support quality, integration of program design to support code compliance and quality; implement SB 454 (quality and codes and standards are integrated); discussion of ensuring programs are designed based on potential to reach all CE EE and to allocate money to programs where there is CE EE (vs. remove $$ from one sector to put in the other);	1	1	0.25								1				0.5						3.75
01/06/12	Write Comments	update with substantive modifications to rationale and recommendations	0.5	0.5																			1.00
01/06/12	Review Docs	review ALJ ruling on EE goals and 30+ page attachment							1.75	0.75													2.50
1/07-1/10/12	Write Comments	lead comment writing, incorporating technical additions from SM and PM	1.25			0.25	1		0.75	1.25													4.50
01/12/12	Review Docs	review party comments							2	2													4.00
1/13/12-1/19/12	Write Comments	write reply comments on the goals/potential; integrating SM's substantive additions	1.5				2		0.5	0.5													4.50
1/11-1/13/12	Review Docs	read and drafted positions on key financing issues to cover. the ruling itself is 31 pages, attachment A is 19 pages, attachment B is over 60 pages, and attachment c is over 15 pages																2.5					2.50
1/17/2012	Strategize	internal strategy discussion with center for market innovation (CMI) team, responsible for our efforts in EE financing across the country. We discussed aspects to focus on and our initial position															0.50						0.50
1/22/2012	Write Comments	CMI wrote the bulk of the comments, LAE wrote CPUC/CA context, ensured substantive connections were made to other portions of the complex proceeding and wrote the section on suggested topics and panelists for the upcoming financing workshops	1			1												1.5	0.5	0.5			4.50
1/24/2012	Comm/Advisor Meeting	met with M. Colvin re: DEER issues (1/2 time since PM was present)					0.5																0.50
01/25/12	Comm/Advisor Meeting	discussed peer review group and third party solicitations with Matthew Tisdale						0.5										1.25	1.5				3.25
1/26/2012	Attend workshop	attend, participate, provide recommendations on strategy and follow up															4.5						4.50
2/15-2/22/12	Write Comments	provided context for second set of financing comments																1.5					1.50
																							0.00
																							0.00
3/25-3/26/12	Review Docs	Read 400+ page proposed decision	1.5	2			2	0.5	0.5	1	1.75					2.5	0.25	1.75			0.25		14.00
03/28/12	Stategize	Outlined positions to discuss with team prior to drafting comments (19 points to cover and discuss)	0.25	0.75																			1.00
03/29/12	Stategize	Discussed with team (only claim time for Ms. Ettenson)		1																			1.00
4/2-4/5/12	Stategize	checked in with multiple parties (four IOUs, LGSEC, CCSE, DRA, Efficiency Council, CCSF) regarding various portions of the PD. Discussed NRDC position, areas of alignment with other parties, and strategies for advocacy that advance mutli-party approaches to resolve outstanding policy issues	1	1																			2.00
4/2-4/9/12	Write Comments	wrote comments on multiple issues, totally 25+ pages with specific recommended language for incorporation into the final decision	1	1.5		0.5	1.5	2	0.5	0.5	1.5	0.75			0.25	1.5							11.50
04/09/12	Doc Review	read reply comments (12+)		4																			4.00
4/10-4/16	Write Comments	wrote reply comments, including additional analysis/recommendations from team		0.5		0.25										0.5						0.5	1.75
04/13/12	Comm/Advisor Meeting	Meeting with D. Franz (LAE only)		0.5																			0.50
04/16/12	Comm/Advisor Meeting	Meeting with C.Kersten (1/3 time b/c with PM and SM)		0.1666667																			0.17
05/07/12	Comm/Advisor Meeting	meeting with D. Franz (1/2 time b/c with SM)		0.375																			0.38
05/08/12	Advocacy	prep time for email sent to commissioners summarizing the main issues and the options for modifications in the PD, including language suggestions		1																			1.00
			A	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**	**N**	**O**	**P**	**Q**	**R**	**S**	**T**	**Total Hours**
	$ 11,592.71	**LAE Total Hours 2012 (Claimed $155/hr)**	**9.0**	**14.3**	**0.3**	**2.0**	**7.0**	**3.0**	**6.0**	**6.0**	**3.3**	**0.8**	**1.0**	**0.0**	**0.3**	**4.5**	**5.8**	**8.5**	**2.0**	**0.5**	**0.3**	**0.5**	**74.8**
		% issue area	**12.0%**	**19.1%**	**0.3%**	**2.7%**	**9.4%**	**4.0%**	**8.0%**	**8.0%**	**4.3%**	**1.0%**	**1.3%**	**0.0%**	**0.3%**	**6.0%**	**7.7%**	**11.4%**	**2.7%**	**0.7%**	**0.3%**	**0.7%**	**100.0%**
	$ 28,077.71	**LAE TOTAL 2010-2012**	**14.25**	**51.88**	**2.25**	**9.25**	**11.00**	**10.75**	**11.50**	**8.25**	**14.25**	**2.50**	**3.50**	**0.25**	**0.75**	**13.00**	**6.00**	**10.00**	**2.00**	**0.50**	**1.00**	**24.75**	**197.63**
		LAE TOTAL % ISSUE AREA	**7.2%**	**26.2%**	**1.1%**	**4.7%**	**5.6%**	**5.4%**	**5.8%**	**4.2%**	**7.2%**	**1.3%**	**1.8%**	**0.1%**	**0.4%**	**6.6%**	**3.0%**	**5.1%**	**1.0%**	**0.3%**	**0.5%**	**12.5%**	**100.0%**

Peter Miller - 2010-2012									
Date	Activity	Description	A	B	C	D	E	N	Total Hours
08/22/11	Comm/Advisor Meeting	met with Ferron's advisors re: timeline, policy issues, recommendations, etc. (1/2 time b/c LAE was also there)	0.50						0.50
11/15/2011	Comm/Advisor Meeting	Met with M.Colvin re: bridge year issues (claim 1/3 time since LAE and SM were in the mtg as well)		0.33					0.33
11/30/11	Attend Workshop	Attend ED workshop on DEER update					7		7.00
11/30/2011	travel to/from workshop	travel time to LA claimed at half rate (not claiming expense of flight)					2		2.00
			A	B	C	D	E	N	Total Hours
	$ 1,770.00	PM Total Hours 2011 (Claimed $180/hr)	0.50	0.33	0.00	0.00	9.00	0.00	9.83
		% issue area	5.1%	3.4%	0.0%	0.0%	91.5%	0.0%	100.0%
1/3-5/2012	Write Comments	Write recommendations on DEER update process and proposed values.					4.25		4.25
01/12/12	Review Docs	review party comments on DEER update					1.5		1.5
1/13/12-1/19/12	Write Comments	write reply comments on DEER update					2		2
1/25/2012	Comm/Advisor Meeting	met with M. Colvin re: DEER issues (1/2 time since LAE was present)					0.5		0.5
3/28/2012	Review PD	Read PD relevant sections for comment writing	0.25		0.25	0.25	0.5	0.25	1.5
3/28-30/12	Write Comments	Write comments on DEER update issues, cost-effectiveness, EUC, and process recommendations	0.25		0.5	0.5	2	1	4.25
4/2/2012	Write Comments	Revise draft comments and wrote proposed revisions to PD			0.25	0.25	0.5	0.5	1.5
04/16/12	Comm/Advisor Meeting	Meeting with C.Kersten (1/3 time b/c with LAE and SM)		0.17					0.166667
05/07/12	Comm/Advisor Meeting	Meeting with D. Franz (1/2 time b/c with LAE)		0.38					0.375
			A	B	C	D	E	N	Total Hours
	$ 2,887.50	PM Total Hours 2012 (Claimed $180/hr)	0.50	0.54	1.00	1.00	11.25	1.75	16.04
		% issue area	3.1%	3.4%	6.2%	6.2%	70.1%	10.9%	100.0%
	$ 4,657.50	PM TOTAL HOURS 2011-2012	1.00	0.88	1.00	1.00	20.25	1.75	25.88
		PM TOTAL % ISSUE AREA	3.9%	3.4%	3.9%	3.9%	78.3%	6.8%	100.0%

Sierra Martinez: 2011-2012												
Date	Activity	Description	B	G	H	I	J	K	L	M	Total Hours
08/15/11	Doc Review	Review Navigant/Kema update to Potential Goals and Targets for 2013 and beyond		1.70	1.50						3.20
10/05/11	Doc Review	Review ALJ Ruling on EE avoided costs (including ED proposal)				2.00					2.00
10/12/11	Doc Review	Review ED's response to stakeholder comments re potential and goal study, in particular: use of variables in scenario development, and use of Monte Carlo simulation for sensitivity analyses.			0.25						0.25
10/12/11	Strategize	Communicate ED's response to internal team and discuss path forward for future comments			0.25						0.25
10/18/11	Research	Conduct research into components of avoided cost for purposes of preparing comments; dissemminated to internal team for incorporation into comments				0.75					0.75
10/18/11	Write Comments	Write and revise comments on responses to ED/Navigants Scoping Plan for the EE Goals, Targets, and Potential Study, in particular supporting TMG goals, transparency of the model, opposition to focusing on attribution, and opposition to use of certain interactive effects.		1.25	0.75						2.00
10/21/11	Doc Review	provide recommendations to cost-effective assumptions based on the calculator inputs				0.25	0.25	0.25			0.75
10/21-24/2011	Strategize	Call with PG&E to discuss cost-effectiveness comments and to reduce any duplicate work; discuss avoided cost updates in order to reduce number of written comments and to reduce any duplicate work				2.00					2.00
10/24/11	Write Comments	Write and revise comments on avoided cost updates, in particular: avoided distribution and transmission, avoided capacity generation, and renewable procurement.				0.50	0.25	0.25	0.25	0.25	1.50
11/15/2011	Comm/Advisor Meeting	Met with M.Colvin re: bridge year issues (claim 1/3 time since LAE and PM were in the mtg as well)	0.33								0.33
11/15/2011	Doc Review	review docs for discussion at 11/16 DAWG meeting		0.50							0.50
11/16/11	Attend Workshop	Attend DAWG/CPUC workshop on potential and goals study		5.00							5.00
11/18/11	Write Comments	Write Comments on CPUC Analysis To Update Energy Efficiency Potential, Goals and Targets for 2013 and Beyond, specifically with respect to: improving the estimate of low-income EE, applying better definition of potential for refrigerators, including more emerging technologies, and incorporating updated cost-effectiveness updates into potential study		3.50							3.50
			B	G	H	I	J	K	L	M	Total Hours
$200	$ 4,406.67	SM Total Hours 2011 (Claimed $200/hr)	0.33	11.95	2.75	5.50	0.50	0.50	0.25	0.25	22.03
		% issue area	1.5%	54.2%	12.5%	25.0%	2.3%	2.3%	1.1%	1.1%	100.0%
01/03/12	Doc Review	Review Staff Proposal for goals for 2013-2014 period			2.50						2.50
01/08/12	Write Comments	Write comments on the proposed 2013-2014 goals re: inclusion of emerging technologies, reasonableness in light of the Navigant potential study, setting goals at 100% of market potential level, using gross goals, using non-binding sub-goals, using the Staff-proposed guidelines, and better defining decay, among others		1.25	4.75						6.00
01/17/12	Doc Review	Review comments of IOUs and TURN on proposed 2013-2014 goals			0.75						0.75
01/18/12	Write Comments	Write reply comments on parties positions on 2013-2014 goals, including: ensuring consistent assumptions between DEER and goals; agreeing with TURN to not support separate goals; and for consistent treatment of interactive effects			2.75						2.75
03/26/12	Doc Review	Review Proposed Decision sections re: energy efficiency goals			1.25						1.25
03/26/12	Doc Review	Review Proposed Decision sections re: cost effectiveness				1.10					1.10
03/29/12	Write Comments	Wrote comments on recommended use of gross measurements for goals, including codes and standards, and use of total goals for adoption, with sub-goals as guidance			3.50		3.75			2.50	9.75
04/03/12	Strategize	wrote email for team regarding codes and standards savings in potential study and goals and the attribution disagregation between net and gross and incorporated responses into comment writing			0.50						0.50
04/16/12	Comm/Advisor Meeting	Meeting with C.Kersten (1/3 time b/c with PM and LAE)	0.17								0.17
			B	G	H	I	J	K	L	M	Total Hours
$210	$ 5,201.00	SM Total Hours 2012 (Claimed $210/hr)	0.17	1.25	16.00	1.10	3.75	0.00	0.00	2.50	24.77
		% issue area	1%	5%	65%	4%	15%	0%	0%	10%	100%
	$ 9,607.67	SM TOTAL 2011-2012 HOURS	0.50	13.20	18.75	6.60	4.25	0.50	0.25	2.75	46.80
		SM TOTAL % ISSUE	1.1%	28.2%	40.1%	14.1%	9.1%	1.1%	0.5%	5.9%	100.0%

Philip Henderson - 2011-2012							
Date	Activity	Description	A	P	Q	R	Total Hours
10/25-28/11	Review Docs	reviewed ruling pertaining to the financing section and energy division proposal		0.5			0.5
10/28-11-7/11	Write Comments	focused on financing portion of the energy division proposal		2	0.5	0.75	3.25
11/16 and 11/17/11	Attend Workshop	attended via phone for a portion of the workshops - claimed half time for being on phone vs. in person		3.5			3.5
	$ 2,175.00	**PH Total Hours 2011 (Claimed $300/hr)**	**0**	**6**	**0.5**	**0.75**	**7.25**
		% issue area	**0%**	**83%**	**7%**	**10%**	**100%**
1/11-1/13/12	Review Docs	read the ruling (31 pages), attachment A (19 pages), attachment B (60 pages), and attachment C (over 15 pages)		4			4
1/17/2012	Strategize	internal strategy discussion with energy program team, responsible for our CA CPUC efforts, Discussed aspects to focus on and our initial position		0.50			0.5
1/22/2012	Write Comments	wrote the bulk of the substantive comments on all financing areas addressed by or inquired by the CPUC (e.g., stay with the meter, on bill repayment vs. financing, etc.)	1	2.25	1.75	1.5	6.5
2/8/12-2/10/12	Attend Workshop	the CPUC hosted 3 full days of workshops, bringing in experts, and discussed issues that the CPUC was considering. No time claimed for lunch hour. Claimed half time since participation was via phone.		10.75			10.75
2/15-2/22/12	Write Comments	wrote second set of comments for financing based on party opening comments		1.25	3		4.25
03/26/12	Review Docs	financing section of the proposed decision		1			1
4/1-4/9/12	Write Comments	wrote comments on the financing section of the PD		0.75			0.75
	$ 8,741.25	**PH Total Hours 2011 (Claimed $315/hr)**	**1**	**20.5**	**4.75**	**1.5**	**27.75**
		% issue area	**3.6%**	**73.9%**	**17.1%**	**5.4%**	**100.0%**
	$ 10,916.25	**PH TOTAL 2011-2012**	**1.00**	**26.50**	**5.25**	**2.25**	**35.00**
		PH TOTAL % ISSUE AREA	**2.9%**	**75.7%**	**15.0%**	**6.4%**	**100.0%**

Siddhartha Oza - 2011-2012										
Date	Activity	Description	A	B	C	D	N	S	T	Total Hours
12/7/2011	Review Docs	Read the ALJ ruling and the 40 page attachment document		2.5						2.5
12/10-21/2011	Research	Researched (1) water energy, (2) appliance recycling issues, and (3) rolling cycles. This included reviewing policies at a state and federal level, prior NRDC comments on the matter (from the 90s, and early 2000s), and interviewing experts on the matter. For rolling cycles, this involved reviewing Vermont Energy Investment Corporation's (VEIC) program cycle policies as a potential model for CA. Read and synthesized expert testimony that led to VEIC decisions.				7	5	5		17
12/10-21/2011	Write Comments	Drafted comments for integration into NRDC's opening comments				2.5	2.5	2		7
12/23-12/30/11	Review Docs	Read 18 of the party comments and integrated into a matrix for Lara Ettenson's review and integration into NRDC reply comments		8						8
	$ 4,312.50	SO Total Hours 2011 Claimed $125/hr)	0	10.5	0	9.5	7.5	7	0	34.5
		% issue area	0%	30%	0%	28%	22%	20%	0%	100%

Amanda Gonzalez - 2011					
Date	**Activity**	**Description**	**G**	**H**	**Total Hours**
8/5/2011	Review Navigant Scoping Plan	Read and reviewed EE potential section of Navigant Scoping Plan	2		2
8/5/2011	Review Navigant Scoping Plan	Read and reviewed EE goals section of the Navigant Scoping Plan		1	1
8/8/2011	Review & Summarize Navigant Plan	Finished reviewing the EE potential Section & started drafting comments	0.75		0.75
8/9/2011	Write Comments	Drafted comments and recommendations to revise the EE potential	2.75		2.75
8/9/2011	Write Comments	Drafted comments and recommendations to revise the EE goals section		2	2
8/16/2011	Attend Workshop	Called into a portion of the 8/16 workshop on EE potential	2.75		2.75
8/16/2011	Attend Workshop	Called into a portion of the 8/16 workshop on EE Goals		1.25	1.25
9/28/2011	Attend Workshop	Participated in the EE potential portion of the 9/28 workshop	4		4
9/28/2011	Attend Workshop	Participated in the EE goals portion of the 9/28 workshop		2.25	2.25
10/3/2011	Summarize Workshop	A synoposis of the workshop was provided to the NRDC team with initial recommendations	0.5		0.5
10/5/2011	Strategize Comments	A brief phone meeting was held to review the workshop and address additional questions	0.5		0.5
10/11/2011	Write Comments	Energy Solutions began drafting comment on the EE potential	0.75		0.75
10/11/2011	Phone Meeting	A brief phone meeting was held to discuss strategy for Goals portion of comments		0.25	0.25
10/12/2011	Write Comments	Continued comment letter development and research	3		3
10/12/2011	Write Comments	Continued comment letter development and research		1.25	1.25
10/13/2011	Internal Review	Internal review was conducted on the EE potential , and edits were made accordingly	2		2
10/13/2011	Internal Review	Internal review was conducted on the EE goals portion, and edits were made accordingly		0.5	0.5
10/17/2011	Final revision of comments	Energy Solutionsa and NRDC team discussed changes to final comments	0.25		0.25
10/18/2011	Finalize comments	Final version was reviewed		0.25	0.25
			G	**H**	**Total**
	$ 3,500.00	**AG Total Hours 2011 (Claimed $125/hr)**	**19.3**	**8.75**	**28**
		% issue area	**69%**	**31%**	**100%**

Attachment 2 - Staff Resumes

AMANDA GONZALEZ

Work Experience

2/11- Present	**Energy Solutions: Project Manager.** *Project Manager for Federal and Title 20 Casework*. Responsibilities include: Comment letter development based on research and analyses; crafting a savings model based on market research, analyzing MR lamp performance potential through learning curve analysis. *Technical Advisor to the Natural Resource Defense Council (NRDC)*. Responsibilities include: serving as a technical advisor and developing comment letters on behalf of the NRDC for the California Energy Commission's Demand Forecast policy research initiative. *Project Lead for Embodied Energy Research Initiative for NRDC*. Responsibilities include: developed research scope, reviewed literature on life cycle and embodied energy of appliances and electronics, conducted expert interviews, wrote report for NRDC, which will be presented at the ACEEE conference in Monterey in August. *Agency Lead for Energy Technology Assistance Program*. Responsibilities include: working with public agencies to identify energy-efficiency retrofit opportunities in the advanced lighting and HVAC space; screening projects for initial cost/benefit analyses; assisting in bid formulation and equipment selection; streamlining project execution *Project Manager for LED Accelerator Program*. Responsibilities include: fieldwork lead for the lighting retail space; lamp qualification expert
7/10 to 1/11	**Rocky Mountain Institute, MAP Energy Fellow.** Worked on the Next Generation Utility Project to assess and define how the business models and value chains of today's iconic utilities will (need to) transform as they begin to adopt low-carbon pathways within a changing regulatory and market environment.
11/08 to 2/10	**FromConcentrate, Co-Founder.** Managed the business and funding aspects of a project to empower off-grid communities in East Africa with a battery charging device that would enable lighting and cell phone use in remote areas.
6/08 to 5/10	**Stanford Technology Ventures Program, Research Assistant.** Studied the impact of the kinds of funding and their timing (among other variables) that minimally invasive device firms were receiving and how these variables influenced a firm's ability to innovate, as defined by the number of commercialized products reaching the market.
1/09 to 4/09	**Aspire Public Schools, Project Leader.** Created a standardized decision-making Framework for all IT and project requests for a network of rapidly expanding charter schools focused on serving underserved communities, by studying information and resource supply and flow
6/08 to 9/08	**ReputationDefender, Summer Intern.** Oversaw ReputationDefender's online marketing platform and utilized optimization and decision analysis techniques for business and strategy decisions
11/06 to 6/08	**Stanford Consulting.** Consulted on 2 cases, one involving a large internet company in the bay area and the other for a start-up working on development issues within China

Education	**Stanford University** Bachelors of Science in Management Science & Engineering (MS&E) Masters of Science in the Energy & Environment Program (MS&E) **Oxford University** Bing Overseas Program in Comparative Education
Awards & Honors	MAP Energy Fellowship, 2010 Haas Summer Fellowship for Public Service, 2009 Clinton Global Initiative University Fellowship for Climate Change, 2009 Green Winner of Stanford's Global Innovation Challenge, 2007

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EDUCATION

Stanford University, Stanford, CA — 2007-2011
B.S. Earth Systems. Concentration in Entrepreneurship, Economics and Policy.
GPA: 3.7/4.0. SAT: Math – 800, Critical Reading – 770, Writing – 760.

EXPERIENCE

MAP Sustainable Energy Fellow, Natural Resources Defense Council. San Francisco, CA — 2011-Present
Responsibilities include: forecast modeling of CA renewables net short; development of a standardized energy metrics calculator; data center energy efficiency evaluation; advocacy at the Energy Commission; collaboration with utilities to pursue accelerated energy efficiency programs and models; and research on CleanTech's "Valley of Death."

Research Assistant, Stanford University – Bill Lane Center for the West. Stanford, CA — 2010-2011
Enabled Directors of the Water in the West Program to make investment decisions in the stewardship of California's Carmel River. Researched the economic, scientific, legal and technical dimensions of the region's water challenges.

Product Development Consultant, Silver Spring Networks. Redwood City, CA — 2010 (Fall)
Developed and presented recommendations to Senior Project Managers on how to reduce customer energy use by enhancing proprietary products, for a course on "Sustainable Product Design."

Business Analyst, Locus Analytics Asset Management. New York City — 2010 (Summer)
Applied a proprietary model for classifying businesses to create a family of funds that manages portfolio risk using investment cohorts with low correlation. Researched 200+ companies through 10K and Annual Report analyses.

Legal Research Intern, Department of Justice Environmental Division. Washington D.C. — 2010 (Winter)
Performed industry research to determine the feasibility of corporate compliance with emissions regulations. Prepared written legal briefs on technical and policy aspects of federal air quality regulations.

Co-Founder, Project FeedBack. Palo Alto, CA — 2009-2011
Designed and launched a web-based nonprofit venture that redirects edible food waste on university campuses to the hungry in local community homeless shelters. Raised $7,000 to support development and implementation.

Edwin L. Z'Berg Senate Fellow, California State Senate – Senator Joseph Simitian. Sacramento, CA — 2009 (Summer)
Analyzed pending energy and environmental legislation, scientific studies, advocacy information, state laws, and court decisions. Developed vote recommendations for 150+ bills and presented findings to the Senator.

Earth Sciences Research Intern, NASA. Mountain View, CA — 2008 (Summer)
Created satellite-based Excel models to better monitor California air quality and Yosemite National Park vegetation anomalies. Presented published findings to California Air Resources Board and Environmental Protection Agency.

LEADERSHIP

President, Students for a Sustainable Stanford. Stanford, CA — 2007-2011
Oversaw a $50,000 annual budget and team of 65 students to promote energy efficiency and environmental sustainability. Developed and deployed "Trayless Cafeteria" initiative resulting in $2.9 M/year savings.

Vice Chair, Stanford in Government. Stanford, CA — 2007-2011
Managed three committees of 15 students and a $150,000 budget to organize a conference on energy policy, arrange speaking engagements with Thomas Friedman and Kofi Annan, and perform community service in East Palo Alto.

Team Captain, Stanford Mock Trial. Stanford, CA — 2007-2010
Trained and led a team of 20 students in case analysis, cross examination technique and closing argument composition.

HONORS AND AWARDS

- **MAP Energy Fellowship**, Year-long fellowship with Natural Resources Defense Council's Energy Program.
- **Stanford University School of Earth Sciences**, Dean's Award for Undergraduate Academic Achievement.
- **Stanford Business Association of Entrepreneurial Students**, Business Plan Competition, ranked 3rd out of 80 teams.
- **American Mock Trial Association**, All-Regional Attorney Award.

SKILLS

- **Languages**: Spanish (Proficient). Hindi (Proficient). Arabic (Basic). Mandarin (Basic).
- **Research**: Factset Research Systems. Westlaw - Online Legal Research Service and PeopleMap. LexisNexis – CaseMap, Concordance Litigation Documentation Management, CourtLink eDiscovery. ESRI ArcGIS.
- **Computer**: Microsoft – Excel, Word, PowerPoint. Adobe – InDesign, Photoshop.
- **Programming**: HTML. CSS. Python.

PUBLICATIONS AND PRESENTATIONS

- "Investigating Correlations Between Satellite and Ground Measurements of Air Quality in the San Joaquin Valley." 2008. Presented to Environmental Protection Agency, NASA. Published in *American Geophysical Union Journal*.
- "Utilizing MODIS LAI to Identify Vegetative Anomalies in Yosemite National Park." 2006. Published in *American Geophysical Union Journal* and proceedings paper in *American Society for Photogrammetry and Remote Sensing*.

PHILIP C. HENDERSON

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PROFESSIONAL EXPERIENCE

Overture Technologies, Inc., ***General Counsel & Strategy*** Jan., 2007 to Oct., 2009 (currently engaged as consultant)

Overture provides technology solutions for financial institutions, provides advisory services, and operates an online loan information facility.

- Worked with clients to design and implement innovative solutions for online loan programs, including: federal GSE on renovation of loan processing technology; state agency for online consumer tools to deliver loan information; and, a top consumer website to deliver reliable online loan information for multiple investors.
- Responsible for privacy and data security policies, IP protection efforts, and for managing compliance with legal and regulatory requirements, including RESPA, TILA, ECOA, and Fair Lending.
- Led effort to educate federal policymakers on role of technology in loan modification efforts and possible models to implement systems to accomplish policy objectives.
- Led team in strategic planning effort and regular review of key business metrics on major projects. Supported CEO in outreach to prospective investors, and worked closely with CFO to close Series C financing of $6.0 million and related bridge loans.
- Designed, negotiated, and completed agreements to implement systems as software licenses and SaaS agreements to perform a wide range of related services for financial institutions.

LendingTree, Inc. 1999 to 2006 (Acquired by IAC/InterActiveCorp in 2003)

Vice President, Government Affairs *2004 to 2006*

Led project within Legal Department to identify and address legal and policy issues important to Company's strategic objectives, develop thought leadership, and build coalitions in support of positions. Launched Washington, D.C. office. Successfully accomplished key objectives within budget. Worked with federal and state officials, regulators, and thought-leaders with primary focus on enabling online real estate brokerage services, privacy and data security policy, and monitoring developments in all lending regulations.

Senior Director, Corporate Strategy *2003 to 2004*

- Created and executed Benchmark Study to identify business methods related to top-performance among lenders and to disseminate key learnings to company partners. Studied group of lenders, prepared report of actionable lessons, and presented findings to executive team of lenders.
- Explored new business lines such as settlement services and insurance, and performed diligence of potential acquisitions in related businesses.

Associate General Counsel *1999 to 2003*

- Managed privacy and data security policies and compliance. Responsible for compliance with lending regulations, including RESPA, TILA, ECOA, FCRA, and all marketing requirements (e.g., UDAP).
- Responsible for managing all commercial transactions. Draft, negotiate, and close deals with lenders, marketing partners, and technology clients. Completed deals with Google, Yahoo, Microsoft, various banks, and others.
- Worked closely with product management team and marketing teams on various initiatives.
- Advised senior management team on legal risks and opportunities, and participated in all strategic initiatives. Supported SVP of Strategy on key projects, including identification and diligence of prospective acquisitions and new product lines.
- Supported General Counsel and CFO to complete regular SEC disclosures, filings, and reports, including S1 for IPO. Worked closely with CFO and finance team on revenue recognition matters on transactions.

Kirkpatrick & Lockhart, ***Associate Attorney*** 1997 to 1999

- Provided legal advice to banks and national mortgage lenders on various matters, including consumer privacy, GLB compliance, marketing programs, development of new loan products, FCRA and RESPA compliance, preemption of state law limitations, and creation of affiliated business entities.
- Led efforts to identify opportunities, risks, and challenges related to financial institutions developing online channels for consumer engagement and worked with regulators to build familiarity with new online channel.

United Companies Financial Corp., ***Associate General Counsel*** 1995 to 1997

National lender and securitizer of residential mortgages through direct, branch offices, and wholesale channels.

- Responsible for regulatory compliance in loan origination, underwriting, and loan servicing on range of compliance and business issues related to legal requirements under federal and state law. Created program to train 1,000+ loan officers on legal and regulatory requirements.
- Supported loan servicing on loss mitigation efforts on large subprime portfolio. Worked closely with technology team on implementation of loan origination and underwriting system for use across >200 branch offices and home office. Worked with strategy team on development of Internet-based loan origination business model and systems.
- Supported technology group in assessment and acquisitions of systems.

U.S. Representative Cleo Fields (D-La.), ***Legislative Counsel*** 1993 to 1995

- Advised Congressman on legislative policy including for Banking Committee and various other policy matters.
- Worked closely with Committee staff on development and passage of major amendments to the Truth-in-Lending Act (HOEPA).
- Worked with energy companies on policy positions and legislation, including project to amend PURPA to better enable sale of cogeneration power to utilities.
- Worked with U.S. Justice Department and Louisiana Attorney General's office to support defense of voting rights lawsuit challenging constitutionality of voting district (Hays v. Louisiana, 515 U.S. 737 (1995)).

EDUCATION AND CREDENTIALS

University of Virginia School of Law, Juris Doctor, 1993

University of North Carolina Greensboro, Bachelor of Arts, Economics and History, 1990

Member, Virginia Bar