ALJ/BWM/AES/lil **Date of Issuance 5/17/2012**

Decision 12-05-013 May 10, 2012

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.	Rulemaking 08-08-009 (Filed August 21, 2008)

DECISION GRANTING REQUEST OF THE UTILITY REFORM NETWORK FOR INTERVENOR COMPENSATION FOR SUBSTANTIAL CONTRIBUTIONS TO DECISIONS 09-06-018, 09-06-050, 09-11-014, 10-12-048, 11-01-026, AND 11-04-030

Claimant: The Utility Reform Network	**For contributions to D.09-06-018, D.09-06-050, D.09-11-014, D.10-12-048, D.11-01-026, D.11-04-030**
Claimed ($): $61,995	**Awarded ($): $61,938.60**
Assigned Commissioner: Ferron	**Assigned ALJs: Burton Mattson, Anne Simon**
Claim Filed:	**July 11, 2011**

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	Rulemaking (R.) 08-08-009 was instituted as a successor docket to R.06-05-027 to continue implementation and administration of the California Renewables Portfolio Standard (RPS) program. The specific decisions cited in this request are as follows: D.09-06-018 – Conditionally accepts the 2009 RPS procurement plans filed by Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E). D.09-06-050 – Approves simplified and standardized procedures for Commission review of short-term procurement contracts executed by Investor-Owned Utilities (IOUs) under the RPS program.

	D.09-11-014 – Grants (in part) the Motion of The Utility Reform Network (TURN) and Joint Petitioners for Modification of Decisions 06-10-019 and 06-10-050 and prospectively changes the calculation of Annual Procurement Targets for compliance with the RPS program. D.10-12-048 – Authorizes the Renewable Auction Mechanism (RAM) as a contracting tool for the procurement of smaller renewable energy projects that are eligible under the California RPS program. D.11-01-026 – Implements Public Utilities Code § 365.1, enacted as part of Senate Bill (SB) 695 (Kehoe), which requires that Electric Service Providers (ESPs) are subject to the same requirements of the RPS program as are the three large IOUs. D.11-04-030 -- Conditionally accepts the 2011 RPS procurement plans filed by SCE, PG&E, and SDG&E.

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

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (§ 1804(a)):		
1. Date of Prehearing Conference:	No PHC held	
2. Other Specified Date for NOI:	October 14, 2008 *See* Comment #1	Correct
3. Date NOI Filed:	October 14, 2008	Correct
4. Was the notice of intent timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.06-05-027	Correct
6. Date of ALJ ruling:	October 30, 2006	Correct
7. Based on another CPUC determination:	*See* Comment #2	Correct
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:	R.06-05-027	Correct

10. Date of ALJ ruling:	October 30, 2006	Correct
11. Based on another CPUC determination:	*See* Comment #2	Correct
12. Has the claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	OIR 11-05-005	Correct
14. Date of Issuance of Final Decision:	May 10, 2011	Correct
15. File date of compensation request:	July 11, 2011	Correct
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Claimant	Comment
1	x	In the R.08-08-009, issued on April 26, 2008, the Commission stated that a party found eligible for compensation in R.06-05-027 would be permitted "to remain eligible in this proceeding" pursuant to Rules 1.2 and 17.2 (pages 12-13). TURN was found eligible to file a claim for intervenor compensation in R.06-05-027 by a Ruling issued on October 30, 2006. The Commission requested that any party that intends to continue its eligibility should "update its planned participation, potential compensation, or other relevant information," and indicated that the NOI "may be amended within 15 days after the issuance of the scoping memo." A Scoping Memo was issued on September 26, 2008, and TURN timely filed an Amended Notice of Intent on October 14, 2008.
2	x	November 19, 2008 ruling by Administrative Law Judge (ALJ) Mattson found TURN to be eligible to claim intervenor compensation.

PART II: SUBSTANTIAL CONTRIBUTION

A. Claimant's description of its contribution to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059)[1]

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
1. **ST / CONCERNS ABOUT THE USE OF SHORT-TERM RENEWABLE CONTRACTING*** TURN argued against SCE's request for	**D.09-06-050** The Commission rejected SCE's proposal for pre-approval of up to 10,000 GWh in short-term renewable	Yes. TURN's contribution area with respect to

[1] *See* Part III.C.2 below for an explanation of the codes relative to issue area, in the "contribution" column.

preapproval of up to 10,000 Gigawatthours (GWh) of renewable energy under short-term transactions. TURN also urged the Commission to reject PG&E's proposals for the pre-approval of certain quantities of short-term contracts. TURN reply comments, October 22, 2008, pages 1-3. TURN reply comments, June 1, 2009, pages 3-4.	contracts and noted that "DRA, Reid and TURN observe that this proposal would effectively remove Commission oversight of short-term contracts for hundreds of megawatts of RPS-eligible generation over the next five years." (page 28.) **D.09-06-018** The Commission agreed with TURN's objections to PG&E and SCE's proposals and rejected both requests for pre-approval of short-term contract quantities. (pages 54-55, 57-59.)	D.09-06-050 is correctly identified. Yes. TURN accurately describes its contributions to D.09-06-018.
2. **ST / USE OF MARKET PRICE REFERENT FOR DETERMINING REASONABLENESS OF SHORT-TERM CONTRACTS** TURN urged the Commission to reject the use of utility-specific pricing benchmarks and use the existing statewide Market Price Referent (MPR) methodology to determine the reasonableness of pricing for short-term renewable energy contracts less than 10 years in duration. TURN comments, R.06-02-012, June 14, 2007, pages 5-7. TURN reply comments, R.06-02-012, June 25, 2007, pages 2-5.	**D.09-06-050** The Commission rejected proposals for a green premium and instead found that "the existing MPR methodology should be used to calculate the moderately short-term price benchmark, generating price benchmarks for each duration (4-9 years) of moderately short-term contracts from the MPR model." (page 19.)	Yes. TURN's contribution area with respect to D.09-06-050 is correctly identified.
3. **RPP / USE OF TRADABLE RENEWABLE ENEGRY CREDITS IN 2009 RENEWABLE PROCUREMENT PLANS** TURN urged the Commission to reject efforts to include Tradable Renewable Energy Credits (TRECs) purchases in the 2009 RPS procurement plans due to the lack of CPUC authorization for retail sellers to use of TRECs to satisfy RPS procurement targets, TURN reply comments, October 22, 2008, page 1.	**D.09-06-018** The Commission agreed with TURN and found that "it would be premature to authorize IOUs' use of TRECs (even subject to conditions) until we have actually authorized the use of TRECs for RPS compliance...The IOUs should, therefore, remove discussion from the Amended Plans to be filed pursuant to this order regarding the use of TRECs to meet RPS Program targets." (pages 37-38.)	Yes. TURN accurately describes its contributions to D.09-06-018.

4. **PETMOD / MODIFICATION OF RPS ANNUAL PROCUREMENT TARGETS TO RELY ON CURRENT YEAR RETAIL SALES** TURN filed a joint petition with a group of direct access parties and large industrial customers seeking to modify the calculation of the RPS annual procurement target to base current year obligations on current year retail sales (rather than prior year retail sales). Joint Petition of TURN and other parties for Modification of D.06-01-019 and D.06-10-050, Filed May 1, 2009.	**D.09-11-014** The Commission granted the Joint Petition (in part) and ordered that the requested change be made for calculating compliance with RPS obligations in 2010 and beyond. Specifically, the Commission determined that "It therefore makes sense, and is more consistent with the 20% compliance target, to shift the calculation of APT so that it is based on retail sales in the current year for each year in which the target is a fixed 20% of retail sales." (page 11.)	Yes. The Commission granted one of the central requests of the petition for modification, although it rejected the reasoning of the joint filers of the petition, including TURN.
5. **RAM / SUPPORT FOR CREATION OF RENEWABLE AUCTION MECHANISM** TURN urged the Commission to create a Renewable Auction Mechanism (RAM) on the basis that it would be desirable to provide a more streamlined competitive procurement process for smaller grid-connected renewable resources. TURN opening comments, October 19, 2009.	**D.10-12-048** The Commission agreed that it would be appropriate to create a streamlined procurement process for smaller RPS projects along with the "right balance of terms, conditions, and prices here in the form of the RAM." (pages 9-11.)	Yes. TURN accurately describes its contributions on this issue.
6. **RAM / USE OF COMPETITIVE AUCTIONS (RAM) TO SET PRICING FOR DISTRIBUTED RENEWABLE GENERATION** TURN urged the Commission to adopt a competitive auction process (RAM) for procurement of distributed resources under any expansion of the AB 1969/SB 32 Feed-in Tariff program. TURN opposed the establishment of administratively set pricing for these projects and argued that ratepayers would be better served by a competitive pricing mechanism. TURN opening comments, October 19, 2009, pages 2-4.	**D.10-12-048** The Commission adopted an auction approach (RAM)(Conclusion of Law #2), agreed with TURN's concern regarding administratively-set prices in finding that "a fixed price could result in ratepayer backlash if the price is set too high, as occurred in Spain and Italy" (page 16) and concurred that the competitive auction approach taken in the RAM "balances the goals of maintaining a competitive market and reducing transaction costs for small renewable projects." (page 17.)	Yes. TURN accurately describes its contributions in this area.

TURN reply comments, October 26, 2009, pages 3-5.		
7. **RAM / SUPPORT FOR 1000 MW RAM TARGET, OPPOSITION TO PREFERRED RESOURCE SET-ASIDE, SUPPORT FOR ALLOWING EXCESS SALES TO QUALIFY** TURN made a series of recommendations regarding RAM program design including: (1) Supporting the Energy Division proposal for the adoption of a 1,000 Megawatt (MW) RAM program target; (2) Urging the Commission to allow SCE's Renewables Standard Contract (RSC) procurement to count towards the targets; (3) Opposing any set-asides for specific types of renewable resource products; and (4) Allowing net excess sales arrangements to participate in the RAM. TURN reply comments, October 26, 2009, pages 5-6, 7-8. TURN's Comments on the Energy Division Feed-in Tariff Proposal, April 10, 2009, pages 5-6.	**D.10-12-048** The Commission agreed with TURN on each of the following outcomes: (1) Adopted a 1,000 MW RAM procurement target for the three major IOUs (Finding of Fact #15); (2) Allowed SCE to apply capacity from RSC procurement towards its obligations (page 32); (3) Rejected proposals to require IOUs to procure specific products and instead directed selection to be based exclusively on price (page 35); and (4) Allowed net excess sales arrangements to be eligible under RAM (pages 45-46).	Yes. TURN accurately describes its contributions on this issue.
8. **RAM / CHANGES TO PROPOSED DECISION -- ELIGIBILITY LIMITED TO PROJECTS LOCATED IN IOU SERVICE TERRITORIES AND CAPPED AT 20 MW PROJECT SIZE** TURN strongly urged the Commission to modify the Proposed Decision (PD) in two respects: (1) Limit eligibility to facilities located within IOU service territories; and (2) Limiting the project size (rather than	**D.10-12-048** The final Commission Decision adopted both of the changes to the PD sought by TURN: (1) The Commission modified the PD and accepted TURN's recommendation to restrict eligibility to projects located in the service territory of a California IOU. The Decision quotes TURN and agrees that the original purpose of RAM was to promote renewable distributed	Yes. TURN accurately describes its contributions on this issue.

transaction size) to 20 MW. TURN opening comments on PD, September 27, 2010, pages 4-10. TURN reply comments on PD, October 7, 2010, pages 4-5.	generation (DG) within IOU service territories. (pages 46-48.) (2) The Commission modified the PD and restricted project size (rather than transaction size) to 20 MW. (page 80.)	
9. **SB695 / INTERPRETING THE RPS IMPACTS OF SB 695 ON IOUS AND OTHER RETAIL SELLERS** TURN urged the Commission to conclude that: (1) SB 695 requires a "fresh look" at whether RPS rules are being applied equally to all retail sellers, (2) SB 695 does not support the requests of SCE and SDG&E to be relieved of existing RPS obligations, (3) Any limit on TRECs must be applied to all retail sellers, and (4) ESPs should be required to file renewable procurement plans. TURN reply brief on SB 695 implementation issues, May 13, 2010, pages 2-7. TURN reply comments on PD, October 5, 2010, pages 1-4.	**D.11-01-026** The Commission adopted TURN's preferred position on each of the following issues: (1) Agreed that SB 695 requires the Commission to "take a fresh look at RPS requirements" in order to "equalize responsibilities of ESPs and the three large utilities." (pages 10-11.) (2) Rejected proposals by SCE and SDG&E to be relieved of various existing RPS requirements. (pages 14, 16, 18-19, 20-23.) (3) Agreed that previously adopted limits on the use of TRECs should apply to IOUs and ESPs. (pages 16-18.) (4) Adopted the requirement that ESPs must file renewable procurement plans. (pages 12-15.)	Yes. TURN made critically important contributions to this decision.
10. **RPP / CHANGES TO 2010/11 RPS PROCUREMENT PLANS** TURN urged the Commission to take the following actions with respect to the 2010/2011 RPS procurement plans: (1) Limit SCE's ability to issue a *pro forma* contract that contains unlimited uncompensated economic curtailment provisions; and (2) Prohibit SCE and SDG&E from developing proprietary integration cost adders for use in the Least Cost/Best Fit (LCBF) bid evaluation and instead require that any such adders be developed	**D.11-04-030** The Commission agreed with TURN's position on each of these issues in deciding that: (1) *Pro Forma* contracts must contain provisions dealing with economic curtailment that share congestion cost risk between developers and ratepayers and allows independent projects to be financeable. (pages 16-18); (2) The non-zero integration cost adders proposed by SCE and SDG&E may not be used as part of LCBF bid	Yes. TURN accurately describes its contributions on these issues.

through an open public process, (3) Reject IOU proposals for preapproval of a specified quantity of short-term renewable contracts, (4) Direct the three IOUs to modify their Non-Disclosure Agreements (NDAs) to explicitly permit bidders to disclose information about their bids and contract negotiations to non-utility individuals who participate in the Procurement Review Groups (PRGs) and are eligible to access confidential materials. TURN reply comments on the 2011 Renewable Procurement Plans, January 26, 2010, pages 1-6.	evaluation and any future adders "need to be developed with public review and comment." (pages 22-23.); (3) IOU pilot proposals for preapproval of short-term contracts are rejected due to lack of limits and specificity on price and cost ("We are simply not convinced that the pilot programs proposed by the IOUs are reasonable.") (pages 30-33.); and (4) IOUs should modify their NDAs to permit disclosure of information by bidders to Commission staff, the PRG, and the Independent Evaluator. (pages 37-39.)	

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

	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (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: Independent Energy Producers, Union of Concerned Scientists, Green Power Institute, Center for Energy Efficiency and Renewable Technologies, FIT Coalition, Solar Alliance, Shell North America, Sustainable Conservation, Solutions for Utilities, Vote Solar, Californians for Renewable Energy, L. Jan Reid, Southern California Edison, San Diego Gas & Electric Company, Pacific Gas & Electric, Sierra Pacific Power Company, Recurrent Energy, California Solar Energy Industries Association, Alliance for Retail Energy Markets, EnXco, California Wind Energy Association.		Yes
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: TURN took a relatively surgical approach to participation in this proceeding. Due to the very large number of issues presented in the various phases of the rulemaking, TURN focused on identifying areas of involvement where it could present a unique position, be one of the only parties to articulate opposition to a utility request, or provide an important perspective on a hotly debated issue. As a result, TURN's involvement was tailored and strategic throughout the case. This is demonstrated by the relatively small number of hours spread over		Yes

a large number of decisions in which TURN made a substantial contribution. Given the extremely large number of parties involved in this case, it was not possible to avoid all duplication. However, TURN did communicate with other intervenors (including DRA) in an effort to minimize unnecessary work by all parties.	

C. Additional Comments on Part II:

#	Claimant	CPUC	Comment
1	TURN		A small number of hours related to short-term contracting issues (and coded as "ST") were originally performed under R.06-02-12. In opening R.08-08-009, the Commission explained that certain issues previously under consideration in R.06-02-012 would be decided in R.08-08-009 (*see* OIR page 6). In issuing D.09-06-050, the Commission explained that "consideration of the issues addressed in this decision began in R.06-02-012" (D.09-06-050, page 4). It is therefore appropriate for TURN to claim compensation for all hours related to D.09-06-050.

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
Since the rulemaking did not address specific requests for cost recovery by Investor Owned Utilities, none of the decisions identified in this request include authorization to recover any particular revenue requirements. Therefore, it is not possible to calculate a precise amount of ratepayer savings that will be realized through TURN's involvement. Meeting the California RPS program targets requires billions of dollars of long-term power purchase commitments by the IOUs. TURN's involvement was focused on ensuring that these commitments result in the least-cost renewable power that provides the highest value to ratepayers and the state of California. TURN's positions focused on the use of competitive solicitations, an emphasis on long-term contracting (to promote the development of new generation infrastructure), equal obligations by all retail sellers, contracting structures that enable efficient project financing, and ensuring that IOU actions are subject to full Commission review. All of these changes will promote efficiency and maximize ratepayer benefits. Given the magnitude of costs at stake under the RPS program, the benefits produced by TURN's substantial contributions far exceed (by orders of magnitude) the small cost of TURN's participation in the proceeding.	The requested amount is reasonable.

B. Specific Claim: *

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	**Year**	**Hours**	**Rate**	**Basis for Rate**	**Total**	**Year**	**Hours**	**Rate**	**Total**
Matthew Freedman	2007	17.50	$300	D.07-12-026	$5,250	2007	17.5	$300	$5,250.00
Matthew Freedman	2009	20.75	$325	D.10-09-044	$6,744	2009	20.75	$325	$6,743.75
Matthew Freedman	2010	57.00	$325	D.10-09-044	$18,525	2010	57.00	$325	$18,525.00
Matthew Freedman	2011	13.00	$325	D.10-09-044	$4,225	2011	13.00	$325	$4,225.00
Nina Suetake	2008	5.25	$225	D.09-04-027	$1,181	2008	5.00	$225	$1,125.00
Marcel Hawiger	2007	2.00	$300	D.07-12-026	$600	2007	2.00	$300	$600.00
Marcel Hawiger	2008	10.50	$325	D.08-08-027	$3,413	2008	10.50	$325	$3,412.50
Marcel Hawiger	2009	25.50	$325	D.10-04-050	$8,288	2009	25.50	$325	$8,287.50
Marcel Hawiger	2010	26.25	$350	Comment #1	$9,188	2010	26.25	$350	$9,187.50
Marcel Hawiger	2011	4.25	$350	Comment #1	$1,488	2011	4.25	$350	$1,487.50
				Subtotal:	**$58,900.00**			***Subtotal:***	***$58,843.75***
INTERVENOR COMPENSATION CLAIM PREPARATION **									
Item	**Year**	**Hours**	**Rate**	**Basis for Rate**	**Total**	**Year**	**Hours**	**Rate**	**Total**
Marcel Hawiger	2008	1.00	$162.50	½ rate	$163	2008	1.00	$162.50	$162.50
Marcel Hawiger	2011	0.50	$175.00	½ rate	$88	2011	0.50	$175.00	$87.50
Matthew Freedman	2011	17.00	$162.50	½ rate	$2,763	2011	17.00	$162.50	$2,762.50
				Subtotal:	**$3,013**			***Subtotal:***	***$3,012.50***

COSTS					
#	Item	Detail	Amount	Detail	Amount
	Photocopies	pleadings	$67.00	Photocopies	$66.60
	Postage	Mailing	$16.00	Postage	$15.75
		Subtotal:	**$82.00**	***Subtotal:***	**$82.35**
		TOTAL REQUEST $:	**$61,995.00**	**TOTAL AWARD $:**	**61,938.60**

* 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.
** Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate (the same applies to the travel time).

C. Additional Comments on Part III:

#	Claimant	CPUC	Description/Comment
1		X	TURN rounded the total dollar amounts to the nearest dollar. In the award, we do not round the results to the nearest dollar, but use the actual calculation, including cents.
2	X		**Hourly Rate for Marcel Hawiger in 2010 and 2011**: TURN seeks an increase in the hourly rate for the work of staff attorney Marcel Hawiger in 2010 from the $325 rate authorized for work in 2009 to $350 for his work in 2010. This increase would reflect a change in the rate range applicable to his work, based on his 13+ years of experience, which corresponds to the $300 - $535 rate range.
2		**X**	Hourly rates of $350 for Hawiger's work in 2010 and 2011 have been already approved in D.11-09-014 and D.11-09-037.
3	X		**Allocation of TURN Attorney and Consultant Hours by Issue/Activity Code**: TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN:

Code	Explanation
ST	Issues related to short-term contracting authority, benchmark pricing for short-term contracts, and other issues raised in the 2009 Renewable Procurement Plans submitted by the three Investor-Owned Utilities. These issues were resolved in D.09-06-018 and D.09-06-050.

				PETMOD	Joint Petition to Modify Decisions 06-10-019 and 06-10-050 and change the method for calculating Annual Procurement Target obligations under the RPS program. This petition was granted (in part) by D.09-11-014.
				RAM	Work on the development of a Commission sponsored Feed-in Tariff (FIT) mechanism beginning in 2008 and culminating in the adoption of the RAM. Includes all elements of FIT design that were incorporated into the RAM Decision. These issues were resolved in D.10-12-048.
				SB695	Interpretation of the impact of statutory changes contained in SB 695 (Kehoe) on RPS program obligations for all retail sellers. These issues were resolved in D.11-01-026.
				RPP	Work relating to the 2009 and 2011 Renewable Procurement Plans including issues of economic curtailment, short-term procurement authority, non-disclosure issues, and the use of TRECs. These issues were resolved in D.09-06-018 and D.11-04-030.
				GP	General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This can include reading the initial application, Commission rulings, participating in prehearing conferences, etc.
				COMP	Preparation of compensation request and Notice of Intent (NOI).

D. CPUC's Comments and Disallowances:

#	Reason
Hourly Rates	All of the requested hourly rates have been approved by the Commission, as reasonable. We confirm our previous findings.
Clerical Task	We disallow the estimated 0.25 hours spent by Suetake formatting reply comments of October 22, 2008, as this task is clerical and non-compensable.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the claim?	No

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

FINDINGS OF FACT

1. Claimant has made substantial contributions to Decisions 09-06-018, 09-06-050, 09-11-014, 10-12-048, 11-01-026, and 11-04-030.

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 $ 61,938.60.

CONCLUSION OF LAW

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

ORDER

1. Claimant is awarded $ 61,938.60.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall pay The Utility Reform Network their respective shares of the award. We direct these utilities to allocate payment responsibility among themselves based on their California-jurisdictional electric revenues for the 2010 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 September 24, 2011, the 75th day after the filing date of The Utility Reform Network's request for compensation, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated May 10, 2012, at Fresno, California.

MICHAEL R. PEEVEY
President
TIMOTHY ALAN SIMON
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
MARK J. FERRON
Commissioners

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D1205013	**Modifies Decision?**	**No**
Contribution Decisions:	D0906018, D0906050, D0911014, D1012048, D1101026, D1104030		
Proceeding:	R0808009		
Author:	ALJs Anne E. Simon and Burton W. Mattson		
Payers:	Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change /Disallowance
The Utility Reform Network	7/11/11	$61,995	$61,938.60	No	Clerical task not compensable

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matthew	Freedman	Attorney	The Utility Reform Network	$300	2007	$300
Matthew	Freedman	Attorney	The Utility Reform Network	$325	2008	$325
Matthew	Freedman	Attorney	The Utility Reform Network	$325	2009	$325
Matthew	Freedman	Attorney	The Utility Reform Network	$325	2010	$325
Matthew	Freedman	Attorney	The Utility Reform Network	$325	2011	$325
Nina	Suetake	Attorney	The Utility Reform Network	$225	2008	$225
Marcel	Hawiger	Attorney	The Utility Reform Network	$300	2007	$300
Marcel	Hawiger	Attorney	The Utility Reform Network	$325	2008	$325
Marcel	Hawiger	Attorney	The Utility Reform Network	$325	2009	$325
Marcel	Hawiger	Attorney	The Utility Reform Network	$350	2010	$350
Marcel	Hawiger	Attorney	The Utility Reform Network	$350	2011	$350

(END OF APPENDIX)