

Decision 10-09-015 September 2, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the Commission's Energy Efficiency Risk/Reward Incentive Mechanism.

Rulemaking 09-01-019
(Filed January 29, 2009)

DECISION GRANTING AMENDED REQUEST OF WOMEN'S ENERGY MATTERS FOR INTERVENOR COMPENSATION FOR SUBSTANTIAL CONTRIBUTIONS TO DECISION 09-12-045

Claimant: Women's Energy Matters (WEM)	For contribution to Decision (D.) 09-12-045
Claimed (\$): \$8,347.50	Awarded (\$): \$7,638.75
Assigned Commissioner: John A. Bohn	Assigned ALJ: Thomas R. Pulsifer
Claim Filed:	March 1, 2010¹

PART I: PROCEDURAL ISSUES**A. Brief Description of Decision:**

Decision awarded 12% profits to utilities for the second claim for 2006-08 EE². It rejected the proposed Settlement.

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

	As Stated by Claimant	CPUC Verified
Timely filing of notice of intent (NOI) to claim compensation (§ 1804(a)):		
1. Date of Prehearing Conference:	4/7/09	Correct
2. Other Specified Date for NOI:		
3. Date NOI Filed:	5/7/09	Correct
4. Was the notice of intent timely filed?		Yes

¹ Amended request was filed on July 21, 2010. See, CPUC's Comment No. 1 in Part I, C.

² Energy Efficiency.

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:		
6. Date of ALJ ruling:		
7. Based on another CPUC determination (specify):	D.09-06-016; see also, Attachment 4.	Based on the provisions of §1802(b)(C) and WEM's bylaws.
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:		
10. Date of ALJ ruling:		
11. Based on another CPUC determination (specify):	D.09-06-016; see also, our NOI.	Based on the provisions of §1802(g) and WEM's NOI.
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.09-12-045	Correct
14. Date of Issuance of Final Decision:	12/29/09	Correct
15. File date of compensation request:	3/1/10	Correct
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Claimant	CPUC	Comment
		X	WEM's request was originally filed on March 1, 2010; however, it failed to provide certain required information. At our request, WEM filed the subject amended claim. WEM enumerates the following changes to the original request: (1) Part III.C lists new and amended attachments; (2) Attachment 2 was added: WEM Time-Allocation by Issue; (3) Amended Time Sheets are included as Attachment 3; (4) Attachment 4 added: WEM Bylaws (demonstrating customer status); (5) Changed amount of request: when WEM updated its time sheets to calculate issues, a 6/22/09 item which pertained to a separate track of the proceeding was removed, and also mathematical errors in the compensation hours and total amount were corrected.

PART II: SUBSTANTIAL CONTRIBUTION

A. Claimant’s description of its contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059):

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
<p>1. Introduction: Overall, WEM’s participation sought to reduce costs to ratepayers by reducing undeserved awards of EE profits. We rejected the Settlement because it would have discarded Evaluation, Measurement and Verification (EM&V) findings. We provided historic perspective that demonstrated why the Commission should respect Energy Division’s (ED) implementation of the first-ever fully independent EM&V and reject Investor-owned Utilities (IOUs)’ efforts to undermine it.</p>	<p>The Commission chose to alter some of the goals and EM&V parameters to ensure profits in this claim, however it rejected the proposed Settlement, which would have discarded the findings of expensive EM&V and the final true-up. The decision preserved these important ratepayer protections, citing many of the issues that WEM raised in its comments.</p>	<p>Yes</p>
<p>2. WEM encouraged CPUC to reject the Proposed Settlement. 6/12/09 Comments at 2-8. WEM discussed the problem with IOU-caused delays in 2008, and warned that IOUs could easily delay the 2009 VR³ and/or the true-up, thereby derailing them. 6/12/09 Comments at 2, 4, 6. We pointed out that the Settlement would result in discarding tens of million worth of EM&V work and using IOU self-reports or more utility-friendly processes that were inadequate to protect ratepayers. 6/12/09 Comments at 6-7; 6/26/09 Motion at 2.</p>	<p>The decision rejected the Settlement for a variety of reasons, many of which WEM had expressed. The decision noted that the Settlement “lacks the sponsorship of parties representing ratepayer advocates (i.e., Division of Ratepayer Ratepayer Advocates (DRA), The Utility Reform Network (TURN), and WEM).” Ibid at 27.</p> <p>The decision specifically acknowledged WEM’s warnings that the Settlement would allow IOUs to cause delays in the 2009 Verification Report (VR) (Ibid, at 21), and would also restrict the true-up. Ibid, at 27. Conclusions of Law (COL) 3</p>	<p>Yes</p>

³ Verification Report.

	<p>confirmed that “previously adopted program” for awards would be followed, and COL4 stated the second interim award would be based on ED’s “independent evaluation of performance results” produced in the ED’s Second VR. Ordering Paragraph (OP) 4 specifically rejected the Settlement’s restrictions to the true-up, and ordered the true-up to proceed. OP 4.</p>	
<p>3. WEM brought attention and clarity to the dispute about the Compact Fluorescent Lamps (CFL) split between Residential/non-Residential customers. Our analysis described the substantial impact on energy savings (therefore increased profits) that would result from the IOUs proposal to allocate 10% of the CFLs to non-Residential instead of the 5% in ED’s VR. We noted that the Settlement would remove the section of the VR that dealt with this issue, which would also delete the VR’s point that only 2 out of 3 CFLs are in-service. We pointed out that utilities’ ex ante assumptions re upstream CFLs assumed 100% Residential. We noted that IOUs cited an out-of-date 1994 study to support their requested changes to the VR. 6/12/09 Comments at 4-5. See also 6/29/09 Motion at 2.</p>	<p>Findings of Fact (FOF) 11 noted that the Settlement differed with ED regarding the CFL split as well as in-service rates; FOF 16 noted differences regarding upstream CFL splits. The text noted that Southern California Edison Company (SCE) cited a 1994 report. Ibid at 49. While the decision did not specifically mention WEM’s input on these points, the Commission has stated previously: “[T]he fact that WEM is not specifically credited with making a substantial contribution on a particular issue does not mean that a substantial contribution was not made. Where a decision states a position that is consistent with that asserted by a party we may infer that the party made a contribution on that issue. D.09-03-043 at 7-8.</p>	<p>Yes</p>
<p>4. WEM repudiated the Settling Parties claim that ED’s report was not “vetted” and defended ED for following agreed-on procedures.</p>	<p>The decision stated that ED “properly followed adopted procedures” (at 56). It largely restored due process, taking care to describe the vetting process. Ibid at 56-59. FOF 23.</p>	<p>Yes</p>

<p>5. WEM filed a Motion for Evidentiary Hearings 6/26/09, in part to determine to what extent the IOUs had knowingly misled the Commission in their 2006-2008 applications.</p>	<p>The decision took note of WEM’s Motion for hearings. Decision at 13. The Motion was denied, but WEM’s request alerted the Commission that there were serious factual disputes that Settling Parties wanted the Commission to ignore.</p>	<p>The decision did not discuss merits of WEM’s motion, and mentioned it only as a part of the proceeding’s background⁴. The decision also notes that the motion was denied.⁵</p>
<p>6. In this phase, as well as concurrent efforts related to future Risk/Reward Incentive Mechanism (RRIM), WEM demonstrated that the current RRIM exacerbates the conflicts of interest of the utilities and their allies, tending to undermine the best use of EE dollars. WEM recommended extreme caution lest the desire to gain maximum EE profits (without being required to demonstrate specific reductions in supply side resources or profits) leads to exaggerated savings claims and undeserved profits. All WEM’s comments addressed these concerns, as well as our NOI, Petition to Intervene, and 6/29/09 Ex Parte with Commissioner Bohn’s Advisor.</p>	<p>The decision reflected WEM’s position, stating, “Independent verification of claimed savings is essential...” Ibid at 7. It faulted the utilities pre-Settlement position, which “relies upon utility self-reported earnings without independent verification.” Ibid at 34. The final decision noted ongoing controversy regarding the RRIM, and stressed the Commission’s intention to pursue reforms. Ibid at 4.</p>	<p>In this proceeding, the use of EE funds issue was not explored.</p>
<p>7. WEM preferred the ALJ’s Proposed Decision to the Alternate. 12/7/09 Comments at 2.</p>	<p>The ALJ’s Proposed Decision (which was rejected in favor of Commissioner Bohn’s Alternate) was even more cautious about overpayment, as it more closely followed the original</p>	<p>Yes</p>

⁴ D.09-12-045 at 13.

⁵ The ruling of July 8, 2009 denied the motion because it “does not identify specific factual disputes that require evidentiary hearings.” Furthermore, the ruling found that WEM’s request to question witnesses regarding improper use of EE funds was outside the scope of issues necessary to evaluate the merits of the proposed settlement. (Ruling of July 8, 2009 at 3.) At the same time, the ruling found that the record needs to be supplemented to identify the specific adjustments in energy savings values included in the proposed settlement. (Ruling of July 8, 2008 at 4.)

	<p>protocols and goals, resulting in a lower award.</p> <p>The Commission has stated that a contribution to a Proposed Decision may be considered in determining the value of an intervenor’s participation.</p>	
<p>8. Conclusion: WEM’s participation clearly resulted in a very substantial contribution and should be compensated in full.</p>	<p>In this case, the Commission specifically recognized WEM’s input on several important points, and adopted many of our major recommendations.</p> <p>Even where the decision did not agree with WEM’s recommendations, it is clear that WEM contributed substantially. The Commission has previously determined that an intervenor may make a substantial contribution by “providing a unique perspective that enriched the Commission’s deliberations and the record” even if it did not adopt any of the customer’s recommendations. (D.05-06-027 at 3.)</p> <p>It is clear that all of WEM’s participation made a substantial contribution to this proceeding and should be compensated in full.</p>	<p>Yes, except as discussed in Comment 1 and in Part III, Section D of this decision.</p>

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

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding?	Yes	Correct
b. Were there other parties to the proceeding?	Yes	Correct
c. If so, provide name of other parties: TURN, NRDC ⁶ , NAESCO ⁷ , CLECA ⁸ , IOUs		Correct

⁶ National Resources Defense Council

⁷ National Association of Energy Service Companies

⁸ California Large Energy Consumers Association

<p>d. Claimant’s description of how Claimant coordinated with DRA and other parties to avoid duplication or how Claimant’s participation supplemented, complemented, or contributed to that of another party:</p> <p>WEM has discussed with DRA and TURN generally which issues we are following, to reduce duplication. As noted in our 6/12/09 Comments at 5-6, WEM was one of the first parties to analyze the exaggerations of CFL savings, well before DRA and TURN; attendance by WEM’s principal advocate at nearly all utility-run EM&V meetings California Measurement Advisory Council (CALMAC) since 2002 enables us to offer important historical perspective.</p> <p>Where there was duplication, WEM supplemented and complemented others’ comments. For example, both TURN and WEM discussed the problem with IOU-caused delays in 2008, but as the decision acknowledged, WEM took this a step further in its analysis of the flawed process that the Settlement proposed going forward. WEM warned that the IOUs could cause delays in the 2009 Verification Report, (Decision at 21), and also restrict the True-Up (Ibid at 27).</p> <p>Regarding the other parties: NRDC and WEM seldom overlap. NAESCO and CLECA were not very active in this phase.</p>	<p>No unnecessary duplication occurred as a result of WEM’s participation.</p>
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C. Additional Comments on Part II:

#	Claimant	CPUC	Comment
1		X	The claim and the proceeding’s record show that WEM worked on, among other things, the use of EE dollars (WEM advocated reducing undeserved awards of EE profits and the best use of EE dollars, and claimed improper use of EE funds by the IOUs); and the issue of EE as a reliable resource for the grid. WEM states that these issues were addressed in its comments, as well as NOI, motion to become a party, and June 29, 2009 ex parte communication with Commissioner Bohn. Since these matters were outside the proceeding’s scope, WEM work on them did not contribute to D.09-12-045.

PART III: REASONABLENESS OF REQUESTED COMPENSATION**A. General Claim of Reasonableness (§§ 1801 & 1806):**

Explanation by Claimant of how the cost of Claimant's participation bore a reasonable relationship with benefits realized through participation	CPUC Verified
<p>The Decision rejected the Proposed Settlement, in part because of WEM's strong objections to it, and our support of ED's EM&V efforts, which the Settlement would have largely discarded. The decision preserved the process — including the Second VR and the final True-Up, without which utilities would very likely have been able to base claims on self-reported earnings. Thus, WEM's participation saved ratepayers from potentially paying tens of millions in undeserved claims. WEM's participation overall was very efficient, thanks to our extensive nine years experience in CPUC proceedings addressing RRIM and EM&V issues, which enabled us to quickly understand and provide substantive comments on the issues here.</p>	<p>With the minor reductions and adjustments made in the compensation award, WEM's claim is reasonable.</p>

B. Specific Claim*:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Year	Hours	Rate	Total \$
Barbara George	2009	38.25	\$180	D0906016	\$6,885.00	2009	37.15	\$175	\$6,501.25
Subtotal:					\$6,885.00	Subtotal:			\$6,501.25
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Year	Hours	Rate	Total \$
Barbara George	2010	16.25	\$90	D0906016	\$1,462.50	2009	2.00	\$87.50	\$175.00
						2010	11.00	\$87.50	\$962.50
Subtotal:					\$1,462.50	Subtotal:			\$1,137.50
TOTAL REQUEST \$:					\$8,347.50	TOTAL AWARD \$:			\$7,638.75
<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. Claimant's records should identify specific issues for which it requested 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>**Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>									

C. Additional Comments on Part III:

#	Claimant	CPUC	Comment ⁹																					
1	X		<p>WEM Time-Allocation by Issue</p> <p>In this Amended Request, WEM responds to the request by the Intervenor Compensation Coordinator to provide a time-allocation by issue pursuant to Rule 17.4(b)(3) and (4) and D.98-04-059 (at 47-48). We respond in this section and in our time sheets.</p> <p>We provide an Issue Allocation Chart, below, and we have amended our timesheets to reflect the major issues we addressed in our comments and in our review of the Settlement proposals, ED’s Report, and the PD and Alternate. See our timesheets for our method of calculating the Issue Allocation in this chart. (Note: It would be very difficult — virtually impossible after the fact — to determine exactly how much time was spent on each major issue or the many sub-issues.)</p> <table border="1"> <thead> <tr> <th>Issue allocation</th> <th></th> </tr> </thead> <tbody> <tr> <td>ED Process</td> <td>\$1,644.00</td> </tr> <tr> <td>EM&V</td> <td>\$1,644.00</td> </tr> <tr> <td>GP</td> <td>\$810.00</td> </tr> <tr> <td>EE Resource</td> <td>\$99.00</td> </tr> <tr> <td>Misuse</td> <td>\$99.00</td> </tr> <tr> <td>Settlement</td> <td>\$2,589.00</td> </tr> <tr> <td>Total</td> <td>\$6,885.00</td> </tr> </tbody> </table>	Issue allocation		ED Process	\$1,644.00	EM&V	\$1,644.00	GP	\$810.00	EE Resource	\$99.00	Misuse	\$99.00	Settlement	\$2,589.00	Total	\$6,885.00					
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2	Claimant		<p>We provide the following key to major issues, sub-issues, and abbreviations:</p> <table border="1"> <thead> <tr> <th>Issues</th> <th>Sub-issues</th> <th>Issue description</th> </tr> </thead> <tbody> <tr> <td>Settlement</td> <td></td> <td>Pertaining to proposed settlement(s)</td> </tr> <tr> <td></td> <td>GS</td> <td>General – re Settlement</td> </tr> <tr> <td></td> <td>Audit</td> <td>Financial Audit (which IOUs proposed to substitute for the VR)</td> </tr> <tr> <td></td> <td>IOU Reports</td> <td>Utility-reported savings claims</td> </tr> <tr> <td>EM&V</td> <td></td> <td>Evaluation, Measurement, and Verification</td> </tr> <tr> <td></td> <td>CS</td> <td>Cumulative Savings</td> </tr> </tbody> </table>	Issues	Sub-issues	Issue description	Settlement		Pertaining to proposed settlement(s)		GS	General – re Settlement		Audit	Financial Audit (which IOUs proposed to substitute for the VR)		IOU Reports	Utility-reported savings claims	EM&V		Evaluation, Measurement, and Verification		CS	Cumulative Savings
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⁹ We moved to this section the relevant information from WEM’s Attachment 2 to the claim.

				DEER	DEER values & updates (e.g. for Estimated Useful Life (EULs); Net to Gross (NTG), interactive effects, CFLs (compact fluorescent lights))
				<i>Ex Ante, Ex Post</i>	Predictions in program planning documents (<i>ex ante</i>); Completed & measured savings (<i>ex post</i>)
			ED Process		ED process & timing for EM&V studies & reports
				TRUE	Final True-Up (final comprehensive EM&V report for a whole cycle)
				VR	Verification Report (interim limited EM&V report for part of a cycle)
			EE Resource		EE as a reliable resource for the grid
			Misuse		Improper use of EE funds
			GP		General Practice (generic responsibilities of any party in a proceeding)
3	Claimant		<p>Discussion of Issues in R0901019</p> <p>They say the devil is in the details, and this is an apt description of the issues in the Commission’s current RRIM, the subject of this proceeding. As the Scoping Memo stated:</p> <p style="padding-left: 40px;">[E]valuation, measurement and verification EM&V of RRIM earnings claims, have proved to be highly controversial, quite complex, and not as easily or as timely resolved as had been hoped. Scoping Memo at 2.</p> <p>The parallel (concurrent) track of this proceeding hopes to “develop a more transparent, more streamlined and less controversial RRIM process.”</p> <p>WEM’s original request reflected the fact that the overall issue in this decision was whether or not to approve Settlements proposed by IOUs or to follow through with determining the RRIM using ED’s reports, as originally planned. The decision determined the amount of the second interim earnings claims for each utility and also set ground rules for the upcoming decision on overall 2006-2008 claims.</p> <p>The Commission chose to rely primarily on ED reports for the 2009 interim claim, but the final decision made significant changes to the inputs to earnings calculations, which resulted in increased earnings for utilities.</p>		

<p>4</p>	<p>Claimant</p>	<p>Description of Issues and Sub-Issues WEM Addressed</p> <p>During the decade WEM has participated in EE Rulemakings and Applications before the Commission, ED, utilities and parties (and Commissioners and ALJs) have literally spent years arguing over a multitude of EM&V issues. Major points of contention include what should be the correct EM&V input values for the Estimated Useful Life (EUL) of EE measures, their Net-to-Gross (NTG – i.e. how many of a given EE item was purchased because of the EE program vs. other motivations), and Interactive Effects (for example, CFL bulbs run cooler than incandescents so they reduce air conditioning needs in summer but raise heating needs in winter).</p> <p>Further controversial issues involve the process and timing of updating these and other values in the DEER (Database for EE Resources) and non-DEER measurements; to what extent interim Verification Reports (VR) and the final True-Up for the program cycle (TRUE) should use updated DEER values and <i>ex ante</i> or <i>ex post</i> data (i.e. predictions at the start of the program or after the fact accomplishments); and whether and how to count cumulative savings (CS).</p> <p>Tens, even hundreds of millions of dollars of profits or penalties for utilities rest on these details. WEM pointed out that this is a powerful incentive for utilities to bend energy savings data to benefit their shareholders in their annual reports (IOU Reports). We also expressed concern that the important question of whether EE Resources - what EE actually does or does not defer or displace at particular locations on the grid — tends to get lost because it is not reflected in any specific way in EM&V. WEM has shown how PG&E has an opportunity to misuse EE funds by funneling them into communities where the company has certain political objectives.</p> <p>Meanwhile, the utilities have taken aim at the umpire in the game, ED, attacking the process and timing of ED’s EM&V studies and reports, helping to delay them, and pressuring the Commission to adopt settlement proposals that would derail and discard ED’s reports in favor of a much more limited financial audit and/or utilities’ own reports that tend to pick and choose whether to use updated or <i>ex ante</i> values depending on what values would lead to more profits for the utilities.</p> <p>In the broadest sense, WEM’s time in this proceeding (beyond General Practice tasks necessary to participate in any proceeding) was about evenly split between advocating why the Commission should reject the Settlement and why it should adopt the conclusions in ED’s Reports. The PD discussed at length why the Commission rejected the Settlement, but then it and the Alternate PD diverged from ED and</p>
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			from each other regarding which values would be left as <i>ex ante</i> or updated (and updated according to what) and how the goals should or should not be adjusted. At this point, many of the EM&V sub-issues (which WEM had addressed as reasons to approve ED’s conclusions or reject the Settlement) became significant in themselves.
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D. CPUC Disallowances & Adjustments:

#	Reason
Adjustment of Hourly Rate for Work in 2009	WEM mentions D.09-01-016 as the basis for the hourly rate of \$180 for George’s work in 2009; however, that decision adopted the 2008 rate of \$170. The rate of \$175 for George’s work in 2009 was adopted in D.10-05-049, and in our present award we use the same rate for her work in 2009 and 2010. ¹⁰
Unproductive Effort	As we have noted in Comment 1, Part II, WEM claim includes work on two areas (WEM’s issues “EE Resource” and “Misuse”) outside the scope of D.09-12-045. WEM allocates approximately 2.9% of its time. ¹¹ (Attachment 2 to the claim at 13.) To reflect in our award these unproductive efforts on the part of the intervenor, we reduce WEM’s claim by 2.9% or 1.10 hours.
Excessive Hours on Intervenor Compensation Matters	WEM spent 14.25 hours on the subject claim. In determining the reasonableness of these hours, we consider the facts that the request encompasses approximately seven months, one person’s work and one decision. We also note that WEM’s original claim was deficient. We allow 11 hours of WEM’s time, which we believe is more than enough to prepare a claim of similar complexity.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the claim?	No
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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6)) (Y/N)?	Yes
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¹⁰ Resolution ALJ-147 adopts no cost of living increase from the 2009 rates for work performed in 2010.

¹¹ Attachment 2 to the claim at 13. We note that in the amended claim, instead of allocating its time by issue, WEM allocated dollar amounts. The percentage of WEM’s time here is based on the calculation we needed to make.

FINDINGS OF FACT

1. Claimant has made a substantial contribution to Decision (D.) 09-12-045.
2. The claimed fees and costs, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$7,638.75.

CONCLUSION OF LAW

1. The claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code Sections 1801-1812.

ORDER

1. Claimant is awarded \$7,638.75.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay Claimant the total award. We direct Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company to allocate payment responsibility among them, based on their California-jurisdictional gas and electric revenues for the 2009 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 October 4, 2010, the 75th day after the filing of Claimant's amended request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated September 2, 2010, at San Francisco, California.

MICHAEL R. PEEVEY
President
DIAN M. GRUENEICH
JOHN A. BOHN
TIMOTHY ALAN SIMON
NANCY E. RYAN
Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D1009015	Modifies Decision? No
Contribution Decision:	D0912045	
Proceeding:	R0901019	
Author:	ALJ Thomas R. Pulsifer	
Payers:	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Women's Energy Matters	7/21/10 ¹²	\$8,347.50	\$7,638.75	No	Adjusted hourly rate; unproductive efforts, excessive hours

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Barbara	George	Advocate	Women's Energy Matters	\$180	2009	\$175
Barbara	George	Advocate	Women's Energy Matters	\$180	2010	\$175

(END OF APPENDIX)

¹² Amended claim filed on this date; the original claim was filed on March 1, 2010.